GERMAN GREEN STEEL AND POWER LIMITED

Date: 05th November, 2026

To **Listing Department** **BSE Limited** Phiroze Jeejeebhoy Towers Dalal Street Mumbai – 400 001 **Script Code: 544957 (BSE)**	**To** **Listing Department** **National Stock Exchange of India Limited** Exchange Plaza, C-1, Block G Bandra Kurla Complex Bandra (E), Mumbai – 400 051 **Company Code: GERMAN (NSE)**

Sub: Reporting of violation related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

Dear Sir/ Madam,

This is with reference to the Company's Code of Conduct for Prevention of Insider Trading to regulate, monitor and report trading by Designated Persons and other Connected Persons as per the requirements of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Please find enclosed herewith the report related to the violation of Company's Code of Conduct for Prevention of Insider Trading by a Designated Person, in the format prescribed by SEBI vide its Circular HO/43/15/12(3)2025-ISD-POD2/I/11734/2026 dated May 15, 2026 as Annexure -A.

Kindly take the above information on record.

Thanking you,

Yours faithfully,

For, German Green Steel and Power Limited

Abira Idris Mansuri

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Date: 2026.11.05 19:44:52 +05'30'

Abira Mansuri
Company Secretary & Compliance Officer
Membership No.: A42410

Annexure -A

Report by German Green Steel and Power Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

Sr. No.	Particulars	Details
1	Name of the listed company / Intermediary / Fiduciary	German Green Steel and Power Ltd
2	Please tick appropriate checkbox – Reporting in capacity of:	☒ Listed Company ☐ Intermediary ☐ Fiduciary
3A(i)	Name of the Designated Person (DP)	Mr. Mushirulhaq Inamulhaq Iraki
3A(ii)	PAN of the DP	AMMPI9288E
3A(iii)	Designation of DP	Designated Person / Promoter Group
3A(iv)	Functional Role of DP	Promoter Group
3A(v)	Whether DP is Promoter or belongs to Promoter Group	Yes (Member of Promoter Group)
3B	Details where reporting is for immediate relative of DP	Yes
3B(i)	Name of the immediate relative of DP	Mrs. Sanya Zafar
3B(ii)	PAN of the immediate relative of DP	AEPPZ3202A
3C(i)	Name of the scrip	Name of the Company: German Green Steel and Power Ltd BSE Scrip Code: 544957 NSE Symbol: GERMAN
3C(ii)	No. of shares traded and value (date-wise)	On October 15, 2026, Mrs. Sanya Zafar, spouse of Mr. Mushirulhaq Inamulhaq Iraki, purchased 7,500 equity shares of the Company for an aggregate consideration of ₹9,57,075/-. Subsequently, on October 29, 2026, she purchased an additional 3,000 equity shares for an aggregate consideration of ₹3,06,660/-. Accordingly, she purchased a total of 10,500 equity shares for an aggregate consideration of ₹12,63,735/-.
3D	In case value of trade(s) is more than Rs. 10 lacs in a calendar quarter	
3D(i)	Date of intimation of trade(s) by concerned DP / Director / Promoter / Promoter Group to Company under Regulation 7 of the SEBI (PIT) Regulations, 2015	Not applicable
3D(ii)	Date of intimation of trade(s) by Company to stock exchanges under Regulation 7 of the SEBI (PIT) Regulations, 2015	Not Applicable, as the Company is not required to make manual filings of disclosures under Regulation 7(2)(a) and (b) of the PIT Regulations, pursuant to SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2021/617 dated August 13, 2021.

4	Details of violations observed under Code of Conduct	Trading (Purchase) by Designated Person Relative (Spouse) during trading window closure period.
5	Action taken by Listed Company / Intermediary / Fiduciary	The Company has issued a written warning to Mr. Mushirulhaq Inamulhaq Iraki and Mrs. Sanya Zafar not to repeat any such actions in the future and to ensure strict compliance with the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct. Further, it is proposed to transfer an amount equivalent to 2% of the aggregate transaction value, i.e. approximately ₹25,200/-, to the Prime Minister's National Relief Fund (PMNRF).
6	Reasons recorded in writing for taking action stated above	The Compliance Officer sought explanations from Mr. Mushirulhaq Inamulhaq Iraki and Mrs. Sanya Zafar, who admitted the violation and clarified that the transactions were inadvertent and not intended to violate the Company's Code of Conduct or the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("SEBI PIT Regulations"). They further confirmed that they were not in possession of or had access to any unpublished price-sensitive information (UPSI) at the time of the transactions and expressed regret for the inadvertent violation. Considering that the Company is newly listed and this is the first such instance, warning letters have been issued to both individuals, advising them to ensure strict compliance in future. The Company maintains a zero-tolerance approach towards violations of the Code of Conduct and SEBI PIT Regulations. Further, it is proposed to transfer an amount equivalent to 2% of the aggregate transaction value, i.e. approximately ₹25,200/-, to the SEBI Invertor Protection and education Fund (SEBI IPEF).

7	Details of previous instances of violations, if any, since last financial year	Nil
8	If any amount collected for Code of Conduct violation(s)	i) Mode of transfer to SEBI – IPEF (Net Banking ~~/ NEFT / RTGS / Debit Cards / UPI~~): Transaction ID: 261105291794997 (ii) Details of transfer / payment: Not Applicable
9	Any other relevant information	The Audit Committee at its meeting held on November 05, 2026, took note of the same.

Thanking you,

Yours faithfully,

For, German Green Steel and Power Limited

Abira Idris Mansuri

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Abira Mansuri
Company Secretary & Compliance Officer
Membership No.: A42410