

2nd April, 2024

DCS – Listing
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai – 400 001
Scrip Code – 506655
Scrip Code NCDs - 974058

Listing Department
National Stock Exchange of India Limited
Exchange Plaza, C-1, Block G,
Bandra Kurla Complex,
Bandra (East), Mumbai – 400 051
Scrip Symbol - SUDARSCHEM

Dear Sir / Madam,

Sub : Reporting of violation under the ‘Code of Conduct to Regulate, Monitor and Report Trading by Insiders’ of the Company under SEBI (Prohibition of Insider Trading) Regulations, 2015

Ref.: SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated 23rd July, 2020

In terms of Company’s ‘Code of Conduct to Regulate, Monitor and Report Trading by Insiders’ read with Schedule B and Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time, please find enclosed herewith a report on violation as per the format specified by SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated 23rd July, 2020.

Kindly take the same on record.

Thanking You,
Yours faithfully,
For SUDARSHAN CHEMICAL INDUSTRIES LIMITED

MANDAR VELANKAR
GENERAL COUNSEL & COMPANY SECRETARY

Encl.: as above

Sudarshan Chemical Industries Limited
Registered Office:

7th Floor, Eleven West Panchshil, Survey No. 25,
Near PAN Card Club Road, Baner, Pune – 411 069,
Maharashtra, India
Tel. No.: +91 20 682 81 200
Email: contact@sudarshan.com
www.sudarshan.com
Corporate Identity No.: L24119PN1951PLC008409

Report by Sudarshan Chemical Industries Limited for violation related to Company's Code of Conduct to Regulate, Monitor and Report Trading by Insiders and as per the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015

[Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

Sr. No.	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	Sudarshan Chemical Industries Limited
2	<i>Please tick appropriate checkbox</i> Reporting in capacity of : <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	
3	A. Details of Designated Person (DP)	
	i. Name of the DP	Mr. Nagesh V. Kamat
	ii. PAN of the DP	ACRPK3666K
	iii. Designation of DP	Mentor – EHS and EMD
	iv. Functional Role of DP	Mentoring the EHS and EMD Functions
	v. Whether DP is Promoter or belongs to Promoter Group	No
	B. If Reporting is for immediate relative of DP	
	i. Name of the immediate relative of DP	Not Applicable
	ii. PAN of the immediate relative of DP	Not Applicable
	C. Details of transaction(s)	
	i. Name of the scrip	Sudarshan Chemical Industries Limited BSE – 506655 (Equity); 974058 (Debt) NSE – SUDARSCHEM (Equity)
	ii. No of shares traded and value (Rs.) (Date- wise)	5 th February, 2024 – Sold 2,000 Equity Shares for Rs. 530.29/- per Share through on Market Sale on BSE Limited

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		(Aggregate Sale Value Rs. 10,60,582.30 [excluding brokerage and taxes])
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar Quarter	
	i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	28 th March, 2024
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	2 nd April, 2024
4	Details of violations observed under Code of Conduct	<p>Mr. Nagesh Kamat has sold Equity Shares of the Company (as mentioned in 3(C) above) without completing Pre - Clearance formalities.</p> <p>Further, Mr. Kamat failed to submit necessary disclosures as per the SEBI (PIT) Regulations, 2015 and Code of Conduct of the Company, with respect to Sale of Equity Shares, within the statutory timelines.</p> <p>Mr. Kamat was not holding any Unpublished Price Sensitive Information (“UPSI”) and Equity Shares were sold outside of Trading Window Closure period.</p>

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5	Action taken by Listed company/ Intermediary/ Fiduciary	<p>The Company has taken following actions:</p> <ol style="list-style-type: none"> a. Sought explanation from Mr. Kamat in writing for committing the aforesaid violation; and b. Issued a warning letter to Mr. Kamat to strictly adhere as per the statutory requirements henceforth and levied a penalty of Rs. 5,000/- after taking into account the relevant facts and in terms of the provisions of Company's Code of Conduct to Regulate, Monitor and Report Trading by Insiders.
6	Reasons recorded in writing for taking action stated above	<p>Following points have been considered while taking action in terms of the Company's Code of Conduct:</p> <ol style="list-style-type: none"> 1. Mr. Nagesh Kamat was not in possession of any Unpublished Price Sensitive Information ("UPSI"). 2. Mr. Kamat conducted the trade after the opening of Trading Window.

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		<p>3. As per the explanation received from Mr. Kamat, he had planned to carry out the trade below the threshold limit of Rs.10 Lacs but eventually resulted in exceeding the limit by Rs.60,000/- after execution of trade. Hence, he missed out on seeking pre-clearance for the trade and subsequent reporting of the transaction to the Company.</p> <p>4. There is no instance of any contra-trade in this case.</p> <p>5. Based on the facts of the matter, it was found that Mr. Kamat's failure to seek pre-clearance and report the trade was a mistake on his part.</p> <p>6. Such violation was first instance and there was no history of earlier violation on the part of Mr. Kamat.</p>
7	Details of the previous instances of violations, if any, since last financial year	No such instance
8	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online

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	ii. Details of transfer/ payment – In case of online:	
	Particulars	Details
	Name of the Transferor	Mr. Nagesh V. Kamat
	Bank Name and Branch	HDFC Bank Limited, Bangur Nagar Branch, Goregaon West, Mumbai
	Bank Account Number	50200016551370
	UTR/Transaction reference Number	N089242958279974
	Transaction date	29 th March, 2024
Transaction Amount (in Rs.)	Rs. 5,000/-	
9	Any other relevant information	Nil

For SUDARSHAN CHEMICAL INDUSTRIES LIMITED

MANDAR VELANKAR
GENERAL COUNSEL & COMPANY SECRETARY

Date: 2nd April, 2024
Place: Pune, Maharashtra, India

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