

DLF LIMITED

DLF Gateway Tower, R Block,
DLF City Phase – III, Gurugram – 122 002,
Haryana (India)
Tel.: (+91-124) 4396000, investor-relations@dlf.in



26th April 2024

The General Manager Dept. of Corporate Services BSE Limited P.J. Tower, Dalal Street, Mumbai – 400 001	The Vice-President National Stock Exchange of India Limited Exchange Plaza, Bandra Kurla Complex, Bandra(E), Mumbai – 400 051
---	---

Sub: Reporting of violation under Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and DLF Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons and their Immediate Relatives

Dear Sir/ Madam,

This is to inform you that the Compliance Officer of the Company has observed trading/ dealing in equity shares of the Company by an immediate relative of one of the Independent Directors ('Designated Person') of the Company, who had acquired 1,000 number of shares and thereafter created pledge over the consolidated holding comprising of 2,000 number of shares of the Company during the ongoing trading window closure period.

In view of the observed violation, an e-mail dated 16th April 2023 was sent to the Designated Person seeking information/ clarification on the above along with relevant information pertaining to the above-mentioned trading/ dealing observed in the shares of the Company.

Pursuant to the afore-stated e-mail, the Designated Person apprised that the immediate relative had engaged the services of a Portfolio Management Company, which managed such immediate relative's trading(s)/ dealing(s) in the Securities Market and hence inadvertently traded/ dealt in the shares of the Company without prior knowledge of such immediate relative or the Designated Person. The Designated Person also informed that the Portfolio Manager while undertaking such trading/ dealing decisions in the shares of the Company was not in possession of any Unpublished Price Sensitive Information (UPSI) and the trading/ dealing was solely undertaken as per the Portfolio Manager's commercial prudence and judgement.

The Designated Person further submitted that as a rectification measure, the Designated Person had put in place appropriate and adequate arrangements to ensure that the provisions of SEBI PIT Regulations and the Company's Code of Conduct are not violated in future.

DLF LIMITED

DLF Gateway Tower, R Block,
DLF City Phase – III, Gurugram – 122 002,
Haryana (India)
Tel.: (+91-124) 4396000, investor-relations@dlf.in



The Audit Committee of the Board of Directors which is responsible for review of compliance with the Company's Code of Conduct was notified of this matter and the Audit Committee upon considering the value of the trade, sensitivity of the matter and the submissions made by the Designated Person, imposed a penalty of ₹ 1,00,000/- (Rupees One lakh only), respectively for each observed violation for trading and thereafter dealing in the shares of the Company, aggregating to ₹ 2,00,000/- (Rupees Two lakhs only).

The Audit Committee has further advised that in addition to the afore-said penalty, any profit made, upon disposal of the above-mentioned acquired shares during a valid trading window period and becoming eligible to sell those shares, would also be disgorged and such proceeds would also be remitted to the Designated bank Account of SEBI.

The Designated Person has been advised to deposit the penalty amount for onward remittance to the designated Bank Account of SEBI.

The requisite reporting in the format prescribed by SEBI vide Circular No. SEBI/HO/ISD/ISD-PoD-2/P/CIR/2023/039 dated 23rd March 2023 would be made post deposit of the penalty amount to the designated Bank Account of SEBI.

This is for your information and record please.

Thanking you,

Yours faithfully,
for **DLF Limited**

R. P. Punjani

Company Secretary

Encl.: As above

For Stock Exchange's clarifications, please contact:- Mr. R. P. Punjani – 09810655115 / punjani-rp@dlf.in Mr. Amit Kumar Sinha – 09810988710 / sinha-amit@dlf.in
--