



July 13, 2022

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| BSE Limited Phiroze Jeejeebhoy Towers Dalal Street Mumbai – 400 001 Scrip Code: 542760 | National Stock Exchange of India Limited Exchange Plaza Bandra Kurla Complex Bandra (East), Mumbai – 400 051 Symbol: SWSOLAR |
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Dear Sir/ Ma'am,

Sub.: Reporting to the Stock Exchange regarding violation of Company's Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

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

We refer to the captioned subject and enclose herewith the report by the Company for the violation relating to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 in the format of Annexure-A as prescribed by the SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

Kindly take the same on record.

Yours faithfully,

For Sterling and Wilson Renewable Energy Limited

Jagannadha Rao Ch. V.
Company Secretary and Compliance Officer



Encl: As above

Report by (Name of the listed company/ Intermediary/Fiduciary) 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 | Sterling and Wilson Renewable Energy Limited |
| 2 | Please tick appropriate checkbox Reporting in capacity of: <input type="radio"/> Listed Company <input type="radio"/> Intermediary <input type="radio"/> Fiduciary | Listed Company |
| 3 | A. Details of Designated Person (DP) | |
| | i. Name of the DP | N.A. |
| | ii. PAN of the DP | |
| | iii. Designation of DP | |
| | iv. Functional Role of DP | |
| | v. Whether DP is Promoter or belongs to Promoter Group | |
| | B. If Reporting is for immediate relative of DP | |
| | i. Name of the immediate relative of DP | Gp Capt A. Shajahan (Spouse of DP) |
| | ii. PAN of the immediate relative of DP | AFTPA0654G |
| | C. Details of transaction(s) | |
| | i. Name of the scrip | BSE Scrip Code: 542760 NSE Symbol: SWSOLAR |
| | ii. No of shares traded and value (Rs.) (Date- wise) | Date of Purchase- April 04, 2022 No. of shares purchased - 2 Value of purchase – Rs. 686.8 Date of Sale- April 12, 2022 No. of shares sold - 2 Value of sale- Rs. 703.9 |
| | 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 | Not Applicable, as the value of trade does not exceed Rs. 10 lacs in a calendar quarter |
| | ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015 | Not Applicable, as the value of trade does not exceed Rs. 10 lacs in a calendar quarter |



| Sr. No. | Particulars | Details |
|---------|--|---|
| 4 | Details of violations observed under Code of Conduct | <p>Immediate relative of DP traded during the trading window closure period (<i>Trading window was closed from April 01, 2022 to April 09, 2022</i>). Shares were purchased on April 04, 2022.</p> <p>Further, a contra trade transaction was undertaken, i.e. purchased on April 04, 2022 and sold on April 12, 2022.</p> |
| 5 | Action taken by Listed company/ Intermediary/ Fiduciary | <p>Warning letter has been issued to the DP and her immediate relative informing that she and her immediate relative would not engage in any kind of dealings in the Equity Shares of the Company in violation of the Company's Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015.</p> <p>The DP and her immediate relative has also been provided with a copy of Code of Conduct once again. Both have been further advised that in case of any subsequent violation stricter action(s) would be taken by the Company.</p> |
| 6 | Reasons recorded in writing for taking action stated above | <p>The DP has clarified that her immediate relative has undertaken the transaction inadvertently. Further, she mentioned that the transaction was not undertaken to violate the Insider Trading Code but was inadvertently and erroneously done by her immediate relative without any mala fide intention of violating the same. She has also confirmed that Gp Capt A. Shajahan has been sufficiently advised and will not be undertaking any such transaction in future.</p> <p>Matter was discussed with the Audit Committee at its meeting held on July</p> |



| Sr. No. | Particulars | Details | | | | | | | | | | |
|----------------------|---|--|---------|----------------------|--|-----------|--|---------|--|--------------------|--|------|
| | | 12, 2022, and it was suggested by the Audit Committee to issue warning letter to the DP and the immediate relative. Further, the Audit Committee discussed that the number or shares and amount involved is immaterial and hence, decided not to levy any penalty. | | | | | | | | | | |
| 7 | Details of the previous instances of violations, if any, since last financial year | Nil | | | | | | | | | | |
| 8 | If any amount collected for Code of Conduct violation(s) | Nil | | | | | | | | | | |
| | i. Mode of transfer to SEBI - IPEF (Online/Demand Draft) | N.A. | | | | | | | | | | |
| | ii. Details of transfer/payment | N.A. | | | | | | | | | | |
| | In case of Demand Draft (DD): <table border="1" data-bbox="272 974 845 1198"> <thead> <tr> <th data-bbox="272 974 646 1014">Particulars</th> <th data-bbox="646 974 845 1014">Details</th> </tr> </thead> <tbody> <tr> <td data-bbox="272 1014 646 1055">Bank Name and branch</td> <td data-bbox="646 1014 845 1055"></td> </tr> <tr> <td data-bbox="272 1055 646 1095">DD Number</td> <td data-bbox="646 1055 845 1095"></td> </tr> <tr> <td data-bbox="272 1095 646 1135">DD date</td> <td data-bbox="646 1095 845 1135"></td> </tr> <tr> <td data-bbox="272 1135 646 1198">DD amount (in Rs.)</td> <td data-bbox="646 1135 845 1198"></td> </tr> </tbody> </table> | Particulars | Details | Bank Name and branch | | DD Number | | DD date | | DD amount (in Rs.) | | N.A. |
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| DD date | | | | | | | | | | | | |
| DD amount (in Rs.) | | | | | | | | | | | | |
| 9 | Any other relevant information | Nil | | | | | | | | | | |

