



# Swan Energy Limited

(Formerly Swan Mills Limited)

6 FELTHAM HOUSE, 2nd FLOOR, 10, J. N. HEREDIA MARG, BALLRD ESTATE, MUMBAI - 400 001  
Tel.: +91 22 4058 7300 • Email: info@swan.co.in / invgrv@swan.co.in • website: swan.co.in  
CIN. L17100MH1909PLC000294

February 19, 2025

To,  
The Corporate Relationship Department,  
**BSE Limited**,  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai - 400 001.  
**Scrip Code: 503310**

The Manager, Listing Department,  
**National Stock Exchange of India Limited**,  
Exchange Plaza, Bandra Kurla Complex, Bandra (E),  
Mumbai - 400 051.  
**NSE Symbol: SWANENERGY**

**Sub: Reporting of violations relating to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015**

Dear Madam/ Sir,

In compliance with Company's Code of Conduct (To Regulate, Monitor and Report Trading by Designated Persons and their immediate relatives) ("Insider Trading Code") read with Schedule B and Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015, please find the enclosed report in respect of violation of Insider Trading Code by the designated persons of the Company as per format specified by SEBI vide its Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135, dated July 23, 2020.

This is for your information and records.

Yours Faithfully,

**For Swan Energy Limited**

**Deepesh Kedia**  
**Company Secretary**



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## Report by Swan Energy Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

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

S. No.	Particulars	Details
1.	Name of the listed Company/ <del>Intermediary/</del> <del>Fiduciary</del>	Swan Energy Limited
2.	Please tick the appropriate checkbox Reporting in capacity of: Listed Company <input checked="" type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary <input type="checkbox"/>	Listed Company
3	<b>A. Details of Designated Person (DP)</b>	
i	Name of DP	1. Mr. Rahul Sharma 2. Mr. Amit Jain
ii	PAN of DP	1. Mr. Rahul Sharma – BNLPS****L 2. Mr. Amit Jain – AGVPJ****D
iii	Designation of DP	1. Chief Executive Officer, Swan LNG Private Limited 2. Ceased to be a Designated person w.e.f. 17/04/2023
iv	Functional role of DP	1. To handle project implementation of the material subsidiary based at Ahmedabad, Gujarat. 2. Preparation and Finalization of Accounts
v	Whether DP is Promoter or belongs to Promoter Group	No
	<b>B. Reporting is for immediate relative of DP</b>	Yes
i.	Name of the immediate relative of DP	Mrs. Bhoomika Sharma, W/o Mr. Rahul Sharma
ii.	PAN of the immediate relative of DP	ACCPT****G
	<b>C. Details of transaction(s)</b>	
i.	Name of the Scrip	Equity Shares of Swan Energy Limited (Scrip Code: 503310 / Symbol: SWANENERGY)
ii.	No of shares traded and value (Rs.) (Date-wise)	For Details of Trades, please refer to <b>Annexure – A 3-C</b>
	<b>D. In case the value of trade(s) is more than Rs. 10 lacs in a calendar quarter</b>	Not Applicable
	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
	Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable



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4	Details of violations observed under Code of Conduct	Equity shares were traded during the trading window closure period.
5	Action taken by Listed company/ <del>Intermediary/ Fiduciary</del>	<p>Since this was the first instance which came into the knowledge of the Audit Committee / Board / Management, the Designated persons (“DP”) were warned not to engage in any kind of dealings in the Equity Shares of the Company (“shares”) in violation of the Company’s Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015 and were directed to remit entire profit so earned in the dealings of the shares to the Investor Protection and Education Fund Account of the SEBI (“IPEF”). As per intimation received from DP, the amounts (net of taxes) have been deposited / disgorged by Mr. Rahul Sharma, Mrs. Bhoomika Sharma and Mr. Amit Jain in the IPEF, as per details in point no. 8 below.</p> <p>They have been further advised that in case of any subsequent violation, stricter action(s) would be taken against him and the related persons by the Company.</p>
6.	Reasons recorded in writing for taking action stated above	Violation of SEBI Insider Trading Regulations.
7.	Details of the previous instances of violations, if any, since last financial year	None
8.	If any amount collected for the Code of Conduct violation(s)	
	i. Mode of transfer to SEBI – ii. Details of transfer/payment in case of Online	<p>Online Payment</p> <ol style="list-style-type: none"><li>1. Mr. Rahul Sharma - Transaction Id No. Transaction ID: 250108216021402, dated – 08/01/2025, Amount Rs. 19,26,664/-</li><li>2. Mrs. Bhoomika Sharma - Transaction Id No. 250107215857542 dated – 07/01/2025, Amount Rs. 24,391/-</li><li>3. Mr. Amit Jain - Transaction Id No. Transaction ID: 250121218152422 dated – 21/01/2025, Amount Rs. 6,249/-</li></ol>
	iii. In case of Demand Draft (DD):	N.A.
	iv. Any other relevant information	N.A.

**Annexure A: Point no. 3-C**

- i- Name of the Scrip: **Swan Energy Limited**  
ii- No of shares traded and value (Rs.) (Date -wise):

**Rahul Sharma - Designated Person**

Date	Gr Buy Vol	Gr Sell Vol	Net Trd Vol	Gr Trd Vol	Gr Buy Value	Gr Sell Value
04-09-2023	10650	2500	8150	13,150.00	32,35,208.90	7,61,875.00
04-09-2023	1000	1000	0	2,000.00	3,01,900.00	3,04,800.00
05-09-2023	1000	0	1000	1,000.00	2,96,815.00	-
05-09-2023	1600	0	1600	1,600.00	4,76,835.50	-
06-09-2023	1000	0	1000	1,000.00	2,93,425.00	-
08-09-2023	100	0	100	100.00	30,025.00	-
12-09-2023	1375	0	1375	1,375.00	3,92,182.45	-
13-09-2023	250	500	-250	750.00	68,852.50	1,40,760.00
14-09-2023	330	115	215	445.00	94,656.00	33,709.25
18-09-2023	1100	0	1100	1,100.00	3,19,389.70	-
21-09-2023	600	300	300	900.00	1,77,205.00	89,490.00
25-09-2023	1200	1200	0	2,400.00	3,58,200.00	4,04,588.60
26-09-2023	250	250	0	500.00	73,425.00	74,400.00
27-09-2023	600	600	0	1,200.00	1,71,527.50	1,73,970.00
28-09-2023	100	0	100	100.00	28,640.00	-
12-11-2023	0	3000	-3000	3,000.00	-	13,50,623.80
12-11-2023	0	5050	-5050	5,050.00	-	22,72,312.50
16-11-2023	900	0	900	900.00	3,83,362.50	-
17-11-2023	1500	1500	0	3,000.00	6,48,750.00	6,58,826.10
21-11-2023	250	0	250	250.00	1,06,012.50	-
22-11-2023	1501	1501	0	3,002.00	6,33,120.90	6,43,853.95
23-11-2023	0	20485	-20485	20,485.00	-	89,63,304.30
29-11-2023	11400	0	11400	11,400.00	48,27,370.00	-
13-11-2023	44895	43600	24093	1,11,293.00	1,93,80,348.28	1,94,49,871.20

**Bhoomika Sharma - Relative of Designated Person**

Date	Gr Buy Vol	Gr Sell Vol	Net Trd Vol	Gr Trd Vol	Gr Buy Value	Gr Sell Value
31-07-2023	100	0	100	100	21,900.00	-
02-08-2023	100	0	100	100	21,600.00	-
29-08-2023	200	0	200	200	61,000.00	-
10-10-2023	0	400	-400	400	-	1,18,000.00
12-10-2023	1000	0	1000	1000	3,05,000.00	-
13-10-2023	0	600	-600	600	-	1,87,200.00
19-10-2023	0	400	-400	400	-	1,30,000.00
25-10-2023	300	200	100	500	90,200.00	61,200.00
26-10-2023	0	100	-100	100	-	31,500.00
30-10-2023	100	100	0	200	38,505.00	39,000.00

**Amit Jain - Designated Person**

Date	Gr Buy Vol	Gr Sell Vol	Net Trd Vol	Gr Trd Vol	Gr Buy Value	Gr Sell Value
11-09-2023	10	0	10	10	3,046.00	-
12-09-2023	20	0	20	20	5,701.90	-
21-09-2023	10	0	10	10	2,921.50	-
25-09-2023	20	0	20	20	6,324.90	-
26-09-2023	10	0	10	10	3,008.00	-
27-09-2023	10	0	10	10	2,856.50	-
09-10-2023	10	0	10	10	2,909.50	-
13-10-2023	0	10	-10	10	-	3,070.10
16-10-2023	0	10	-10	10	-	3,159.00
25-10-2023	0	10	-10	10	-	3,085.00
27-10-2023	0	35	-35	35	-	12,636.00
30-10-2023	0	5	-5	5	-	1,940.50
24-11-2023	0	10	-10	10	-	4,252.00
29-11-2023	0	10	-10	10	-	4,260.00