



# IG PETROCHEMICALS LIMITED

26<sup>th</sup> November, 2020

SECT/1042

<b>BSE Limited</b> Corporate Relationship Department 1 <sup>st</sup> Floor, P J Towers Dalal Street Mumbai - 400 001 <b><u>Scrip Code: 500199</u></b>	<b>The National Stock Exchange of India Ltd.</b> Exchange Plaza Bandra Kurla Complex Bandra (East) Mumbai – 400 051 <b><u>Scrip Code: IGPL</u></b>
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Dear Sir,

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

With reference to the above and in accordance with the SEBI circular no. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated 23<sup>rd</sup> July, 2020, we enclose herewith report on violations under SEBI (Prohibition of Insider Trading) Regulations, 2015 relating to the Code of Conduct.

Kindly take the same on your record.

Thanking you,

Yours faithfully,  
For I G Petrochemicals Limited



Sudhir R Singh  
Company Secretary

Encl.: As above


**Report by I G Petrochemicals 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*

<b>Sr. No.</b>	<b>Particulars</b>	<b>Details</b>
1	Name of the listed company/ <del>Intermediary/Fiduciary</del>	I G Petrochemicals Limited
2	<i>Please tick appropriate checkbox</i> Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	Jitendra Kumar Saboo
	ii. PAN of the DP	AFXPS8382K
	iii. Designation of DP	Executive Director
	iv. Functional Role of DP	Responsible for operations at Plant/ Occupier
	v. Whether DP is Promoter or belongs to Promoter Group	No
	<b>B. If Reporting is for immediate relative of DP</b>	
	i. Name of the immediate relatives of DP	Santosh Saboo Jitendra Kumar Saboo HUF Yajur Saboo
	ii. PAN of the immediate relatives of DP	AOJPS4412H AADHS0657L AVEPS5111M
	<b>C. Details of transaction(s)</b>	
	i. Name of the scrip	I G Petrochemicals Ltd.
	ii. No. of shares traded and value (Rs.) (Date- wise)	Santosh Saboo – 80 shares purchased on 4 <sup>th</sup> Sept. 2020 and 11 <sup>th</sup> Sept. 2020 @ Rs. 239/- per share (average) and sold 200 shares on 22 <sup>nd</sup> Oct. 2020 @ Rs. 283/- per share Jitendra Kumar Saboo HUF – 200 shares purchased on 26 <sup>th</sup> Aug. 2020 @ Rs. 262/- per share and sold 500 shares on 22 <sup>nd</sup> Oct. 2020 @ Rs. 283/- per share Yajur Saboo – 500 shares sold @ Rs. 300/- per share on 22 <sup>nd</sup> Oct. 2020
	<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter</b>	
	i. Date of intimation of trade(s) by concerned DP / Director / Promoter / Promoter Group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	N.A.

	ii. Date of intimation of trade(s) by Company to stock exchange under regulation 7 of SEBI (PIT) Regulations, 2015	N.A.
4	Details of violations observed under Code of Conduct	<p>Santosh Saboo – Contra-trade violation by sale of shares. The total sale of shares was 200 and were during the closure of trading window which were reported to the stock exchanges vide our letter dated 10<sup>th</sup> Nov. 2020)</p> <p>Jitendra Kumar Saboo HUF - Contra-trade violation by sale of shares. The total sale of shares was 500 and were during the closure of trading window which were reported to the stock exchanges vide our letter dated 10<sup>th</sup> Nov. 2020)</p> <p>Yajur Saboo – Sale of 500 shares during the closure of trading window period.</p> <p>Shri J K Sahoo didn't disclose the above trades during our previous investigation.</p>
5	Action taken by Listed Company/ <del>Intermediary/</del> Fiduciary	<p>Shri J K Saboo was asked to disgorge the profit of Rs. 1,46,005/- made while dealing in the above referred shares in violation of the Code of Conduct/ SEBI (Prohibition of Insider Trading) Regulations, 2015. Further a monetary penalty @ 10% of the profit i.e. Rs. 14,601/- was also imposed on him. The disgorged profit and the penalty has been deposited to the credit of Investor Protection and Education Fund (IPEF) of SEBI. Also, he (including his immediate relatives) has been directed to not engage in any trading in the shares of the Company for the next 6 months.</p>
6	Reasons recorded in writing for taking action stated above	<p>The Audit Committee considered the necessary documents and the submissions made by the Designated Person (DP). The transactions, though, practically were part of one single lot but due to the same being not disclosed in the first instance, was considered as a separate transaction and an offence of a repetitive nature. The Committee also noted that the DP was provided full opportunity to disclose the transaction but he deliberately not disclosed it and also failed to justify the reason for non-disclosure satisfactorily. The deliberate concealment of the information has been considered as a serious violation. Hence the profits made while dealing in the above shares were disgorged and penalty @ 10% was imposed on the DP.</p> <p>The DP is warned not to be negligent in observance of the Code of Conduct of the Company and follow practice of good governance at all times, be faithful and transparent.</p>

7	Details of the previous instances of violations, if any, since last financial year	<u>Trades during the closure of trading window period:</u> Jitendra Kumar Saboo - 200 shares sold on 22 <sup>nd</sup> Oct. 2020 Santosh Saboo - 200 shares sold on 22 <sup>nd</sup> Oct. 2020 Jitendra Kumar Saboo HUF - 500 sold on 22 <sup>nd</sup> Oct. 2020 Reported to stock exchanges vide our letter dated 10 <sup>th</sup> Nov. 2020																								
8	If any amount collected for Code of Conduct violations																									
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online																								
	ii. Details of transfer/payment:  In case of Online: <table border="1" data-bbox="209 831 1329 1137"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Name of the transferor</td> <td>I G Petrochemicals Limited</td> </tr> <tr> <td>Bank name, branch and account no.</td> <td>State Bank of India World Trade Centre, 2<sup>nd</sup> Floor, Arcade Building Cuffe Parade, Mumbai – 400 005</td> </tr> <tr> <td>UTR/Transaction reference no.</td> <td>SBIN420331625708</td> </tr> <tr> <td>Transaction date</td> <td>26<sup>th</sup> November, 2020</td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td>Rs. 1,60,606/-</td> </tr> </tbody> </table> In case of Demand Draft (DD): Not applicable <table border="1" data-bbox="209 1249 1329 1487"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Particulars</td> <td></td> </tr> <tr> <td>Bank branch and name</td> <td></td> </tr> <tr> <td>DD Number</td> <td></td> </tr> <tr> <td>DD Date</td> <td></td> </tr> <tr> <td>DD Amount (Rs.)</td> <td></td> </tr> </tbody> </table>		Particulars	Details	Name of the transferor	I G Petrochemicals Limited	Bank name, branch and account no.	State Bank of India World Trade Centre, 2 <sup>nd</sup> Floor, Arcade Building Cuffe Parade, Mumbai – 400 005	UTR/Transaction reference no.	SBIN420331625708	Transaction date	26 <sup>th</sup> November, 2020	Transaction Amount (in Rs.)	Rs. 1,60,606/-	Particulars	Details	Particulars		Bank branch and name		DD Number		DD Date		DD Amount (Rs.)	
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9	Any other relevant information	None																								

Yours faithfully,  
 For I G Petrochemicals Limited  
  
 Sudhir R Singh  
 Company Secretary & Compliance Officer

**PAN:** AKHPS9494F  
**Email ID:** [ssingh@igpetro.com](mailto:ssingh@igpetro.com)

26<sup>th</sup> November, 2020, Mumbai