



Ref: Syn/CS/PIT/SE/SEPT 2020/01

**Syngene International Limited**

Biocon SEZ, Biocon Park, Plot No. 2 & 3,  
Bommasandra Industrial Area, IV Phase,  
Jigani Link Road, Bengaluru 560 099,  
Karnataka, India  
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CIN: L85110KA1993PLC01493  
[www.syngeneintl.com](http://www.syngeneintl.com)

September 30, 2020

To, The Manager, BSE Limited Corporate Relationship Department Dalal Street, Mumbai – 400 001	To, The Manager, National Stock Exchange of India Limited Corporate Communication Department Bandra (EAST), Mumbai – 400 051
<b>Scrip Code: 539268</b>	<b>Scrip Symbol: SYNGENE</b>

Dear Sir/Madam,

**Subject: Reporting under SEBI (Prevention of Insider Trading) Regulations, 2015**  
**Re: Intimation of Violation under Insider Trading Code by a Designated Employee**

In terms of SEBI circular SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, please find attached as Annexure A, the report by the Company for violation on Code of Conduct for Prevention of Insider Trading Regulations under SEBI (Prevention of Insider Trading) Regulations, 2015.

We would like to submit that the reported deviation is not material in relation to the total paid up equity share capital of the Company.

You are requested to take this intimation on record.

Thanking you.

Yours faithfully,

For **SYNGENE INTERNATIONAL LIMITED**

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Priyadarshini Mahapatra  
**Company Secretary & Compliance Officer**

**Encl: As above**

## Annexure A

### Report format by Syngene International Limited 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	Syngene International Limited
2	Please tick appropriate checkbox Reporting in capacity of: <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3	<p><b>A. Name of the Designated Person (DP)</b></p> <p>a. Name of the DP ii. PAN of the DP iii. Designation of DP iv. Functional Role of DP v. Whether DP is Promoter or belongs to Promoter Group</p> <p><b>B. If Reporting is for immediate relative of DP</b></p> <p>i. Name of the immediate relative of DP ii. PAN of the immediate relative of DP</p> <p><b>C. Details of transaction(s)</b></p> <p>i. Name of the scrip ii. No of shares traded and value (Rs.) (Date-wise)</p> <p><b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter</b></p> <p>i. Date of intimation of trade(s) by concerned DP/ director/ promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015 ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015</p>	<p>Mayank Verma AEPPV7701L Assistant General Manager, Holding Company Secretarial Department No</p> <p>NA</p> <p>Syngene International Limited 50 shares @ Rs. 566/- per share (Rs. 28, 300/- in total) on September 15, 2020</p> <p>September 17, 2020</p> <p>September 21, 2020</p>
4	Details of violations observed under Code of Conduct	The Designated Employee had taken a pre-clearance approval for sale of 8,000 shares on September 14, 2020. However, while

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		<p>placing the order for sale on September 15, 2020, he inadvertently placed an order for purchase of 50 shares alongwith his other sale transactions. This is in violation of the Syngene Insider Trading Code.</p> <p>He realised this upon verifying his demat transaction statement a couple of days later and immediately disclosed the mistake to the Company on September 17, 2020. He has filed respective Form Cs with the Company with the full information on sale as well as purchase of the above shares. The said Form Cs have been submitted by the Company to the Stock Exchanges on September 18 and 21, 2020. Having realised the unintentional purchase, he has also confirmed that he hasn't sold the said shares and has not made any unlawful gains on the transaction. He has also suo-moto confirmed that he will hold on to the shares for the next six months and will not engage in any contra-trade on the said shares.</p>						
5	Action taken by Listed Company/ Intermediary/ Fiduciary	<ul style="list-style-type: none"> <li>Warning notice issued and directed to attend a training on the Syngene Code of Prevention of Insider Trading</li> <li>Instructed to hold on to the 50 shares for 6 months</li> </ul>						
6	Reasons recorded in writing for taking action stated above	The contravention is considered as a bonafide mistake and considering the insignificant trade size and the circumstances, the same has been condoned with suitable cautionary guidance to the official. It may be noted that unless, the employee had disclosed this information, the Company would not have been in a position to know about the purchase of shares as the BENPOS statement received from the Registrar and Share Transfer Agents reflects only the cumulative transactions of designated employees for a particular week.						
7	Details of the previous instances of violations, if any, since last financial year	None						
8	<p>If any amount collected for Code of Conduct violation(s)</p> <p>i. Mode of transfer to SEBI - IPEF (Online/ Demand Draft)</p> <p>ii. Details of transfer/payment</p> <p>In case of Online:</p>	<p>Not applicable</p> <table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Name of the transferor</td> <td></td> </tr> <tr> <td>Bank Name, branch and Account number</td> <td></td> </tr> </tbody> </table>	Particulars	Details	Name of the transferor		Bank Name, branch and Account number	
Particulars	Details							
Name of the transferor								
Bank Name, branch and Account number								

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	In case of Demand Draft (DD):	UTR/Transaction reference Number	
		Transaction date	
		Transaction Amount (in Rs.)	
		<b>Particulars</b>	<b>Details</b>
		Bank Name and branch	
		DD Number	
		DD date	
		DD amount (in Rs.)	
8	Any other relevant information	None	

Yours faithfully,

**For Syngene International Limited**

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Priyadarshini Mahapatra  
**Company Secretary & Compliance Officer**  
PAN: AJJPM0077B  
Email Id: [Priyadarshini.Mahapatra@syngeneintl.com](mailto:Priyadarshini.Mahapatra@syngeneintl.com)  
Mobile Number: +91 96995 53081

Date: September 30, 2020  
Place: Bengaluru