

IAL//2021/ April 15, 2021

**Head Office:** 

CIN: L24301PB1986PLC006715

ISO 9001-2008 Certified

SCO 49-50-51. Sector-26.

Madhya Marg, Chandigarh -160 019 (INDIA)

INDIAN ACRYLICS LIMITED

Tel: +91-172-2792385 / 2793112 Fax: +91-172-2794834 / 2790887 Website: www.indianacrylics.com

Bombay Stock Exchange Ltd. Department of Corporate Services PJ Towers, Dalal Street, Mumbai-400001

> Sub: Inadvertent trade in securities of Indian Acrylics Limited by Designated Person during closure period of Trading Window.

## Dear Sir/ Madam

This is further to our letter dated 01.04.2021 inter-alia intimating about closure of trading window for dealing in the securities of Indian Acrylics Limited w.e.f 1st April, 2021 till 48 hours after declaration of Financial Results in line with the SEBI (Prohibition of Insider Trading Regulations), 2015 and Company's Code of Conduct on Insider Trading for Regulating, Monitoring and Reporting of Trading by Designated Persons and their immediate relatives.

In this regard, Shri Ajit Singh Chatha, Independent Director informed the Company vide his letter dated 13/04/2021 (copy attached) about inadvertent sale of 13,000 securities of Indian Acrylics Limited on 12-04-2021 during the closure period of Trading window. He further informed that to meet urgent/ immediate financial requirements, securities of companies available in his portfolio including Indian Acrylics Limited were sold by him without realising that trading window for dealing in equity shares of Indian Acrylics is closed. The said shares were purchased by him in Oct-Nov 2016 at a cost of Rs.21.50 per share (approx.) and now sold at a loss at a price of Rs. 10.00 per share (approx.)

The matter was taken up to the management and deliberated extensively. It was ensured that Mr. Chatha was not in possession of Unpublished Price Sensitive Information (UPSI) and the fact that he is only member of Board and Board-level committees & is not involved in the day-to-day management and function of Indian Acrylics Limited

However, it was determined that there has been a violation of SEBI (PIT) Regulations and Company's Code of Conduct without any intent of reaping abnormal gains. In this regard, the disclosure as prescribed vide SEBI Circular dated July 23, 2020 is enclosed herewith as Annexure A. This is for your kind information and dissemination.

Thanking you, Yours\_faithfully

for Indian Acrylics Limited

(BHAVNESH K GUPTA)

**GM CUM COMPANY SECRETARY** 

Works & Regd. Office: Village Harkishanpura, Patiala - Sangrur Highway, Distt. Sangrur - 148 026 (Pb.)

Tel.: +91 (1672) 278106, 278104, Fax: +91 (1672) 278110

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: S-2, Second Floor, Vasant Square Mall, Community Center, Pocket V , Plot No. A, Sector B, Vasant Kunj, New Delhi - 110 070, Phone-011-40000378, 377, 376





## Report by (Name of the listed company/ Intermediary/Fiduciary) for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

{For listed company: Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015

For Intermediary/ Fiduciary: Schedule C read with Regulation 9(1) and 9(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015)

Sr No	Particulars	Details
1	Name of the listed company/. Intermediary/Fiduciary	INDIAN ACRYLICS LIMITED
2	0 Listed Company O Intermediary	Listed Company
3	Name of the immediate relative of DP if reporting is for immediate relative.	Shri Ajit Singh Chatha
4	PAN of the immediate relative of DP if reporting is forimmediate relative.	AAKPC3593J
	Designation of DP	Independent Director
	Functional Role of DP	Shri Ajit Singh Chatha is Independent Director of Indian Acrylics Limited (IAL) on the Board of IAL since May 31, 2017. Shri Ajit Singh Chatha as Independent Director of IAL is only involved in deliberations
		and decision taken in Meetings of Board and Board level Committees of which he is the Chairperson/ Member. He is not involved in the day to day management and functioning of IAL
	7 Whether DP is Promoter /Promoter Group/holding CXO level position (e.g. CEO, CFO, CTO etc.)	No
	8 Transaction details a) Name of the scrip b) No of shares traded (which includes pledge) and value (Rs) (Date- wise)	Indian Acrylics Limited Scrip Code: 514165 (BSE)  Date No. of Value (Rs.) Shares Traded
	0.00	12.04.2021   13000   127760.60

14	Any other relevant information	
13	Details of the previous instances of violations, if any, since last financial year	None
12	Details of the previous instances of	abnormal gains.
		time of entering into the transaction, he was not in possession of any Unpublished Price Sensitive Information and the said trade was carried out inadvertently without any intent of reaping
		price of Rs. 10.00 per share (approx.) He further stated that at the
		shares were purchased by him in Oct-Nov 2016 at a cost of Rs.21.50 per share (approx.) and now sold at a loss at a
		his urgent financial requirements without realizing that the trading window for shares is closed. The said
		shares of all the companies including Indian Acrylics Limited in his portfolio to meet
12	Reasons recorded in writing for taking action stated above	Shri Ajit Singh Chatha has conveyed in his letter dated 13/04/2021 that he sold equity
11	Action taken by Listed company/ Intermediary/ Fiduciary	It was informed by the Management of the Company and BSE/ SEBI about violation as per SEBI Circular dated 23 <sup>rd</sup> July 2020 and cautioned Mr. Chatha to strictly comply with Code of Conduct.
10	(Prohibition of Insider Trading) Regulations, 2015	Indian Acrylics Limited during the period of closure of window.
	b) Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015	Not Applicable
	10 lacs in a calendar quarter - a) Date of intimation of trade(s) by concerned DP/ director/ promoter/ promoter group to Company under regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015	Not Applicable
9	In case value of trade(s) is more than Rs	,

Yours faithfully

Date: 15/04/2021

BHAVNESH K GUPTA

Place: Chandigarh

Company Secretary & Compliance Officer PAN: ABNPG6214A

Email Id: bhavnesh@indianacrylics.com

Dated: 13.04.2021

The Board of Directors Indian Acrylics Limited SCO 49-50, Sector-26 Madhya Marg-160019

Sub: Inadvertent trade in securities of Indian Acrylics Limited during closure period of Trading Window.

Dear Sir/ Madam

This has reference to inadvertent sale of 13,000 securities of Indian Acrylics Limited on 12-04-2021 during the closure period of Trading window which commenced from 01/04/2021 as notified in terms of code of conduct for prevention of Insider Trading.

In this regard I would like to inform that to meet urgent/ immediate financial requirements, I sold all securities of companies available in my portfolio without realising that trading window for dealing in equity shares of Indian Acrylics is closed. The said shares of Indian Acrylics Limited were purchased by me in Oct-Nov 2016 at a cost of Rs.21.50 per share (approx.) and now sold at a loss at a price of Rs.10.00 per share (approx.)

Further, I would like to confirm you that at the time of sale of shares of Indian Acrylics Limited, I was not in possession of any Unpublished Price Sensitive information (UPSI) which had bearing on the share price of company, whether at present or in future. Further, it is also informed that the said 'small' transaction was carried out inadvertently, neither with any intent of reaping abnormal gains nor based on any price sensitive information or violating the norms for Insider Trading in any manner whatsoever.

I agree to comply with the provisions of the Code and provide any information relating to the trade as may be required by the Compliance Officer and permit the Company to disclose such details to SEBI, if so required by SEBI.

In view of the above, it is requested to condone the procedural violation in making above inadvertent transaction in securities of Indian Acrylics Limited. I further assure you that such kind of violations of SEBI(PIT) Regulations will not happen again.

Thanking You

Yours Faithfully

Ajit Singh Chatha (Independent Director of Indian Acrylics Limited) House No. 333, Sector 9, Chandigarh 160009.