

The National Stock Exchange of India Ltd.,
Exchange Plaza, 5th Floor,
Bandra-Kurla Complex,
Mumbai-400 051
NSE Symbol - SEPC

BSE Limited
14th Floor, PJ. Towers,
Dalal Street,
Mumbai-400 001
Scrip Code: 532945

10th August, 2023

Dear Sir/Madam,

Sub: Reporting of violations under SEBI (Prohibition of Insider Trading) Regulations, 2015.

This is in reference to the Company's Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons and their Immediate Relatives read with Schedule B and Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

The Board at its meeting held today i.e., 10th August, 2023, had considered trades executed in contravention to the Company's code of conduct and Insider Trading Regulations by Mark AB Welfare trust, an entity forming part of Promoter Group of the Company classified as a designated person in accordance with the said Regulations. The Board further noted that the Company is awaiting response from the Mark AB Welfare trust with respect to the said violation. Pending receipt of response from the designated person, please find enclosed herewith an interim report related to the violation based on the data available with the Company.

In terms of SEBI Circular SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, the final report w.r.t said violation will be filed with the stock exchanges along with the details action taken by the Board in this regard upon receipt of response from the Mark AB Welfare trust.

Thanking you,

Yours Faithfully,
For SEPC Limited

T. Sriraman
Company Secretary & Compliance Officer
Encl.: a. a.



Report by SEPC 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/ Intermediary/Fiduciary	SEPC Limited
2.	Reporting in capacity of : <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3.	A. Details of Designated Person (DP)	
	i. Name of the DP	Mark AB Welfare trust
	ii. PAN of the DP	AAITM3625M
	iii. Designation of DP	NA
	iv. Functional Role of DP	NA
	v. Whether DP is Promoter or belongs to Promoter Group	Promoter group
	B. If Reporting is for immediate relative of DP	
	i. Name of the immediate relative of DP	NA
	ii. PAN of the immediate relative of DP	NA
	C. Details of transaction(s)	
	i. Name of the scrip	SEPC Limited BSE: 532945, NSE: SEPC
	ii. No of shares traded and value (Rs.) (Date-wise)	As per Annexure - I
	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 required, as per SEBI Circular no. SEBI/HO/ISD/ISD/CIR/P/2021/617 dated August 13, 2021.
	ii. Date of intimation of trade(s) by Company to stock exchanges under Regulation 7 of SEBI (PIT) Regulations, 2015.	
4.	Details of violations observed under Code of Conduct	Sale of shares of the Company during trading window closure. Execution of Contra Trade and shares were traded without obtaining preclearance.
5.	Action taken by Listed company/ Intermediary/ Fiduciary	Appropriate action to be taken and intimation will be given in due course of time.
6.	Reasons recorded in writing for taking action stated above	<ul style="list-style-type: none"> Sale of shares of the Company without obtaining Pre-clearance and also transacting during trading window closure & execution of contra trade in violation of code of conduct and Insider Trading

		<p>Regulations.</p> <ul style="list-style-type: none"> The aforesaid violation by the Mark AB Welfare Trust was noted by the Board at its meeting held on August 10, 2023, since the response from Mark AB Welfare Trust is awaited, the action taken will be intimated in due course. 												
7.	Details of the previous instances of violations, if any, since last financial year	NA												
8.	If any amount collected for Code of Conduct violation(s)													
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	-												
	ii Details of transfer/payment													
	In case of Online:													
	<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> <tr> <td>UTR/Transaction reference Number</td> <td>-</td> </tr> <tr> <td>Transaction date</td> <td>-</td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td>-</td> </tr> </tbody> </table>		Particulars	Details	Name of the transferor	-	Bank Name, branch and Account number	-	UTR/Transaction reference Number	-	Transaction date	-	Transaction Amount (in Rs.)	-
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DD Number	-													
DD date	-													
DD amount (in Rs.)	-													
9.	Any other relevant information	-												

Thanking you,

**Yours Faithfully,
For SEPC Limited**

T. Sriraman
Company Secretary & Compliance Officer
Email ID: tsr@sepc.in
PAN: AOYPS5139N
Date: 10th August, 2023
Place: Chennai



Annexure – I

Date	Bought	Sold	Price per share (in Rs.)	Value
31-03-2023		3,51,00,000	*	*
31-03-2023	3,00,00,000		*	*
07-04-2023		32,00,000	*	*
07-04-2023		31,11,869	*	*
14-04-2023		81,00,000	*	*
21-04-2023		60,30,000	*	*
28-04-2023		35,05,000	*	*
12-05-2023	1,55,71,677 ^{\$}		*	*
02-06-2023		2,75,00,000	*	*
02-06-2023	1,85,95,026		*	*
09-06-2023		2,78,48,157	*	*

^{\$} Rights Issue

* Pending receipt of response from the designated person

