

# *The Sandur Manganese & Iron Ores Limited*

(An ISO 9001:2015; ISO 14001:2015 and 45001:2018 certified company)  
CIN:L85110KA1954PLC000759; Website: www.sandurgroup.com

## REGISTERED OFFICE

'SATYALAYA', No.266  
Ward No.1, Palace Road  
Sandur - 583 119, Ballari District  
Karnataka, India  
Tel: +91 8395 260301/ 283173-199  
Fax: +91 8395 260473



## CORPORATE OFFICE

'SANDUR HOUSE', No.9  
Bellary Road, Sadashivanagar  
Bengaluru - 560 080  
Karnataka, India  
Tel: +91 80 4152 0176 - 79 / 4547 3000  
Fax: +91 80 4152 0182

The Secretary,  
BSE Limited,  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai - 400 001

23 February 2022

Dear Sir/Madam,

**Sub: Disclosure under Regulation 5(5) of SEBI (Prohibition of Insider Trading) Regulations, 2015 - Trading Plan**

**Ref: Company Code: 504918**

In compliance with provisions of Regulation (5) of SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's policy on Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons, the Company hereby notify the trading plan submitted by Vaibhav Agarwal, Deputy General Manager - Corporate Finance on 22 February 2022 and duly approved by undersigned.

We are enclosing herewith the trading plan and declaration submitted by the Designated Person along with approval letter from the Compliance Officer. We request you to kindly take the same on record.

Thanking you.

*for The Sandur Manganese & Iron Ores Limited*

  
**Bijan Kumar Dash**  
Company Secretary & Chief Compliance Officer

**MINES OFFICE:** Deogiri - 583112, Sandur Taluk, Ballari District

Tel: +91 8395 271025 / 28 / 29 / 40; Fax: +91 8395 271066

**PLANT OFFICE:** Metal & Ferroalloy Plant, Vyasankere, Mariyammanahalli - 583 222, Hosapete Taluk, Ballari District

Tel: +91 8394 244450 / 244335

22 February 2022

To,  
The Compliance Officer  
The Sandur Manganese and Iron Ores Limited  
'Satyalaya', Door No. 266 (Old No.80),  
Behind Taluka Office, Ward No.1,  
Palace Road, Sandur -583 119

Dear Sir,

**Sub: Trading Plan under Regulation 5 of the SEBI (Prohibition of Insider Trading) Regulations, 2015**

In terms of Regulation 5 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and Clause 6.4 of the Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons of The Sandur Manganese and Iron Ores Limited ('the Company'), I, Vaibhav Agarwal, Designated Person, holding 13 shares of the Company as on date, hereby submit my trading plan for approval, to trade in the equity shares of the Company, as per the details furnished hereunder:

<b>Name of the Insider</b>	Vaibhav Agarwal
<b>Designation</b>	Deputy General Manager - Corporate Finance
<b>Date of Submission</b>	22 February 2022
<b>Period of Trading</b>	1 September 2022 to 31 August 2023
<b>Person executing the trade</b>	Self
<b>No trading period</b>	From 1 September 2022 to the second trading day after the disclosure of financial results for the half year.
	From 1 December 2022 to the second trading day after the disclosure of financial results for the third quarter.
	From the 1 March 2023 to the second trading day after the disclosure of annual financial results.
	From the 1 June 2023 to the second trading day after the disclosure of financial results for the first quarter.

**Details of Trades to be executed:**

<b>Demat Account Number</b>	<b>Type of security</b>	<b>Nature of trade (Buy/ Sell)</b>	<b>Proposed date of trade</b>	<b>Number of shares proposed to be traded</b>
IN30154954380273	Equity	Buy	17 November 2022	6
IN30154954380273	Equity	Buy	22 November 2022	6
IN30154954380273	Equity	Buy	29 November 2022	6
IN30154954380273	Equity	Buy	17 February 2023	6
IN30154954380273	Equity	Buy	22 February 2023	6

Vaibhav  
Agarwal

IN30154954380273	Equity	Buy	28 February 2023	6
IN30154954380273	Equity	Buy	17 August 2023	6
IN30154954380273	Equity	Buy	22 August 2023	6
IN30154954380273	Equity	Buy	29 August 2023	6

With respect to the above trading plan, I hereby undertake that I:

- a. shall not trade in the securities of the Company during the cool off period of six months as prescribed in Regulation 5(2)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015;
- b. shall not trade in the securities of the Company during the no trading periods specified herein above;
- c. shall not trade in securities for market abuse;
- d. shall not tender any other trading plan for the period for which the above trading plan is already in force;
- e. shall not commence the trading as per above plan if the Unpublished Price Sensitive Information which is in my possession at present, do not comes into public domain till the time of commencement of trading plan and shall defer the commencement of trading plan till such information becomes generally available;
- f. confirm that this trading plan once approved shall be irrevocable and I shall mandatorily implement the trades contemplated in this trading plan. Further, I shall not deviate from this trading plan or execute any trade in the securities of the Company outside the scope of this trading plan;
- g. am fully aware of, and understand, my obligations under the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time and shall comply with such obligations at all times;
- h. have made complete and true disclosures in the matter.

I request you to kindly do the needful at the earliest.

Signature:

*Vaibhav  
Agarwal*

Name: Vaibhav Agarwal

Designation: Deputy General Manager - Corporate Finance

Place: Bengaluru

**UNDERTAKING / DECLARATION**

(TO BE ACCOMPANIED WITH THE APPLICATION FOR TRADING PLAN)

To  
The Compliance Officer  
The Sandur Manganese & Iron Ores Limited  
'Sandur House', No.9, Bellary Road  
Sadashivanagar, Bangalore- 560 080

Dear Sir,

I, Vaibhav Agarwal, Son of Gopal Agarwal, resident of Vaishnavi Nakshatra, Flat D 101, Yeshwantpur, Bangalore, Karnataka- 560022, hereby declare that I am a Designated person of the Company.

I further declare that I am not in possession of or otherwise privy to any Unpublished Price Sensitive Information upto and at the time of signing of this undertaking.

In case, I get access to or receive Unpublished Price Sensitive Information after the signing of this undertaking/Declaration but before the execution of this transaction I shall inform the Compliance Officer of the change in my position and I would completely refrain from Trading in the Securities of the Company till the time such Unpublished Price Sensitive Information becomes public.

I declare that I had executed contra trade before joining the organisation and being categorised as a Designated Person and shall not execute a contra trade in the next 6 months.

I declare that I have shall not contravene the Company's Code of Conduct to Regulate, Monitor and Report Trading by its Designated Persons and Code for Fair Disclosure of Unpublished Price Sensitive Information.

I am aware that, I shall be liable to face penal consequences set forth in the Code including disciplinary action, in case the above declarations are found to be misleading or incorrect at any time.

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.

I declare that I have made full and true disclosure in the matter

Date: 22/02/2022  
Place: BANGALORE

Name: Vaibhav Agarwal  
Designation: Deputy General Manager - Corporate Finance

Signature: *Vaibhav Agarwal*

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Vaibhav Agarwal  
Deputy General Manager – Corporate Finance  
The Sandur Manganese and Iron Ores Limited  
'Sandur House', No.9, Bellary Road,  
Sadhashivanagar, Bengaluru -560080

22 February 2022

Dear Vaibhav,

### **Sub: Trading Plan Approval**

This is with reference to your email dated 22 February 2022 with respect to application for approval of trading plan. Your trading plan is approved and you may please proceed with the proposed transaction as per details mentioned in your trading plan.

Kindly note that trading plan submitted to us shall be irrevocable and you shall mandatorily implement the trades mentioned in your trading plan. Further, you shall not execute any trade in the securities of the Company outside the scope of this trading plan.

Further as per the Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons of the Company, you are required to disclose to the Company, in formats specified by Securities Exchange Board of India (SEBI), the number of securities traded within two trading days of such transaction.

Please note that you are restricted from executing any contra trade (i.e. sell) for 6 months from the date of the transaction (buy).

Thanking you.

*For The Sandur Manganese & Iron Ores Limited*

  
**Bijan Kumar Dash**  
Company Secretary & Chief Compliance Officer



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