

August 10, 2020

Bombay Stock Exchange Limited
New Trading Ring,
Rotunda Building, P J Towers,
Dalal Street, Fort
Mumbai-400001
Security Code: 535754

National Stock Exchange of India Limited
“Exchange Plaza”, Plot No. C-1, Block G
Bandra – Kurla Complex, Bandra (East),
Mumbai – 400 051
Symbol: ORIENTCEM

Subject: Reporting regarding violations of Code of Conduct under
SEBI (Prohibition of Insider Trading) Regulations, 2015

Dear Sir(s),

With reference to SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, please find enclosed herewith report for violation related to code of conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 in prescribed Annexure – A.

This is for your information and record.

Thanking you,

Yours sincerely,
For **Orient Cement Limited**

Nidhi Bisaria
(Company Secretary)

Encl: Annexure A

Report by Orient Cement 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

Sr. No.	Particulars	Details	
1	Name of the listed company/ Intermediary/Fiduciary	Orient Cement Ltd.	
2	<i>Please tick appropriate checkbox</i> Reporting in capacity of: <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary		
3	A. Details of Designated Person (DP)		
	i. Name of the DP	Mr. Y Srinivasarao	
	ii. PAN of the DP	AAQPY8037M	
	iii. Designation of DP	Senior Vice President	
	iv. Functional Role of DP	Marketing	
	v. Whether DP is Promoter or belongs to Promoter Group	No	
	B. If Reporting is for immediate relative of DP		No
	i. Name of the immediate relative of DP	N.A.	
	ii. PAN of the immediate relative of DP	N.A.	
	C. Details of transaction(s)		
	i. Name of the scrip	ORIENTCEM	
	ii. No of shares traded and value (Rs.) (Date- wise)	10 (Ten) shares purchased by Mr. Y Srinivasarao on 16-7-2020, at total cost of Rs. 637.50	
	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/promotor group to Company under regulation 7 of SEBI	Not Applicable		
ii. Date of intimation of trade(s) by Company to stock exchanges under Regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable		

4	Details of violations observed under Code of Conduct	Mr. Srinivasarao has submitted an apology to the Company stating that he has inadvertently bought 10 shares of the Company during the stipulated trading window closure period. Considering the small quantity of shares purchased and the absence of any <i>mala fide</i> intent, his mistake may be condoned. His intent for purchasing the shares was to participate in the Annual General Meeting (AGM) of the Company to be held on July 31, 2020 for the first time through Video Conferencing.
5	Action taken by Listed company/ Intermediary/ Fiduciary	Warning letter issued to Mr. Y Srinivasarao to forbidding him from entering into any such transaction in future.
6	Reasons recorded in writing for taking action stated above	<p>The Management has considered the matter and based on the reasons cited above and the small number of shares traded by Mr. Srinivasarao, it is obvious that there is no mala fide intent of making profit taking advantage of his position or information.</p> <p>The intent was just to attend the first virtual AGM of the Company. Nevertheless, the management has issued a warning to the designated person to forbidding from entering into any such transaction in future.</p> <p>Mr. Srinivasarao has been associated with the Company for more than 2 decades and is a very senior employee of the Company and no such incident has been reported earlier.</p>
7	Details of the previous instances of violations, if any, since last financial year	No such previous instance

8	<p>If any amount collected for Code of Conduct violation(s) – Since the transaction value involved is very small, no amount has been collected towards penalty for violation of the provisions.</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> <table border="1" data-bbox="337 415 1002 705"> <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> <p>In case of Demand Draft (DD):</p> <table border="1" data-bbox="337 743 1002 947"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Bank Name and branch</td> <td></td> </tr> <tr> <td>DD Number</td> <td></td> </tr> <tr> <td>DD date</td> <td></td> </tr> <tr> <td>DD 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)		Particulars	Details	Bank Name and branch		DD Number		DD date		DD amount (in Rs.)		<p>Not Applicable</p>
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9	Any other relevant information	NIL																						

Yours faithfully,
For **Orient Cement Limited**

August 10, 2020
New Delhi

Nidhi Bisaria
(Company Secretary)
PAN- AHOPB4273D
Email Id: nidhi.bisaria@orientcement.com