



PUNJAB CHEMICALS

AND CROP PROTECTION LTD.

CIN NO. L24231PB1975PLC047063

Regd. Office & Works

Milestone-18, Ambala-Kalka Road, Village & P.O. Bhankharpur, Derabassi, Distt SAS Nagar, Mohali (Punjab)-140201, INDIA
Tele: 01762-280086, 522250, Fax: 01762-280070, E-mail: info@punjabchemicals.com, Website: www.punjabchemicals.com

Date: 13th September, 2021

By E-filing

The Manager
Department of Corporate Services
Bombay Stock Exchange Limited
1st Floor, New Trading Wing,
P.J Towers, Dalal Street Fort
MUMBAI-400 001
Scrip Code: 506618
Tel No.: 022-22728073

The Manager
Listing Department
National Stock Exchange of India Limited
Exchange Plaza, Bandra Kurla Complex,
Bandra (East)
MUMBAI-400 051
Scrip Symbol: PUNJABCHEM
Tel No.: 022-26598235/26598458

Subject: Reporting of violation related to Code of Conduct under SEBI (Prohibition of Insider trading) Regulations, 2015

Dear Sir,

Pursuant to SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated 23rd July 2020, please find enclosed herewith Report of Violation by one of the employee of the Company with regard to "Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons" formulated under the SEBI (Prohibition of Insider trading) Regulations, 2015. The report is being filed as per the format prescribed under the aforesaid circular.

The Company had already initiated penal action by imposing a penalty and issued a Warning letter, even though the unintentional violation was of only 20 equity shares.

Kindly take the same on the record and inform all your constituents accordingly.

Thanking you,

Yours faithfully

For PUNJAB CHEMICALS AND
CROP PROTECTION LIMITED

(CS PUNIT K ABROL)
SR. V.P. (FINANCE) & SECRETARY



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**Report by PUNJAB CHEMICALS AND CROP PROTECTION 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	PUNJAB CHEMICALS AND CROP PROTECTION LIMITED
2	Please tick appropriate checkbox Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	<input type="checkbox"/> Listed Company
3	A. Details of Designated Person (DP)	
	i. Name of the DP	Ms. Darshana Devi Saini
	ii. PAN of the DP	AQOPS9622G
	iii. Designation of DP	Dy. Manager (Secretarial)
	iv. Functional Role of DP	Working as Deputy Manager in the Secretarial Department
	v. Whether DP is Promoter or belongs to Promoter Group	Not applicable
	B. If Reporting is for immediate relative of DP	
	i. Name of the immediate relative of DP	Not applicable
	ii. PAN of the immediate relative of DP	Not applicable
	C. Details of transaction(s)	
	i. Name of the scrip	BSE: 506618 NSE: PUNJABCHEM
	ii. No of shares traded and value (Rs.) (Date- wise)	20 equity shares @ Rs. 1550 per share on 14 th August, 2021.
	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 applicable



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	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	The Designated Person voluntarily informed the Company immediately on becoming known of the violation through an Apology letter which was inadvertent and unintentional. The Designated Person has sold 20 equity shares during the closed trading window in order to understand the online trading, as she got her demat and trading account opened recently.
5	Action taken by Listed company/ Intermediary/ Fiduciary	A Penalty of Rs. 5,000/- was imposed on Designated Person. The same was deposited with the Company. The Designated Person was also issued a warning letter and was advised to take due care and ensure the compliance under the Company's Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons formulated under the SEBI (Prohibition of Insider trading) Regulations, 2015.
6	Reasons recorded in writing for taking action stated above	<p>The matter of trading by the Designated Person during the closed Trading Window was referred to the Chairman of the Board by the Compliance Officer as required under the Company's Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons formulated under the SEBI (Prohibition of Insider trading) Regulations, 2015.</p> <p>The Chairman while going through the situation, apology letter and taking note of her previous record, observed that she had sold only 20 equity shares even though she was holding 400 equity shares of the Company. Further there was no contra trade. The Designated Person explained that the transaction of 20 equity shares was absolutely inadvertent as she was only trying to understand the "App". She was holding 400 equity shares since more than 10 years and she got her new demat cum trading account opened recently to understand the online trading of shares on Stock Exchanges. The Chairman and the Compliance Officer considered her apology and explanation that it was her first and unintentional violation, imposed a penalty of Rs 5000/- and issued a warning letter.</p>



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7	Details of the previous instances of violations, if any, since last financial year	Not applicable, this is the first instance.
8	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online
	ii. Details of transfer/payment in case of Online:	
	Particulars	Details
	Name of the transferor	PUNJAB CHEMICALS AND CROP PROTECTION LIMITED
	Bank Name, branch and Account number	STATE BANK OF INDIA, DERABASSI Current Account No. 32451509175
	UTR/Transaction reference Number	SBIN221251167201--114194 SEBI IPEF
	Transaction date	8 th September, 2021
	Transaction Amount (in Rs.)	Rs. 5000/-
	In case of Demand Draft (DD):	Not applicable
	Particulars	Details
	Bank Name and branch	Not applicable
DD Number		
DD date		
DD amount (in Rs.)		
9	Any other relevant information	Ms. Darshana Devi Saini paid the penalty of Rs 5,000/- vide cheque No. 000039 dated 2nd September, 2021 drawn on HDFC Bank in favour of Punjab Chemicals and Crop Protection Limited which in turn has been deposited with the SEBI-IPEF account on 8th September, 2021

Yours faithfully,

Signature

Name of Compliance Officer: PUNIT K ABROL

PAN: ACGPA6734K

Email ID: pka@punjabchemicals.com

Date: 13th September, 2021

Place: Derabassi