



21st February, 2020

STOCK. EXG/ AS/ 2019-20

The Corporate Relationship
Department
Bombay Stock Exchange
Limited,
1st Floor,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400001

The Listing Department
National Stock Exchange of
India Limited
Exchange Plaza, 5th Floor,
Plot No.-C/1, 'G' Block,
Bandra- Kurla Complex,
Bandra (E)
Mumbai - 400051

Listing Department
The Calcutta Stock
Exchange Ltd.
7 Lyons Range,
Kolkata-700001

Scrip Code : 509480

Scrip Code: BERGEPAIN

Scrip Code : 12529

Dear Sirs,

**Sub : Report for violations related to Code of Conduct
under SEBI (Prohibition of Insider Trading) Regulations, 2015**

This has reference to SEBI circular no. SEBI/HO/ISD/CIR/P/2019/82 dated 19th July, 2019 in relation to Standardizing Reporting of violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

Please find enclosed report for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 by two employees of the Company and action taken by the Company for such violation.

This is for your information and records, please.

Thanking you.

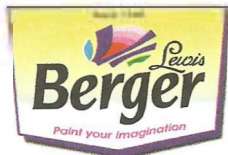
Yours faithfully,
For **BERGER PAINTS INDIA LIMITED**


Aniruddha Sen
Sr Vice President & Company Secretary

Encl.: a/a

BERGER PAINTS INDIA LIMITED

Berger House, 129, Park Street, Kolkata - 700 017, Phone : 2229 9724-28, 2229 6005-06, Fax : 91-33-2249 9009/9729, www.bergerpaints.com
CIN - L51434WB1923PLC004793, E-mail : consumerfeedback@bergerindia.com



**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]

Sr. No.	Particulars	Details
1	Name of the Listed Company/ Intermediary/ Fiduciary	Berger Paints India Limited
2	Please tick appropriate checkbox Reporting in capacity of: <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	
3	Name of the Designated Person (DP) Name of the immediate relative of DP if reporting is for immediate relative	Mr Anish Chawla
4	PAN of the DP PAN of the immediate relative of DP if reporting is for immediate relative	AAKPC9491K
5	Designation of DP	Regional Sales Manager- Automotive
6	Functional Role of DP	Sales
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	BERGEPAIN (NSE), 509480 (BSE), 12529 (CSE)
	b) No of shares traded (which includes pledge) and value (Rs) (Date-wise)	10/02/2020 – 100 shares @ Rs 574.00 = Rs 57,400 11/02/2020 – 100 shares @ Rs 588.80 = Rs 58,880 Total = Rs 1,16,280/-
9	In case value of trade(s) is more than Rs 10 lacs in a calendar quarter –	Not Applicable
	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	
	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
	Details of violations observed under SEBI (Prohibition of Insider Trading) Regulations, 2015	Trading in securities of the Company by Mr Anish Chawla, identified as
	BERGER PAINTS INDIA LIMITED	





		Designated Person by the Company when the trading window was closed pursuant to Schedule B read with sub-regulation (1) of Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015.
11	Action taken by Listed Company/Intermediary/Fiduciary	clawback i.e purchase such shares from the open market, after obtaining the necessary approval of the Compliance Officer within a period of seven trading days.
12	Reasons recorded in writing for taking action stated above	Mr Anish Chawla had expressed that he did not have any malafide intention and these would not be repeated in the future, that he had no intention to violate the Regulations
13	Details of the previous instances of violations, if any, since last financial year	No
14	Any other relevant information	

Yours faithfully,

Name and signature of Compliance Officer
For BERGER PAINTS INDIA LIMITED

Aniruddha Sen
Senior Vice President & Company Secretary

PAN: AKTPS1168C

Email id: aniruddhasen@bergerindia.com

Mobile No.9230043997

Date : 21/02/2020

Place: Kolkata

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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]

Sr. No.	Particulars	Details
1	Name of the Listed Company/ Intermediary/ Fiduciary	Berger Paints India Limited
2	Please tick appropriate checkbox Reporting in capacity of: <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	
3	Name of the Designated Person (DP) Name of the immediate relative of DP if reporting is for immediate relative	Mr Vineet Bhatia
4	PAN of the DP PAN of the immediate relative of DP if reporting is for immediate relative	ACTPB6308D
5	Designation of DP	Sr General Manger –Sales & Marketing
6	Functional Role of DP	Sales & Marketing
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	BERGEPAIN (NSE), 509480 (BSE), 12529 (CSE)
	b) No of shares traded (which includes pledge) and value (Rs) (Date-wise)	04/02/2020 - 200 shares Rs 1,15,389
9	In case value of trade(s) is more than Rs 10 lacs in a calendar quarter –	Not Applicable
	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	
	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
	Details of violations observed under SEBI (Prohibition of Insider Trading) Regulations, 2015	Trading in securities of the Company by Mr Vineet Bhatia, identified as



BERGER PAINTS INDIA LIMITED



		Designated Person by the Company when the trading window was closed pursuant to Schedule B read with sub-regulation (1) of Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015.
11	Action taken by Listed Company/Intermediary/Fiduciary	clawback i.e purchase such shares from the open market, after obtaining the necessary approval of the Compliance Officer within a period of seven trading days.
12	Reasons recorded in writing for taking action stated above	Mr Vineet Bhatia had expressed that he did not have any malafide intention and these would not be repeated in the future, that he had no intention to violate the Regulations
13	Details of the previous instances of violations, if any, since last financial year	No
14	Any other relevant information	

Yours faithfully,

Name and signature of Compliance Officer
For BERGER PAINTS INDIA LIMITED

Aniruddha Sen
Senior Vice President & Company Secretary

PAN: AKTPS1168C

Email id: aniruddhasen@bergerindia.com

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