



November 09, 2021

To,
The Manager,
Listing & Compliance,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai - 400 001.

Ref: Scrip Code - 506405

Sub: Reporting of violation related to Code of Conduct under Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 read with SEBI circular dated July 23,2020.

Dear Sir/Madam,

With respect to the above subject, please find attached herewith the report of violation of Code of Conduct under Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 read with SEBI circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23,2020, in prescribed form as Annexure A.

We request you to take note of the above

Thanking you,
For The Dharamsi Morarji Chemical Company Ltd

Omkar C. Mhamunkar
Company Secretary & Compliance Officer
Membership No. ACS 26645

Encl : As Above

CIN NUMBER: L24110MH1919PLC000564

Report by The Dharamsi Morarji Chemical Company 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	The Dharamsi Morarji Chemical Company Limited
2	Please tick appropriate checkbox Reporting in capacity of : <input 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	Mr. Somnath Patil
	ii. PAN of the DP	BFSP7083N
	iii. Designation of DP	Manager - R & D
	iv. Functional Role of DP	R & D
	v. Whether DP is Promoter or belongs to Promoter Group	No
	B. If Reporting is for immediate relative of DP	Not Applicable
	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	DHARAMSI (Scrip Code: 506405)
	ii. No of shares traded and value (Rs.) (Date-wise)	Sale of 10 Shares on 6 th October, 2021
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter	Not Applicable
	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
	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	<p>1. <u>Trading when Trading Window is Closed:</u></p> <p>Sold 10 shares during closure pf trading window (Trading Window was closed from 1st October, 2021 till 48 hours after conclusion of Board meeting for adoption of results for the quarter and half year ended 30th September, 2021 i.e. tentatively upto 14th November, 2021)</p> <p>2. <u>Execution of Contra Trade Reverse Transaction within 6 months.</u> (On 29th September, 2021 purchased, 3</p>

		Shares @ 325.95/- and 7 Shares @ 326.00/-) and sold the entire shareholding on 6 th October, 2021 and made profit of Rs. 560.15 only.
5	Action taken by Listed company/ Intermediary/ Fiduciary	The Matter was placed before the Audit Committee and the Board at its meeting held on 1 st November, 2021 and having regard to the recommendation of the Audit Committee, Code of Conduct, quantum, transaction, relevant information, relevant documents and explanation & undertaking provided by the designated person, the Board has taken following action: a) Directed to remit profit made from the said transaction i.e. Rs. 560.15, to be rounded off to Rs. 570/- to SEBI IEPF Account. b) In view of the volume of trade and the Designated Person's clarifications regarding the trading being inadvertent, the warning letter was issued for exercising due diligence in compliance with the Code of Conduct.
6	Reasons recorded in writing for taking action stated above	Designated Person clarified that transaction was carried out of inadvertence and provided assurance that he will exercise due diligence in future.
7	Details of the previous instances of violations, if any, since last financial year	NIL
8	If any amount collected for Code of Conduct violation(s)	Rs. 570/- (Rupees Five Hundred and Seventy Only)
	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	Mr. Somnath Patil
	Bank Name, Branch Account number	Axis Bank, Bharuch 913010052811065
	UTR/Transaction reference Number	130821731226
	Transaction Date	4 th November, 2021
	Transaction Amount (In Rs.)	Rs. 570.00
	In case of Demand Draft (DD): Not Applicable	
	Particulars	Details
	Bank Name and Branch	-
	DD No	-
	DD Date	-

	DD Amount (in Rs.)	-
9	Amy other relevant information	Nil

Thanking you,
For The Dharamsi Morarji Chemical Company Ltd

Omkar C. Mhamunkar
Company Secretary & Compliance Officer
Place : Mumbai
Date : 9th November, 2021
PAN : ASHPM2025J
Email ID : omhamunkar@dmcc.com