



February 18, 2022

<b>The National Stock Exchange of India Ltd.</b> Listing Department Exchange Plaza, Bandra Kurla Complex, Bandra (East), Mumbai - 400 051  <b>Company Symbol: DHARAMSI</b>	<b>BSE Limited</b> Department of Corporate Services Floor 25, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai – 400 001  <b>Scrip Code : 506405</b>
--	---

**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	<b>Name of the listed company/ Intermediary/Fiduciary</b>	The Dharamsi Morarji Chemical Company Limited
2	<b>Please tick appropriate checkbox Reporting in capacity of :</b> <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	Mr. Dharmendra Chaudhari
	ii. PAN of the DP	BFSP7083N
	iii. Designation of DP	Manager – EHS
	iv. Functional Role of DP	EHS (Environment, Health and Safety)
	v. Whether DP is Promoter or belongs to Promoter Group	No
	<b>B. If Reporting is for immediate relative of DP</b>	Not Applicable
	i. Name of the immediate relative of DP	Not Applicable
	ii. PAN of the immediate relative of DP	Not Applicable
	<b>C. Details of transaction(s)</b>	
	i. Name of the scrip	DHARAMSI (Scrip Code: 506405)
	ii. No of shares traded and value (Rs.) (Date- wise)	Sale of 10 Shares on 3 <sup>rd</sup> December, 2021
	<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter</b>	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	<u>Execution of Contra Trade Reverse Transaction within 6 months. (On 3<sup>rd</sup> December, 2021 sold 10 Shares @ 304.55/- and incurred loss of <b>Rs. 47.63/-</b></u>
5	Action taken by Listed company/ Intermediary/ Fiduciary	The Matter was placed before the Audit Committee and the Board at its meeting held on 11 <sup>th</sup> February, 2022 and having regard to the recommendation of the Audit Committee, Code of Conduct, quantum, transaction, intent and relevant information provided by the designated person, the Board has taken following action:  a) In view of the volume of trade and the Designated Person's clarifications regarding the trading being inadvertent,

		<p>the warning letter was issued for exercising due diligence in compliance with the Code of Conduct.</p> <p><b>Note :</b> Since Designated Person has left the Company the warning letter is issued to him on his registered email as well as courier to his residential address.</p> <p>As a part of Exit Interview Process, the designated person was also informed about not to trade in the Company's Securities for the next 6 months from the date of leaving the company.</p>																						
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)	Not Applicable																						
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Not Applicable																						
	ii. Details of transfer/payment In case of Online <table border="1" data-bbox="272 1039 1385 1290"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Name of the transferor</td> <td>NA</td> </tr> <tr> <td>Bank Name, Branch Account number</td> <td>NA</td> </tr> <tr> <td>UTR/Transaction reference Number</td> <td>NA</td> </tr> <tr> <td>Transaction Date</td> <td>NA</td> </tr> <tr> <td>Transaction Amount (In Rs.)</td> <td>NA</td> </tr> </tbody> </table> In case of Demand Draft (DD): Not Applicable <table border="1" data-bbox="272 1350 1366 1565"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Bank Name and Branch</td> <td>-</td> </tr> <tr> <td>DD No</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	NA	Bank Name, Branch Account number	NA	UTR/Transaction reference Number	NA	Transaction Date	NA	Transaction Amount (In Rs.)	NA	Particulars	Details	Bank Name and Branch	-	DD No	-	DD Date	-	DD Amount (in Rs.)	-
Particulars	Details																							
Name of the transferor	NA																							
Bank Name, Branch Account number	NA																							
UTR/Transaction reference Number	NA																							
Transaction Date	NA																							
Transaction Amount (In Rs.)	NA																							
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 : 18<sup>th</sup> February, 2022  
 PAN : ASHPM2025J  
 Email ID : [omhamunkar@dmcc.com](mailto:omhamunkar@dmcc.com)