

Castrol India Limited
CIN L23200MH1979PLC021359
Technopolis Knowledge Park,
Mahakali Caves Road,
Chakala, Andheri (East),
Mumbai - 400 093.

Tel: (022) 6698 4100
Fax: (022) 6698 4101
https://www.castrol.com/en_in/india.html
Customer Service Toll Free No. : 1800 222 100 / 1800 209 8100



22 October 2020

To,

**The BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai 400001.**

**National Stock Exchange of India Limited,
Exchange Plaza, Bandra Kurla Complex,
Bandra East,
Mumbai – 400051.**

Scrip Code: 500870

Scrip Symbol: CASTROLIND

Dear Sir/Madam,

Sub: Reporting under SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135, dated July 23, 2020

This is to inform you that pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“the SEBI Regulations”), the Castrol India Limited Code of Conduct to Regulate, Monitor and Report Trading by Insiders and Designated Persons (“the Company Rules”) and SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, details of non-adherence of the Company Rules by Designated Persons, along with the actions taken by the Company thereon are enclosed as “**Annexure A**” to this letter.

We would like to submit that the reported non-adherence is not material in comparison to the total paid up equity share capital of the Company.

This is for your information.

Yours faithfully,

For Castrol India Limited

**CHANDANA
DHAR**

Digitally signed by
CHANDANA DHAR
Date: 2020.10.22 14:20:39
+05'30'

Chandana Dhar

Company Secretary and Compliance Officer

Encl. As above



Annexure A

Report by Castrol India 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 | Castrol India 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 | Atul Ashar |
| | ii. PAN of the DP | AALPA6203A |
| | iii. Designation of DP | Deputy Manager, Retirals & Insurance |
| | iv. Functional Role of DP | Deputy Manager, Retirals & Insurance |
| | v. Whether DP is Promoter or belongs to Promoter Group | No |
| | 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 | Castrol India Limited BSE Scrip Code : 500870 NSE Scrip Symbol : CASTROLIND |
| | ii. No of shares traded and value (Rs.) (Date- wise) | Sale of shares : • 25 September 2020 (Qty 300) @ INR109.55 • 29 September 2020 (Qty 200) @ INR109.80 |
| | 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 |
| | 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 | Sale of Five Hundred (500) shares during the closure of trading window |
| 5 | Action taken by Listed company/ Intermediary /Fiduciary | i) Show Cause notice and caution letter issued. |



| | | ii) Further investigation done by the Compliance Officer iii) Matter discussed in detail between management and the Compliance Officer iv) A penalty of Rs.10,000/- imposed, which has since been deposited with SEBI | | | | | | | | | | | | |
|--------------------------------------|---|---|---------|------------------------|-----------------------|--------------------------------------|------------------------------------|----------------------------------|----------------------------|--------------------|-----------------|-----------------------------|----------|--|
| 6 | Reasons recorded in writing for taking action stated above | Same as (5) above | | | | | | | | | | | | |
| 7 | Details of the previous instances of violations, if any, since last financial year | None | | | | | | | | | | | | |
| 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: | | | | | | | | | | | | | |
| | <table border="1"><thead><tr><th>Particulars</th><th>Details</th></tr></thead><tbody><tr><td>Name of the transferor</td><td>Castrol India Limited</td></tr><tr><td>Bank Name, branch and Account number</td><td>BANK OF INDIA, A/C 12210210000008,</td></tr><tr><td>UTR/Transaction reference number</td><td>NFT-102001431GN00001XXXXXX</td></tr><tr><td>Transaction date</td><td>20 October 2020</td></tr><tr><td>Transaction Amount (in Rs.)</td><td>10,000/-</td></tr></tbody></table> | Particulars | Details | Name of the transferor | Castrol India Limited | Bank Name, branch and Account number | BANK OF INDIA, A/C 12210210000008, | UTR/Transaction reference number | NFT-102001431GN00001XXXXXX | Transaction date | 20 October 2020 | Transaction Amount (in Rs.) | 10,000/- | |
| Particulars | Details | | | | | | | | | | | | | |
| Name of the transferor | Castrol India Limited | | | | | | | | | | | | | |
| Bank Name, branch and Account number | BANK OF INDIA, A/C 12210210000008, | | | | | | | | | | | | | |
| UTR/Transaction reference number | NFT-102001431GN00001XXXXXX | | | | | | | | | | | | | |
| Transaction date | 20 October 2020 | | | | | | | | | | | | | |
| Transaction Amount (in Rs.) | 10,000/- | | | | | | | | | | | | | |
| | iii. In case of Demand Draft (DD):- | | | | | | | | | | | | | |
| | <table border="1"><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 | Bank Name and branch | | DD Number | | DD date | | DD amount (in Rs.) | | | | |
| Particulars | Details | | | | | | | | | | | | | |
| Bank Name and branch | | | | | | | | | | | | | | |
| DD Number | | | | | | | | | | | | | | |
| DD date | | | | | | | | | | | | | | |
| DD amount (in Rs.) | | | | | | | | | | | | | | |
| 9 | Any other relevant information | | | | | | | | | | | | | |

Yours faithfully,
For Castrol India Limited

**CHANDANA
DHAR**

Digitally signed by
CHANDANA DHAR
Date: 2020.10.22
14:19:17 +05'30'

Chandana Dhar
Company Secretary & Compliance Officer
Email ID: Chandana.dhar@bp.com

Mumbai, 22 October 2020