

18th May, 2021

To, Dy. General Manager **Department of Corporate Services,** BSE Ltd., P. J. Towers, Dalal Street, Fort, Mumbai - 400 001

Ref: Scrip Code: 532296

To. The Manager - Listing, National Stock Exchange of India Ltd., Plot No. C/1, G Block, Bandra Kurla Complex, Bandra (E), Mumbai - 400 051

**Ref: Scrip Name: GLENMARK** 

Dear Sirs,

Sub:- Reporting under SEBI (Prohibition of Insider Trading) Regulations, 2015 for violation of Company's **Insider Trading Policy** 

This is to inform you that in terms of the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("the SEBI Regulations"), Policy for Trading in the securities of Glenmark Pharmaceuticals Limited by an Insider' ("the Policy"), and SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, the details of violation of the Policy by the Designated Persons along with the action taken by the Company thereon is enclosed as "Annexure A" to this letter.

Request you to kindly take the same on record.

Thanking you.

Yours faithfully, For Glenmark Pharmaceuticals Limited

**Company Secretary & Compliance Officer** 

Encl.: As above



## Annexure A

## I. Report by Glenmark Pharmaceuticals 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	Glenmark Pharmaceuticals Limited			
2,	Please tick appropriate Checkbox.				
	Reporting in capacity of:				
	✓ Listed Company				
	Intermediary				
	Fiduciary				
3.	A. Details of Designated Person (DP)				
	i. Name of the Designated Person (DP)	Mr. Brijlal Motwani			
	ii. PAN of the DP	AGAPM2076L			
	iii. Designation of DP	Executive Vice President & Global Head			
	iv. Functional Role of DP	Formulation Operations			
	v. Whether DP is Promoter or belongs to Promoter	No			
	B. If Reporting is for immediate relative of DP				
	i. Name of the immediate relative of DP	N.A			
	ii. PAN of the immediate relative of DP	N.A			
	C. Details of transaction(s)				
	i. Name of the scrip	GLENMARK			
	ii. No of shares traded and value (Rs.) (Date- wise)	Purchased 200 shares in January, 2021 for Rs. 96,680 during the trading window closure and sold 100 shares for Rs. 50,311 in second week of February, 2021, i.e execution of contra trade for 100 shares, amounting to Profit of Rs. 1,971.00			
	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.	N.A			
	ii. Date of intimation of trade(s) by Company to Stock Exchanges under Regulation 7 of SEBI (PIT) Regulations, 2015.	N.A			
4.	Details of violations observed under Code of Conduct	Trading in shares of the Company during the closure of Trading window and entering into contra trade transaction.			





5.	Action taken by Listed Company	Being the first instance of violation of Insider Trading code by the Designated Person, the Audit Committee issued a strict warning letter in this behlaf to the employee and further suggested that he shall compulsorily attend the training which will be held for Designated	
6.	Reasons recorded in writing for taking action stated above		Person in the future.  The action stated above was taken after considering the fact that it was first instance of violation on the part of the Designated Person and the quantum of shares involved being non substantial portion.
7.	Details of previous instances of violations, if any, since last financial year		N.A
8.	If any amount collected for Code		
		T	
	i. Mode of transfer to SEBI - IPEF ii. Details of transfer/payment	(Online/Demand Draft)	N.A N.A
	ii. Details of transfer/payment In case of Online:		
	ii. Details of transfer/payment In case of Online:  Particulars	(Online/Demand Draft)  Details	
	ii. Details of transfer/payment  In case of Online:  Particulars  Name of the transferor		
	ii. Details of transfer/payment  In case of Online:  Particulars  Name of the transferor  Bank Name, branch and		
	ii. Details of transfer/payment  In case of Online:  Particulars  Name of the transferor  Bank Name, branch and Account number		
	ii. Details of transfer/payment  In case of Online:  Particulars  Name of the transferor  Bank Name, branch and Account number  UTR/Transaction reference		
	ii. Details of transfer/payment  In case of Online:  Particulars  Name of the transferor  Bank Name, branch and Account number  UTR/Transaction reference  Transaction date		
	ii. Details of transfer/payment  In case of Online:  Particulars  Name of the transferor  Bank Name, branch and Account number  UTR/Transaction reference	Details	
	ii. Details of transfer/payment  In case of Online:  Particulars  Name of the transferor  Bank Name, branch and Account number  UTR/Transaction reference  Transaction date  Transaction Amount (in Rs.)	Details	
	ii. Details of transfer/payment  In case of Online:  Particulars Name of the transferor Bank Name, branch and Account number UTR/Transaction reference Transaction date Transaction Amount (in Rs.)  In case of Demand Draft (DD):	Details	
	ii. Details of transfer/payment  In case of Online:  Particulars  Name of the transferor  Bank Name, branch and Account number  UTR/Transaction reference  Transaction date  Transaction Amount (in Rs.)  In case of Demand Draft (DD):  Particulars	Details	
	ii. Details of transfer/payment  In case of Online:  Particulars  Name of the transferor  Bank Name, branch and Account number  UTR/Transaction reference  Transaction date  Transaction Amount (in Rs.)  In case of Demand Draft (DD):  Particulars  Bank Name and branch	Details	
	ii. Details of transfer/payment  In case of Online:  Particulars  Name of the transferor  Bank Name, branch and Account number  UTR/Transaction reference  Transaction date  Transaction Amount (in Rs.)  In case of Demand Draft (DD):  Particulars  Bank Name and branch  DD Number	Details	





## II. Report by Glenmark Pharmaceuticals 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	Glenmark Pharmaceuticals Limited			
2.	Please tick appropriate Checkbox.				
	Reporting in capacity of:				
	✓ Listed Company				
	Intermediary				
	Fiduciary				
3.	A. Details of Designated Person (DP)				
	i. Name of the Designated Person (DP)	Mr. Mangesh Arun Chaudhari			
	ii. PAN of the DP	ACLPC4127H			
	iii. Designation of DP	Manager			
	iv. Functional Role of DP	Finance			
	v. Whether DP is Promoter or belongs to Promoter	No			
	B. If Reporting is for immediate relative of DP				
	i. Name of the immediate relative of DP	N.A			
	ii. PAN of the immediate relative of DP	N.A			
	C. Details of transaction(s)				
	i. Name of the scrip	GLENMARK			
	ii. No of shares traded and value (Rs.) (Date- wise)	Purchased 50 shares on 24.02.2021			
		for Rs. 23,349 and sold 25 shares			
		for Rs. 11,945 on 08.03.2021			
		resulting into contra trade,			
		amounting to Profit of Rs. 270.00			
	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	N.A			
	DP/director/promoter/promoter group to				
	Company under Regulation 7 of SEBI (PIT) Regulations, 2015.				
	ii. Date of intimation of trade(s) by Company to	N.A			
	Stock Exchanges under Regulation 7 of SEBI (PIT)				
	Regulations, 2015.				
4.	Details of violations observed under Code of Conduct	Contra trade transaction			
5.	Action taken by Listed Company/ Intermediary/ Fiduciary	Being the first instance of violation			
		of Insider Trading code by the			
		Designated Person, the Audit			
	7	Committee issued a strict warning			
		letter in this behlaf to the employee			
		and further suggested that he shall			
		compulsorily attend the training			
		which will be held for Designated			
		Person in the future.			





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6.	Reasons recorded in writing for taking action stated above		The action stated above was taken
			after considering the fact that it
			was first instance of violation on
			the part of the Designated Person
			and the quantum of shares involved
			being non substantial portion.
7.	Details of previous instances of violations, if any, since last financial year		N.A
8.	If any amount collected for Code	of Conduct violation(s):	
	i. Mode of transfer to SEBI - IPEF	N.A	
	ii. Details of transfer/payment		N.A
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	In case of Online:		
	in case of offinite.		
	Particulars	Details	
	Name of the transferor		
	Bank Name, branch and		
	Account number		
	UTR/Transaction reference		
	Transaction date		
	Transaction Amount (in Rs.)		
	In case of Demand Draft (DD):		
	Particulars	Details	
		Details	
	Bank Name and branch		
	DD Number		
	DD date		
	DD amount (in Rs.)		
9.	Any other relevant information	N.A	
٦.	Any other relevant information		INIO

