



**COCHIN MINERALS AND RUTILE LTD. (100% E. O. U.)**  
(AN ISO 9001 : 2015 COMPANY)

Regd. Office: P. B. No.73, VIII/224, Market Road, Alwaye-683 101, Kerala, India  
Phone: Off : 0484 - 2626789 (6 Lines) Fact : 0484 - 2532186, 2532207 Fax : 0484-2625674  
E-mail : cmrlexim@cmrlindia.com, cmrlexim@dataone.in CIN: L24299KL1989PLC005452

02020B/CMRL/2020/670

July 29, 2020

B S E Limited,  
Regd. Office: Floor 25,  
P J Towers, Dalal Street,  
Mumbai – 400 001

Ph: 022-2272 1233/1234

STOCK CODE – COCHRDM 513353  
DEMATISIN - INE105D01013

Dear Sirs,

Sub : Filing of Report for violation of Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

This is to inform you that one of our Directors, Mr. Mathew M Cherian had sold 1,153 equity shares of the company during 'No Trading Period', viz between 03.10.2019 and 10.10.2019 in violation of the Code of Conduct in terms of SEBI Regulations, 2015. The details of the action taken by the Audit Committee and Board of Directors of the Company is enclosed in Annexure A.

Kindly take the above on record.

Thanking you,

Yours faithfully,  
for COCHIN MINERALS AND RUTILE LIMITED,

Suresh Kumar P,  
C G M (Finance) & Company Secretary



GSTIN: 32AABCC1950D1ZD

**An Eco-Friendly model company**

39576

**Report by Cochin Minerals And Rutile Ltd 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*

*For Intermediary/Fiduciary: Schedule C read with Regulation 9(1) and 9(2) of SEBI (Prohibition of  
Insider Trading) Regulations, 2015]*

| Sr.No | Particulars                                                                                                                                                                                                                                              | Details                                                                                                                                                                            |
|-------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1     | Name of the Listed Company/intermediary/Fiduciary                                                                                                                                                                                                        | Cochin Minerals and Rutile Ltd                                                                                                                                                     |
| 2     | Please tick appropriate checkbox<br>Reporting in capacity if:<br><input type="checkbox"/> Listed Company<br><input type="checkbox"/> Intermediary<br><input type="checkbox"/> Fiduciary                                                                  | Listed Company                                                                                                                                                                     |
| 3     | Name of the Designated Person(DP)<br>(Name of the immediate relative of DP if reporting is for immediate relative)                                                                                                                                       | Mathew M. Cherian                                                                                                                                                                  |
| 4     | PAN of the DP<br>(PAN of the immediate relative of DP if reporting is for immediate relative)                                                                                                                                                            | ANKPM8063E                                                                                                                                                                         |
| 5     | Designation of DP                                                                                                                                                                                                                                        | Director                                                                                                                                                                           |
| 6     | Functional Role of DP                                                                                                                                                                                                                                    | NIL                                                                                                                                                                                |
| 7     | Whether DP is Promoter/Promoter Group/holding CXO level position(e.g. CEO,CFO,CTO etc)                                                                                                                                                                   | Promoter                                                                                                                                                                           |
| 8     | Transaction Details                                                                                                                                                                                                                                      |                                                                                                                                                                                    |
|       | a) Name of Scrip                                                                                                                                                                                                                                         | COCHINM(513353) EQ                                                                                                                                                                 |
|       | b) No. of Shares traded(which include pledge) and value (Rs.)                                                                                                                                                                                            | 1153 shares at Rs. 1,94,585.60                                                                                                                                                     |
| 9     | In case value of trade(s) is more than Rs. 10 lacs in a calendar quarter-<br>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 | NA                                                                                                                                                                                 |
|       | b) Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI(Prohibition of Insider Trading) Regulations, 2015                                                                                                             | NA                                                                                                                                                                                 |
| 10    | Details of violation of trade(s) observed under SEBI(Prohibition of Insider Trading) Regulations, 2015                                                                                                                                                   | Sale of shares during <b>No Trading Period</b>                                                                                                                                     |
| 11    | Action taken by Listed company/Intermediary/Fiduciary                                                                                                                                                                                                    | Show cause notice (SCN) was issued to the director by the Compliance officer on receipt of Form C from the director and it was tabled before the Audit Committee and the committee |



|    |                                                                                     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
|----|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    |                                                                                     | proceeded the investigation against the director and as an initial step and reply to that SCN was tabled before the Audit committee.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| 12 | Reasons recorded in writing for taking actions stated above                         | Audit committee on receipt of reply by DP and on investigation of matter noted that the offense by DP is first time offence and there was no material transaction and DP has confirmed in writing that DP does not possess any unpublished price sensitive information due to Chinese wall policy of the Company. Nevertheless due to violation of no trading period, and considering the limited number of shares transacted, the amount involved and only a marginal notional profit of Rs.11714/- was made, the Committee has recommended to the Board to levy a penalty of not less than three times the profit made by DP on transaction and accordingly a sum of Rs.50,000/- was levied and paid by Mr. Mathew M. Cherian. He was also censured and directed to be careful in future. |
| 13 | Details of the previous instances of violations, if any, since last financial year. | NIL                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| 14 | Any other relevant matter                                                           | NIL                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

Yours Faithfully,

Date: 25.07.2020  
Place: Always

Name of Compliance Officer: Suresh Kumar P

Signature: 

PAN: ADWPP3828Q  
Email ID: cmrlexim@cmrlindia.com  
Mobile Number: 9447021114