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February 25, 2022

**BSE Limited**

Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort,  
Mumbai 400001  
**Scrip Code: 532504**

**National Stock Exchange of India Limited**

Exchange Plaza,  
Bandra Kurla Complex, Bandra (East),  
Mumbai 400051  
**Symbol: NAVINFLUOR EQ**

Dear Sir / Madam,

**Sub.: Inadvertent Trading by Designated Person**

It has come to the attention of the Compliance Officer of the Company that 10 equity shares of Rs. 2 each of the Company, has been acquired by the portfolio manager of Mr. Mohan M. Nambiar, Non-Executive Director, during window closure period.

On seeking explanation, Mr. Nambiar has informed the Company that the trade was carried out by the portfolio manager without his knowledge. Mr. Nambiar had given no instruction to conduct the trade. The portfolio manager at his discretion took the decision to conduct the trade. Further, he submitted that he had not made any gain/profit by this inadvertent transaction as the cost of acquisition per share of this nominal 10 shares was Rs. 3,961.20/- while immediately on re-opening of the window, the market price was much low. Even the quantity of shares was insignificant.

After considering the reply given by Mr. Nambiar, the Committee constituted under the Code of Practices and Procedures for fair disclosure of Unpublished Price Sensitive Information ('the Code') deemed it fit to levy penalty of Rs. 10,000/- even though it was merely a technical or venial and unintentional breach of the provisions of the said Code.

In terms of SEBI (Prohibition of Insider Trading) Regulations, 2015, the Code of Conduct to regulate, monitor and report trading in the securities of the Company by Designated Persons and their Immediate Relatives and SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, the details of transgressions of the Company's Code along with action taken by the Company thereon, are enclosed herein as Annexure A.

Kindly take the information on record.

Thanking you,

**For NAVIN FLUORINE INTERNATIONAL LIMITED**

**Niraj B. Mankad**  
**President Legal and Company Secretary**

*Encl.: a/a*



**Annexure A**

**Report by Navin Fluorine International 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	Navin Fluorine International Limited
2	<i>Please tick appropriate checkbox</i> Reporting in capacity of : <input checked="" type="checkbox"/> <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. T.M.M. Nambiar
	ii. PAN of the DP	ABZPN8804B
	iii. Designation of DP	Non-Executive Director
	iv. Functional Role of DP	Non-Executive Director
	v. Whether DP is Promoter or belongs to Promoter Group	No
	<b>B. If Reporting is for immediate relative of DP</b>	
	i. Name of the immediate relative of DP	NA
	ii. PAN of the immediate relative of DP	NA
	<b>C. Details of transaction(s)</b>	
	i. Name of the scrip	BSE: 532504 NSE: NAVINFLUOR EQ
	ii. No. of shares traded and value (Rs.) (Date- wise)	10 shares of Face Value Rs. 2/- each, purchased on October 11, 2021 at Rs. 3,961.20/- per share, aggregating to Rs. 39,612/-
	<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter</b>	
	i. Date of intimation of trade(s) by concerned DP / director / promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	NA



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	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	NA
4	Details of violations observed under Code of Conduct	Purchase of 10 shares of the Company during Window Closure Period as per details mentioned in 3(C)(ii) above
5	Action taken by Listed company/ Intermediary/ Fiduciary	Levy of Penalty of Rs. 10,000/- as per Company's Code
6	Reasons recorded in writing for taking action stated above	Contravention of Company's Code, even though the trade was unintentional for nominal shares, without any gain / profits. The shares have been acquired by Portfolio Manager under Portfolio Management Services without the knowledge of the DP.
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)	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online
	ii. Details of transfer/payment	
	<b>Particulars</b>	<b>Details</b>
	Name of the transferor	Navin Fluorine International Limited
	Bank Name, branch and Account number	HDFC Bank, Fort A/c No.: 00600310004335
	UTR/Transaction reference Number	N056221848106221
	Transaction date	February 25, 2022
Transaction Amount (in Rs.)	Rs. 10,000/-	
9	Any other relevant information	-

Yours faithfully,

Niraj B. Mankad  
Compliance Officer  
PAN: AAUPM0351N  
Email ID: niraj.mankad@nfil.in

Mumbai, February 25, 2022