

Ref: Syn/CS/PIT/SE/NOV 2020/01

Syngene International Limited

Biocon SEZ, Biocon Park, Plot No. 2 & 3, Bommasandra Industrial Area, IV Phase, Jigani Link Road, Bengaluru 560 099, Karnataka, India

T +91 80 6775 8000 F +91 80 6775 8808

CIN: L85110KA1993PLC01493

www.syngeneintl.com

| То, | То, | |
|-----------------------------------|--|--|
| The Manager, | The Manager, | |
| BSE Limited | National Stock Exchange of India Limited | |
| Corporate Relationship Department | Corporate Communication Department | |
| Dalal Street, Mumbai – 400 001 | Bandra (EAST), Mumbai – 400 051 | |
| | | |
| Scrip Code: 539268 | Scrip Symbol: SYNGENE | |

Dear Sir/Madam,

November 27, 2020

Subject: Reporting under SEBI (Prevention of Insider Trading) Regulations, 2015
Re: Intimation of Violation under Insider Trading Code by a Designated Employee

In terms of SEBI circular SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, please find attached as Annexure A, the report by the Company for violation on Code of Conduct for Prevention of Insider Trading under SEBI (Prevention of Insider Trading) Regulations, 2015.

We would like to submit that the reported deviation is not material in relation to the total paid up equity share capital of the Company.

You are requested to take this intimation on record.

Thanking you.

Yours faithfully,

For **SYNGENE INTERNATIONAL LIMITED**

Priyadarshini Mahapatra

Company Secretary & Compliance Officer

Encl: As above



Annexure A

Report format by Syngene International Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

| Sr. | SEBI (Prohibition of Insider Trading) Regulations, 2015. Particulars Details | | | | |
|-----|---|---|--|--|--|
| No. | . ar siculars | Setuns | | | |
| 1 | Name of the listed company/ | Syngene International Limited | | | |
| _ | Intermediary/ Fiduciary | Syngene international Elimited | | | |
| 2 | Please tick appropriate checkbox | Listed Company | | | |
| 2 | Reporting in capacity of: | Listed Company | | | |
| | Listed Company | | | | |
| | · · · | | | | |
| | ☐ Intermediary ☐ Fiduciary | | | | |
| | • | | | | |
| 3 | A. Name of the Designated Person (DP) | Pahul Caval | | | |
| | a. Name of the DP ii. PAN of the DP | Rahul Goyal | | | |
| | iii. Designation of DP | BHOPG1714P | | | |
| | iv. Functional Role of DP | Deputy Manager | | | |
| | v. Whether DP is Promoter or belongs | Finance and Accounts | | | |
| | to Promoter Group | No | | | |
| | B. If Reporting is for immediate relative | | | | |
| | of DP | NA | | | |
| | i. Name of the immediate relative of DP | | | | |
| | ii. PAN of the immediate relative of DP | | | | |
| | | | | | |
| | C. Details of transaction(s) | | | | |
| | i. Name of the scrip | Syngene International Limited | | | |
| | ii. No of shares traded and value (Rs.) | 50 shares purchased on October 23, 2020 | | | |
| | (Date-wise) | @Rs. 535/- per share (Rs. 26,750/- in total) | | | |
| | | 50 shares sold on October 26, 2020 Rs. | | | |
| | | 552.5/- per share (Rs. 27, 625/- in total) | | | |
| | D. In case value of trade(s) is more than | Not Applicable | | | |
| | 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 | | | | |
| | ii. Date of intimation of trade(s) by | | | | |
| | Company to stock exchanges under | | | | |
| | regulation 7 of SEBI (PIT) Regulations, | | | | |
| | 2015 | The Designated Person had asserbed 50 | | | |
| 4 | Details of violations observed under Code of Conduct | The Designated Person had purchased 50 | | | |
| | of Conduct | shares on Friday, October 23, 2020, from the | | | |
| | | market. This was the last day of trading window closure for disclosure of financial | | | |
| | | results, which was disclosed on October 21, | | | |
| | | 2020. On realization of his mistake, the | | | |
| | | designated person sold the 50 shares on | | | |
| | | designated person sold the 30 shales on | | | |

Syngene

| also reported his mistake to the Company The above trading was in violation of th Syngene Insider Trading Code. 5 Action taken by Listed Company/ Intermediary/ Fiduciary • Warning notice issued and th designated person was directed t attend a training on the Syngen Code of Prevention of Inside Trading • Levied a penalty of Rs. 1,000/- to b paid in favour of SEBI- IPEF. 6 Reasons recorded in writing for taking action stated above This being the first instance of violation be the Employee, and considering the facts of the case and the explanation given by th Employee, the above actions were taken. None 7 Details of the previous instances of violations, if any, since last financial year 8 If any amount collected for Code of Conduct violation(s) i. Mode of transfer to SEBI - IPEF (Online/ Demand Draft) ii. Details of transfer/payment In case of Online: Particulars Name of the transferor Bank Name, branch and Account number Electronic city branch, A/c #: 50100313436250 UTR/Transaction reference Number Transaction date November 18, 2020 | 1 | | | | |
|--|---|--|--|---|--|
| Intermediary/ Fiduciary designated person was directed to attend a training on the Syngen Code of Prevention of Inside Trading Levied a penalty of Rs. 1,000/- to be paid in favour of SEBI- IPEF. Reasons recorded in writing for taking action stated above This being the first instance of violation being the Employee, and considering the facts of the Employee, and considering the facts of the case and the explanation given by the Employee, the above actions were taken. Details of the previous instances of violations, if any, since last financial year If any amount collected for Code of Conduct violation(s) i. Mode of transfer to SEBI - IPEF (Online/Demand Draft) ii. Details of transfer/payment In case of Online: Particulars Name of the transferor Bank Name, branch and Account number Electronic city branch, A/c #: 50100313436250 UTR/Transaction 032314516948 Transaction date November 18, 2020 | | | Monday, October 26, 2020. The employee also reported his mistake to the Company. The above trading was in violation of the Syngene Insider Trading Code. | | |
| action stated above the Employee, and considering the facts of the case and the explanation given by the Employee, the above actions were taken. 7 Details of the previous instances of violations, if any, since last financial year 8 If any amount collected for Code of Conduct violation(s) i. Mode of transfer to SEBI - IPEF (Online/Demand Draft) ii. Details of transfer/payment In case of Online: Particulars Details | 5 | | • Levied a penalty of Rs. 1,000/- to be | | |
| violations, if any, since last financial year 8 | 6 | _ | This being the first instance of violation by the Employee, and considering the facts of the case and the explanation given by the | | |
| Conduct violation(s) i. Mode of transfer to SEBI - IPEF (Online/ Demand Draft) ii. Details of transfer/payment In case of Online: Name of the transferor Bank Name, branch and Account number UTR/Transaction reference Number Transaction date November 18, 2020 | 7 | · | None | | |
| (in Rs.) | 8 | Conduct violation(s) i. Mode of transfer to SEBI - IPEF (Online/ Demand Draft) ii. Details of transfer/payment | Name of the transferor Bank Name, branch and Account number UTR/Transaction reference Number Transaction date Transaction Amount | Rahul Goyal HDFC bank, Electronic city branch, A/c #: 50100313436250 032314516948 November 18, | |
| In case of Demand Draft (DD): Particulars Details | | In case of Demand Draft (DD): | Bank Name and branch DD Number DD date | | |
| 8 Any other relevant information None | 8 | Any other relevant information | None | | |

Yours faithfully,

For Syngene International Limited

Priyadarshini Mahapatra

Company Secretary & Compliance Officer

PAN: AJJPM0077B

Email Id: Priyadarshini.Mahapatra@syngeneintl.com

Mobile Number: +91 96995 53081

Date: November 27, 2020 Place: Bengaluru