



THE INDIA CEMENTS LIMITED

Corporate Office : Coromandel Towers, 93, Santhome High Road, Karpagam Avenue,
R.A. Puram, Chennai - 600 028. Phone : 044-2852 1526, 2857 2100
Fax : 044-2851 7198, Grams : 'INDCEMENT'
CIN : L26942TN1946PLC000931

SH/

29.06.2024

BSE Limited
Corporate Relationship Dept., First Floor
New Trading Ring, Rotunda Building
Phiroze Jeejeebhoy Towers
Dalai Street, Fort
MUMBAI 400 001.

National Stock Exchange of India Limited
Exchange Plaza, 5th Floor
Plot No.C/1, G Block
Bandra-Kurla Complex
Bandra (E)
MUMBAI 400 051.

Scrip Code: 530005

Scrip Code: INDIACEM

Dear Sirs,

Sub.: Reporting of violation as per SEBI (Prohibition of Insider Trading) Regulations, 2015

In terms of SEBI (Prohibition of Insider Trading) Regulations, 2015 ('the SEBI PIT Regulations'), ICL Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons ('ICL Code of Conduct') and SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated 23rd July 2020, the details of violation under ICL Code of Conduct and the action taken by the Company is enclosed as Annexure-A.

Thanking you,

Yours faithfully,
for **THE INDIA CEMENTS LIMITED**

COMPANY SECRETARY

Encl.: As above





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Annexure - A

Report by The India Cements Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

[Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

I.

Sr. No.	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	The India Cements Limited
2	<i>Please tick appropriate checkbox</i> Reporting in capacity of : <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	
3	A. Details of Designated Person (DP)	
	i. Name of the DP	Mr.R.Parthasarathy
	ii. PAN of the DP	AEWPR2174Q
	iii. Designation of DP	Chief Marketing Officer
	iv. Functional Role of DP	Head of Marketing
	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	NA
	ii. PAN of the immediate relative of DP	NA
	C. Details of transaction(s)	
	i. Name of the scrip	Derivatives of The India Cements Limited
	ii. No of shares traded and value (Rs.) (Date- wise)	28.11.2023 – Purchase of 11,600 Call Options for Rs.27,96,760/- 29.11.2023 – Sale of 11,600 Call Options for Rs.28,30,400/-
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter	





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Sr. No.	Particulars	Details
	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 since the Company has not received any intimation of trade from the DP. The Company is complying with the requirements of System Driven Disclosures (SDD) and the details of trade are available at the websites of the Stock Exchanges.
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Hence, manual filing of disclosures as required under Regulation 7(2) (a) & (b) of SEBI (PIT) Regulations, 2015 is not mandatory.
4	Details of violations observed under Code of Conduct	DP has not obtained pre-clearance for entering the said transaction and executed a contra trade before expiry of the contract, in violation of ICL Code of Conduct.
5	Action taken by Listed company/ Intermediary/ Fiduciary	The Company had intimated the DP to remit the profit of Rs.33,640/- accrued through the aforesaid transaction together with a penalty of Rs.10,000/- imposed by Audit Committee at its meeting held on 22.06.2024 to Investor Protection and Education Fund (IPEF) administered by SEBI under SEBI Act, 1992.
6	Reasons recorded in writing for taking action stated above	DP submitted that: i) he had engaged a Fund/Portfolio Manager for making strategic investments on his behalf and authorized them to have direct access and operate his trading account. ii) he had inadvertently through his Fund Manager, among other trades, took a contra-position in derivatives of the Company and made a profit of Rs.33,640/-. iii) the transaction was unintentional and carried out by mistake and neither he nor his Fund Manager possessed any unpublished price sensitive information on the dates of the transactions. iv) The transactions were not carried out during trading window closure period. v) he did not obtain pre-clearance as the trade was inadvertently executed. vi) this was his first instance of non-compliance of the ICL Code of Conduct. vii) he has assured that he shall be more vigilant and shall avoid recurrence of violation under ICL Code of Conduct.
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)	Net Banking



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ii. Details of transfer/payment case of Online:		
Particulars	Details	
Name of the transferor	Mr.R.Parthasarathy	
Bank Name, branch and Account number	Net Banking	
UTR/Transaction referenceNumber	240626188143260	
Transaction date	26.06.2024	
Transaction Amount (in Rs.)	Rs.43,640/- (Rupees Forty Three Thousand Six Hundred Forty Only) (Rs.33,640/- Profit and Rs.10,000/- Penalty)	
In case of Demand Draft (DD): Not Applicable		
9	Any other relevant information	Nil

II.

Sr. No.	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	The India Cements Limited
2	<i>Please tick appropriate checkbox</i> Reporting in capacity of : <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	
3	A. Details of Designated Person (DP)	
	i. Name of the DP	Mr.T.S.Raghupathy
	ii. PAN of the DP	AADPR7018J
	iii. Designation of DP	Director (till 10.08.2023)
	iv. Functional Role of DP	Non-Executive Director
	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	Equity Shares of The India Cements Limited (INDIACEM, 530005)
	ii. No of shares traded and value (Rs.) (Date- wise)	09.08.2023 - Sale of 10,000 equity shares for Rs.22,07,000/-
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter	
	i. Date of intimation of	DP has not submitted any intimation of trade to the



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	trade(s) by concerned DP/director/promoter/promoter group to Company under Regulation 7 of SEBI (PIT) Regulations, 2015	Company. The Company is complying with the requirements of System Driven Disclosures (SDD) and the details of trade are available at the websites of the Stock Exchanges.
	ii. Date of intimation of trade(s) by Company to stock exchanges under Regulation 7 of SEBI (PIT) Regulations, 2015	Hence, manual filing of disclosures as required under Regulation 7(2) (a) & (b) of SEBI (PIT) Regulations, 2015 is not mandatory.
4	Details of violations observed under Code of Conduct	DP has sold 10,000 equity shares of the Company on 09.08.2023 before the trading window was opened.
5	Action taken by Listed company/ Intermediary/ Fiduciary	The Audit Committee of the Company at its meeting held on 22.06.2024 imposed a penalty of Rs.10000/- to DP for violation of ICL Code of Conduct. The Company had advised the DP to remit the penalty to IPEF administered by SEBI under SEBI Act, 1992.
6	Reasons recorded in writing for taking action stated above	DP submitted that: i) after obtaining pre-clearance from the Company, he had advised his stock broker to sell 10,000 equity shares once the trading window was opened for dealing in securities of the Company. ii) his stock broker had inadvertently executed the trade 50 minutes before opening of the trading window. The mistake was committed due to miscommunication among staff members of his stock broker. iii) The execution of the transaction was unintentional and there were no ulterior motives in execution of it and had happened without his knowledge. iv) he did not possess any unpublished price sensitive information at the time of trading and the said transaction was done by accident without any malafide intention/wrong motive. v) he always abided by the ICL Code of Conduct and had obtained pre-clearance for execution of the transaction in compliance with the Code. vi) the time gap between the execution of trade and the opening of trading window was very marginal and this was his first instance of non-compliance of the ICL Code of Conduct.
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)	UPI





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ii. Details of transfer/payment case of Online:	
Particulars	Details
Name of the transferor	Mr.T.S.Raghupathy
Bank Name, branch and Account number	Through UPI
UTR/Transaction referenceNumber	240628188292735
Transaction date	28.06.2024
Transaction Amount (in Rs.)	Rs.10,000/- (Rupees Ten Thousand Only)
In case of Demand Draft (DD): Not Applicable	
9	Any other relevant information Nil

Yours faithfully,

Date: Chennai
Place: 29.06.2024

S.SRIDHARAN
PAN: AASPS3003P
Email ID: ssridharan@indiacements.co.in

