

IRSL:STEXCH:2021-22:  
November 03, 2021

**National Stock Exchange of India Limited**  
Exchange Plaza, 5<sup>th</sup> Floor,  
Bandra - Kurla Complex,  
Bandra (E), Mumbai - 400 051.  
Thru.: **NEAPS**  
Stock Code NSE: **INDORAMA**

**BSE Limited**  
Floor 25, P. J. Towers,  
Dalal Street,  
Mumbai - 400 001.  
Thru.: **BSE Listing Centre**  
Stock Code BSE: **500207**

**ISIN: INE156A01020**

**Indo Rama Synthetics (India) Limited - CIN L17124MH1986PLC166615**

**Sub: Reporting of violation of Code of Conduct for Prohibition of Insider Trading**

**Ref: SEBI Circular No. SEBI/HO/ISD/CIR/P/2020/135 dated July 23, 2020**

Dear Sir/ Madam,

We would like to inform that one of the Designated Person of Indo Rama Synthetics (India) Limited ("Company"), have traded in the equity shares of the Company in violation of the Code read with SEBI (Prohibition of Insider Trading) Regulations, 2015 ("PIT Regulations").

In compliance with SEBI Circular No. SEBI/HO/ISD/CIR/P/2020/135 dated July 23, 2020, a report for the aforesaid by the Designated Person is annexed as "**Annexure - A**".

Kindly take the above information on record.

Thanking you.

Yours faithfully,  
for **Indo Rama Synthetics (India) Limited**

**Pawan Kumar Thakur**  
**Company Secretary and Compliance Officer**



Encl.: As above

## Reporting of violations of Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015

| Sr. No. | Particulars  | Details   |
|---------|--|---|
| 1       | Name of the listed Company/<br>Intermediary/ Fiduciary   | Indo Rama Synthetics (India) Limited  |
| 2       | Please tick appropriate checkbox<br>Reporting in capacity of:<br><input checked="" type="checkbox"/> Listed Company<br><input type="checkbox"/> Intermediary<br><input type="checkbox"/> Fiduciary | Listed on BSE & NSE   |
| 3       | <b>A. Details of Designated Person (DP)</b>  |   |
|         | i. Name of the DP  | Mr. Rajiv Kumar Girotra   |
|         | ii. PAN of the DP  | AEYPG0882Q  |
|         | iii. Designation of DP   | Sr. V P   |
|         | iv. Functional Role of DP  | Head of Marketing   |
|         | 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  | Not Applicable  |
|         | ii. PAN of the immediate relative of DP  | Not Applicable  |
|         | <b>C. Details of transaction(s)</b>  |   |
|         | i. Name of the scrip   | NSE Symbol - INDORAMA<br>BSR Symbol - 500207  |
|         | ii. No. of shares traded and value (Rs.)<br>(Date- wise)   | As per the sheet annexed as <b>Annexure-B</b> containing the details of trades in violation of Code of Conduct for Prohibition of Insider Trading, (hereinafter referred to as "Code").   |
|         | <b>D. In case value of trade(s) is more than Rs.10 Lakhs 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  | October 28, 2021  |
|         | ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015  | October 28, 2021  |
| 4       | Details of violations observed under Code of Conduct   | Trading in securities of the Company which is in excess of the threshold (i.e., 2,000 in number or Rs. 10 Lakhs in value, whichever is lower, in a month) without taking pre-clearance for such trades from the Compliance Officer.<br><br>Transaction undertaken during the Trading Window closure period. |



INDO RAMA SYNTHETICS (INDIA) LTD

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Registered Office & Manufacturing Complex : A-31, MIDC Industrial Area, Butibori, Nagpur - 441122, Maharashtra, India. Tel : 07104-663000 / 01, Fax : 07104-663200

E-mail : corp@indorama-ind.com • Website : www.indoramaindia.com

CIN : L17124MH1986PLC166615

|                                 |  |   |  |
|---------------------------------|--|---|--|
| 5                               | Action taken by Listed Company/<br>Intermediary/ Fiduciary                         | The Audit Committee of the Company had advised the Company Secretary and Compliance Officer of the Company to issue a warning letter to Mr. Rajiv Kumar Girotra to strictly adhere to the provisions of the Code and also to remain diligent and be in complete compliance of the Code henceforth to avoid stringent actions for any subsequent violations. Accordingly, warning letter has been issued to him. |  |
| 6                               | Reasons recorded in writing for taking action stated above                         | Mr. Rajiv Kumar Girotra had admitted that the trades executed by him in violation of the Code read with SEBI ("PIT Regulations"), were unintentional and solely because of ignorance without any malafide intent and his failure in understanding the nitty gritty of the framework of Code.  |  |
| 7                               | Details of the previous instances of violations, if any, since last financial year | First-time identification of violation of the Code and the PIT Regulations.   |  |
| 8                               | If any amount collected for Code of Conduct violation(s)                           | Mr. Rajiv Kumar Girotra purchased and sold the entire 22,000 Equity shares acquired during the closure of Trading Window.   |  |
|                                 | i. Mode of transfer to SEBI - IPEF (Online/ Demand Draft)                          | None  |  |
|                                 | ii. Details of transfer/ payment   | Not Applicable.   |  |
|                                 | <b>In case of Online:</b>  |   | Mr. Rajiv Kumar Girotra incurred a loss of Rs.46,000/- (Indian Rupees Forty Six Thousand only) by trading of the securities of the Company during the period of closure of Trading Window. |
|                                 | <b>Particulars</b>   | <b>Details</b>  |  |
|                                 | Name of the transferor   | Not   |  |
|                                 | Bank Name, branch and Account number   | Applicable  |  |
|                                 | UTR/ Transaction reference Number  |   |  |
|                                 | Transaction date   |   |  |
|                                 | Transaction Amt. (in Rs.)  |   |  |
|                                 |  |   |  |
| <b>In case of Demand Draft:</b> |  |   |  |
| <b>Particulars</b>              | <b>Details</b>   |   |  |
| Bank Name and branch            | Not  |   |  |
| DD Number                       | Applicable   |   |  |
| DD date                         |  |   |  |
| DD Amount (in Rs.)              |  |   |  |
| 9                               | Any other relevant information   | None  |  |

For Indo Rama Synthetics (India) Limited

*Pawan Kumar Thakur*

**Pawan Kumar Thakur**  
**Company Secretary and Compliance Officer**

Encl.: As above.



## ANNEXURE - B

| Date of Trading | No. of shares traded | Value in (Rs.) | Type of violation                                |
|-----------------|----------------------|----------------|--|
| 01/10/2021      | 4,000                | 1,96,750/-     | Buy shares during closure of trading window      |
| 06/10/2021      | 2,000                | 1,02,935.55    | Buy shares during closure of trading window      |
| 18/10/2021      | 6,000                | 3,07,600       | Buy shares during closure of trading window      |
| 19/10/2021      | 6,000                | 3,04,974.45    | Buy shares during closure of trading window      |
| 20/10/2021      | 4,000                | 1,98,100       | Buy shares during closure of trading window      |
| 25/10/2021      | 8,000                | 3,88,800       | Sale Shares during the closure of Trading window |
| 26/10/2021      | 8,000                | 3,90,400       | Sale Shares during the closure of Trading window |
| 27/10/2021      | 6,000                | 2,95,020       | Sale Shares during the closure of Trading window |

Yours faithfully,  
For Indo Rama Synthetics (India) Limited



*Pawan Kumar Thakur*

PAN: ADWPT2236N  
Pawan Kumar Thakur

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Date: November 03, 2021