



Ref. No: HSCL / Stock-Ex/2022-23/69

Date: 01/11/2022

E-mail: monika@himadri.com

Ref: Listing Code: 500184 (Equity) BSE Limited Department of Corporate Services P. J. Towers, 25 th Floor, Dalal Street, Mumbai- 400 001	Ref: Listing Code: HSCL National Stock Exchange of India Ltd Exchange Plaza, C-1, Block-G Bandra Kurla Complex, Bandra (E) Mumbai- 400 051
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Sub-Reporting of Violation relating to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

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

Dear Sir/Madam

In terms of Company's Code of Conduct (To Regulate, Monitor and Report of Trading by Designated Persons) ("Insider Trading Code") read with Schedule B and Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015, we hereby submit a report in respect of violation of Insider Trading Code of the Company as per format specified by SEBI vide its Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

You are requested to kindly take the above information on your records.

Thanking you.

Yours faithfully,
For Himadri Speciality Chemical Ltd

(Company Secretary &
Compliance Officer)
ACS: 29322

Enclo: a/a



(I) Report by Himadri Speciality Chemical Ltd for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

[For listed companies: Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015

Sr. No.	Particulars	Details											
1	Name of the listed company	Himadri Speciality Chemical Ltd											
2	Please tick appropriate checkbox Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company											
3	A. Details of Designated Person (DP)												
	i. Name of the DP	Mr. Dinesh Kumar Verma											
	ii. PAN of the DP	AEAPV4159F											
	iii. Designation of DP	General Manager											
	iv. Functional Role of DP	Finance & Accounts											
	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	Himadri Speciality Chemical Ltd NSE Listing Code: HSCL BSE Listing Code: 500184											
	ii. No of shares traded and value (Rs.) (Date- wise)	<table border="1"> <thead> <tr> <th>Date</th> <th>Transaction</th> <th>No of Share</th> <th>Value (Rs)</th> </tr> </thead> <tbody> <tr> <td>11/12/2020</td> <td>Buy</td> <td>200</td> <td>8,565.05</td> </tr> <tr> <td>25/02/2021</td> <td>Sale</td> <td>200</td> <td>9,726.00</td> </tr> </tbody> </table>	Date	Transaction	No of Share	Value (Rs)	11/12/2020	Buy	200	8,565.05	25/02/2021	Sale	200
Date	Transaction	No of Share	Value (Rs)										
11/12/2020	Buy	200	8,565.05										
25/02/2021	Sale	200	9,726.00										

Himadri Speciality Chemical Ltd

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 Corp. Office: 8, India Exchange Place, 2nd Floor, Kolkata – 700 001, India
 Tel: 91-33-2230-9953, 2230-4363, Fax: 91-33-2230-9051, Website: www.himadri.com



D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter		
	<p>i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015</p> <p>ii. Date of intimation of trade(s) by Company to stock exchanges under Regulation 7 of SEBI (PIT) Regulations, 2015</p>	
	Not Applicable	
	Not Applicable	
4	Details of violations observed under Code of Conduct	Execution of Contra Trades in shares of the Company by the Dp.
5	Action taken by Listed company	The Company had issued a warning letter and instructed to remit 100% of the profit made i.e Rs. 1,160.95 to SEBI for credit to the Investor Protection and Education Fund.
6	Reasons recorded in writing for taking action stated above	Violation of Insider Trading Code of Company- execution of contra trade.
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)	
	<p>i. Mode of transfer to SEBI –</p> <p>ii. Details of transfer/payment In case of Online</p> <p>iii. In case of Demand Draft (DD):</p>	<p>Online Payment on 01.11.2022</p> <p>Rs 1,160.95 (Transaction Ref No 230515837514)</p> <p>Name of the Transferor: Dinesh Kumar Verma</p> <p>Bank Name: ICICI Bank</p> <p>A/c No :000601545264</p>
9	Any other relevant information	Nil

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(II) Report by Himadri Speciality Chemical Ltd for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

[For listed companies: Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015

Sr. No.	Particulars	Details															
1	Name of the listed company	Himadri Speciality Chemical Ltd															
2	Please tick appropriate checkbox Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company															
3	A. Details of Designated Person (DP)																
	i. Name of the DP	Mr. Abhishek Damani															
	ii. PAN of the DP	ALGPD2176B															
	iii. Designation of DP	AGM - Finance & Accounts															
	iv. Functional Role of DP	Finance & Accounts															
	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	Himadri Speciality Chemical Ltd NSE Listing Code: HSCL BSE Listing Code: 500184															
	ii. No of shares traded and value (Rs.) (Date- wise)	<table border="1"> <thead> <tr> <th>Date</th> <th>Trans action</th> <th>No of Share</th> <th>Per Share</th> <th>Value (Rs)</th> </tr> </thead> <tbody> <tr> <td>30/03/2021</td> <td>Sale</td> <td>2640</td> <td>41.85</td> <td>1,10,484</td> </tr> <tr> <td>24/09/2021</td> <td>Buy</td> <td>10</td> <td>49.70</td> <td>497</td> </tr> </tbody> </table>	Date	Trans action	No of Share	Per Share	Value (Rs)	30/03/2021	Sale	2640	41.85	1,10,484	24/09/2021	Buy	10	49.70	497
	Date	Trans action	No of Share	Per Share	Value (Rs)												
30/03/2021	Sale	2640	41.85	1,10,484													
24/09/2021	Buy	10	49.70	497													
D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter																	

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	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
	ii. Date of intimation of trade(s) by Company to stock exchanges under Regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable
4	Details of violations observed under Code of Conduct	Execution of Contra Trades in shares of the Company by the Dp.
5	Action taken by Listed company	The Company had issued a warning letter and cautioned him not to repeat any violation in future under the Code.
6	Reasons recorded in writing for taking action stated above	Violation of Insider Trading Code of Company- execution of contra trade.
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 –	Nil
	ii. Details of transfer/payment In case of Online	
	iii. In case of Demand Draft (DD):	Nil
		Nil
9	Any other relevant information	Nil

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Sr. No.	Particulars	Details																						
1	Name of the listed company	Himadri Speciality Chemical Ltd																						
2	Please tick appropriate checkbox Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company																						
3	A. Details of Designated Person (DP)																							
	i. Name of the DP	Mr. Bhutnath Ghosh																						
	ii. PAN of the DP	AKZPG7906J																						
	iii. Designation of DP	DGM - Operations																						
	iv. Functional Role of DP	CTD																						
	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	Himadri Speciality Chemical Ltd NSE Listing Code: HSCL BSE Listing Code: 500184																						
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Date		Transaction	No of Share	Value (Rs)																				
26.05.2020		Buy	1	47.73																				
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	D. In case value of trade(s) is more than 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	Not Applicable
	ii. Date of intimation of trade(s) by Company to stock exchanges under Regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable
4	Details of violations observed under Code of Conduct	Execution of Trades in shares of the Company by the Dp during the closure of trading window.
5	Action taken by Listed company	The Company had issued a warning letter and cautioned him not to repeat any violation in future under the Code.
6	Reasons recorded in writing for taking action stated above	Violation of Insider Trading Code of Company- execution of trade during closure of Trading Window
7	Details of the previous instances of violations, if any, since last financial year	First-time identification of violation of the Insider Trading Code and SEBI (PIT) regulations, 2015.
8	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI –	NA
	ii. Details of transfer/payment In case of Online	
	iii. In case of Demand Draft (DD):	NA
9	Any other relevant information	Nil

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(IV) Report by Himadri Speciality Chemical Ltd for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

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1	Name of the listed company	Himadri Speciality Chemical Ltd										
2	Please tick appropriate checkbox Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company										
3	A. Details of Designated Person (DP)											
	i. Name of the DP	Mr. Mukesh Goenka										
	ii. PAN of the DP	AGEPG9538P										
	iii. Designation of DP	General Manager - Finance & Accounts										
	iv. Functional Role of DP	Accounts										
	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	Himadri Speciality Chemical Ltd NSE Listing Code: HSCL BSE Listing Code: 500184										
	ii. No of shares traded and value (Rs.) (Date- wise)	<table border="1"> <thead> <tr> <th>Date</th> <th>Transaction</th> <th>No of Share</th> <th>Value (Rs)</th> </tr> </thead> <tbody> <tr> <td>30/04/2020</td> <td>Sale</td> <td>602</td> <td>30527</td> </tr> </tbody> </table>				Date	Transaction	No of Share	Value (Rs)	30/04/2020	Sale	602
Date		Transaction	No of Share	Value (Rs)								
30/04/2020		Sale	602	30527								

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	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter	
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8	If any amount collected for Code of Conduct violation(s)	
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9	Any other relevant information	Nil

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2	Please tick appropriate checkbox Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company								
3	A. Details of Designated Person (DP)									
	i. Name of the DP	Mr. Satish Kumar Chhabra								
	ii. PAN of the DP	ACAPC4946K								
	iii. Designation of DP	President-Material Management								
	iv. Functional Role of DP	CTD								
	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	Himadri Speciality Chemical Ltd NSE Listing Code: HSCL BSE Listing Code: 500184								
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04/02/2022	Sale	4500	286501.85							

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2	Please tick appropriate checkbox Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company											
3	A. Details of Designated Person (DP)												
	i. Name of the DP	Mr. Satyaki Banerjee											
	ii. PAN of the DP	BAXPB5546E											
	iii. Designation of DP	General Manager- R&D and Tech. Ser											
	iv. Functional Role of DP	CBD											
	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											
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Date	Transaction	No of Share	Value (Rs)										
07.01.2021	Buy	315	15,340.5										
07.05.2021	Sale	315	14,978.25										

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7	Details of the previous instances of violations, if any, since last financial year	First-time identification of violation of the Insider Trading Code and SEBI (PIT) regulations, 2015.
8	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI –	NA
	ii. Details of transfer/payment In case of Online	
	iii. In case of Demand Draft (DD):	NA
9	Any other relevant information	Nil

Yours faithfully,
For Himadri Speciality Chemical Ltd

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