



Ref. No: HSCL / Stock-Ex/2022-23/71

Date: 03/11/2022

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



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. Sudipta Bhattacharya																											
	ii. PAN of the DP	AQKPB6097L																											
	iii. Designation of DP	DGM - 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>Transaction</th> <th>No of Share</th> <th>Value (Rs)</th> </tr> </thead> <tbody> <tr> <td>20/07/2020</td> <td>Sale</td> <td>1</td> <td>50.41</td> </tr> <tr> <td>16/08/2021</td> <td>Sale</td> <td>6427</td> <td>3,14,555</td> </tr> <tr> <td>17/09/2021</td> <td>Buy</td> <td>1</td> <td>51.07</td> </tr> <tr> <td>21/01/2022</td> <td>Buy</td> <td>5</td> <td>316.37</td> </tr> <tr> <td>21/01/2022</td> <td>Sale</td> <td>1</td> <td>59.47</td> </tr> <tr> <td>18/04/2022</td> <td>Sale</td> <td>1</td> <td>73.83</td> </tr> </tbody> </table>	Date	Transaction	No of Share	Value (Rs)	20/07/2020	Sale	1	50.41	16/08/2021	Sale	6427	3,14,555	17/09/2021	Buy	1	51.07	21/01/2022	Buy	5	316.37	21/01/2022	Sale	1	59.47	18/04/2022	Sale	1
Date	Transaction	No of Share	Value (Rs)																										
20/07/2020	Sale	1	50.41																										
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Himadri Speciality Chemical Ltd

(Formerly known as Himadri Chemicals & Industries Limited) CIN: L27106WB1987PLC042756
 Regd. Office: 23A, Netaji Subhas Road, 8th Floor, Kolkata – 700 001, India
 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 and also execute trade during the closure of trading window.
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. 10.55 to SEBI for credit to the Investor Protection and Education Fund. 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 and execute trade during the 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)	
	<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 02.11.2022 Rs 10.55 (Transaction Ref No 230614080617)</p> <p>Name of the Transferor: Sudipta Bhattacharya</p> <p>Bank Name: ICICI Bank</p> <p>A/c No :000601536252</p>
9	Any other relevant information	Nil

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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)			
	vi. Name of the DP	Mr. Sukanta Dam		
	vii. PAN of the DP	ANFPD6401N		
	viii. Designation of DP	DGM - Operations		
	ix. Functional Role of DP	CTD		
	x. Whether DP is Promoter or belongs to Promoter Group	No		
	B. If Reporting is for immediate relative of DP			
	iii. Name of the immediate relative of DP	Not Applicable		
	iv. PAN of the immediate relative of DP	Not Applicable		
	C. Details of transaction(s)			
iii. Name of the scrip	Himadri Speciality Chemical Ltd NSE Listing Code: HSCL BSE Listing Code: 500184			
iv. No of shares traded and value (Rs.) (Date- wise)	Date	Transaction	No of Share	Value (Rs)
	07.02.2022	Buy	19	1280.60

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D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter		
	<p>iii. 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>iv. 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 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	NA
	iii. In case of Demand Draft (DD):	NA
9	Any other relevant information	Nil

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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)											
	xi. Name of the DP	Mr. Swapan Kumar Sengupta										
	xii. PAN of the DP	AJFPS5041M										
	xiii. Designation of DP	AGM - Engineering (Consultant)										
	xiv. Functional Role of DP	Instrumentation										
	xv. Whether DP is Promoter or belongs to Promoter Group	No										
	B. If Reporting is for immediate relative of DP											
	v. Name of the immediate relative of DP	Not Applicable										
	vi. PAN of the immediate relative of DP	Not Applicable										
	C. Details of transaction(s)											
	v. Name of the scrip	Himadri Speciality Chemical Ltd NSE Listing Code: HSCL BSE Listing Code: 500184										
vi. 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>28.01.2022</td> <td>Sell</td> <td>3000</td> <td>178740</td> </tr> </tbody> </table>				Date	Transaction	No of Share	Value (Rs)	28.01.2022	Sell	3000	178740
	Date	Transaction	No of Share	Value (Rs)								
28.01.2022	Sell	3000	178740									

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D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter		
	<p>v. 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>vi. 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 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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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)	
	xvi. Name of the DP	Mr. Arup Kumar Kundu
	xvii. PAN of the DP	AJGPK8263Q
	xviii. Designation of DP	DGM - Engineering
	xix. Functional Role of DP	CBD
	xx. Whether DP is Promoter or belongs to Promoter Group	No
	B. If Reporting is for immediate relative of DP	
	vii. Name of the immediate relative of DP	Not Applicable
	viii. PAN of the immediate relative of DP	Not Applicable
	C. Details of transaction(s)	
	vii. Name of the scrip	Himadri Speciality Chemical Ltd NSE Listing Code: HSCL BSE Listing Code: 500184
viii. No of shares traded and value (Rs.) (Date- wise)	As per Annexure -A	

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D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter		
	<p>vii. 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>viii. 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 and also execute trade during the closure of trading window.
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. 67,769/- to SEBI for credit to the Investor Protection and Education Fund. 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 and also execute trade during the 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)	
	<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 03-11-2022 Rs 67,769/- (Transaction Ref No 230716746485)</p> <p>Name of the Transferor: Arup Kumar Kundu</p> <p>Bank Name: ICICI Bank</p> <p>A/c No :024801000356</p>
9	Any other relevant information	Nil

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Annexure-A

No of shares traded and value of Mr. Arup Kumar Kundu

Date	Transaction	No of Share	Value (Rs.)
11-Mar-20	Buy	500	20410
24-Apr-20	Buy	300	14160
20-Aug-21	Buy	1000	45150
22-Oct-21	Buy	500	27700
22-Oct-21	Buy	500	27700
04-Nov-21	Buy	1000	51900
20-Dec-21	Buy	500	21100
03-Feb-22	Sale	2500	165000
29-Mar-22	Sale	1000	70061.9
04-Apr-22	Sale	500	41350
25-Apr-22	Sale	500	37275

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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)	
	xxi. Name of the DP	Mr. Debashis Ghosh
	xxii. PAN of the DP	AKHPD7198M
	xxiii. Designation of DP	Asst. Vice President - Operations
	xxiv. Functional Role of DP	CBD
	xxv. Whether DP is Promoter or belongs to Promoter Group	No
	B. If Reporting is for immediate relative of DP	
	ix. Name of the immediate relative of DP	Not Applicable
	x. PAN of the immediate relative of DP	Not Applicable
	C. Details of transaction(s)	
	ix. Name of the scrip	Himadri Speciality Chemical Ltd NSE Listing Code: HSCL BSE Listing Code: 500184
x. No of shares traded and value (Rs.) (Date- wise)	As per Annexure -B	

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	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter	
	ix. 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
	x. 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.
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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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Annexure-B

No of shares traded and value of Mr. Debashis Ghosh

Date	Transaction	No of Share	Value (Rs)
27-May-20	Sell	100	4,735
07-Jul-20	Sell	90	4,532
08-Jul-20	Sell	85	4,556
12-Aug-20	Buy	100	4,575
19-Aug-20	Sell	100	5,320
20-Aug-20	Sell	100	5,850
28-Sep-20	Sell	92	5,094
29-Oct-20	Buy	100	4,870
02-Nov-20	Buy	100	4,570
13-Jan-21	Sell	100	5,270
10-May-21	Sell	100	5,130
26-May-21	Sell	100	5,330
27-May-21	Sell	100	5,445
08-Jun-21	Sell	100	5,530
10-Jun-21	Sell	100	5,600
17-Jun-21	Sell	100	5,820
17-Jun-21	Sell	100	6,135
18-Jun-21	Sell	100	5,790
21-Jun-21	Sell	100	5,750
23-Jun-21	Sell	100	5,960
04-Aug-21	Buy	100	4,900
04-Oct-21	Sell	100	5,305
21-Oct-21	Sell	200	10,870
10-Jan-22	Sell	200	10,400
13-Jan-22	Sell	200	10,610
14-Jan-22	Sell	200	10,690
17-Jan-22	Sell	200	11,290
19-Jan-22	Sell	200	11,700
20-Jan-22	Sell	200	12,200
20-Jan-22	Sell	200	13,000
25-Jan-22	Sell	200	11,280
27-Jan-22	Sell	200	11,700
03-Feb-22	Sell	200	12,900
03-Feb-22	Sell	200	13,490
07-Feb-22	Sell	200	13,700
01-Apr-22	Sell	200	15,450
04-Apr-22	Sell	100	8,235
02-Jun-22	Sell	100	7,185

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