



SIFL/SECT/SP/21-22/52
July 15, 2021

The Secretary
BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Mumbai - 400 001
Fax: 022-2272 2037/2039/2041/3121
BSE Scrip Code: 523756

The Secretary
National Stock Exchange of India Limited
Exchange Plaza, 5th Floor, Plot no. C/1
G Block, Bandra-Kurla Complex
Bandra (E), Mumbai - 400 051
Fax: 022-2659 8237/38; 2659 8347/48
NSE Symbol: SREINFRA

Dear Sir,

Sub: Report for violation related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

Pursuant to SEBI Circular no. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, please find enclosed herewith the Report (in prescribed format) by the Company for violation related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 (Srei Insider Code) by a Designated Person, being an employee of Material Subsidiary of the Company and his immediate relative, namely Spouse, as observed by the Compliance Officer.

You are requested to kindly take on record the aforesaid.

Thanking you.

Yours faithfully,
For **Srei Infrastructure Finance Limited**

Manoj Kumar
Compliance Officer

Encl: as above

Srei Infrastructure Finance Limited

CIN: L29219WB1985PLC055352

Registered Office: 'Vishwakarma' 86C, Topsia Road (South), Kolkata - 700046

Tel.: +91.33.22850112-15, 61607734, Fax: +91.33.2285 7542/8501

Email: corporate@srei.com Website: www.srei.com



Report by Srei Infrastructure Finance Limited 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

For Intermediaries/ Fiduciaries: Schedule C read with Regulation 9(1) and 9(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

Sr. No.	Particulars	Details								
1.	Name of the listed company/ Intermediary/Fiduciary	Srei Infrastructure Finance Limited (SIFL)								
2.	Please tick appropriate checkbox 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. Surendra Kumar Agrawal, Designated Person (employee of Srei Equipment Finance Limited (SEFL), Material Subsidiary company of the Company)								
	ii. PAN of the DP	ADAPA1189P								
	iii. Designation of DP	Associate Vice President, Equipment Solution Group (ESG) Operations - Asset Control of Srei Equipment Finance Limited (SEFL)								
	iv. Functional Role of DP	Equipment Solution Group (ESG) Operations - Asset Control								
	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	Mrs. Sangita Agarwal, spouse of Mr. Surendra Kumar Agrawal								
	ii. PAN of the immediate relative of DP	AUFPA3660F								
	C. Details of transaction(s)									
	i. Name of the scrip	SIFL								
	ii. No of shares traded and value (Rs.) (Date- wise)	Details of shares traded by Mr. Surendra Kumar Agrawal:								
		<table border="1"> <thead> <tr> <th>No. of Shares Traded</th> <th>Date of trading</th> <th>Nature of Transaction</th> <th>Value of trade</th> </tr> </thead> <tbody> <tr> <td>2,400</td> <td>18.06.2021</td> <td>Purchase</td> <td>Trade of 2,400 Equity shares @ Rs. 12.80 per share</td> </tr> </tbody> </table>	No. of Shares Traded	Date of trading	Nature of Transaction	Value of trade	2,400	18.06.2021	Purchase	Trade of 2,400 Equity shares @ Rs. 12.80 per share
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				aggregating to Rs. 30,720 (excluding brokerage & taxes)
	2,500	18.06.2021	Purchase	Trade of 2,500 Equity shares @ Rs. 13.35 per share aggregating to Rs. 33,375 (excluding brokerage & taxes)
	4,900	18.06.2021	Sale	Trade of 4,900 Equity shares @ Rs. 14.50 per share aggregating to Rs. 71,050 (excluding brokerage & taxes)

Details of shares traded by Mrs. Sangita Agarwal, spouse of Mr. Surendra Kumar Agrawal:

No. of Shares Traded	Date of trading	Nature of Transaction	Value of trade
4,000	18.06.2021	Purchase	Trade of 4,000 Equity shares @ Rs. 12.75 per share aggregating to Rs. 51,000 (excluding brokerage & taxes)
4,000	18.06.2021	Sale	Trade of 4,000 Equity shares @ Rs. 14.50 per share aggregating to Rs. 58,000 (excluding brokerage & taxes)

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	Not Applicable
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	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	Not Applicable																		
4.	Details of violations observed under Code of Conduct	<p>The details of violations are as under:</p> <table border="1"> <thead> <tr> <th>Name of Designated Person & his immediate relative</th> <th>Nature of Transaction</th> <th>Date of trading</th> <th>Particulars (Nature of breach)</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Mr. Surendra Kumar Agrawal</td> <td>Purchase</td> <td>18.06.2021</td> <td rowspan="3">➤ Violation of clause 9 of the 'Srei Insider Code' w.r.t trading in Securities during the closure of trading window*; and</td> </tr> <tr> <td>Purchase</td> <td>18.06.2021</td> </tr> <tr> <td>Sale</td> <td>18.06.2021</td> </tr> <tr> <td rowspan="2">Mrs. Sangita Agarwal, spouse of Mr. Surendra Kumar Agrawal</td> <td>Purchase</td> <td>18.06.2021</td> <td rowspan="2">➤ Violation of clause 11 of the 'Srei Insider Code' w.r.t. execution of contra trade during next 6 (six) months following prior trade.</td> </tr> <tr> <td>Sale</td> <td>18.06.2021</td> </tr> </tbody> </table> <p>*Trading Window closed from 01.04.2021 till further information.</p>	Name of Designated Person & his immediate relative	Nature of Transaction	Date of trading	Particulars (Nature of breach)	Mr. Surendra Kumar Agrawal	Purchase	18.06.2021	➤ Violation of clause 9 of the 'Srei Insider Code' w.r.t trading in Securities during the closure of trading window*; and	Purchase	18.06.2021	Sale	18.06.2021	Mrs. Sangita Agarwal, spouse of Mr. Surendra Kumar Agrawal	Purchase	18.06.2021	➤ Violation of clause 11 of the 'Srei Insider Code' w.r.t. execution of contra trade during next 6 (six) months following prior trade.	Sale	18.06.2021
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	Sale	18.06.2021																		
5.	Action taken by Listed company/ Intermediary/ Fiduciary	<p>The Stakeholders Relationship Committee (SRC) at its Meeting held on July 07, 2021 imposed a penalty of Rs. 93,300 (Rupees Ninety Three Thousand and Three Hundred only) for violation of Srei Insider Code by the Designated Person by himself and through his immediate relative, namely Spouse, and forewarned the Designated Person not to repeat the violation of Srei Insider Code in future.</p> <p>The Committee further directed that the entire profit of Rs. 13,699 made out of the transactions be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund (IPEF) administered by SEBI.</p> <p>The Designated Person has been instructed to attend educative session on the Srei Insider Code, as and when communicated by the Company. Further, he has also been advised to get himself well versed with the Do's and Don'ts and Responsibilities of Designated Persons arising out of the Srei Insider Code circulated</p>																		

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		as part of monthly awareness emails by the Company. The above decision of the SRC was communicated to the Designated Person vide email dated July 08, 2021.
6.	Reasons recorded in writing for taking action stated above	Violation of Clause 9 and 11 of the Srei Insider Code (Trading during closure of Trading Window and Contra Trade).
7.	Details of the previous instances of violations, if any, since last financial year	Mr. Surendra Kumar Agarwal is an employee of a Material Subsidiary of the Company, and hence became the Designated Person under Srei Insider Code w.e.f. 01.04.2019. Further, no previous instances of violation of Srei Insider Code by the aforesaid Designated Person has been observed since 01.04.2019.
8.	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online
	ii. Details of transfer/payment	
	<u>In case of online:</u>	
	Name of the transferor	Mr. Surendra Kumar Agrawal
	Bank Name, branch and Account number	Bank Name: Axis Bank Limited Branch: Electronic Complex, Salt Lake Branch Account No.: 005010100086019
	UTR/Transaction reference Number	AXIR211958765749
	Transaction date	July 14, 2021
	Transaction Amount (in Rs.)	Rs. 1,06,999/-
	<u>In case of Demand Draft (DD)</u>	
	Bank Name and branch	-
	DD Number	-
	DD date	-
	DD amount (in Rs.)	-
9.	Any other relevant information	-
Date and Place:		July 15, 2021, Kolkata
Name and Signature of Compliance Officer:		Manoj Kumar 
PAN:		AJKPK8315P
Email ID:		secretarial@srei.com