



SIFL/SECT/FA/21-22/126

March 15, 2022

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 the Company, 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

(A Company under Corporate Insolvency Resolution Process vide NCLT (Kolkata) Order dated October 08, 2021)

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.	<b>A. Details of Designated Person (DP)</b>				
	i. Name of the DP	Mr. Suman Ranjan Sensarma			
	ii. PAN of the DP	AWMPS3775J			
	iii. Designation of DP	Vice President, Advisory			
	iv. Functional Role of DP	Vice President, Advisory			
	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	SIFL			
	ii. No of shares traded and value (Rs.) (Date- wise)	<b>No. of Shares Traded</b>	<b>Date of trading</b>	<b>Nature of Transaction</b>	<b>Value of trade</b>
		200	04.01.2022	Purchase	Trade of 200 Equity shares @ Rs. 5.87 per share aggregating to Rs. 1,174 (excluding brokerage & taxes)
		800	05.01.2022	Purchase	800 Equity shares

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				@ Rs. 5.76 per share aggregating to Rs. 4,608 (excluding brokerage & taxes)									
<b>D. In case value of trade(s) is more than Rs. 10 lacs 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	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	The details of violations are as under:											
		<table border="1"> <thead> <tr> <th>Nature of Transaction</th> <th>Date of trading</th> <th>Particulars (Nature of breach)</th> </tr> </thead> <tbody> <tr> <td>Purchase</td> <td>04.01.2022</td> <td>➤ Violation of clause 9 of the 'Srei Insider Code' w.r.t trading in Securities during the closure of trading window*.</td> </tr> <tr> <td>Purchase</td> <td>05.01.2022</td> <td>➤ Violation of clause 9 of the 'Srei Insider Code' w.r.t trading in Securities during the closure of trading window*.</td> </tr> </tbody> </table>			Nature of Transaction	Date of trading	Particulars (Nature of breach)	Purchase	04.01.2022	➤ Violation of clause 9 of the 'Srei Insider Code' w.r.t trading in Securities during the closure of trading window*.	Purchase	05.01.2022	➤ Violation of clause 9 of the 'Srei Insider Code' w.r.t trading in Securities during the closure of trading window*.
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		*Trading Window closed from 01.01.2022 till 16.02.2022.											
5.	Action taken by Listed company/ Intermediary/ Fiduciary	<p>Penalty of Rs. 1,446 (Rupees One Thousand Four Hundred and Forty Six only), being 25 (twenty-five) per cent of the gross value of transaction has been imposed and the Designated Person has been forewarned not to repeat the violation of Srei Insider Code in future.</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 as part of monthly awareness emails by the Company.</p> <p>The above decision was communicated to the Designated Person vide email dated March 03, 2022.</p>											
6.	Reasons recorded in writing for taking action stated above	Violation of Clause 9 of the Srei Insider Code (Purchase of shares during closure of Trading Window).											

### Srei Infrastructure Finance Limited

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7.	Details of the previous instances of violations, if any, since last financial year	Mr. Suman Ranjan Sensarma is an employee of the Company and is designated as Vice President, Advisory, 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	
	<b><u>In case of online:</u></b>	
	Name of the transferor	Suman Ranjan Sensarma
	Bank Name, branch and Account number	Bank Name – Axis Bank Branch Name – Saket, New Delhi[DL]- New Delhi, 110 017 Account Number – 918010065814898 IFC- UTIB0000160
	UTR/Transaction reference Number	R7XY2P376180
	Transaction date	07.03.2022
	Transaction Amount (in Rs.)	Rs. 1,446/-
	<b><u>In case of Demand Draft (DD)</u></b>	
	Bank Name and branch	-
	DD Number	-
	DD date	-
	DD amount (in Rs.)	-
9.	Any other relevant information	-
	<b>Date and Place:</b>	<b>March 15, 2022, Kolkata</b>
	<b>Name and Signature of Compliance Officer:</b>	<b>Manoj Kumar</b> 
	<b>PAN:</b>	<b>AJKPK8315P</b>
	<b>Email ID:</b>	<b><a href="mailto:secretarial@srei.com">secretarial@srei.com</a></b>

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