



SIFL/SECT/FA/21-22/125

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 Srei Equipment Finance Limited (SEFL), Material Subsidiary 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/ <u>Intermediary/Fiduciary</u>	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	Ms. Nidhi Saharia			
	ii. PAN of the DP	AVNPS9799N			
	iii. Designation of DP	Chief Risk Officer of Srei Equipment Finance Limited, a material subsidiary of SIFL			
	iv. Functional Role of DP	Chief Risk Officer of Srei Equipment Finance Limited, a material subsidiary of SIFL			
	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	SIFL			
	ii. No of shares traded and value (Rs.) (Date- wise)	No. of Shares Traded	Date of trading	Nature of Transaction	Value of trade
		12,000	03.01.2022	Sale	Trade of 12,000 Equity shares @ Rs. 5.79 per share aggregating to Rs. 69,480 (excluding brokerage & taxes)

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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	<p>The details of violations are as under:</p> <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>Sale</td> <td>03.01.2022</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> <p>*Trading Window closed from 01.01.2022 till 16.02.2022.</p>	Nature of Transaction	Date of trading	Particulars (Nature of breach)	Sale	03.01.2022	➤ 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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Sale	03.01.2022	➤ Violation of clause 9 of the 'Srei Insider Code' w.r.t trading in Securities during the closure of trading window*.						
5.	Action taken by Listed company/ Intermediary/ Fiduciary	<p>Penalty of Rs. 40,000 (Rupees Forty Thousand only), 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, she has also been advised to get herself 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 (Sale of shares during closure of Trading Window).						
7.	Details of the previous instances of violations, if any, since last financial year	<p>Ms. Nidhi Saharia is an employee of Srei Equipment Finance Limited a material subsidiary of the Company and is designated as Chief Risk Officer, and hence became the Designated Person under Srei Insider Code w.e.f. 01.04.2019.</p> <p>Further, 1 (one) previous instances of violation of Srei Insider Code by the immediate relative of aforesaid Designated Person was observed on 22.01.2020 and the penalty amount of Rs. 2,800/- was paid by Designated Person, the reporting of which was done on 20.02.2020.</p>						

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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	Nidhi Saharia
	Bank Name, branch and Account number	Bank Name – Axis Bank Branch Name – Plot No. AH/5, Dongfang Building, Biswa Bangla Sarani, New Town, Kolkata, West Bengal, 700 156. Account Number – 669010100022039 IFC – UTIB0000669
	UTR/Transaction reference Number	206812382220
	Transaction date	09.03.2022
	Transaction Amount (in Rs.)	Rs. 40,000/-
	<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:	March 15, 2022, Kolkata
	Name and Signature of Compliance Officer:	Manoj Kumar 
	PAN:	AJKPK8315P
	Email ID:	secretarial@srei.com

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