



SEFL/SECT/MS/20-21/39

January 11, 2021

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

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

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 (SEFL Insider Code) by a Designated Person (through 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 Equipment Finance Limited**

Ritu Bhojak
Digitally signed
by Ritu Bhojak
Date: 2021.01.11
17:50:42 +05'30'

Ritu Bhojak
Compliance Officer

Encl: as above

Srei Equipment Finance Limited
CIN U70101WB2006PLC109898

Head Office: Y-10, Block - EP, Sector - V, Saltlake City, Kolkata - 700 091

Tel: +91 33 6639 4700 **Fax:** +91 33 6602 2600

Email: sefpl@srei.com **Website:** www.srei.com

Registered Office: 'Vishwakarma', 86C Topsia Road (South), Kolkata - 700 046



**Report by Srei Equipment 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 Equipment Finance Limited (SEFL)			
2.	Please tick appropriate checkbox Reporting in capacity of : <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company (Debt Listed)			
3.	A. Details of Designated Person (DP)				
	i Name of the DP	Mr. Shailendra Kumar Lath			
	ii PAN of the DP	ABBPL6752E			
	iii Designation of DP	Vice President			
	iv Functional Role of DP	Equipment Solution Group Credit & Operations (ESG CROPS)			
	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. Manisha Lath, Spouse			
	ii. PAN of the immediate relative of DP	ABWPL2304H			
	C. Details of transaction(s)				
	i. Name of the scrip	SEFL (ISIN no. INE872A07UP7)			
	ii. No of Shares traded and value (Rs.) (Date- wise)	No. of Non-convertible Debentures (NCDs) Traded	Date of trading	Nature of Transaction	Value of trade
		243	04.01.2021	Sale	Trade of 243 NCDs @ Rs. 1,100 per NCD aggregating to Rs. 2,67,300 (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	Not Applicable			

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	group to 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>Nature of Transaction</th> <th>Date of trading</th> <th>Particulars (Nature of breach)</th> </tr> </thead> <tbody> <tr> <td>Sale</td> <td>04.01.2021</td> <td>➤ Violation of clause 9 of the 'SEFL Insider Code' w.r.t trading in Securities during the closure of trading window*.</td> </tr> </tbody> </table> <p>*Trading Window closed from 01.01.2021 till further notice</p>	Nature of Transaction	Date of trading	Particulars (Nature of breach)	Sale	04.01.2021	➤ Violation of clause 9 of the 'SEFL Insider Code' w.r.t trading in Securities during the closure of trading window*.
Nature of Transaction	Date of trading	Particulars (Nature of breach)						
Sale	04.01.2021	➤ Violation of clause 9 of the 'SEFL Insider Code' w.r.t trading in Securities during the closure of trading window*.						
5.	Action taken by Listed company/ Intermediary/ Fiduciary	<p>The Stakeholders Relationship Committee (SRC), through Resolution passed by Circulation on January 08, 2021, imposed a penalty of Rs. 26,730 (Rupees Twenty Six Thousand Seven Hundred and Thirty only) upon the Designated Person and advised him to deposit the penalty amount levied to the Investor Protection & Education Fund (IPEF) and submit proof of deposit to the Compliance Officer within 7 (Seven) days from the date of communication of this decision to him.</p> <p>The Designated Person has been cautioned not to repeat any violation in future under the SEFL Insider Code. He has also been instructed to attend educative session on the SEFL 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 SEFL Insider Code circulated as part of monthly awareness emails sent by the Company.</p> <p>The above decision of the SRC was communicated to the Designated Person vide email dated January 09, 2021.</p>						
6.	Reasons recorded in writing for taking action stated above	Violation of Clause 9 of the SEFL Insider Code (Sale of NCDs during closure of Trading Window).						
7.	Details of the previous instances of violations, if any, since last financial year	<p>Mr. Shailendra Kumar Lath is Vice President, Equipment Solution Group Credit & Operations (ESG CROPS) of the Company, and hence is a Designated Person under SEFL Insider Code.</p> <p>Further, no previous instances of violation of SEFL Insider Code by the aforesaid Designated Person has been observed since 01.04.2020.</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	Shailendra Kumar Lath
	Bank Name, branch and Account number	Axis Bank Limited, Branch: Shakespeare Sarani, Account No: 005010100255998
	UTR/Transaction reference Number	INB/NEFT/AXIR210116040249/SEBI IPE/BANK
	Transaction date	11.01.2021
	Transaction Amount (in Rs.)	Rs. 26,730/- (Rupees Twenty Six Thousand Seven Hundred and Thirty Only)
	<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:	January 11, 2021, Kolkata
	Name and Signature of Compliance Officer:	Ritu Bhojak  Digitally signed by Ritu Bhojak Date: 2021.01.11 17:44:56 +05'30'
	PAN:	AMOPB0746N
	Email ID:	secretarial.sefl@srei.com

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