



SIFL/SECT/SP/21-22/41

June 24, 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, 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. Pawan Nahata								
	ii. PAN of the DP	ABIPN4293M								
	iii. Designation of DP	Vice President, Srei Equipment Finance Limited (SEFL), Material Subsidiary Company of SIFL								
	iv. Functional Role of DP	Regional Head, Equipment Solution Group (ESG) – Sales								
	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)	<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>133</td> <td>16.06.2021</td> <td>Sale</td> <td>Trade of 133 Equity shares @ Rs. 10.85 per share aggregating to Rs. 1443.05 (excluding brokerage & taxes)</td> </tr> </tbody> </table>	No. of Shares Traded	Date of trading	Nature of Transaction	Value of trade	133	16.06.2021	Sale	Trade of 133 Equity shares @ Rs. 10.85 per share aggregating to Rs. 1443.05 (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>16.06.2021</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 01.04.2021 till further information.</p>	Nature of Transaction	Date of trading	Particulars (Nature of breach)	Sale	16.06.2021	➤ 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	16.06.2021	➤ 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>The Stakeholders Relationship Committee (SRC), through Resolution passed by Circulation on June 24, 2021, forewarned the Designated Person 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>No penalty has been levied considering the following submissions made by the Designated Person i.e (i) The Designated Person has not sold the shares of the Company intentionally and that his demat account was auto debited due to non-discharge of his obligation towards Margin/MTM/Settlement or other debit; (ii) The Designated Person has not made any profits / gains out of the sale transaction; and (iii) The quantum and value of the shares sold is minimal.</p> <p>The above decision of the SRC was communicated to the Designated Person vide email dated June 24, 2021.</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>Mr. Pawan Nahata 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.</p> <p>Further, no previous instances of violation of Srei Insider Code by the aforesaid Designated Person has been observed since 01.04.2019.</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)	No
	ii. Details of transfer/payment	
	<u>In case of online:</u>	
	Name of the transferor	-
	Bank Name, branch and Account number	-
	UTR/Transaction reference Number	-
	Transaction date	-
	Transaction Amount (in Rs.)	-
	<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:		June 24, 2021, Kolkata
Name and Signature of Compliance Officer:		Manoj Kumar 
PAN:		AJKPK8315P
Email ID:		secretarial@srei.com

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