

SE/CS/2021-22/14

19th May 2021

To,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street, Fort,
Mumbai-400001

To,
National Stock Exchange of India Limited
Exchange Plaza, Plot no. C/1, G Block,
Bandra-Kurla Complex, Bandra (W),
Mumbai-400051

Company Scrip Code: 530871
Code No: 530871

Company Scrip Code: CHEMBOND
Code: CHEMBOND

Ref: ISIN: INE995D01025

Sub: Reporting regarding Violation of Company's Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

Dear Sir/Madam,

This is to inform you that in terms of the SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, the details of violation of the Company's code of conduct under the SEBI (Prohibition of Insider Trading) Regulations, 2015 by the Designated Person along with the action taken by the Company thereon is enclosed as "Annexure A" to this letter.

Kindly take the same on record.

Yours truly,
For Chembond Chemicals Limited



Suchita Singh
Company Secretary & Compliance Officer



Encl: As above

Chembond Chemicals Limited

EL-71 Mahape MIDC, Navi Mumbai 400710. INDIA

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www.chembondindia.com

CIN: L24100MH1975PLC018235

Annexure A

Report by Chembond Chemicals Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015

Sr. No	Particulars	Details
1	Name of the listed company/ Intermediary/ Fiduciary	Chembond Chemicals Limited
2	Reporting in capacity of: <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3	A. Details of Designated Person (DP)	
	i. Name of the DP	Mr. Sameer V. Shah
	ii. PAN of the DP	AAQPS4670Q
	iii. Designation of DP	Chairman & Managing Director
	iv. Functional Role of DP	As the Managing Director he is involved in the day-to-day affairs, operations, and management.
	v. Whether DP is Promoter /Promoter Group/ holding CXO level position (eg. CEO, CFO, CTO etc.)	Yes, he belongs to the Promoter Group
	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	Chembond Chemicals Limited
	ii. No. of shares traded and value (Rs.) (Date-wise)	1691 Shares @ Rs.198.67 in the name of Sameer V. Shah and 1000 shares @ Rs.199.96 in the name of Sameer V. Shah HUF on 17 th May 2021. Total Trade value: Rs.535,911
	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 (Prohibition of Insider Trading) Regulations, 2015)	Trade does not exceed Rs. 10 lakhs in the calendar quarter. However, DP informed voluntarily on the date of trade i.e., on 17 th May 2021.
	ii Date of intimation of trades(s) by Company to stock exchanges under regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015	Intimated on 18 th May 2021.

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4	Details of violations observed under SEBI (Prohibition of Insider Trading) Regulations, 2015).	Trading after publication of financial results but before opening of trading window without pre-clearance.
5	Action taken by the Listed Company/ Intermediary/Fiduciary	<p>The matter was reported to the Audit Committee and the Committee at its meeting held on 18th May 2021 confirmed the violation of Code of Conduct formulated pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 by Mr. Sameer V. Shah, the DP.</p> <p>The DP was offered an opportunity to clarify the incidence. Based on the clarification by DP, the fact that DP had promptly and voluntarily informed the Compliance Officer about the transaction, the apology received from the DP for the lapse and his reassurance of non-recurrence of incidence, the Committee gave a verbal notification to DP and as a matter of prudent policy and keeping in view the fact that the lapse occurred from the highest ranking person in the Company, and to ensure that such incidences are not repeated, decided to levy a penalty of Rs.8,073 on the DP.</p> <p>The DP has since remitted the penalty amount to the Company, which in turn has transferred the same to SEBI - IPEF.</p>
6	Reasons recorded in writing for taking action stated above.	<p>It was noted that:</p> <ul style="list-style-type: none"> - the financial results of the Company for the quarter / year ended 31st March 2021 were declared to the Stock exchanges on 15th May 2021, were published in Newspapers on 16th May 2021 and the trading window would re-open post 48 hours of the declaration of financial results. - DP had purchased shares of the Company while the trading window was closed. - The purchase was a lapse on his part arising out of sheer oversight and the belief that as the financial results of the Company had already been declared on Saturday, 15th May 2021 the Trading Window automatically re-opened on Monday, 17th May. - DP had bought this small quantity of shares without applying for pre-clearance and clarified that there was no intent other than to invest his savings by buying shares of the Company. - the shares purchased by DP amounted to

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		1.16% of the total turnover value on both exchanges. - the Committee found merit in the submission by the DP that the trade was a result only of sheer oversight on his part and based on the explanation and DP's past track record, the Committee was of the view that there was no "mens-rea" and it was the very first instance of such a lapse on his part.
7	Details of the previous instances of violations, if any, since last financial year.	No previous instances of violations.
8	If any amount collected for Code of Conduct violation(s)	
	(i) Mode of transfer to SEBI IPEF (online / Demand Draft) (ii) Details of Transfer / Payment	Online
	In case of Online	
	Particulars	Details
	Name of the Transferor	Chembond Chemicals Limited
	Bank Name Branch and Account No.	HDFC Bank Ltd. Worli Branch, Mumbai 02400120000078
	UTR / Transaction Reference	N139211508527925
	Transaction Date	19-May-2021
	Transaction Amount	Rs.8,073.00
	In case of Demand Draft (DD)	
	Details	
	Bank Name and Branch	Not Applicable
	DD Number	Not Applicable
	DD Date	Not Applicable
	DD Amount (in Rs)	Not Applicable
9	Any Other relevant Information	Nil

For Chembond Chemicals Limited



Suchita Singh

Company Secretary & Compliance Officer

PAN: AYKPS9202L

email ID: suchita.singh@chembondindia.com

Mumbai, 19th May 2021



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