



McLEOD RUSSEL
Believe in tea

30th May 2024

The Secretary
BSE Limited PJ.
Towers,
25th Floor, Dalal Street,
MUMBAI-400001
Scrip Code: 532654

The Secretary
National Stock Exchange of India
Ltd,
Listing dept. Exchange Plaza,
5th Fl. Plot No. C/1,
G- Block, Bandra-Kurla Complex,
Bandra (E) MUMBAI-400051
Scrip Code: MCLEODRUSS

The Secretary
The Calcutta Stock
Exchange Limited
7, Lyons Range
KOLKATA-700001
Scrip Code: 10023930

Dear Sir/Madam,

Sub: Report for violation related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

Please find enclosed report in Annexure - A on violation under SEBI (Prohibition of Insider Trading) Regulations, 2015 relating to Company's Code of Conduct for (Insider Trading) to Regulate, Monitor and Report Trading by Insiders by designated persons and their immediate relatives, in the format prescribed by SEBI vide Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

Thanking you,

Yours faithfully,

For McLEOD RUSSEL INDIA LIMITED

(ALOK KUMAR SAMANT)
COMPANY SECRETARY

Encl: As above

Registered Office :

McLEOD RUSSEL INDIA LIMITED

Corporate Identity Number (CIN) : L51109WB1998PLC087076
FOUR MANGO LANE, SURENDRA MOHAN GHOSH SARANI, KOLKATA - 700 001
TELEPHONE : 033-2210-1221, 2248-9434 / 35, FAX : 91-33-2248-8114 / 6265
E-mail : administrator@mcleodrussel.com Website : www.mcleodrussel.com

Annexure – A

Report by McLeod Russel India Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

Mr. Ashok Krishan

SI No.	Particulars	Details
1.	Name of the listed company/ Intermediary/Fiduciary	McLeod Russel India Limited
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. Ashok Krishan
	ii. PAN of the DP	ADVPK2225P
	iii. Designation of DP	Head of Plantations, Assam (till 31 st March 2024)
	iv. Functional Role of DP	Operations in Estates
	v. Whether DP is Promoter or belongs to Promoter Group	No
	B. If Reporting is for immediate relative of DP	No
	i. Name of the immediate relative of DP	NA
	ii. PAN of the immediate relative of DP	NA
	C. Details of transaction(s)	
	i. Name of the scrip	BSE: 532654; NSE: MCLEODRUSS
	ii. No of shares traded and value (Rs.) (Date-wise)	17.04.2023 - Purchase of 5,000 shares at an average price of Rs. 19.90 aggregating to Rs. 99,531.50 (approx) 18.04.2023 - Purchase of 5,000 shares at an average price of Rs. 21 aggregating to Rs. 1,05,000 (approx) 19.06.2023 – Sale of 70,000 shares in several tranches at an average price of Rs. 20.15 aggregating to Rs. 13,97,779.45 (approx) 21.07.2023 – Sale of 38,000 shares in several tranches at an average price of Rs. 18.23 aggregating to Rs. 6,91,887.05 (approx) 25.08.2023 - Purchase of 450 shares at an average price of Rs. 22.36 aggregating to Rs. 1,60,000 (approx)
	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	Not Reported

	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 Reported
4.	Details of violations observed under Code of Conduct	Acquired /sold some shares within Closure of Trading Window and carried out contra trades in violation of the Company's Code of Conduct and the SEBI (Prohibition of Insider Trading) Regulations, 2015
5.	Action taken by Listed company/ Intermediary/ Fiduciary	Immediately after the violation came to the knowledge of the Company, Show Cause Notice was issued on 20 th May 2024 to Mr. Krishan. Since Mr. Krishan is no longer associated with the Company and is no more a designated person w.e.f 01 st April 2024, therefore, based on the recommendation of the audit committee the Board of Directors of the Company at its Meeting held on 30 th May 2024 after considering several factors including the overall loss incurred by Mr. Krishan and keeping in view the code of the Company imposed a penalty of Rs. 40,000 (Rupees Forty Thousand only) for violation of Company's Insider Code and decided that the amount received will be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund (IPEF) administered by SEBI.
6.	Reasons recorded in writing for taking action stated above	As informed by Mr. Krishan, the decision to acquire/sell, despite the loss, arose from an urgent need for funds related to his son's education. Further, he is no longer associated with the Company in any capacity with effect from 01 st April 2024. Therefore, in view of the submission of Mr. Krishan to the show cause notice issued to him, and considering several other factors including the volume of transaction and violation of Company's code as mentioned above, the Board took the necessary action.
7.	Details of the previous instances of violations, if any, since last financial year	No such instances reported by the concerned persons.
8.	If any amount collected for Code of Conduct violation(s)	The Board at its meeting held on 30 th May 2024 based on the recommendation of the Audit Committee, has imposed a fine Rs. 40,000/- on Mr. Krishan and he shall be intimated for making the payment and accordingly, the fine amount will be disgorged for

		remittance to SEBI for credit to the Investor Protection and Education Fund (IPEF) administered by SEBI. Post receipt of the fine amount, the payment details would be intimated to the stock exchanges.																								
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	NA																								
	ii. Details of transfer/payment: NA In case of Online: <table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Name of the transferor</td> <td></td> </tr> <tr> <td>Bank Name, branch and Account number</td> <td></td> </tr> <tr> <td>UTR/Transaction reference Number</td> <td></td> </tr> <tr> <td>Transaction date</td> <td></td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td></td> </tr> </tbody> </table> In case of Demand Draft (DD): <table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Bank Name and branch</td> <td></td> </tr> <tr> <td>DD Number</td> <td></td> </tr> <tr> <td>DD date</td> <td></td> </tr> <tr> <td>DD amount (in Rs.)</td> <td></td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td></td> </tr> </tbody> </table>		Particulars	Details	Name of the transferor		Bank Name, branch and Account number		UTR/Transaction reference Number		Transaction date		Transaction Amount (in Rs.)		Particulars	Details	Bank Name and branch		DD Number		DD date		DD amount (in Rs.)		Transaction Amount (in Rs.)	
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9.	Any other relevant information	None																								

Mr. Debjyoti Sen

SI No.	Particulars	Details
1.	Name of the listed company/ Intermediary/Fiduciary	McLeod Russel India Limited
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. Debjyoti Sen
	ii. PAN of the DP	AYXPS7039L
	iii. Designation of DP	Manufacturing Advisor (Senior General Manager) from 01 st January 2023 to 08 th January 2024.
	iv. Functional Role of DP	Dealing with Garden Managers and below
	v. Whether DP is Promoter or belongs to Promoter Group	No
	B. If Reporting is for immediate relative of DP	No
	i. Name of the immediate relative of DP	NA

	ii. PAN of the immediate relative of DP	NA
	C. Details of transaction(s)	
	i. Name of the scrip	BSE: 532654; NSE: MCLEODRUSS
	ii. No of shares traded and value (Rs.) (Date-wise)	<p>02.05.2023 - Sale of 10,250 shares at an average price of Rs. 19.43 aggregating to Rs. 1,99,141.42 (approx)</p> <p>04.05.2023 - Purchase of 7,450 shares at an average price of Rs. 22.18 aggregating to Rs. 1,65,262.81 (approx)</p> <p>08.05.2023 - Sale of 4,450 shares at an average price of Rs. 21.43 aggregating to Rs. 95,356.16 (approx)</p> <p>06.07.2023 - Sale of 3,000 shares at an average price of Rs. 18.56 aggregating to Rs. 55,683.17 (approx)</p>
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter	No
	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	Acquired /sold some shares within Closure of Trading Window and carried out contra trades in violation of the Company's Code of Conduct and the SEBI (Prohibition of Insider Trading) Regulations, 2015
5.	Action taken by Listed company/ Intermediary/ Fiduciary	Immediately after the violation came to the knowledge of the Company, Show Cause Notice was issued on 20 th May 2024 to Mr. Sen. Since Mr. Sen is no longer associated with the Company and is no more a designated person w.e.f 09 th January 2024, therefore, based on the recommendation of Audit Committee, the Board of Directors of the Company at its Meeting held on 30 th May 2024 after considering several factors including the overall loss incurred by Mr. Sen during the period of his association (from 01 st January 2023 to 08 th January 2024) with the Company and keeping in view the code of the Company imposed

		a penalty of Rs. 20,000 (Rupees Twenty Thousand only) for violation of Company's Insider Code and decided that the amount received will be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund (IPEF) administered by SEBI.
6.	Reasons recorded in writing for taking action stated above	As informed by Mr. Sen, despite the loss, Mr. Sen had transacted in the shares of the Company at a loss of Rs 11,107/- due to an urgent need of funds required for his daughter's admission to college for her higher studies Further, he is no longer associated with the Company in any capacity with effect from 09 th January 2024. Therefore, in view of the submission of Mr. Sen to the show cause notice issued to him, and considering several other factors and violation of Company's code as mentioned above, the Board took the necessary action.
7.	Details of the previous instances of violations, if any, since last financial year	No such instances noticed and reported in the last financial year.
8.	If any amount collected for Code of Conduct violation(s)	The Board at its meeting held on 30 th May 2024 based on the recommendation of the Audit Committee, has imposed a fine Rs. 20,000/- on Mr. Sen and he shall be intimated for making the payment and accordingly, the fine amount will be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund (IPEF) administered by SEBI. Post receipt of the fine amount, the payment details would be intimated to the stock exchanges.
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	NA

	ii. Details of transfer/payment: NA	
	In case of Online:	
	Particulars	Details
	Name of the transferor	
	Bank Name, branch and Account number	
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	Transaction date	
	Transaction Amount (in Rs.)	
	In case of Demand Draft (DD):	
	Particulars	Details
	Bank Name and branch	
	DD Number	
	DD date	
	DD amount (in Rs.)	
	Transaction Amount (in Rs.)	
9.	Any other relevant information	None

Yours Faithfully,

**For and On Behalf of
McLeod Russel India Limited**

Alok Kumar Samant
Company Secretary

PAN: AXQPS 3281C

Email: alok.samant@mcleodrussel.com

Date: 30th May 2024

Place: Kolkata