

APL/SEC/54/2026-27/33

21st August 2026

BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai – 400 001
Security Code: 500820

National Stock Exchange of India Limited
Exchange Plaza, C-1, Block G,
Bandra Kurla Complex, Bandra (East),
Mumbai – 400 051
Symbol: ASIANPAINT

Sir/Madam,

Sub: Intimation under Regulation 5(4) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 regarding Audit Committee's determination on partial non-implementation of the Trading Plan submitted by Geetanjali Trading and Investments Private Limited

This is with reference to our letter no. APL/SEC/32/2025-26/44 dated 19th March 2026 regarding the Trading Plan submitted by Geetanjali Trading and Investments Private Limited ("GTIPL"), an entity forming part of the Promoter(s)/Promoter Group and a Designated Person of the Company, which was approved by the Compliance Officer.

Under the aforesaid Trading Plan, GTIPL had proposed, *inter alia*, to purchase an aggregate of 4,00,000 equity shares of the Company in two tranches of 2,00,000 equity shares each during the periods from 27th July 2026 to 31st July 2026 and 17th August 2026 to 21st August 2026.

The purchase transaction under the first tranche could not be executed as the market price of the equity shares of the Company during the relevant trading period remained above the upper price limit of Rs. 2,650 per share as specified in the Trading Plan throughout the relevant trading period.

The Trading Plan was implemented in respect of the pledge transaction, and the purchase transaction under the second tranche. It was not implemented only in respect of the purchase transaction contemplated under the first tranche.

Pursuant to Regulation 5(4) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("SEBI PIT Regulations") read with Asian Paints Limited – Code of Conduct to Regulate, Monitor and Report trading by Designated Persons ("Code of Conduct"), GTIPL, vide its letter dated 20th August 2026, intimated the Compliance Officer regarding the partial non-implementation of the Trading Plan and submitted the reason thereof together with the relevant supporting documents.

In accordance with Regulation 5(4) of the SEBI PIT Regulations read with the Code of Conduct, the matter, together with GTIPL's submissions, the supporting documents and the recommendation of the Compliance Officer, was placed before the Audit Committee at its immediate next meeting held today i.e. 21st August 2026.



After considering the aforesaid documents and recommendation, the Audit Committee determined that the non-implementation of the purchase transaction under the first tranche of the Trading Plan was *bona fide*.

You are requested to take the above information on record.

Thanking you,

Yours truly,

For **ASIAN PAINTS LIMITED**

R J JEYAMURUGAN
CFO, COMPANY SECRETARY &
COMPLIANCE OFFICER

