



September 21, 2020

The Secretary Listing Department, BSE Limited, 1 st Floor, Phiroze Jeejeebhoy Towers Dalal Street, Mumbai 400001 Scrip Code: 540975	The Manager, Listing Department, The National Stock Exchange of India Ltd Exchange Plaza, C-1, Block G Bandra Kurla Complex Bandra (East), Mumbai 400051 Scrip Symbol: ASTERDM
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Dear Sir/ Madam,

Sub: Report on violation of Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 ("PIT Regulations")

Ref: SEBI Gazette Notification No. SEBI/LAD-NRO/GN/2020/23 dated July 17, 2020 read with SEBI Circular No. SEBI/HO/ISD/CIR/P/2020/135 dated July 23, 2020

Aster DM Healthcare Limited (the "**Company**") is committed to conducting its business in compliance with the applicable regulatory framework and with robust internal governance standards. As part of its regulatory obligations, the Company had formulated and implemented "The Code for Prevention of Insider Trading in the Securities of Aster DM" ("**Insider Trading Code**") in accordance with Regulation 9(1) of the PIT Regulations. Through this Insider Trading Code, the Company has adopted standards set out in Schedule B of the PIT Regulations to regulate, monitor and report trading by its designated persons and their immediate relatives.

It has been recently brought to our attention, that Mr. Sharfuldeen Valiyapeedika Kandy, Non-Executive Director of Malabar Institute of Medical Sciences Limited, a material subsidiary of the Company, and Designated Person ("DP") of the Company (under the Insider Trading Code) had undertaken the following trades without seeking necessary pre-clearance from the Compliance Officer, in accordance with the Insider Trading Code, and delayed reporting of:

- (i) Sale of 40,000 equity shares of the Company on February 12, 2020 during window close period ("Trade 1"); and
- (ii) Sale of 40,000 shares of the Company on August 26, 2020 during window open period ("Trade 2").

In this regard, pursuant to our correspondence, the DP has confirmed that he had inadvertently carried out the aforementioned trades, and that at the time of each of the abovementioned trades, he was not in possession of any Unpublished Price Sensitive Information (UPSI) of the Company.

As an organization mindful of its regulatory obligations in the securities market, the Company has zero tolerance for any violation of its internal policies. Accordingly, upon these incidents being brought to its notice, the Company, as an immediate step, reported the incidents to the Audit Committee which discussed this matter at its meeting held on September 18, 2020. At this meeting, the Audit Committee considered that: (a) insofar as Trade 1 was concerned, while the trade was during the window closure period, the DP had undertaken the trade after the financial results were declared (pursuant to board meeting held on [February 11, 2020]) and disclosed to the stock exchanges, and (b) Trade 2 had been undertaken by the DP during the window open period.

Aster DM Healthcare Limited
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Tel: +91 484 6699999, Fax: +91 484 6699862
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Consequently, as directed by the Audit Committee, appropriate internal action has been initiated against the DP wherein a warning letter has been issued coupled with imposition of monetary penalty of INR 6,00,000. This penal amount will be remitted to the Investor Protection and Education Fund, in line with the PIT Regulations.

In light of the above, please find enclosed a report on the abovementioned violation of the Company's Insider Trading Code under PIT Regulations, in the manner prescribed under the abovementioned SEBI circular.

We would like to reiterate that Company is committed to ensuring continued adherence to regulatory obligations under the PIT Regulations and Insider Trading Code and applicable laws to avoid such recurrence of such instances going forward.

We request you to kindly take the above information on record.

Thank You,

For **Aster DM Healthcare Limited**

Puja Aggarwal
Company Secretary and Compliance Officer

Encl: As above

**Report by Aster DM Healthcare 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	Aster DM Healthcare Limited									
2	Please tick appropriate checkbox Reporting in capacity of: ☐ Listed Company ☐ Intermediary ☐ Fiduciary	Listed Company									
3	A. Details of Designated Person (DP)										
	i. Name of the DP	Mr. Sharfulddeem Valiyapeedika Kandy									
	ii. PAN of the DP	AFGPV7083R									
	iii. Designation of DP	Non-Executive Director of Malabar Institute of Medical Sciences Limited, material subsidiary of Aster DM Healthcare Limited									
	iv. Functional Role of DP	Non-Executive Director of the material subsidiary									
	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	BSE: 540975 NSE: ASTERDM									
	ii. No of shares traded and value (Rs.) (Date-wise)	<table border="1"> <thead> <tr> <th>Date of sale</th><th>No of shares sold</th><th>Value</th></tr> </thead> <tbody> <tr> <td>February 12, 2020</td><td>40,000</td><td>69,69,513.29</td></tr> <tr> <td>August 26, 2020</td><td>40,000</td><td>57,65,479.47</td></tr> </tbody> </table>	Date of sale	No of shares sold	Value	February 12, 2020	40,000	69,69,513.29	August 26, 2020	40,000	57,65,479.47
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February 12, 2020	40,000	69,69,513.29									
August 26, 2020	40,000	57,65,479.47									
	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	September 15, 2020									

	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	September 17, 2020
4	Details of violations observed under Code of Conduct	The Designated Person ("DP") of the Company had undertaken the following trades without seeking necessary pre-clearance from the Compliance Officer, in accordance with the Insider Trading Code, and delayed reporting of: (i) Sale of 40,000 equity shares of the Company on February 12, 2020 during window close period and (ii) Sale of 40,000 shares of the Company on August 26, 2020 during window open period
5	Action taken by Listed company/ Intermediary/ Fiduciary	In light of the violation of the Insider Trading Code as set out above, the Company has reported these incidents to the Audit Committee, a committee of the Board, which discussed this matter at its meeting held on September 18, 2020. Pursuant to the directions received from the Audit Committee, the Company has initiated disciplinary action against the DP, including issuance of warning letter coupled with imposition of penalty of INR 6,00,000
6	Reasons recorded in writing for taking action stated above	The Audit Committee has decided on the disciplinary action taking the following into consideration: The DP is a Non-Executive Director of the material subsidiary and has confirmed that the above trades were carried out inadvertently and that he was not in possession of any unpublished price sensitive information of the Company at that time. The first trade on February 12, 2020 was undertaken during the window closed period but the financial results for Q3 FY 2019-20 of the Company was declared on February 11, 2020. The second trade on August 26, 2020 was undertaken during the window open period but had not taken the pre-clearance. In both the cases DP delayed reporting of trades to the Company.
7	Details of the previous instances of violations, if any, since last financial year	None

8	If any amount collected for Code of Conduct violation(s)-	The Company has issued a warning letter to the DP and has also advised him to promptly remit the penalty to the SEBI - IPEF. The Company shall intimate the exchanges with the below details after the remittance has been made.																						
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft) ii. Details of transfer/payment In case of Online: <table border="1" data-bbox="280 607 877 927"> <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" data-bbox="280 1050 877 1256"> <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> </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.)	
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9	Any other relevant information	NIL																						

Yours faithfully,



Date: September 21, 2020
Place: Bangalore

Puja Aggarwal
Company Secretary and Compliance Officer
PAN: AFGPA8582C
Email ID:
puja.aggarwal@asterdmhealthcare.com