

Date: November 11, 2025

To,
BSE Limited,
20th Floor, P.J. Towers,
Dalal Street,
Mumbai - 400001.
BSE Scrip Code: 544449

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

Subject: Intimation of violation under Company's Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons as required under SEBI (Prohibition of Insider Trading) Regulations 2015 ("**SEBI PIT Regulations**")

Dear Sir/Ma'am

In continuation to our letter dated October 28, 2025, we wish to inform that, in terms of Company's Code of Conduct to Regulate, Monitor and Report of Trading by Designated Persons ("Insider Trading Code") read with Schedule B and Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015, we hereby submit a report in respect of violation of Insider Trading Code of the Company as per format specified by SEBI Master Circular No. SEBI/HO/ISD/ISD-PoD-2/P/CIR/2023/039 dated March 23, 2023.

We request you to kindly take the same on record.

Thanking you,

Yours truly,
For Anthem Biosciences Limited
(Formerly known as Anthem Biosciences Private Limited)

Divya Prasad
Company Secretary & Compliance Officer
Membership No: A41438

Report by Anthem Biosciences Limited for violation related to Company's Code of Conduct to Regulate, Monitor and Report Trading by Insiders and as per the provisions of 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	Anthem Biosciences Limited												
2	<i>Please tick appropriate checkbox</i> Reporting in capacity of: <input 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	Srinivas L												
	ii. PAN of the DP	CVIPS0074D												
	iii. Designation of DP	Manager												
	iv. Functional Role of DP	Indirect Taxes												
	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)													
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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>Mr. Srinivas L, the Designated person (DP) sold an aggregate of 674 equity shares of the Company on two separate occasions, as detailed in Section 3(c) above. These trades were executed during the trading window closure period, which commenced on October 01, 2025 and remain in effect until 48 hours from the date of Board's approval for the financial results of quarter ended September 30, 2025. Accordingly, this constitutes a violation of Clause 10 of the Company's Code of Conduct on Insider Trading.</p> <p>The breach occurred due to the transaction of pledged equity shares by an agent of the DP. While the DP had explicitly instructed the pledgee not to sell the pledged shares during the trading window closure period. However, the pledgee proceeded to square off the shares to recover the credit amount, resulting in multiple transactions during the restricted period constituting a breach of the Code.</p>
5	Action taken by Listed company/ Intermediary/ Fiduciary	<p>The above breach of the Company's Code of Conduct and applicable regulatory obligations has been taken very seriously by the Company. The matter was placed before the Audit Committee at its meeting held on November 06, 2025 and after careful consideration, the Committee has resolved the following:</p> <ol style="list-style-type: none"> 1. A warning letter to be issued to the designated person, instructing the DP to ensure strict adherence to the Code and regulatory requirements going forward; and 2. Company has taken acknowledgement letter from him confirming that, he will strictly adhere to the Company Code of Code of Conduct to Regulate, Monitor and Report of Trading by Designated Person as required under SEBI PIT Regulations. This acknowledgement, along with a copy of the email communication sent to the pledgee

		<p>instructing that the pledged shares are restricted from trading during the trading window closure period, is enclosed as Annexure 1.</p> <p>Further, he has been advised to treat this matter with utmost seriousness. Any future violation of the Company’s Code of Conduct or SEBI regulations will attract stricter disciplinary action, as the company may deem fit.</p>															
6	Reasons recorded in writing for taking action stated above	Violation of the clause 10 of the Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons as required under SEBI PIT Regulations.															
7	Details of the previous instances of violations, if any	Not Applicable															
8	If any amount collected for Code of Conduct violation(s)																
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Not Applicable															
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9	Any other relevant information	Nil															

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3	A. Details of Designated Person (DP)									
	i. Name of the DP	Bhuvaneswari M								
	ii. PAN of the DP	AVAPB6859P								
	iii. Designation of DP	Deputy Manager								
	iv. Functional Role of DP	Administering Account Payables								
	v. Whether DP is Promoter or belongs to Promoter Group	No								
	B. If Reporting is for immediate relative of DP									
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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	Ms. Bhuvaneswari, the Designated Person (DP) has sold 5000 equity shares of the Company amounting to Rs.41,75,000.00 without obtaining the pre clearance approval for the transaction, thereby violating the Clause 09 of Code of Conduct on Insider Trading of the Company.
5	Action taken by Listed company/ Intermediary/ Fiduciary	<p>The DP had taken a preclearance approval on 25/08/2025 which was valid upto 31/08/2025. Due to medical emergency, the said DP was on leave and missed the validity period. Consequently, the transaction took place on 15/09/2025, thereby violating the Clause 09 of Code of Conduct on Insider Trading of the Company.</p> <p>The above breach of the Company's Code of Conduct and applicable regulatory obligations has been taken very seriously by the Company. The matter was placed before the Audit Committee at its meeting held on November 06, 2025, and after careful consideration, the Committee has resolved the following:</p> <ol style="list-style-type: none"> 1. A warning letter to be issued to the designated person, instructing the DP to ensure strict adherence to the Code and regulatory requirements going forward; and 2. Company has taken acknowledgement letter from the DP confirming that, she will strictly adhere to the Company's Code of Conduct going forward attached herewith as Annexure 2. <p>Further, the designated person has been advised to treat this matter with utmost seriousness. Any future violation of the Company's Code of Conduct or SEBI regulations will attract stricter disciplinary action, as the company may deem fit.</p>

6	Reasons recorded in writing for taking action stated above	Violation of the clause 09 of the Companies Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons as required under SEBI PIT Regulations.
7	Details of the previous instances of violations, if any	Not Applicable
8	If any amount collected for Code of Conduct violation(s)	
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	DD Date	
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	9	Any other relevant information

Annexure 1

Date - 29/10/25

To

The Compliance Officer.

Anthem BioScience Ltd

Bommasandra Industrial Area

Bengaluru - 560099.

Respected Sir/madam

Sub:- Liquidate ESOP Shares During Trading window close :- Reg,

with the reference to the above I Srinivas.L working in Anthem BioScience Ltd, hereby inform you that Certain ESOP Shares allotted to me, were liquidated by my agent during the trading window close, the transaction occurred without my awareness or instruction & I Sincerely regret the oversight.

I acknowledge that, as a Designated person it is my responsibility to Ensure strict adherence to the Company insider trading policy.

I assure you that this was unintentional & I will take all necessary precaution to prevent such occurrences in the future.

I kindly request you to this instance be Considered with leniency as it was not deliberate.

Going forward I will Keep the Compliance team informed of all relevant transaction.

Thanking you

Yours faithfully .


(Srinivas.L)

AS062

Encl - mail copy



srinivas rohith <srinivas.rohith@gmail.com>

Re:[## 12691992 ##] 59953583 - outcall - concern is about ageing square clarification of anthem bioscience

srinivas rohith <srinivas.rohith@gmail.com>
To: <support@5paisa.com>

Mon, 20 Oct at 3:30 PM

Hi samdhan,

Thanks for your mail, as per our discussion, before you square off, I inquired about any shares can be square off and match the balance amount, but after I square off and match the outstanding payment even though your team has been square off some of my shares, since am DP PERSON of Anthem bioscience shares , I should not sell or buy after ending of any finanacial quarter next 45 days , and your company has sold my shares and as I informed to you if any penalty or fine imposed by SEBI .

And I also informed that if any shortfall of margins square off, messages has to send us at least 1-2 before not for the same day , but today also occurred same thing morning your people send message and your team has sold my shares. Than what is use of am using 5 paisa securities, please confirm this is the way 5 paisa capital is working standard, I will offload all my shares from 5 paisa capital.

Regards
[Quoted text hidden]



srinivas rohith <srinivas.rohith@gmail.com>

Re:[## 12691992 ##] 59953583 - outcall - concern is about ageing square clarification of anthem bioscience

srinivas rohith <srinivas.rohith@gmail.com>
To: <support@5paisa.com>

Wed, 29 Oct at 5:00 PM

Dear Concern,

I am writing to express my strong disappointment regarding the repeated unauthorized square-off of my ESOP shares, despite my clear and prior instructions.

As I had already informed your team earlier, I am a Designated Person (DP) for Anthem Biosciences and, as per SEBI regulations, I am restricted from buying or selling shares for 45 days following the end of any financial quarter. I had explicitly communicated that under no circumstances should my Anthem Bioscience ESOP shares be sold. Yet, today, your team has once again squared off three of these shares without my consent.

This action not only violates my compliance obligations but also puts me at serious regulatory risk. If any penalty or fine is imposed by SEBI due to this unauthorized transaction, I will hold 5paisa Capital fully responsible and expect the penalty to be borne entirely by your organization.

Additionally, I had requested that any margin shortfall alerts or square-off notifications be sent at least 1–2 days in advance. However, your team continues to send alerts on the same day and proceeds with square-offs without giving me a chance to act. Please also note that since these alerts are sent to personal email IDs, we are unable to view them during office hours, which further limits our ability to respond in time.

I need an immediate explanation for this repeated breach and a clear solution to prevent such incidents going forward. Please confirm whether 5paisa Capital considers this an acceptable standard of service. If not resolved promptly, I will be forced to reconsider my association with your platform.

Looking forward to your urgent response.

Regards
[Quoted text hidden]

Annexure 2

Date : 16 / 09 / 2025

Place : Bangalore.

To,

Mrs. Divya Prasad,
Compliance officer,
Anthem Bioscience Ltd,
#49, F1 & F2, Bommanandra Indl. Area,
Bangalore - 560099.

Sub: Explanation for delay and subsequent sale of
Shares.

Dear Divya,

I had obtained Prior permission to
sell my shares, however, I was unable to complete
the sale within the specified time as my husband
had undergone surgery during that period, subsequently
I proceeded with the sale of my shares without
obtaining fresh permission.

I sincerely apologize for the lapse and
assure you that such an occurrence will not be
repeated in the future.

Thanking you for your understanding,
Yours sincerely,
Bhuv

BHUVANESWARI.M [AB024]