February 23, 2022

National Stock Exchange of India Limited, Listing Compliance Department Exchange Plaza, C-1, Block G, Bandra Kurla Complex, Bandra (East) Mumbai – 400 051 **Scrip Symbol: GALAXYSURF**	BSE Limited, Listing Department, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai- 400001 **Scrip Code: 540935**

Sub: Reporting of violation of code of conduct for Prohibition of Insider Trading.
Ref: SEBI Circular no. SEBI/HO/ISD/CIR/P/2020/135 dated July 23, 2020.

Dear Sir/Madam,

Pursuant to the Regulation 9(1) and Schedule B of the SEBI (Prohibition of Insider Trading) Regulations, 2015, read with above captioned SEBI Circular, we hereby furnish Reports regarding violation of Company's Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons and their immediate relatives and actions taken by the Company.

We request you to take the same on record.

Yours faithfully,
For **Galaxy Surfactants Limited**

NIRANJAN ARUN KETKAR Digitally signed by NIRANJAN ARUN KETKAR
Date: 2022.02.24 15:27:38 +05'30'

Niranjan Ketkar
Company Secretary
Encl: as above

Communication Address:
Rupa Solitaire,
Ground Floor, Unit no. 8, 12A and 14
Millennium Business Park, Mahape,
Navi Mumbai, 400 710
Ph: +91-22-33063700

Regd. Office: C-49/2, TTC Industrial Area,
Pawne, Navi Mumbai-400 703, India
CIN: L39877MH1986PLC039877
Ph: +91-22-27616666
Fax : +91-22-27615883/ 27615886
e-mail : galaxy@galaxysurfactants.com
Website: www.galaxysurfactants.com

Report by Galaxy Surfactants 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

S. no.	Particulars	Details
1.	**Galaxy Surfactants Limited**	
2.	**Please tick appropriate checkbox** **Reporting in capacity of :** **☐ Listed Company** **☐ Intermediary** **☐ Fiduciary**	Listed Company
	A. Details of Designated Person (DP)	
	i. Name of the DP	Shubham Suri
	ii. PAN of the DP	HEGPS1848M
	iii. Designation of DP	Officer – Sourcing process
	iv. Functional Role of DP	Assisting in sourcing of fatty acid
	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	N.A.
	ii. PAN of the immediate relative of DP	N.A.
	C. Details of transaction(s)	
	i. Name of the scrip	Galaxy Surfactants Limited
	ii. No. of shares traded and value (Rs.) (Date- wise)	a. Purchase of 1 equity Share having market value of Rs. 3200 on 27-10-2021 b. Purchase of 1 equity Share having market value of Rs. 2980 on 16-11-2021
	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	N.A.
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	N.A.
4	Details of violations observed under Code of Conduct	Purchase of shares of the Company in violation of provision of Insider Trading Code of the Company
5	Action taken by Galaxy Surfactants Limited	Warning email sent and asked not to deal in shares without prior approval
6	Reasons recorded in writing for taking action stated above	Violation of Code of Conduct
7	Details of the previous instances of violations, if any, since last financial year	Nil
8	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	N.A.

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<td>ii. Details of transfer/payment
In case of Online:
<table>
<tr><th>Particulars</th><th>Details</th></tr>
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Yours Faithfully,

NIRANJAN ARUN KETKAR Digitally signed by NIRANJAN ARUN KETKAR Date: 2022.02.24 15:29:37 +05'30'

Sd/ -

Niranjan Ketkar
Compliance Officer
PAN: AHLPK6422E
Email ID: niranjan.ketkar@galaxysurfactants.com
Date: 24-02-2022
Place: Navi Mumbai

Report by Galaxy Surfactants 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.	**Galaxy Surfactants Limited**	
2.	**Please tick appropriate checkbox** **Reporting in capacity of :** **☐ Listed Company** **☐ Intermediary** **☐ Fiduciary**	Listed Company
	A. Details of Designated Person (DP)	
	i. Name of the DP	Sandesh Mhatre
	ii. PAN of the DP	AZXPM6531A
	iii. Designation of DP	Senior Officer-IT & CM
	iv. Functional Role of DP	Supporting in resolving IT networking, hardware related issues
	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	N.A.
	ii. PAN of the immediate relative of DP	N.A.
	C. Details of transaction(s)	
	i. Name of the scrip	Galaxy Surfactants Limited
	ii. No. of shares traded and value (Rs.) (Date- wise)	Purchase of 2 equity shares having market value of Rs. 5811.80 on 20-12-2021
	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	N.A.
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	N.A.
4	Details of violations observed under Code of Conduct	Purchase of shares of the Company in violation of provision of Insider Trading Code of the Company
5	Action taken by Galaxy Surfactants Limited	Warning email sent and asked not to deal in shares without prior approval
6	Reasons recorded in writing for taking action stated above	Violation of Code of Conduct
7	Details of the previous instances of violations, if any, since last financial year	NIL
8	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	N.A.

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Yours Faithfully,

NIRANJAN ARUN KETKAR Digitally signed by NIRANJAN ARUN KETKAR Date: 2022.02.24 15:30:35 +05'30'

Sd/ -

Niranjan Ketkar
Compliance Officer
PAN: AHLPK6422E
Email ID: niranjan.ketkar@galaxysurfactants.com
Date: 24-02-2022
Place: Navi Mumbai

Report by Galaxy Surfactants 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.	**Galaxy Surfactants Limited**	
2.	**Please tick appropriate checkbox** **Reporting in capacity of :** **☐ Listed Company** **☐ Intermediary** **☐ Fiduciary**	Listed Company
	A. Details of Designated Person (DP)	
	i. Name of the DP	Yogesh S. Kalra
	ii. PAN of the DP	AAGPK2920H
	iii. Designation of DP	Head-Business Creation
	iv. Functional Role of DP	Business Creation
	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	N.A.
	ii. PAN of the immediate relative of DP	N.A.
	C. Details of transaction(s)	
	i. Name of the scrip	Galaxy Surfactants Limited
	ii. No. of shares traded and value (Rs.) (Date- wise)	a. Sell of 461 equity shares of market value Rs. 14,27,402.20 on 25-01-2022. b. Purchase of 461 equity shares of market value Rs. 14,63,748.53 on 27-01-2022
	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	07-02-2022
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Automatically updated
4	Details of violations observed under Code of Conduct	Creating lien, trading in shares during trading window closure, contra trade within six months in violation of Code of Conduct of the Company
5	Action taken by Galaxy Surfactants Limited	A warning letter issued and imposed a penalty of Rs. 10,000/-
6	Reasons recorded in writing for taking action stated above	Violation of Code of Conduct of the Company as stated above
7	Details of the previous instances of violations, if any, since last financial year	NIL

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<tr><td>8</td><td colspan="2">If any amount collected for Code of Conduct violation(s)</td></tr>
<tr><td></td><td>i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)</td><td>Online</td></tr>
<tr><td></td><td>ii. Details of transfer/payment
In case of Online:
<table>
<tr><th>Particulars</th><th>Details</th></tr>
<tr><td>Name of the transferor</td><td>Galaxy Surfactants Limited</td></tr>
<tr><td>Bank Name, branch and Account number</td><td>Standard Chartered Bank</td></tr>
<tr><td>UTR/Transaction reference Number</td><td>SIN00461Q0227389</td></tr>
<tr><td>Transaction date</td><td>23-02-2022</td></tr>
<tr><td>Transaction Amount (in Rs.)</td><td>10,000</td></tr>
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<tr><th>Particulars</th><th>Details</th></tr>
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Yours Faithfully,

Sd/-

NIRANJAN ARUN KETKAR
Digitally signed by NIRANJAN ARUN KETKAR
Date: 2022.02.24 15:31:28 +05'30'

Niranjan Ketkar
Compliance Officer
PAN: AHLPK6422E
Email ID: niranjan.ketkar@galaxysurfactants.com
Date: 24-02-2022
Place: Navi Mumbai

Report by Galaxy Surfactants 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.	**Galaxy Surfactants Limited**	
2.	**Please tick appropriate checkbox** **Reporting in capacity of :** **☐ Listed Company** **☐ Intermediary** **☐ Fiduciary**	Listed Company
	A. Details of Designated Person (DP)	
	i. Name of the DP	Nithyanand C
	ii. PAN of the DP	AJRPC3003B
	iii. Designation of DP	Manager-Conversion Process
	iv. Functional Role of DP	TPM Implementation
	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	N.A.
	ii. PAN of the immediate relative of DP	N.A.
	C. Details of transaction(s)	
	i. Name of the scrip	Galaxy Surfactants Limited
	ii. No. of shares traded and value (Rs.) (Date- wise)	Sell of 100 equity shares having market value of Rs. 3,10,517.33 on 11-01-2022
	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	N.A.
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	N.A.
4	Details of violations observed under Code of Conduct	Sell of shares of the Company in violation of provision of Insider Trading Code of the Company
5	Action taken by Galaxy Surfactants Limited	Warning email sent and asked not to deal in shares without prior approval
6	Reasons recorded in writing for taking action stated above	Violation of Code of Conduct
7	Details of the previous instances of violations, if any, since last financial year	Nil
8	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	

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Yours Faithfully,

NIRANJAN ARUN KETKAR
Digitally signed by NIRANJAN ARUN KETKAR
Date: 2022.02.24 15:33:33 +05'30'

Sd/-
Niranjan Ketkar
Compliance Officer
PAN: AHLPK6422E
Email ID: niranjan.ketkar@galaxysurfactants.com
Date: 24-02-2022
Place: Navi Mumbai

Report by Galaxy Surfactants 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.	**Galaxy Surfactants Limited**	
2.	**Please tick appropriate checkbox** **Reporting in capacity of:** **☐ Listed Company** **☐ Intermediary** **☐ Fiduciary**	Listed Company
	A. Details of Designated Person (DP)	
	i. Name of the DP	Avinash Bari
	ii. PAN of the DP	CBYPB4584K
	iii. Designation of DP	Officer- Business Development
	iv. Functional Role of DP	Assisting in development of syndet formulations, customer support
	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	N.A.
	ii. PAN of the immediate relative of DP	N.A.
	C. Details of transaction(s)	
	i. Name of the scrip	Galaxy Surfactants Limited
	ii. No. of shares traded and value (Rs.) (Date- wise)	a. Purchase of 6 equity shares having market value of Rs. 17610.70 on 16-11-2021. b. Sale of 6 equity shares having market value of Rs. 18718.55 on 06-01-2022
	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	N.A.
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	N.A.
4	Details of violations observed under Code of Conduct	Purchase and Sale of shares of the Company in violation of provision of Insider Trading Code of the Company
5	Action taken by Galaxy Surfactants Limited	Warning email sent and asked not to deal in shares without prior approval
6	Reasons recorded in writing for taking action stated above	Violation of Code of Conduct
7	Details of the previous instances of violations, if any, since last financial year	Nil
8	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	N.A.

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NIRANJAN ARUN KETKAR Digitally signed by NIRANJAN ARUN KETKAR Date: 2022.02.24 15:32:35 +05'30'

Sd/-

Niranjan Ketkar
Compliance Officer
PAN: AHLPK6422E
Email ID: niranjan.ketkar@galaxysurfactants.com
Date: 24-02-2022
Place: Navi Mumbai