

March 02, 2023

The Manager, Listing Department
The National Stock Exchange of India Ltd.
Exchange Plaza, Bandra Kurla Complex,
Bandra (E), Mumbai - 400 051
NSE Symbol : PANACEABIO

BSE Limited
Corporate Relationship Department,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai - 400 001
BSE Scrip Code: 531349

**Sub: Reporting regarding violation of Company's Code of Conduct under SEBI
(Prohibition of Insider Trading) Regulations, 2015**

Dear Sir / Madam,

Please find enclosed herewith report of violation of the provisions of the Company's Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015, done by a Designated Person, in the prescribed format.

This is for your information and record.

Thanking you,

Sincerely yours,

For Panacea Biotec Limited



Vinod Goel
Group CFO and Head Legal
& Company Secretary

Encl.: As above



B1 Extn. /G3, Mohan Co-op Indl. Estate,
Mathura Road, New Delhi -110044
Email: vinodgoel@panaceabiotec.com
Phone: D.I.D. +91-11-4167 9015
Fax: +91-11-4167 9070

Panacea Biotec Ltd.

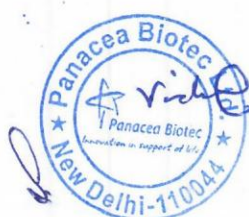
CIN: L33117PB1984PLC022350

Registered Office: Ambala-Chandigarh Highway, Lalru - 140 501, Punjab, India. Ph.: +91-1762-505900, Fax: +91-1762-505906.
e-mail: corporate@panaceabiotec.com website: www.panaceabiotec.com

Annexure A

**Report by Panacea Biotec 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.	Name of the listed company/ Intermediary/Fiduciary	Panacea Biotec 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. Faraz Usmani												
	ii. PAN of DP	ABYPU3439L												
	iii. Designation of DP	Assistant Manager – IT												
	iv. Functional Role of DP	Information Technology Infrastructure												
	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													
	C. Details of transaction(s)													
	i. Name of the scrip	Panacea Biotec Limited BSE - 531349 / NSE - PANACEABIO												
	ii. No of shares traded and value (Rs.) (Date-wise)	<table border="1"> <thead> <tr> <th>Date of Transaction</th><th>Nature</th><th>No. of Shares</th><th>Price (in Rs.)</th></tr> </thead> <tbody> <tr> <td>25.01.23</td><td>Purchase during Trading Window Closure (TWC)</td><td>381</td><td>130.55</td></tr> <tr> <td>01.02.23</td><td>Contra Trade during TWC (Sale)</td><td>381</td><td>132.30</td></tr> </tbody> </table>	Date of Transaction	Nature	No. of Shares	Price (in Rs.)	25.01.23	Purchase during Trading Window Closure (TWC)	381	130.55	01.02.23	Contra Trade during TWC (Sale)	381	132.30
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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	N.A.												
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015													
4.	Details of violations observed under Code of Conduct	a. Traded in Equity Shares of Company during the Trading Window closure period; b. Executed contra trade												



5.	Action taken by Listed company/ Intermediary/ Fiduciary	Upon noticing the violation, the Compliance Officer of the Company had issued Show Cause Notice to DP and the matter was also reported to the Audit Committee which confirmed the violation of Code of Conduct formulated pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and penalty was levied as per the approved basis of levying of penalty based on the nature & number of violations and number of shares involved apart from disgorgement of profits (in case of contra trade) in violation of Code of Conduct. As the case involved contra trade as well, a demand letter was issued to DP levying both penalty and disgorgement of profits aggregating to Rs.3,334 (Rupees Three Thousand Three Hundred Thirty Four only). The said amount has now been remitted to the SEBI-IPEF Account. Further, DP has been advised to ensure strict compliance of Code of Conduct in future.												
6.	Reasons recorded in writing for taking action stated above	DP has clarified that trading has inadvertently been done due to ignorance and assured that in future he will ensure strict compliance of the Code of Conduct.												
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)													
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online												
	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>Panacea Biotec Limited</td></tr><tr><td>Bank Name, branch and Account number</td><td>Axis Bank Ltd., Statesmen House, Barakhamba Road, New Delhi A/c No. 919020023168520</td></tr><tr><td>UTR/Transaction reference Number</td><td>NEFT/TB/AXTB230603078436/SEBI IPEF</td></tr><tr><td>Transaction date</td><td>01.03.2023</td></tr><tr><td>Transaction Amount (in Rs.)</td><td>3,334</td></tr></table>	Particulars	Details	Name of the transferor	Panacea Biotec Limited	Bank Name, branch and Account number	Axis Bank Ltd., Statesmen House, Barakhamba Road, New Delhi A/c No. 919020023168520	UTR/Transaction reference Number	NEFT/TB/AXTB230603078436/SEBI IPEF	Transaction date	01.03.2023	Transaction Amount (in Rs.)	3,334	
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9.	Any other relevant information	N.A.												

Yours faithfully,
For Panacea Biotech Limited


Vinod Goel
Group CFO and Head Legal & Company Secretary
Email ID: vinodgoel@panaceabiotec.com
Date: 02.03.2023
Place: New Delhi

