

June 07, 2024

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 of violations of Company's Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015**

Dear Sir / Madam,

Please find enclosed herewith report of violations of the provisions of the Company's Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015, done by the immediate relatives of the Designated Persons, 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

**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/ <del>Intermediary/Fiduciary</del>	Panacea Biotec Limited																																				
2.	Please tick appropriate checkbox Reporting in capacity of: <input checked="" type="checkbox"/> <b>Listed Company</b> <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company																																				
3.	<b>A. Details of Designated Person (DP)</b>																																					
	i. Name of the DP	Mrs. Anshu Rastogi																																				
	ii. PAN of DP	ACEPR6892D																																				
	iii. Designation of DP	General Manager - Global Sourcing (Biologicals)																																				
	iv. Functional Role of DP	Global Sourcing																																				
	v. Whether DP is Promoter or belongs to Promoter Group	No																																				
	<b>B. If Reporting is for immediate relative of DP</b>																																					
	iii. Name of the immediate relative of DP	Mr. Rajiv Kumar Rastogi																																				
	iv. PAN of the immediate relative of DP	AGCPR9293G																																				
	<b>C. Details of transaction(s)</b>																																					
	iii. Name of the scrip	Panacea Biotec Limited BSE - 531349 / NSE - PANACEABIO																																				
	iv. 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>25.04.23</td> <td>Purchase</td> <td>9</td> <td>1,080</td> </tr> <tr> <td>25.04.23</td> <td>during trading window closure</td> <td>91</td> <td>10,920</td> </tr> <tr> <td>13.06.23</td> <td>Contra Trade</td> <td>100</td> <td>14,100</td> </tr> <tr> <td>18.09.23</td> <td>(Sale)</td> <td>200</td> <td>31,070</td> </tr> <tr> <td>04.01.24</td> <td>Sale during trading window closure</td> <td>150</td> <td>29,700</td> </tr> <tr> <td>21.02.24</td> <td>Contra Trade</td> <td>100</td> <td>16,000</td> </tr> <tr> <td>22.03.24</td> <td>(Purchase)</td> <td>100</td> <td>13,450</td> </tr> <tr> <td>Total</td> <td></td> <td>750</td> <td>1,16,320</td> </tr> </tbody> </table>	Date of Transaction	Nature	No. of Shares	Price (in Rs.)	25.04.23	Purchase	9	1,080	25.04.23	during trading window closure	91	10,920	13.06.23	Contra Trade	100	14,100	18.09.23	(Sale)	200	31,070	04.01.24	Sale during trading window closure	150	29,700	21.02.24	Contra Trade	100	16,000	22.03.24	(Purchase)	100	13,450	Total		750	1,16,320
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	<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter</b>																																					
	iii. 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.																																				
	iv. 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 within six months from previous trade																																				

5.	Action taken by Listed company/ <del>Intermediary/</del> <del>Fiduciary</del>	<p>The Compliance Officer issued Show Cause Notice to Designated Person (“DP”) pursuant to which reply was received. The matter was then 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 imposed penalty based on the nature &amp; count of violations and number of shares involved.</p> <p>A demand letter was then issued to her imposing penalty of Rs.1,500 and disgorgement of profits (in case of contra trade) of Rs.4,185 aggregating to Rs.5,685.</p> <p>The said amount has now been remitted to the SEBI-IPEF Account.</p> <p>Further, concerned employee was advised to ensure strict compliance with the Code of Conduct in future.</p>
6.	Reasons recorded in writing for taking action stated above	Designated Person has clarified that trading has inadvertently been done by her spouse due to oversight and assured that in future she 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)	
	iii. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online
	iv. Details of transfer/payment: In case of Online:	
	<b>Particulars</b>	<b>Details</b>
	Name of the transferor	Panacea Biotec Ltd.
	Bank Name, branch and Account number	Bank Name: State Bank of India Branch: Industrial Finance Branch Account No.: 30236636625 IFSC Code: SBIN0009601
	UTR/Transaction reference Number	240606186582476
	Transaction date	06.06.2024
	Transaction Amount (in Rs.)	5,685
	In case of Demand Draft (DD):	
	<b>Particulars</b>	<b>Details</b>
	Bank Name and branch	N.A.
	DD Number	
	DD date	
	DD amount (in Rs.)	
9.	Any other relevant information	N.A.

Yours faithfully,  
For Panacea Biotec Limited

Vinod Goel  
Group CFO and Head Legal & Company Secretary  
Email ID: [vinodgoel@panaceabiotec.com](mailto:vinodgoel@panaceabiotec.com)  
Date: 07.06.2024  
Place: New Delhi