

August 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 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

Annexure A

**Report by Panacea Biotech 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 Biotech Limited														
2.	Please tick appropriate checkbox Reporting in capacity of: <input checked="" type="checkbox"/> Listed Company Intermediary Fiduciary	Listed Company														
3.	A. Details of Designated Person (DP)															
	i. Name of the DP	Mrs. Upasana Arora														
	ii. PAN of DP	AIHPA2427L														
	iii. Designation of DP	Deputy General Manager (Program Management)														
	iv. Functional Role of DP	Project Management														
	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	Mr. Ravi Kant Rajpoot Mr. Prabhu Dayal Arora														
	ii. PAN of the immediate relative of DP	AZRPR3105R AAAPA0206G														
	C. Details of transaction(s)															
	i. Name of the scrip	Panacea Biotech Limited BSE - 531349 / NSE - PANACEABIO														
	ii. No of shares traded and value (Rs.) (Date- wise)	<table border="1"> <thead> <tr> <th>Name of Designated Person</th> <th>Date of Transaction</th> <th>Nature</th> <th>No. of Shares</th> <th>Price (in Rs.)</th> </tr> </thead> <tbody> <tr> <td>Mr. Ravi Kant Rajpoot</td> <td>15.04.24</td> <td rowspan="2">Purchase during trading window closure</td> <td>1000</td> <td>1,39,000</td> </tr> <tr> <td>Mr. Prabhu Dayal Arora</td> <td>15.04.24</td> <td>100</td> <td>13,850</td> </tr> </tbody> </table>	Name of Designated Person	Date of Transaction	Nature	No. of Shares	Price (in Rs.)	Mr. Ravi Kant Rajpoot	15.04.24	Purchase during trading window closure	1000	1,39,000	Mr. Prabhu Dayal Arora	15.04.24	100	13,850
Name of Designated Person	Date of Transaction	Nature	No. of Shares	Price (in Rs.)												
Mr. Ravi Kant Rajpoot	15.04.24	Purchase during trading window closure	1000	1,39,000												
Mr. Prabhu Dayal Arora	15.04.24		100	13,850												
	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	Traded in Equity Shares of Company during the Trading Window closure period.														
5.	Action taken by Listed company/ Intermediary/Fiduciary	The Compliance Officer of the Company had issued Show Cause Notice to Designated Person (“DP”) pursuant to														

S. No.	Particulars	Details
		which reply was received. Thereafter, a demand letter was issued to her levying a penalty amounting to Rs.2,200 (Rupees Two Thousand Two Hundred only) based on the nature & count of violations and number of shares involved. 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 been done by her immediate relatives independently and without the knowledge of closure of trading window and without any malafide intention. Further, DP has also assured that she will take her responsibilities seriously and uphold the highest standards of integrity and compliance. She has also assured that she will be fully committed to complying with all securities laws and regulations governing insider trading.
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:	
	Particulars	Details
	Name of the transferor	Panacea Biotec Limited
	Bank Name, branch and Account number	Bank Name: State Bank of India Branch: Industrial Finance Branch Account No.: 30236636625
	UTR/Transaction reference Number	240807193167003
	Transaction date	07.08.2024
	Transaction Amount (in Rs.)	2,200
	In case of Demand Draft (DD):	
	Particulars	Details
	Bank Name and branch	NIL
	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
Date: 07.08.2024
Place: New Delhi