November 16, 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
Digitally signed by VINOD GOEL
Date: 2023.11.16 17:26:30 +05'30'

Vinod Goel
Group CFO and Head Legal
& Company Secretary

Encl.: As above

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)

<table>
<tr><th>S. No.</th><th>Particulars</th><th>Details</th></tr>
<tr><td>1.</td><td>Name of the listed company~~/ Intermediary/Fiduciary~~</td><td>Panacea Biotec Limited</td></tr>
<tr><td>2.</td><td>Please tick appropriate checkbox
Reporting in capacity of:
√ Listed Company
Intermediary
Fiduciary</td><td>Listed Company</td></tr>
<tr><td rowspan="11">3.</td><td colspan="2">A. Details of Designated Person (DP)</td></tr>
<tr><td>i. Name of the DP</td><td>Mr. Kumar Gaurav</td></tr>
<tr><td>ii. PAN of DP</td><td>AJFPG3593A</td></tr>
<tr><td>iii. Designation of DP</td><td>General Manager - RA (Vaccines & Biologicals)</td></tr>
<tr><td>iv. Functional Role of DP</td><td>Regulatory Affairs</td></tr>
<tr><td>v. Whether DP is Promoter or belongs to Promoter Group</td><td>No</td></tr>
<tr><td colspan="2">B. If Reporting is for immediate relative of DP</td></tr>
<tr><td>i. Name of the immediate relative of DP</td><td rowspan="2">N.A.</td></tr>
<tr><td>ii. PAN of the immediate relative of DP</td></tr>
<tr><td colspan="2">C. Details of transaction(s)</td></tr>
<tr><td>i. Name of the scrip</td><td>Panacea Biotec Limited
BSE - 531349 / NSE - PANACEABIO</td></tr>
<tr><td>ii. No of shares traded and value (Rs.) (Date-wise)</td><td>
<table>
<tr><th>Date of Transaction</th><th>Nature</th><th>No. of Shares</th><th>Price (in Rs.)</th></tr>
<tr><td>04.10.23</td><td>Sale during Trading Window Closure</td><td>800</td><td>167.20</td></tr>
</table>
</td></tr>
<tr><td></td><td colspan="2">D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter</td></tr>
<tr><td></td><td>i. Date of intimation of trade(s) by concerned DP / director / promoter / promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015</td><td rowspan="2">N.A.</td></tr>
<tr><td></td><td>ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015</td></tr>
<tr><td>4.</td><td>Details of violations observed under Code of Conduct</td><td>Traded in Equity Shares of Company during the Trading Window closure period.</td></tr>
</table>

VINOD GOEL

Digitally signed by VINOD GOEL
Date: 2023.11.16 17:27:41 +05'30'

<table>
<tr><td>5.</td><td>Action taken by Listed company~~/ Intermediary/ Fiduciary~~</td><td>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.
Thereafter, a demand letter was issued to DP levying penalty amounting to Rs.1,600 (Rupees One Thousand Six Hundred 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.</td></tr>
<tr><td>6.</td><td>Reasons recorded in writing for taking action stated above</td><td>DP has clarified that trading has inadvertently been done due to oversight and assured that in future he will ensure strict compliance of the Code of Conduct.</td></tr>
<tr><td>7.</td><td>Details of the previous instances of violations, if any, since last financial year</td><td>None</td></tr>
<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 colspan="2">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>Kumar Gaurav</td></tr>
<tr><td>Bank Name, branch and Account number</td><td>Bank Name: ICICI Bank,
Branch: New Friends Colony, New Delhi
Account No.: 004601506013
IFSC Code: ICIC0000046</td></tr>
<tr><td>UTR/Transaction reference Number</td><td>231116169909909</td></tr>
<tr><td>Transaction date</td><td>16.11.2023</td></tr>
<tr><td>Transaction Amount (in Rs.)</td><td>1,600</td></tr>
</table>
In case of Demand Draft (DD):
<table>
<tr><th>Particulars</th><th>Details</th></tr>
<tr><td>Bank Name and branch</td><td rowspan="4">N.A.</td></tr>
<tr><td>DD Number</td></tr>
<tr><td>DD date</td></tr>
<tr><td>DD amount (in Rs.)</td></tr>
</table></td></tr>
<tr><td>9.</td><td>Any other relevant information</td><td>N.A.</td></tr>
</table>

Yours faithfully,
For Panacea Biotec Limited

VINOD GOEL
Digitally signed by VINOD GOEL
Date: 2023.11.16 17:28:36 +05'30'

Vinod Goel
Group CFO and Head Legal & Company Secretary
Email ID: vinodgoel@panaceabiotec.com
Date: 16.11.2023
Place: New Delhi