

March 30, 2026

To

THE CORPORATE RELATIONSHIP DEPT
M/s.BSE Limited
I Floor, New Trading Ring,
Rotunda Building,
P.J.Towers, Dalal Street,
Fort, Mumbai - 400 001.

M/s. NATIONAL STOCK EXCHANGE OF INDIA LTD.,
Exchange Plaza, C-1, Block G,
Bandra Kurla Complex,
Bandra (E),Mumbai – 400 051

Symbol: **SALZERELEC**

SCRIP CODE: 517059

Dear Sirs/Madam

Sub-Reporting of Violation relating to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015**Ref: SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020**

In terms of Company's Code of Conduct (To Regulate, Monitor and Report of Trading by Designated Persons) ("Insider Trading Code ") read with Schedule B and Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015, we hereby submit a report in respect of violation of Insider Trading Code of the Company as per format specified by SEBI vide its Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

You are requested to kindly take the above information on your records.

This is for your kind information and records.

Thanking you

Yours faithfully

For SALZER ELECTRONICS LTD

K M MURUGESAN
COMPANY SECRETARY AND COMPLIANCE OFFICER
(M No:A25953)

SALZER ELECTRONICS LIMITED

Samichettipalayam, Jothipuram (Post),
Coimbatore - 641 047. INDIA.

+91-422-423 3600  salzer@salzergroup.com

www.salzergroup.com

CIN : L03210TZ1985PLC001535 GSTIN: 33AAECS3411L1ZJ

Report by Salzer Electronics Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

[For listed companies: Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015

Sr.No	Particulars	Details			
1	Name of the listed company/ Intermediary/Fiduciary	Salzer Electronics Limited			
2	Please tick appropriate checkbox Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company			
3	A. Details of Designated Person (DP)				
	a. Name of the DP	R GEETHA			
	b. PAN of the DP	AOLPG5760J			
	c. Designation of DP	Manager			
	d. Functional Role of DP	Corporate Cell			
	e. Whether DP is Promoter or belongs to Promoter Group	No			
	B. If Reporting is for immediate relative of DP				
	a. Name of the immediate relative of DP	NA			
	b. PAN of the immediate relative of DP	NA			
	C. Details of transaction(s)				
	a. Name of the scrip	NSE: SALZERELEC and BSE: 517059			
	b. No of shares traded and value (Rs.) (Date-wise)	Date	Transaction	No. of Shares	Consideration
18-08-2023		Buy	1	391.75	
18-08-2023		Sell	1	392.15	
D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter					
	a. Date of intimation of trade(s) by concerned DP/ director/ promoter/ promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	NA			
	b. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	NA			
4	Details of violations observed under Code of Conduct	Execution of Contra- Trades in shares of the Company by the DP			
5	Action taken by Listed company	The matter was, as required under Code of Conduct, placed before the Audit Committee and the Board at their respective meetings held on March 10, 2026, for their consideration and appropriate directions. While the transaction constituted a technical contra trade violation under the Company's Code of Conduct framed pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015, the magnitude and impact of the violation were			

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		<p>assessed to be negligible.</p> <p>The Audit Committee and the Board noted the facts and circumstances of the case and, based on their evaluation, approved the following actions in terms of the Internal Code of Code:-</p> <ul style="list-style-type: none"> • Issuance of a formal advisory/warning letter, emphasizing the need for strict adherence to the Code of Conduct; • Direction to disgorge the profit to the Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund (IPEF). <p>The above actions have been taken without prejudice to any right of the regulator to initiate such further action as may be deemed appropriate, in accordance with applicable laws and regulations.</p> <p>In accordance with the Board's Direction, Warning letter issued to concerned designated person.</p>
	Reasons recorded in writing for taking action stated above	<p>The Audit Committee and the Board, upon review of the transaction and the explanation provided, observed that the contra trade involved only one share, resulting in a nominal gain of Rs.0.40, and occurred within a short interval, indicating that the transaction was not structured or premeditated.</p> <p>It was further noted that:</p> <ul style="list-style-type: none"> • There was no involvement of Unpublished Price Sensitive Information (UPSI); • The transaction was carried out in the ordinary course, without any malafide intent or misuse of position; • The quantum of gain is insignificant, and the same to be disgorged; • The instance is isolated in nature, with no prior record of non-compliance. <p>Considering the extremely minimal financial impact, absence of intent, and the overall facts and circumstances, the Audit Committee and the Board formed the considered view that the violation is technical and inadvertent in nature.</p> <p>Accordingly, the action of issuing a formal advisory/warning coupled with disgorgement of the nominal gain is considered adequate, proportionate, and sufficient to address the lapse, while also ensuring continued awareness and compliance discipline.</p>
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)	

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	a. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online payment
	b. Details of transfer/payment In case of Online	
	i. Name of the transferor	R GEETHA
	ii. Bank Name, branch and Account number	ICICI BANK, PRICOL COMPLEX Account No. 003301008774
	iii. UTR/Transaction reference Number	UTR No.426909043412
	iv. Transaction date	March 18,2026
	v. Transaction Amount (in Rs.)	Re.1/-
	c. In case of Demand Draft (DD):	NA
9	Any other relevant information	

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Report by Salzer Electronics Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

[For listed companies: Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015

Sr.No	Particulars	Details			
1	Name of the listed company/ Intermediary/Fiduciary	Salzer Electronics Limited			
2	<p><i>Please tick appropriate checkbox</i></p> Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company			
3	A. Details of Designated Person (DP)				
	a. Name of the DP	DORAISWAMY VISHNURANGASWAMY			
	b. PAN of the DP	ADBPV4883G			
	c. Designation of the DP	Director			
	d. Functional DP	Non –Executive and Non Independent			
	e. Whether DP is Promoter or belongs to Promoter Group	Yes			
	B. If Reporting is for immediate relative of DP				
	a. Name of the immediate relative of DP	NA			
	b. PAN of the immediate relative of DP	NA			
	C. Details of transaction(s)				
	a. Name of the scrip	NSE: SALZERELEC and BSE: 517059			
	b. No of shares traded and value (Rs.) (Date- wise)	Date	Transaction	No. of Shares	Consideration (in Rs.)
		22-02-2024	Buy	21158	12099555.75
		22-02-2024	Sell	21158	12123686.15
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter				
	a. Date of intimation of trade(s) by concerned DP/ director/ promoter/ promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	March 17,2026			
	b. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	March 19,2026			
4	Details of violations observed under Code of Conduct	Execution of Contra -Trades in shares of the Company by the DP during the Trading window closure and failure to report the trade to the Company as traded value of shares exceeding Rs.10,00,000 in calendar quarter.			
5	Action taken by Listed company/ Intermediary/ Fiduciary	The matter, as required under Code of Conduct, was placed before the Audit Committee and the Board at their respective meetings held on March 10, 2026, for their consideration and appropriate directions. The transactions executed by Mr. Doraiswamy Vishnurangaswamy, a Non-Executive Director at the relevant time, were reviewed in detail under the Company's Code of Conduct framed pursuant to the SEBI			

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		<p>(Prohibition of Insider Trading) Regulations, 2015.</p> <p>The Audit Committee and the Board noted that the transaction involved trading during the period of trading window closure, which is viewed seriously given its relevance to insider trading safeguards.</p> <p>The Board, taking into account the facts and explanation provided by Mr. Doraiswamy Vishnurangaswamy, issued following directions in accordance with Code Conduct and based on the recommendation of the Audit Committee</p> <ul style="list-style-type: none"> • Issuance of a formal written warning, cautioning against recurrence and emphasizing strict adherence to the Code of Conduct and • Direction has been issued to disgorge 100% of the profits earned, amounting to ₹24,131/-, to the Securities and Exchange Board of India (SEBI), for credit to the Investor Protection and Education Fund (IPEF). • A monetary penalty of Rs.75,000/- and Rs.50,000/- has been levied for (i) failure to report the trades in terms of Regulation 7(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, and (ii) undertaking trades during the Trading Window Closure period, respectively. While, in terms of the Company’s Code of Conduct, such instances, being first-time occurrences, would ordinarily warrant issuance of a warning, the aforesaid monetary levy has been imposed as a considered measure reflecting the Board’s serious view of the matter and to ensure strict adherence to the applicable regulatory requirements. <p>Total remittance amount to SEBI Designated Account – Rs.1.49,131/-</p> <p>The above actions are without prejudice to any right of SEBI to take such further action as may be deemed appropriate under applicable laws and regulations.</p>
6	Reasons recorded in writing for taking action stated above	<p>The Audit Committee and the Board reviewed the explanation submitted by Mr. Doraiswamy Vishnurangaswamy, in respect of the purchase and subsequent sale of 21,158 equity shares executed on February 22, 2024 during the trading window closure period.</p> <p>It was noted from his submission that the transaction was carried out inadvertently, without awareness of the trading window closure as informed by the Compliance Officer and that upon realization; the entire position was reversed on the same day, prior to relevant corporate announcement. He further affirmed that the transaction was bona fide and without any mala fide intent, and that there have been no prior instances of such non-compliance.</p> <p>The Audit Committee and the Board took note of the above explanation and, upon evaluation, observed that:</p> <ul style="list-style-type: none"> • The transaction involved trading during trading window

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		<p>closure, which is a serious compliance requirement under the Code;</p> <ul style="list-style-type: none"> The immediate reversal of the transaction within a short interval, prior to any corporate announcement on February 22,2024, indicates absence of any intent to derive undue advantage; There was no evidence indicating use of Unpublished Price Sensitive Information (UPSI); The profits arising from the transaction have been fully disgorged, in line with regulatory expectations; The instance is isolated in nature, with no prior record of non-compliance. <p>In accordance with the Board's direction, a warning letter has been issued to the concerned Designated Person. The said individual has been advised to exercise utmost caution and ensure strict compliance with the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct in all future dealings in securities. It has also been clearly communicated that any recurrence of such non-compliance will be viewed seriously and may invite more stringent disciplinary and regulatory action.</p>
7	Details of the previous instances of violations, if any, since last financial year	First-time identification of violation of the Insider Trading Code and SEBI (PIT) regulations, 2015.
8	If any amount collected for Code of Conduct violation(s)	
	a. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online payment
	b. Details of transfer/payment In case of Online	
	i. Name of the transferor	DORAISWAMY VISHNURANGASWAMY
	ii. Bank Name, branch and Account number	Canara Bank, Gudalur Branch, Coimbatore-641020 Account No.1262101011168
	iii. UTR/Transaction reference Number	UTR REF NO : CNRBH00118457886
	iv. Transaction date	March 17,2026
	v. Transaction Amount (in Rs.)	Rs. 24,131/-
c. In case of Demand Draft (DD):	NA	
9	Any other relevant information	NIL

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Report by Salzer Electronics Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

[For listed companies: Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

Sr.No	Particulars	Details		
1	Name of the listed company/ Intermediary/Fiduciary	Salzer Electronics Limited		
2	<p><i>Please tick appropriate checkbox</i></p> Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company		
3	A. Details of Designated Person (DP)			
	a. Name of the DP	S VENKATACHALAM		
	b. PAN of the DP	AECPV8703R		
	c. Designation of the DP	General Manager		
	d. Operations Plant II	Commercial -Plant II		
e. Whether DP is Promoter or belongs to Promoter Group	No			
B. If Reporting is for immediate relative of DP				
a. Name of the immediate relative of DP	NA			
b. PAN of the immediate relative of DP	NA			
C. Details of transaction(s)				
a. Name of the scrip	NSE: SALZERELEC and BSE: 517059			
b. No of shares traded and value (Rs.) (Date-wise)	Date	Transaction	No. of Shares	Consideration
	06-11-2023	Buy	100	37,434.40
	15-12-2023	Sell	100	42,900.00
	03-06-2024	Buy	100	72,925.00
	04-06-2024	Buy	100	70,000.00
	05-06-2024	Buy	100	66,680.00
09-10-2024	Sell	300	3,27,480.00	
D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter				
a. Date of intimation of trade(s) by concerned DP/ director/ promoter/ promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	March 10, 2026			
b. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	March 12, 2026			
4	Details of violations observed under Code of Conduct	Contra trade, Failure to report the abovementioned trades to the Company		
5	Action taken by Listed company/ Intermediary/ Fiduciary	The matter, as required under Code of Conduct, was placed before the Audit Committee and the Board at their respective meetings held on March 10, 2026, for their consideration and appropriate directions. The transactions executed by Mr. S Venkatachalam were reviewed in detail in the context of the Company's Code of Conduct framed under the SEBI (Prohibition of Insider		

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		<p>Trading) Regulations, 2015, particularly with respect to (i) contra trade violation and (ii) failure to make requisite disclosures for trades exceeding Rs.10 lakh in a calendar quarter in terms of Regulation 7(2) of SEBI (PIT) Regulations</p> <p>Considering the nature of the lapses, the Board, based on the recommendation of the Audit Committee, issued the following actions in terms of the Internal Code of Conduct:</p> <ul style="list-style-type: none"> • Direction to disgorge 100% of the profits earned from the contra trades, amounting to Rs.1,23,340.60/-, to the Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund (IPEF). • Imposition of a monetary penalty of Rs.75,000/- for failure to comply with the disclosure requirements prescribed under the applicable regulations. While, in terms of the Company's Code of Conduct, such instances, being first-time occurrences, would ordinarily warrant issuance of a warning, the aforesaid monetary levy has been imposed as a considered measure reflecting the Board's serious view of the matter and to ensure strict adherence to the applicable regulatory requirements. <p>Total aggregate amount – Rs.1,98,340.60/-</p> <p>The above actions are without prejudice to the right of SEBI to take such further action as may be deemed appropriate under applicable laws and regulation.</p>
6	Reasons recorded in writing for taking action stated above	<p>The Audit Committee and the Board reviewed the statement submitted by Mr. S. Venkatachalam indicating his inadvertent failure to comply with the applicable provisions relating to contra trades and disclosure requirements, and examined the same in conjunction with the transaction details and surrounding circumstances.</p> <p>Upon evaluation, it was noted that the case involves two distinct compliance lapses, namely:</p> <ul style="list-style-type: none"> • Execution of contra trades in violation of the Company's Code of Conduct framed under the SEBI (Prohibition of Insider Trading) Regulations, 2015; and • Failure to report trades exceeding the prescribed threshold of Rs.10 lakh in a calendar quarter. <p>The Audit Committee and the Board further observed that:</p> <p>The quantum of profit arising from the contra trades is significant, warranting full disgorgement in line with</p>

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		<p>regulatory expectations;</p> <ul style="list-style-type: none"> The non-disclosure of trades constitutes a substantive compliance lapse, affecting adherence to regulatory reporting requirements; There was no material evidence indicating trading based on Unpublished Price Sensitive Information (UPSI); While the lapse has been attributed to inadvertence, the nature and extent of the violations necessitate a strict view, notwithstanding this being a first-time instance. <p>Considering the combined effect of the violations, particularly the magnitude of gains and the disclosure failure, the Audit Committee and the Board formed the considered view that the matter warranted stringent and proportionate action to ensure deterrence and reinforce compliance discipline.</p> <p>Accordingly:</p> <ul style="list-style-type: none"> Disorgement of the entire profits was directed to eliminate any undue financial benefit and A monetary penalty was imposed for the disclosure lapse, reflecting the seriousness of non-compliance with statutory obligations. <p>In accordance with the Board's direction, a warning letter has been issued to the concerned Designated Person. The said individual has been advised to exercise utmost caution and ensure strict compliance with the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct in all future dealings in securities. It has also been clearly communicated that any recurrence of such non-compliance will be viewed seriously and may invite more stringent disciplinary and regulatory action.</p>
7	Details of the previous instances of violations, if any, since last financial year	First-time identification of violation of the Insider Trading Code and SEBI (PIT) regulations, 2015.
8	If any amount collected for Code of Conduct violation(s)	
	a. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online payment
	b. Details of transfer/payment In case of Online	
	vi. Name of the transferor	S VENKATACHALAM
	vii. Bank Name, branch and Account number	ICICI BANK, PRICOL BRANCH, COIMBATORE -641202 ACCOUNT No.003301528437
	viii. UTR/Transaction reference Number	Tr Ref No.FCR3559151
	ix. Transaction date	March 23,2026
	x. Transaction Amount (in Rs.)	1,98,341
c. In case of Demand Draft (DD):	NA	
9	Any other relevant information	nil

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[For listed companies: Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015

Sr.No	Particulars	Details			
1	Name of the listed company/ Intermediary /Fiduciary	Salzer Electronics Limited			
2	<p><i>Please tick appropriate checkbox</i></p> Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company			
3	A. Details of Designated Person (DP)				
	c. Name of the DP	NARAYANASWAMY JAYABAL,			
	d. PAN of the DP	AALPJ3755G			
	e. Designation of DP	Director (Retired from Board on August 08,2024)			
	f. Functional Role of DP	Non Executive (Retired from Board on August 08,2024)			
	g. Whether DP is Promoter or belongs to Promoter Group	No			
B. If Reporting is for immediate relative of DP					
	a. Name of the immediate relative of DP	NA			
	b. PAN of the immediate relative of DP	NA			
C. Details of transaction(s)					
	a. Name of the scrip	NSE: SALZERELEC and BSE: 517059			
	b. No of shares traded and value (Rs.) (Date-wise)	Date	Transaction	No. of Shares	Consideration
		16-06-2023	Buy	40	13,784.00
		17-08-2023	Sell	105	41,374.60
		21-08-2023	Sell	20	8,200.00
		23-08-2023	Sell	20	8,300.00
	15-09-2023	Buy	148	56,240.00	
D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter					
	a. Date of intimation of trade(s) by concerned DP/ director/ promoter/ promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	NA			
	b. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	NA			
4	Details of violations observed under Code of Conduct	Execution of Contra Trades in shares of the Company by the DP			
5	Action taken by Listed company/ Intermediary/ Fiduciary	The matter, as required under Code of Conduct, was placed before the Audit Committee and the Board at their respective meetings held on March 10, 2026, for their consideration and appropriate directions. The transactions executed by Mr. Jayabal, who was a Non-			

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		<p>Executive Director at the relevant time, were reviewed in detail in the context of the Company’s Code of Conduct framed under the SEBI (Prohibition of Insider Trading) Regulations, 2015.</p> <p>After due deliberation, the Audit Committee and the Board noted the facts and circumstances of the case and approved the following action:</p> <ul style="list-style-type: none"> • Direction to disgorge 100% of the profits earned, amounting to Rs.1,978/-, to the Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund (IPEF). <p>The above action has been taken without prejudice to the Company’s right to take such further action as may be warranted, in accordance with applicable laws and regulations.</p>
<p>6</p>	<p>Reasons recorded in writing for taking action stated above</p>	<p>The Audit Committee and the Board, upon review of the transactions and the explanation provided, noted that the contra trade position arose over a period of time due to multiple transactions, and was not indicative of any structured or premeditated intent to undertake contra trading.</p> <p>It was further observed that:</p> <ul style="list-style-type: none"> • There was no involvement of Unpublished Price Sensitive Information (UPSI) at the time of execution of the trades; • The transactions were undertaken in the ordinary course of investment activity, without any malafide intent or misuse of position; • The profits arising from the transactions to be fully disgorged, in line with regulatory expectations; • The instance is isolated in nature, with no pattern of repetitive non-compliance. <p>The Audit Committee and the Board also took note that the individual has since ceased to be associated with the Company as a Director.</p> <p>While recognizing that individuals in such positions are expected to maintain high standards of compliance, the Audit Committee and the Board formed the considered view that the violation was inadvertent in nature, without any element of deliberate misconduct, insider advantage, or abuse of position.</p> <p>Accordingly, the action of full disgorgement of gains was considered commensurate, reasonable, and sufficient to address the lapse and uphold the principles of fairness, accountability, and regulatory compliance.</p>

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)	
	a. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online payment
	b. Details of transfer/payment In case of Online	
	xi. Name of the transferor	NARAYANASWAMY JAYABAL
	xii. Bank Name, branch and Account number	ICICI BANK, TRICHY ROAD BRACH, ACCOUNT NO.1601560501
	xiii. UTR/Transaction reference Number	NFTA00038296107
	xiv. Transaction date	March 18,2026
	xv. Transaction Amount (in Rs.)	Rs 1978/-
	c. In case of Demand Draft (DD):	NA
9	Any other relevant information	nil

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1	Name of the listed company/ Intermediary/Fiduciary	Salzer Electronics Limited		
2	<i>Please tick appropriate checkbox</i> Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company		
3	A. Details of Designated Person (DP)			
	a. Name of the DP	M LAKSHMINARAYANA		
	b. PAN of the DP	ACDPL9590K		
	c. Designation of the DP	Vice President		
	d. Functional Role of DP	Operations - Plant II		
	e. Whether DP is Promoter or belongs to Promoter Group	No		
B. If Reporting is for immediate relative of DP				
a. Name of the immediate relative of DP	NA			
b. PAN of the immediate relative of DP	NA			
C. Details of transaction(s)				
a. Name of the scrip	NSE: SALZERELEC and BSE: 517059			
b. No of shares traded and value (Rs.) (Date- wise)	Date	Transaction	No. of Shares	Consideration
	20-09-2023	Buy	100	36,481.00
	16-10-2023	Sell	90	36,114.95
	01-12-2023	Sell	10	3,880.00
	21-02-2024	Buy	3,001	16,45,039.45
	26-02-2024	Sell	800	5,49,500.00
01-03-2024	Sell	1,200	8,70,000.00	
D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter				
a. Date of intimation of trade(s) by concerned DP/ director/ promoter/ promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	March 10, 2026			
b. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	March 12, 2026			
4	Details of violations observed under Code of Conduct	Contra trade, Traded during trading window closure period and Failure to report the abovementioned trades to the Company		
5	Action taken by Listed company/ Intermediary/ Fiduciary	The matter, as required under Code of Conduct, was placed before the Audit Committee and the Board at their respective meetings held on March 10, 2026, for their		

SALZER ELECTRONICS LIMITED

Samichettipalayam, Jothipuram (Post),
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CIN : L03210TZ1985PLC001535 GSTIN: 33AAECS3411L1ZJ

		<p>consideration and appropriate directions. The transactions executed by Mr. M Lakshminarayana were reviewed in detail in the context of the Company's Code of Conduct framed under the SEBI (Prohibition of Insider Trading) Regulations, 2015.</p> <p>The Audit Committee and the Board noted that the case involved compliance violations, namely:</p> <ul style="list-style-type: none"> • Execution of contra trades; • Failure to disclose trades exceeding Rs.10,00,000/- in a calendar quarter; and • Trading during the period of trading window closure. <p>Considering the nature of violations, and the substantial quantum of gains, the Board, based on the recommendation of the audit Committee and the, after due deliberation, approved the following actions:</p> <ol style="list-style-type: none"> 1. Direction to disgorge 100% of the profits earned, amounting to Rs.3,26,693.90/-, to the Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund (IPEF). 2. A monetary penalty of Rs.75,000/- and Rs.50,000/- has been levied for (i) failure to report the trades in terms of Regulation 7(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, and (ii) undertaking trades during the Trading Window Closure period, respectively. While, in terms of the Company's Code of Conduct, such instances, being first-time occurrences, would ordinarily warrant issuance of a warning, the aforesaid monetary levy has been imposed as a considered measure reflecting the Board's serious view of the matter and to ensure strict adherence to the applicable regulatory requirements. <p>Total aggregate amount – Rs.4,51,694/-</p> <p>The above actions are without prejudice to the right of the Regulator to take such further action as may be deemed appropriate under applicable laws and regulations. -</p>
6	Reasons recorded in writing for taking action stated above	<p>The Audit Committee and the Board reviewed the statement submitted by Mr. M. Lakshminarayana, including his specific submissions in relation to the trade executed on February 21, 2024 during the Trading Window closure period. He, inter alia, stated that the said transaction was undertaken as part of his personal investment decision, that he was not in possession of any Unpublished Price Sensitive Information (UPSI) in relation to relevant Corporate announcement, and that the lapse occurred due to an inadvertent oversight of the communication regarding Trading Window closure issued by the Compliance Officer. He further submitted that the transactions were carried out</p>

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		<p>in bona fide good faith and that there have been no prior instances of non-compliance on his part.</p> <p>The Audit Committee and the Board took note of the above submission. However, upon evaluation of the facts and circumstances, it was observed that:</p> <ul style="list-style-type: none"> • The case involves some regulatory lapses, including contra trade, non-disclosure of trades exceeding prescribed thresholds, and trading during trading window closure; • The quantum of profit is substantial, warranting full disgorgement to eliminate any undue financial benefit; • Trading during the trading window closure constitutes a compliance breach, given its direct relevance to insider trading safeguards; • The failure to make requisite disclosures impacts transparency and regulatory reporting, and is therefore a substantive lapse; • While no material evidence was found indicating trading based on UPSI, the standards of compliance expected require strict adherence irrespective of intent. <p>While the explanation of inadvertence and absence of UPSI has been taken on record, the Audit Committee and the Board formed the considered view that the nature and gravity of the violations warrant stringent action, notwithstanding this being a first-time instance.</p> <p>Accordingly:</p> <ul style="list-style-type: none"> • Disgorgement of the entire profits was directed to neutralize the financial benefit derived; and • Monetary penalties were imposed for the respective violations to address the lapses and to ensure effective deterrence and compliance discipline. <p>In accordance with the Board’s direction, a warning letter has been issued to the concerned Designated Person. The said individual has been advised to exercise utmost caution and ensure strict compliance with the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company’s Code of Conduct in all future dealings in securities. It has also been clearly communicated that any recurrence of such non-compliance will be viewed seriously and may invite more stringent disciplinary and regulatory action</p>
7	Details of the previous instances of violations, if any, since last financial year	First-time identification of violation of the Insider Trading Code and SEBI (PIT) regulations, 2015.
8	If any amount collected for Code of Conduct violation(s) a. Mode of transfer to SEBI - IPEF (Online/Demand Draft) b. Details of transfer/payment In case of	Online payment

SALZER ELECTRONICS LIMITED

	Online	
	xvi Name of the transferor	M LAKSHMINARAYANA
	xvi Bank Name, branch and Account number	ICICI BANK, PRICOL COMPLEX. ACCOUNT No.003301004907
	xvi UTR/Transaction reference Number	Tr ID:FCO3119721 -
	xix Transaction date	March 20,2026
	xx Transaction Amount (in Rs.)	Rs.4,51,694/
	c. In case of Demand Draft (DD):	NA
9	Any other relevant information	NIL

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Report by Salzer Electronics Limited for violations related to Code of Conduct under SEBI
(Prohibition of Insider Trading) Regulations, 2015.

[For listed companies: Schedule B read with Regulation 9 (1) of SEBI (Prohibition of
Insider Trading) Regulations, 2015

Sr.No	Particulars	Details		
1	Name of the listed company/ Intermediary/Fiduciary	Salzer Electronics Limited		
2	<i>Please tick appropriate checkbox</i> Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company		
3	A. Details of Designated Person (DP)			
	c. Name of the DP	KUPPANDAPALAYAM MANICKAM MURUGESAN		
	d. PAN of the DP	APEPM6015Q		
	e. Designation of the DP	Key Managerial Personnel		
	f. Role of the DP	Company Secretary		
	g. Whether DP is Promoter or belongs to Promoter Group	No		
	B. If Reporting is for immediate relative of DP			
	h. Name of the immediate relative of DP	NA		
	i. PAN of the immediate relative of DP	NA		
	C. Details of transaction(s)			
j. Name of the scrip	NSE: SALZERELEC and BSE: 517059			
k. No of shares traded and value (Rs.) (Date- wise)	Date	Transaction	No. of Shares	Consideration
	21-08-2023	Buy	150	59250.00
	21-08-2023	Sell	150	61255.00
	23-08-2023	Buy	100	40855.00
	23-08-2023	Sell	100	41300.00
	31-08-2023	Buy	200	81592.50
31-08-2023	Sell	200	82164.60	
D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter				
	l. Date of intimation of trade(s) by concerned DP/ director/ promoter/ promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	NA		
	m. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	NA		
4	Details of violations observed under Code of Conduct	Execution of Contra Trades in shares of the Company by the DP		
5	Action taken by Listed company/ Intermediary/ Fiduciary	The matter, as required under Code of Conduct, was placed before the Audit Committee and the Board at their respective meetings held on March 10, 2026, for their		

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		<p>consideration and appropriate directions, which examined the transactions, surrounding circumstances, and the explanation in detail. Considering the position of the individual and the nature of the violation, the matter was viewed with due seriousness.</p> <p>The Board, based on the recommendation of the Audit Committee, the following actions were taken based on the Internal Code of Conduct :-</p> <ul style="list-style-type: none"> • Advising the Company to issue formal written warning, advising strict compliance with the Company's Code of Conduct under the SEBI (Prohibition of Insider Trading) Regulations, 2015; • Direction to disgorge 100% of the profits earned, amounting to Rs.3,023/-, to be duly remitted to SEBI for credit to the Investor Protection and Education Fund (IPEF). <p>The above actions are without prejudice to any right of the Regulator to take such further action as may be deemed appropriate under applicable laws and regulations.</p>
6	Reasons recorded in writing for taking action stated above	<p>The Audit Committee and the Board reviewed the brief statement submitted by Mr. Kuppanpalayam Manickam Murugesan, outlining the manner in which the trades were executed inadvertently due to certain operational and technical lapses, which resulted in the transactions not being identified at the relevant time. The Committee and the Board noted that the aforesaid contra trade transactions were confined to a short span during August 2023 and were not repetitive thereafter and accordingly the matter was evaluated in the context of an isolated and exceptional occurrence.</p> <p>It was further observed that:</p> <ul style="list-style-type: none"> • There was no involvement of Unpublished Price Sensitive Information (UPSI); • The transactions were undertaken in the ordinary course, without any malafide intent or misuse of position; • The gains arising from the transactions were minimal and have been fully disgorged; • This being a first-time and isolated instance, with an otherwise clean compliance track record. <p>While noting that higher standards of compliance are expected, particularly given the seniority involved, the Audit Committee and the Board formed the considered view that the lapse was technical and inadvertent in nature.</p> <p>Accordingly, the action of issuing a formal warning coupled with full disgorgement of gains was considered commensurate, reasonable, and sufficient to address the violation and uphold the principles of fairness,</p>

		<p>accountability, and regulatory compliance</p> <p>In accordance with the Board's direction, a warning letter has been issued by the Management to the concerned Designated Person. The said individual has been advised to exercise utmost caution and ensure strict compliance with the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct in all future dealings in securities. It has also been clearly communicated that any recurrence of such non-compliance will be viewed seriously and may invite more stringent disciplinary and regulatory action</p>
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)	
	a. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online payment
	b. Details of transfer/payment In case of Online	
	xxi. Name of the transferor	KUPPANDAPALAYAM MANICKAM MURUGESAN
	xxii. Bank Name, branch and Account number	ICICI BANK, PRICOL BRANCH, COIMBATORE -641202 ACCOUNT No. '003301508477
	xxiii. UTR/Transaction reference Number	UPI Tr ID:607797958963
	xxiv. Transaction date	March 18,2026
	xxv. Transaction Amount (in Rs.)	Rs.3,023/-
	c. In case of Demand Draft (DD):	NA
9	Any other relevant information	NIL

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