SEC/FILING/BSE-NSE/21-22/68A-B

February 25, 2022

BSE Limited
P. J. Towers,
Dalal Street, Fort,
Mumbai – 400 001.
Scrip Code: 511218

National Stock Exchange of India Limited
Listing Department
Exchange Plaza, 5th Floor,
Plot no. C/1, G- Block,
Bandra-Kurla Complex,
Mumbai – 400051
NSE Symbol: SRTRANSFIN

Dear Sirs,

Sub: Reporting of violations under SEBI (Prohibition of Insider Trading) Regulations, 2015

With reference to the Company's Prohibition of Insider Trading Code read with Schedule B and Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015, please find enclosed herewith the report related to the violation of Company's Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 by a Designated Person/employee, in the format prescribed by SEBI Circular SEBI/HO/ISD/ISD /CIR/P/2020/135 dated July 23, 2020.

Thanking you.

Yours faithfully,

For **SHRIRAM TRANSPORT FINANCE COMPANY LIMITED**



VIVEK ACHWAL
COMPANY SECRETARY
Encl.a/a

Annexure A

Report by Shriram Transport Finance Company 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) Regulation, 2015

Sr. No.	Particulars	Details
1	Name of the listed company	Shriram Transport Finance Company Limited
2	Please tick the appropriate checkbox Reporting in capacity of: ☐ Listed Company ☐ Intermediary ☐ Fiduciary	Listed Company Listed on BSE and NSE
3	**A. Details of Designated Person (DP)/Employee**	
	i.Name of DP/employee	Mr. Bijoy Mathew
	ii. PAN of DP/employee	AKKPM1722H
	iii. Designation of DP/ employee	President
	iv. Functional role of DP/employee	The functional role of the above DP/employee pertains to day to day business operations of the Company across all the branches of Tamil Nadu & Kerala
	v.Whether DP/employee is Promoter or belongs to Promoter Group	No
	B. Reporting is for immediate relative of DP/Employee	
	i. Name of the immediate relative of DP/employee	Not Applicable
	ii. PAN of the immediate relative of DP/employee	Not Applicable
	C. Details of transaction(s)	
	i. Name of the Scrip	Shriram Transport Finance Company Limited
	ii. No of shares traded and value (Rs.) (Date-wise)	As per attached Annexure 1

	D. In case the value of trade(s) is more than Rs. 10 lacs in a calendar quarter	
	i. Date of intimation of trade(s) by concerned DP/ employee director/ promoter/ promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	No intimation of trades was given by DP/employee to the Company. Pursuant to SEBI Circular no. SEBI/HO/ISD/ ISD/CIR/P/2021/617 dated August 13, 2021, the manual filing of disclosures as required under Regulation 7(2) (a) & (b) of PIT Regulations is no longer mandatory.
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable in view of the SEBI Circular no. SEBI/HO/ISD/ ISD/CIR/P/2021/617 dated August 13, 2021.
4	Details of violations observed under Code of Conduct	1. No pre-clearance of trades was taken by the said DP/employee from the Company for entering into trades in shares of the Company exceeding Rs.10 lakhs in a calendar quarter. 2. No intimation of the trades in shares of the Company was given to the Company by the said DP/employee under the Company's Code of Conduct. 3. Execution of certain Contra Trades in shares of the Company by the said DP/employee as per Annexure 1. 4. Certain trades in shares of the Company were done by said DP/employee during trading window closure period as per Annexure 1.
5	Action taken by Listed Company	(i) Issue of warning letter to the DP/employee. (ii) Penalty of Rs.25,000/- levied for above violation of Code of Conduct. (iii) The DP/employee is instructed to deposit entire amount of profit in trading in shares to notified account of SEBI in addition to the penalty of Rs.25,000/-. The amount of profit has been computed by the DP/employee and deposited with SEBI directly.
6	Reasons recorded in writing for taking action stated above	The penalty of Rs.25,000/- is determined considering the following: 1. the submissions made by the DP/employee that he was not in possession of Unpublished Price Sensitive Information (UPSI) while trading in shares of the Company, unintentional violation of Code of Conduct for the first time. 2. the quantum of shares involved in the trading.

<table>
<tr><td></td><td></td><td>3. written apology submitted by the DP/employee for the inadvertent violation of the Company's 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>Nil</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 Payment</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>Mr. Bijoy Mathew</td></tr>
<tr><td>Bank Name, branch and Account number</td><td>Axis Bank,
Rajaji Road, Ernakulam Branch,
Account no. 081010100434195</td></tr>
<tr><td>UTR/Transaction reference Number</td><td><u>February 24, 2022</u>
Reference no. AXMB220552436060 - Rs.33,203.20
Reference no. AXMB220552713472 - Rs.3,000/-
<u>February 25, 2022</u>
Reference no. AXMB220563030514 Rs.9,396.14</td></tr>
<tr><td>Transaction date</td><td>February 24, 2022 and February 25, 2022</td></tr>
<tr><td>Transaction Amount (in Rs.)</td><td>Rs.45,599.34</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">Not Applicable</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>Not Applicable</td></tr>
</table>

Buy Date	Sell Date	Quantity	Security	Acq. Date	Acq. Type	Cost Basis	Proceeds	Gain	
								Short Term	# Long Term
12/04/2021	12/01/2022	10	Shriram Transport Finance Company Ltd.	12/04/2021	Market	13091.23	12313.67	-777.56	0
24/01/2022	24/01/2022	20	Shriram Transport Finance Company Ltd.	24/01/2022	Market	23216.52	23075.22	-141.3	0
25/01/2022	25/01/2022	10	Shriram Transport Finance Company Ltd.	25/01/2022	Market	11834.34	11786.67	-47.67	0
25/01/2022	25/01/2022	10	Shriram Transport Finance Company Ltd.	25/01/2022	Market	11784.34	11786.67	2.33	0
25/01/2022	25/01/2022	10	Shriram Transport Finance Company Ltd.	25/01/2022	Market	11724.34	11985.66	261.33	0
25/01/2022	25/01/2022	10	Shriram Transport Finance Company Ltd.	25/01/2022	Market	11624.34	11985.66	361.33	0
25/01/2022	25/01/2022	10	Shriram Transport Finance Company Ltd.	25/01/2022	Market	11534.34	11475.16	-59.17	0
25/01/2022	25/01/2022	10	Shriram Transport Finance Company Ltd.	25/01/2022	Market	11410.33	11536.17	125.83	0
25/01/2022	25/01/2022	10	Shriram Transport Finance Company Ltd.	25/01/2022	Market	11410.33	11575.16	164.83	0
25/01/2022	25/01/2022	10	Shriram Transport Finance Company Ltd.	25/01/2022	Market	11410.33	11725.16	314.83	0
27/01/2022	27/01/2022	10	Shriram Transport Finance Company Ltd.	27/01/2022	Market	12425.28	11974.22	-451.06	0
27/01/2022	27/01/2022	10	Shriram Transport Finance Company Ltd.	27/01/2022	Market	12425.78	12294.72	-131.06	0
27/01/2022	27/01/2022	10	Shriram Transport Finance Company Ltd.	27/01/2022	Market	12424.78	12425.22	0.44	0
27/01/2022	27/01/2022	10	Shriram Transport Finance Company Ltd.	27/01/2022	Market	12404.78	12425.22	20.44	0
12/04/2021	01/02/2022	10	Shriram Transport Finance Company Ltd.	12/04/2021	Market	13091.23	12550.85	-540.37	0
12/04/2021	01/02/2022	5	Shriram Transport Finance Company Ltd.	12/04/2021	Market	6545.61	6280.4	-265.22	0
12/04/2021	01/02/2022	5	Shriram Transport Finance Company Ltd.	12/04/2021	Market	6545.36	6280.4	-264.97	0
12/04/2021	01/02/2022	15	Shriram Transport Finance Company Ltd.	12/04/2021	Market	19636.09	18915.75	-720.34	0
12/04/2021	01/02/2022	5	Shriram Transport Finance Company Ltd.	12/04/2021	Market	6525.24	6305.25	-219.99	0
12/04/2021	01/02/2022	5	Shriram Transport Finance Company Ltd.	12/04/2021	Market	6525.24	6325.13	-200.11	0
31/05/2021	01/02/2022	5	Shriram Transport Finance Company Ltd.	31/05/2021	Market	7174.6	6325.13	-849.46	0
31/05/2021	01/02/2022	5	Shriram Transport Finance Company Ltd.	31/05/2021	Market	7174.6	6325.63	-848.97	0
31/05/2021	01/02/2022	5	Shriram Transport Finance Company Ltd.	31/05/2021	Market	7154.48	6325.63	-828.85	0
31/05/2021	01/02/2022	5	Shriram Transport Finance Company Ltd.	31/05/2021	Market	7154.48	6330.1	-824.37	0
01/06/2021	01/02/2022	10	Shriram Transport Finance Company Ltd.	01/06/2021	Market	14107.54	12660.21	-1447.33	0
17/12/2021	01/02/2022	5	Shriram Transport Finance Company Ltd.	17/12/2021	Market	6502.71	6330.1	-172.61	0
17/12/2021	01/02/2022	5	Shriram Transport Finance Company Ltd.	17/12/2021	Market	6502.71	6354.95	-147.76	0
20/12/2021	01/02/2022	10	Shriram Transport Finance Company Ltd.	20/12/2021	Market	11848.92	12709.91	860.99	0
21/12/2021	01/02/2022	10	Shriram Transport Finance Company Ltd.	21/12/2021	Market	11992.81	12709.91	717.1	0
21/12/2021	01/02/2022	10	Shriram Transport Finance Company Ltd.	21/12/2021	Market	11892.22	12709.91	817.69	0
21/12/2021	01/02/2022	10	Shriram Transport Finance Company Ltd.	21/12/2021	Market	11791.63	12709.91	918.28	0



22/12/2021	01/02/2022	5	Shriram Transport Finance Company Ltd.	22/12/2021	Market	5845.41	6354.95	509.54	0
22/12/2021	01/02/2022	5	Shriram Transport Finance Company Ltd.	22/12/2021	Market	5845.41	6384.78	539.36	0
30/12/2021	01/02/2022	10	Shriram Transport Finance Company Ltd.	30/12/2021	Market	12033.17	12769.56	736.39	0
30/12/2021	01/02/2022	5	Shriram Transport Finance Company Ltd.	30/12/2021	Market	5991.94	6384.78	392.84	0
30/12/2021	01/02/2022	5	Shriram Transport Finance Company Ltd.	30/12/2021	Market	5991.94	6385.28	393.34	0
07/01/2022	01/02/2022	10	Shriram Transport Finance Company Ltd.	07/01/2022	Market	12294.98	12770.55	475.57	0
07/01/2022	01/02/2022	5	Shriram Transport Finance Company Ltd.	07/01/2022	Market	6122.34	6385.28	262.93	0
07/01/2022	01/02/2022	5	Shriram Transport Finance Company Ltd.	07/01/2022	Market	6122.34	6384.78	262.44	0
10/01/2022	01/02/2022	10	Shriram Transport Finance Company Ltd.	10/01/2022	Market	12194.81	12769.56	574.75	0
14/01/2022	01/02/2022	10	Shriram Transport Finance Company Ltd.	14/01/2022	Market	12385.63	12769.56	383.93	0
19/01/2022	01/02/2022	5	Shriram Transport Finance Company Ltd.	19/01/2022	Market	5941.32	6384.78	443.46	0
01/02/2022	01/02/2022	10	Shriram Transport Finance Company Ltd.	01/02/2022	Market	12695.28	12525.22	-170.06	0
01/02/2022	01/02/2022	10	Shriram Transport Finance Company Ltd.	01/02/2022	Market	12685.28	12674.22	-11.06	0
02/02/2022	02/02/2022	10	Shriram Transport Finance Company Ltd.	02/02/2022	Market	12934.65	12955.22	20.57	0
02/02/2022	02/02/2022	10	Shriram Transport Finance Company Ltd.	02/02/2022	Market	12924.65	12965.22	40.57	0
02/02/2022	02/02/2022	10	Shriram Transport Finance Company Ltd.	02/02/2022	Market	12834.65	12974.22	139.57	0
02/02/2022	02/02/2022	10	Shriram Transport Finance Company Ltd.	02/02/2022	Market	12824.65	12789.72	-34.93	0
02/02/2022	02/02/2022	10	Shriram Transport Finance Company Ltd.	02/02/2022	Market	12774.15	12815.22	41.07	0
02/02/2022	02/02/2022	10	Shriram Transport Finance Company Ltd.	02/02/2022	Market	12774.15	12824.22	50.07	0
02/02/2022	02/02/2022	10	Shriram Transport Finance Company Ltd.	02/02/2022	Market	12744.15	12844.22	100.07	0
02/02/2022	02/02/2022	10	Shriram Transport Finance Company Ltd.	02/02/2022	Market	12734.65	12855.22	120.57	0
02/02/2022	02/02/2022	10	Shriram Transport Finance Company Ltd.	02/02/2022	Market	12774.15	12874.72	100.57	0
03/02/2022	03/02/2022	1	Shriram Transport Finance Company Ltd.	03/02/2022	Market	1263.53	1252.17	-11.36	0
						Total		**987.42**	0



Buy Date	Sell Date	Quantity	Security	Acq. Date	Acq. Type	Cost Basis	Proceeds	Gain	
								Short Term	# Long Term
04/02/2022	04/02/2022	10	Shriram Transport Finance Company Ltd.	04/02/2022	Market	12535.28	12424.72	-110.56	0
19/01/2022	08/02/2022	5	Shriram Transport Finance Company Ltd.	19/01/2022	Market	5941.32	6094.49	153.17	0
19/01/2022	08/02/2022	5	Shriram Transport Finance Company Ltd.	19/01/2022	Market	5931.01	6094.49	163.48	0
19/01/2022	08/02/2022	5	Shriram Transport Finance Company Ltd.	19/01/2022	Market	5931.01	6096.73	165.72	0
24/01/2022	08/02/2022	5	Shriram Transport Finance Company Ltd.	24/01/2022	Market	5840.33	6096.73	256.4	0
24/01/2022	08/02/2022	5	Shriram Transport Finance Company Ltd.	24/01/2022	Market	5840.33	6096.48	256.15	0
24/01/2022	08/02/2022	5	Shriram Transport Finance Company Ltd.	24/01/2022	Market	5859.7	6096.48	236.78	0
24/01/2022	08/02/2022	5	Shriram Transport Finance Company Ltd.	24/01/2022	Market	5859.7	6096.73	237.03	0
24/01/2022	08/02/2022	15	Shriram Transport Finance Company Ltd.	24/01/2022	Market	17566.27	18290.19	723.93	0
24/01/2022	08/02/2022	5	Shriram Transport Finance Company Ltd.	24/01/2022	Market	5855.42	6101.7	246.28	0
24/01/2022	08/02/2022	5	Shriram Transport Finance Company Ltd.	24/01/2022	Market	5865.48	6101.7	236.22	0
24/01/2022	08/02/2022	5	Shriram Transport Finance Company Ltd.	24/01/2022	Market	5865.48	6102.2	236.72	0
24/01/2022	08/02/2022	5	Shriram Transport Finance Company Ltd.	24/01/2022	Market	5803.87	6102.2	298.33	0
24/01/2022	08/02/2022	5	Shriram Transport Finance Company Ltd.	24/01/2022	Market	5803.87	6156.38	352.51	0
24/01/2022	08/02/2022	15	Shriram Transport Finance Company Ltd.	24/01/2022	Market	17370.87	18469.13	1098.26	0
24/01/2022	08/02/2022	10	Shriram Transport Finance Company Ltd.	24/01/2022	Market	11580.58	12312.75	732.17	0
24/01/2022	08/02/2022	5	Shriram Transport Finance Company Ltd.	24/01/2022	Market	5790.29	6176.51	386.22	0
24/01/2022	08/02/2022	5	Shriram Transport Finance Company Ltd.	24/01/2022	Market	5746.53	6176.51	429.97	0
08/02/2022	08/02/2022	10	Shriram Transport Finance Company Ltd.	08/02/2022	Market	12121.78	12290.29	168.51	0
08/02/2022	08/02/2022	10	Shriram Transport Finance Company Ltd.	08/02/2022	Market	12325.28	12290.29	-34.99	0
08/02/2022	08/02/2022	10	Shriram Transport Finance Company Ltd.	08/02/2022	Market	12375.28	12290.29	-84.99	0
24/01/2022	09/02/2022	5	Shriram Transport Finance Company Ltd.	24/01/2022	Market	5746.53	6205.99	459.46	0
24/01/2022	09/02/2022	5	Shriram Transport Finance Company Ltd.	24/01/2022	Market	5745.03	6205.99	460.97	0
24/01/2022	10/02/2022	10	Shriram Transport Finance Company Ltd.	24/01/2022	Market	11490.05	12521.68	1031.63	0
24/01/2022	10/02/2022	10	Shriram Transport Finance Company Ltd.	24/01/2022	Market	11490.05	12531.12	1041.07	0
24/01/2022	10/02/2022	5	Shriram Transport Finance Company Ltd.	24/01/2022	Market	5745.03	6305.32	560.3	0
24/01/2022	10/02/2022	5	Shriram Transport Finance Company Ltd.	24/01/2022	Market	5790.29	6305.32	515.03	0
						Total		10215.78	0