

November 28, 2023

<b>BSE Limited</b> Phiroze Jeejeebhoy Towers Dalal Street Mumbai – 400 001  <b>Scrip Code: 542760(Equity)</b> <b>Scrip Code: 725032 (CP)</b>	<b>National Stock Exchange of India Limited</b> Exchange Plaza Bandra Kurla Complex Bandra (East), Mumbai – 400 051  <b>Symbol: SWSOLAR</b>
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Dear Sir/ Ma'am,

**Sub.: Reporting to the Stock Exchange regarding violation of Company's 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*

We refer to the captioned subject and enclose herewith the report by the Company for the violation relating to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 in the format of Annexure-A as prescribed by the SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

Kindly take the same on record.

Yours faithfully,  
**For Sterling and Wilson Renewable Energy Limited**

**Jagannadha Rao Ch. V.**  
**Company Secretary and Compliance Officer**

Encl: As above

**Sterling and Wilson Renewable Energy Limited**

Regd. Office: Universal Majestic, 9<sup>th</sup> Floor, P. L. Lokhande Marg, Chembur (W), Mumbai - 400043  
Phone: (91-22) 25485300 | Fax: (91-22) 25485331 | CIN: L74999MH2017PLC292281  
Email: info@sterlingwilson.com | Website: www.sterlingandwilsonre.com

**Report by Sterling and Wilson Renewable Energy Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015**

<b>Sr. No.</b>	<b>Particulars</b>	<b>Details</b>
1	Name of the Listed Company/ <del>Intermediary/ Fiduciary</del>	Sterling and Wilson Renewable Energy Limited
2	Please tick appropriate checkbox Reporting in capacity of: <input type="radio"/> Listed Company <input type="radio"/> Intermediary <input type="radio"/> Fiduciary	Listed Company
3	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	N.A.
	ii. PAN of the DP	
	iii. Designation of DP	
	iv. Functional Role of DP	
	v. Whether DP is Promoter or belongs to Promoter Group	
	<b>B. If Reporting is for immediate relative of DP</b>	
	i. Name of the immediate relative of DP	Bobby Thomas Cherian (Spouse of DP)
	ii. PAN of the immediate relative of DP	AABPC3018M
	<b>C. Details of transaction(s)</b>	
	i. Name of the scrip	BSE Scrip Code: 542760 NSE Symbol: SWSOxLAR

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Sr. No.	Particulars	Details																														
	ii. No of shares traded and value (Rs.) (Date- wise)	<p>Details of purchase</p> <table border="1"> <thead> <tr> <th>Date</th> <th>No. of shares</th> <th>Amount (in Rs.)</th> </tr> </thead> <tbody> <tr> <td>06-08-2019</td> <td>61</td> <td>47,580.00</td> </tr> <tr> <td>06-08-2019</td> <td>15</td> <td>11,700.00</td> </tr> <tr> <td>22-11-2019</td> <td>108</td> <td>36,126.00</td> </tr> <tr> <td>22-09-2023</td> <td>10</td> <td>3,580.00</td> </tr> <tr> <td><b>Total</b></td> <td><b>194</b></td> <td><b>98,986.00</b></td> </tr> </tbody> </table> <p>Details of sale:</p> <table border="1"> <thead> <tr> <th>Date</th> <th>No. of shares</th> <th>Amount (in Rs.)</th> </tr> </thead> <tbody> <tr> <td>13-11-2023</td> <td>61</td> <td>17,446.00</td> </tr> <tr> <td>15-11-2023</td> <td>133</td> <td>38,463.60</td> </tr> <tr> <td><b>Total</b></td> <td><b>194</b></td> <td><b>55,909.60</b></td> </tr> </tbody> </table>	Date	No. of shares	Amount (in Rs.)	06-08-2019	61	47,580.00	06-08-2019	15	11,700.00	22-11-2019	108	36,126.00	22-09-2023	10	3,580.00	<b>Total</b>	<b>194</b>	<b>98,986.00</b>	Date	No. of shares	Amount (in Rs.)	13-11-2023	61	17,446.00	15-11-2023	133	38,463.60	<b>Total</b>	<b>194</b>	<b>55,909.60</b>
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<b>D. In case value of trade(s) is more than Rs. 10 lacs in a calendar quarter</b>																																
	i. Date of intimation of trade(s) by concerned DP/ Director/ Promoter/ Promoter Group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable, as the value of trade does not exceed Rs. 10 lacs in a calendar quarter																														
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable, as the value of trade does not exceed Rs. 10 lacs in a calendar quarter																														
4	Details of violations observed under Code of Conduct	Contra trade																														
5	Action taken by Listed company/	Warning letter has been issued to the DP																														

**Sterling and Wilson Renewable Energy Limited**

Sr. No.	Particulars	Details
	Intermediary/ Fiduciary	<p>and the immediate relative informing to not engage in any kind of dealings in the Equity Shares of the Company in violation of the Company’s Code of Conduct (“the Code”) and SEBI (Prohibition of Insider Trading) Regulations, 2015.</p> <p>The DP and her immediate relative has also been provided with a copy of Code once again. Both have been further advised that in case of any subsequent violation stricter action(s) would be taken by the Company.</p>
6	Reasons recorded in writing for taking action stated above	<p>The DP has clarified that her immediate relative has undertaken the transaction due to immediate need of funds for his business. Further, she mentioned that the transaction was not undertaken to violate the Code but undertaken due to immediate need of funds for his business, without any mala fide intention of violating the Code. She has also confirmed that Mr. Bobby Cherian has been sufficiently advised and will not be undertaking any such transaction in future.</p> <p>Further, the immediate relative has incurred a loss of Rs. 43.076.40 on this transaction.</p> <p>Matter was discussed with the Audit Committee at its meeting held on November 28, 2023 and it was suggested by the Audit Committee to issue warning letter to the DP and the immediate relative. Further, the Audit Committee discussed that the shares were sold at a loss and no profits were derived from the sale and hence, decided not to levy any penalty.</p>
7	Details of the previous instances of violations, if any, since last financial year	Nil

**Sterling and Wilson Renewable Energy Limited**

Sr. No.	Particulars	Details	
8	If any amount collected for Code of Conduct violation(s)	Nil	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	N.A.	
	ii. Details of transfer/payment	N.A.	
	In case of Online:	N.A.	
	<b>Particulars</b>		<b>Details</b>
	Name of the transferor		
	Bank name, branch and account number		
	UTR/ Transaction reference number		
	Transaction date		
	Transaction amount (in Rs.)		
	In case of Demand Draft (DD):		
	<b>Particulars</b>		<b>Details</b>
	Bank Name and branch		
	DD Number		
	DD date		
	DD amount (in Rs.)		
9	Any other relevant information	Nil	

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