



The Corporate Relationship Department,
BSE Limited
1st Floor, New Trading Ring Rotunda
Building, P.J. Towers
Dalal Street,
Mumbai 400 001

National Stock Exchange of India Limited
"Exchange Plaza"
Bandra-Kurla Complex
Bandra (E)
Mumbai 400 051

Scrip Code-SRF

Scrip Code- 503806

SRF/SEC/BSE/NSE

01.12.2025

Dear Sir,

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

This is with reference to the Company's Code of Conduct to Regulate, Monitor and Report Trading by Insiders to regulate, monitor and report trading by Designated Persons and other Connected Persons as per the requirements of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Please find enclosed herewith the reports related to the violation of Company's Code of Conduct for Prevention of Insider Trading by Designated Person(s), in the format prescribed by SEBI vide its Master Circular SEBI/HO/ISD/ISD-PoD-2/P/CIR/2024/126 dated September 23, 2024.

Thanking you,

Yours faithfully,

For SRF LIMITED

RAJAT LAKHANPAL

Sr. VP (CORPORATE COMPLIANCE) & COMPANY SECRETARY

Encl: As above

SRF LIMITED

Block - C, Sector - 45
Gurugram - 122 003
Haryana, India
Tel: +91-124-4354400
Fax: +91-124-4354500
Email: info@srf.com
Website: www.srf.com

Regd. Office:

Unit No. 236 and 237, 2nd Floor,
DLF Galleria, Mayur Place
Noida Link Road
Mayur Vihar Phase I Extension
Delhi -110 091

CIN : L18101DL1970PLC005197

Report by SRF 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/ Intermediary/Fiduciary	SRF 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)	
	i. Name of the DP	Rama Krishna Putcha
	ii. PAN of the DP	AJHPK7407R
	iii. Designation of DP	Vice President- Legal
	iv. Functional Role of DP	Head of Legal
	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	NA
	ii. PAN of the immediate relative of DP	NA
	C. Details of transaction(s)	
	i. Name of the scrip	SRF
	ii. No of shares traded and value (₹) (Date- wise)	Purchased 600 Shares on 15 th May 2025 and sold 600 Equity shares on 15 th May 2025

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D. In case value of trade(s) is more than ₹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	28 th Nov 2025
	ii. 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	Purchased 600 Equity shares on 15 th May 2025 and sold the same on 15 th May 2025 without obtaining preclearance from the compliance officer in accordance with Code of Conduct and SEBI PIT Regulations and delay in reporting the abovementioned trade to the Company in accordance with SEBI Regulations.
5	Action taken by Listed company	The Company has directed Mr. Putcha to disgorge the profits from the trade amounting to Rs. 8587/- by way of online remittance to SEBI Investor Protection and Education Fund, in terms of the SEBI Circular dated September 4, 2023.

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6	Reasons recorded in writing for taking action stated above	Mr. Putcha has voluntarily informed the Company of the aforementioned default. Further, he confirmed in writing that the default was inadvertent and unintentional. He will be more cautious in future and will ensure compliance with the SEBI PIT Regulations and the Code of Conduct. The Company believes that the action indicated above would be an appropriate measure to address the violation and also serve to discourage any future instances of violation by any DP or their immediate relatives.
7	Details of the previous instances of violations, if any, since last financial year	Not Applicable

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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: <table border="1" data-bbox="236 535 1315 891"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Name of the transferor</td> <td>Rama Krishna Putcha</td> </tr> <tr> <td>Bank Name, branch and Account number</td> <td>ICICI Bank</td> </tr> <tr> <td>UTR/Transaction reference Number</td> <td>251128252035828</td> </tr> <tr> <td>Transaction date</td> <td>28/11/2025</td> </tr> <tr> <td>Transaction Amount (in ₹)</td> <td>8587.00</td> </tr> </tbody> </table> In case of Demand Draft (DD): <table border="1" data-bbox="236 1016 1331 1240"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Bank Name and branch</td> <td>NA</td> </tr> <tr> <td>DD Number</td> <td>NA</td> </tr> <tr> <td>DD date</td> <td>NA</td> </tr> <tr> <td>DD amount (in ₹)</td> <td>NA</td> </tr> </tbody> </table>		Particulars	Details	Name of the transferor	Rama Krishna Putcha	Bank Name, branch and Account number	ICICI Bank	UTR/Transaction reference Number	251128252035828	Transaction date	28/11/2025	Transaction Amount (in ₹)	8587.00	Particulars	Details	Bank Name and branch	NA	DD Number	NA	DD date	NA	DD amount (in ₹)	NA
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9	Any other relevant information	NA																						

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1	Name of the listed company/ Intermediary/Fiduciary	SRF 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)	
	i. Name of the DP	Ganga Singh
	ii. PAN of the DP	AODPS5466B
	iii. Designation of DP	Junior Officer- Treasury
	iv. Functional Role of DP	Clerical role in Treasury
	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	NA
	ii. PAN of the immediate relative of DP	NA
	C. Details of transaction(s)	
	i. Name of the scrip	SRF
	ii. No of shares traded and value (₹) (Date- wise)	Purchased 200 Equity Shares on 27 th May 2025 and sold 200 Equity shares on 27 th May 2025
	D. In case value of trade(s) is more than ₹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	28 th Nov 2025
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	NA

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4	Details of violations observed under Code of Conduct	Purchased 200 Equity shares on 27 th May 2025 and sold the same on 27 th May 2025 without obtaining preclearance from the compliance officer in accordance with Code of Conduct and SEBI PIT Regulations and delay in reporting the abovementioned trade to the Company in accordance with SEBI Regulations
5	Action taken by Listed company	The Company has directed Mr. Singh to disgorge the profits from the trade amounting to Rs. 1927/- by way of online remittance to SEBI Investor Protection and Education Fund, in terms of the SEBI Circular dated September 4, 2023.

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6	Reasons recorded in writing for taking action stated above	Mr. Singh has voluntarily informed the Company of the aforementioned default. Further, he confirmed in writing that the default was inadvertent and unintentional. He will be more cautious in the future and will ensure compliance with the SEBI PIT Regulations and the Code of Conduct. The Company believes that the action indicated above would be an appropriate measure to address the violation and also serve to discourage any future instances of violation by any DP or their immediate relatives.												
7	Details of the previous instances of violations, if any, since last financial year	Not Applicable												
8	If any amount collected for Code of Conduct violation(s)													
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	In case of Demand Draft (DD):	
	Particulars	Details
	Bank Name and branch	NA
	DD Number	NA
	DD date	NA
	DD amount (in ₹)	NA
9	Any other relevant information	Not Applicable

For SRF Limited

Rajat Lakhanpal
SR. VP (Corporate Compliance) & Company Secretary
PAN: ABEPL2744F
Email id: cs@srf.com
Date: 01/12/2025
Place: Gurugram

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