



## KIRLOSKAR PNEUMATIC COMPANY LIMITED

A Kirloskar Group Company

Enriching Lives

Ref.: SEC & LEG / 109

June 11, 2021  
Through Online Portal

### BSE Limited

Corporate Relationship Department  
Phiroze Jeejeebhoy Towers  
Dalal Street, Fort,  
Mumbai 400 001  
Scrip Code - 505283

Kind Atten: Ms. Bharti Bhambwani, Relationship Manager

Dear Madam,

Sub: Reporting of violation of Code of Conduct of the Company under SEBI (Prohibition of Insider Trading) Regulations, 2015

Pursuant to Clause 13 of Schedule B of the SEBI (Prohibition of Insider Trading) Regulations, 2015 ('SEBI (PIT) Regulations, 2015') read with SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, please find enclosed herewith the report in the prescribed format (Annexure A) for an unintentional and inadvertent violation of the Code of Conduct of the Company under the SEBI (PIT) Regulations, 2015 by a Designated Person.

Request you to kindly take the same on record.

Thanking You.

Yours faithfully,

For **Kirloskar Pneumatic Co. Ltd**

**Jitendra R Shah**  
Company Secretary  
Membership No. 17243



Encl.: As above



**KIRLOSKAR PNEUMATIC COMPANY LIMITED**

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**Annexure A**

Report by Kirloskar Pneumatic Company Limited for violation 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]

Sr. No.	Particular	Details
1.	Name of the Listed Company / Intermediary / Fiduciary	Kirloskar Pneumatic Company Limited
2.	Please tick appropriate checkbox Reporting in capacity of : <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3.	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	Mr Sanjay Grover
	ii. PAN of the DP	ACSPG1639D
	iii. Designation of DP	Vice President - IBD
	iv. Functional Role of DP	Responsible for Export business of the Company.
	v. Whether DP is Promoter or belongs to Promoter Group	No
	<b>B. If Reporting is for immediate relative of DP - Not Applicable</b>	
	i. Name of the immediate relative of DP	-
	ii. PAN of the immediate relative of DP	-
	<b>C. Details of transaction(s)</b>	
	i. Name of the scrip	Kirloskar Pneumatic Company Limited (Scrip Code : 505283 ; Scrip Id :KIRLPNU)
	ii. No of shares traded and value (Rs.) (Date- wise)	1. 5,000 Equity Shares were allotted to the Designated Person on April 29, 2021 under KPCL – Employee Stock Option Scheme 2019 (KPCL ESOS 2019) (Exercise Price of Rs. 120 per Equity Share);  2. Out of the above 5,000 Equity Shares, Designated Person sold the following equity shares:

An IMS Certified Company

Manufacturer of Air, Refrigeration, Gas compressors & systems and Transmission Equipments  
Regd. Office: Hadapsar Industrial Estate, Pune - 411 013 INDIA. Tel.: +91 (20) 2672 7000  
Fax: +91 (20) 2687 0297 Email infokpcl@kirloskar.com Website: [www.kirloskarpneumatic.com](http://www.kirloskarpneumatic.com)  
CIN No.: L29120PN1974PLC110307





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		No. of Shares	Date of Sale	Value (Amt in Rs.)
		1,000	May 18, 2021	3,53,569.25
		1,000	May 20, 2021	3,66,283.90
		1,000	June 2, 2021	3,79,000.00
	<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	The Designated Person has intimated to the Company on June 10, 2021.		
	ii. Date of intimation of trade(s) by Company to stock exchanges under Regulation 7 of SEBI (PIT) Regulations, 2015	Pursuant to the provisions of Regulation 7(2)(b), the Company has intimated the details of trade executed by the Designated Person to stock exchange on June 11, 2021 within the prescribed time period, i.e., within two trading days of receipt of disclosure from the Designated Person.		
4.	Details of violations observed under Code of Conduct	The Designated Person sold 3,000 shares received by him under KPCL ESOS 2019. He unintentionally and inadvertently forgot to report the Company in the prescribed format in time after dealing in shares and did not obtain pre-clearance for sale of 1,000 shares on June 2, 2021.		
5.	Action taken by Listed company/ Intermediary/ Fiduciary	a) A warning letter was issued to the Designated Person to strictly forbid from violating the Code of Conduct of the Company under the SEBI (PIT) Regulations, 2015 (KPCL Insider Trading Code) including amendments thereof and henceforth to ensure adherence of the KPCL Insider Trading Code. b) The pre-clearance approval dated June 8, 2021 submitted by Designated Person for sale of further 2,000 shares was rejected.		
6.	Reasons recorded in writing for taking action stated above	The Designated Person has provided an apology letter to the Company for unintentionally and inadvertently failing to report the details of transactions executed on May 18, 2021 and May 20, 2021 and also for trading in the securities of the Company on June 2, 2021 without obtaining pre – clearance as per the KPCL Insider Trading Code. This being the first instance of violation by the Designated Person, warning letter has been issued and pre-clearance approval		

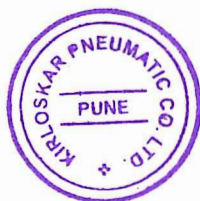


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		dated June 8, 2021 submitted by Designated Person for sale of further 2,000 shares was rejected.
7.	Details of the previous instances of violations, if any, since last financial year	Not Applicable
8.	If any amount collected for Code of Conduct violation(s) <b>Not Applicable</b>	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	
	ii. Details of transfer/payment	
	In case of Online :	
	Particulars	Details
	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) :	
	Particulars	Details
	Bank Name and branch	
	DD Number	
	DD Date	
	DD Amount (in Rs.)	
9.	Any other relevant information -	

Yours faithfully

Jitendra R Shah  
Compliance Officer  
PAN : AVPPS2224L  
Email Id : jitendra.shah@kirloskar.com



Date : June 11, 2021

Place : Pune