

Castrol India Limited
CIN L23200MH1979PLC021359
Technopolis Knowledge Park,
Mahakali Caves Road,
Chakala, Andheri (East),
Mumbai - 400 093.

Tel: (022) 6698 4100
Fax: (022) 6698 4101
<https://www.castrol.com/en/in/india.html>
Customer Service Toll Free No. : 1800 222 100 / 1800 209 8100



11 August 2020

To,

**The BSE Limited,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai 400001.**

**National Stock Exchange of India Limited,
Exchange Plaza, Bandra Kurla Complex,
Bandra East,
Mumbai – 400051.**

Scrip Code: 500870

Scrip Symbol: CASTROLIND

Dear Sir/Madam,

Sub: Reporting under SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135, dated July 23, 2020

This is to inform you that pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“the SEBI Regulations”), the Castrol India Limited Code of Conduct to Regulate, Monitor and Report Trading by Insiders and Designated Persons (“the Company Rules”) and SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, details of non-adherence of the Company Rules by Designated Persons, along with the actions taken by the Company thereon are enclosed as “**Annexure A**” to this letter.

We would like to submit that the reported non-adherences are not material in comparison to the total paid up equity share capital of the Company.

This is for your information.

Yours faithfully,

For Castrol India Limited

**Chandana Dhar
Company Secretary and Compliance Officer**

Encl. As above



Annexure A

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

Sr. No.	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	Castrol India 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)	
	i. Name of the DP	Rajeev Sharma
	ii. PAN of the DP	ARMPS3892B
	iii. Designation of DP	General Manager – Sales, North
	iv. Functional Role of DP	General Manager – Sales, North
	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	Not Applicable
	ii. PAN of the immediate relative of DP	Not Applicable
	C. Details of transaction(s)	
	i. Name of the scrip	Castrol India Limited BSE Scrip Code : 500870 NSE Scrip Symbol : CASTROLIND
	ii. No of shares traded and value (Rs.) (Date- wise)	Ten (10) Equity shares Buy Date: 18 May 2020 Buy Price: INR 116.12 (4 no.) and INR 117(6 no.)
	D. In case value of trade(s) is more than Rs.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	Not Applicable
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations,2015	Not Applicable
4	Details of violations observed under Code of Conduct	Purchase of Ten (10) shares through a pre-existing SIP arrangement during the closure of trading window



5	Action taken by Listed company/ Intermediary/ Fiduciary	<ul style="list-style-type: none"> i) Caution letter issued to the DP. ii) Further investigation done by Compliance Officer iii) Matter discussed by the Audit Committee and the Board on 12 June and 28 July 2020 iv) Basis further investigation conducted by the Compliance Officer, a penalty of Rs.5000/- imposed.
6	Reasons recorded in writing for taking action stated above	Same as (5) above
7	Details of the previous instances of violations, if any, since last financial year	None
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:	
	Particulars	Details
	Name of the transferor	Castrol India Limited
	Bank Name, branch and Account number	DB Bank
	UTR/Transaction reference number	NFT-081000828GN00001XXXXXXX
	Transaction date	7 August 2020
	Transaction Amount (in Rs.)	5,000/-
	iii. 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,
For **Castrol India Limited**

Dhar,
Chandana

Digitally signed
by Dhar,
Chandana
Date: 2020.08.11
17:16:22 +05'30'

Chandana Dhar
Company Secretary & Compliance Officer
Email ID: Chandana.dhar@bp.com

Mumbai, 11 August 2020



Annexure A

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

Sr. No.	Particulars	Details
1	Name of the listed company/ Intermediary /Fiduciary	Castrol India 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)	
	i. Name of the DP	Manas Rajderkar
	ii. PAN of the DP	ADJPR8073J
	iii. Designation of DP	Global Supply Chain Performance Manager (Retired on 31 May 2020)
	iv. Functional Role of DP	Global Supply Chain Performance Manager (Retired on 31 May 2020)
	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	Not Applicable
	ii. PAN of the immediate relative of DP	Not Applicable
	C. Details of transaction(s)	
	i. Name of the scrip	Castrol India Limited BSE Scrip Code : 500870 NSE Scrip Symbol : CASTROLIND
	ii. No of shares traded and value (Rs.) (Date- wise)	Eighty-Four (84) Equity shares Buy Date: 29 June 2020 Buy Price: Rs. 128.30
	D. In case value of trade(s) is more than Rs.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	Not Applicable
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations,2015	Not Applicable
4	Details of violations observed under Code of Conduct	Purchase of Eighty-Four (84) shares during the closure of trading window
5	Action taken by Listed company/ Intermediary /Fiduciary	i) Caution letter issued. ii) Further investigation done by Compliance Officer



		iii) Matter discussed by the Audit Committee and the Board on 28 July 2020 iv) Basis further investigation conducted by the Compliance Officer, a penalty of Rs.5000/- imposed.												
6	Reasons recorded in writing for taking action stated above	Same as (5) above												
7	Details of the previous instances of violations, if any, since last financial year	None												
8	If any amount collected for Code of Conduct violation(s)													
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Yours faithfully,

For **Castrol India Limited**

Dhar,

Chandana

Digitally signed

by Dhar,
Chandana

Date: 2020.08.11

17:15:46 +05'30'

Chandana Dhar

Company Secretary & Compliance Officer

Email ID: Chandana.dhar@bp.com

Mumbai, 11 August 2020

**Report by Castrol India Limited for violations related to Code of Conduct under
SEBI (Prohibition of Insider Trading) Regulations, 2015**

Sr. No.	Particulars	Details
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3	A. Details of Designated Person (DP)	
	i. Name of the DP	Jitender K Dhingra
	ii. PAN of the DP	AFRPD6391K
	iii. Designation of DP	Team member, Indirect Taxation (contractor)
	iv. Functional Role of DP	Team member, Indirect Taxation (contractor)
	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	Not Applicable
	ii. PAN of the immediate relative of DP	Not Applicable
	C. Details of transaction(s)	
	i. Name of the scrip	Castrol India Limited BSE Scrip Code : 500870 NSE Scrip Symbol : CASTROLIND
	ii. No of shares traded and value (Rs.) (Date- wise)	Ten (10) Equity shares Buy Date: 9 July 2020 Buy Price: Rs. 122
	D. In case value of trade(s) is more than Rs.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	Not Applicable
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations,2015	Not Applicable
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Yours faithfully,
For **Castrol India Limited**

Dhar,
Chandana
Digitally signed by
Dhar, Chandana
Date: 2020.08.11
17:14:40 +05'30'

Chandana Dhar
Company Secretary & Compliance Officer
Email ID: Chandana.dhar@bp.com

Mumbai, 11 August 2020