



दि स्टेट ट्रेडिंग कॉरपोरेशन ऑफ़ इंडिया लिमिटेड
(भारत सरकार का उद्यम)
THE STATE TRADING CORPORATION OF INDIA LTD.
(A Govt. of India Enterprise)

THE STATE TRADING CORPORATION OF INDIA LIMITED, NEW DELHI

Board Secretariat & Parliament Division

STC/BS&P/BS/10032/2017/CIR

April 1, 2019

CIRCULAR NO. 230

Sub. : STC's Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons (Insider Trading Code)

1. This division, vide circular No.200 dated May 30, 2011, had notified the "Code of Conduct for Prevention of Insider Trading by employees and Directors of the Company" in line with the SEBI (Prohibition of Insider Trading) Regulations, 1992.
2. In pursuance of the replacement of the above-said Regulations by SEBI (Prohibition of Insider Trading) Regulations, 2015 and subsequent amendments made thereto from time to time, the Board of Directors, in its 627th meeting held on 11.02.1019, has approved and adopted the new "Code of Conduct for listed companies to regulate, monitor and report trading by Designated persons (insider Trading Code), hereinafter referred to as "the Code".
3. A copy of the Code as well as the SEBI (Prohibition of Insider Trading) Regulations, 2015 (as amended till date) is available on STC's website (www.stclimited.co.in).
4. The Code covers various aspects relating to trading in shares of STC including (i) restriction on communication or procurement of unpublished price sensitive information (UPSI) (as defined in Para 3.18 of the Code), (ii) trading plans, (iii) opening and closing of trading window, (iv) not to conduct trade when in possession of UPSI, (v) seeking pre-clearance of trade beyond the threshold stipulated, (vi) disclosure requirements, (vii) Penal provisions etc.
5. The Code shall be binding on all designated persons i.e., the Promoter, Designated Employees, the Directors on the Board of STC including Independent Directors and Government Nominee Directors and their immediate relatives. Designated Employees shall mean the following:
 - i. Top three tier of executives i.e. Directors, Chief General Managers and General Managers
 - ii. All Employees of Corporate Office

पंजीकृत कार्यालय: जवाहर व्यापार भवन, टॉलस्टॉय मार्ग, नई दिल्ली - 110001 / Regd. Office : Jawahar Vyapar Bhawan, Tolstoy Marg, New Delhi - 110001

कॉर्पोरेट पहचान संख्या / Corporate Identity No.: L74899DL1956GOI002674

दूरभाष / Telephone : 011- 23313177, ई-मेल/ E-mail : co@stclimited.co.in वेबसाइट/ website: www.stclimited.co.in



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- iii. Any other Employee of the Company that may be notified by the Compliance Officer i.e. Company Secretary, from time to time, with the approval of CMD.
6. The provisions of the Code are in addition to the provisions on prohibition of insider trading contained in STC Employees (Conduct, Discipline & Appeal) Rules, 1975, duly amended.
7. All designated persons as mentioned in Para 5 above are requested to take note of the above and ensure compliance to the Code.
8. Further, all the designated employees as mentioned in Para 5 above are required to maintain confidentiality of the unpublished price sensitive information (as defined in Para 3.18 of the Code). In this regard, this circular may be deemed to be adequate notice requiring all concerned to maintain confidentiality as stipulated under Regulation 9A of the Regulations.
9. All the designated employees are also requested to provide the following information to BS&P Division for the purpose of creating a structured digital database as per Regulation 3(5) of the Regulations for self as well as for immediate relatives* by April 15, 2019.

Name of employee/immediate relative*	Relationship with employee	PAN or any other identifier in case PAN is not available	Mobile Number

* an immediate relative is defined under Para 3.9 of the Code as "a spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities".

10. The Code shall come into effect from 1st April 2019.
11. The above is in supersession to this Division's earlier Circular No.200 dated May 30, 2011, referred to in Para 1 of this circular.


(Deepak CS)
Company Secretary

To: All concerned

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