



CIRCULAR - CLOSURE OF TRADING WINDOW

[W.e.f. 1st April, 2025]

OIL/SEC/45/IT
25.03.2025

To,

All Designated Persons/Insiders

1. Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Code of Conduct to Regulate, Monitor and Report Trading by Insiders of the Company, it is hereby notified that **the Closure of Trading Window for dealing in equity shares of the Company for all "Designated Persons/Insiders" and their relatives [details annexed] shall commence from 1st April, 2025 keeping in view approval of financial results for quarter and year ended 31st March, 2025.**

Further, the Closure of Trading Window will continue upto 48 hours after the date of approval of the aforesaid financial results by the Board of Directors of the Company.

2. **During the Closure of Trading Window Period, all Designated Persons/Insiders shall not deal in shares of the Company, either in their own name or in the name of their relatives. It may be noted that retired designated employees of the Company are covered in the definition of designated persons for a period of Six months from the date of retirement, therefore PAN freezing criteria will also be applicable for them during the Trading Window Closure Period.**
3. **Kindly note that PAN no. of Designated Persons/Insiders will be freezed by depositories i.e. prohibited for trading in OIL shares w.e.f. 01.04.2025 till end of Trading Window Closure, in pursuance of the SEBI Circular No. SEBI/HO/ISD/ISD-PoD-2/P/CIR/2023/124 dated 19.07.2023.**

The demat accounts shall be identified by the depositories (NSDL/CDSL) based on the PAN of the DP of Sole / joint holder. Depositories and Stock Exchanges will freeze the PAN of Designated Persons w.e.f. 01.04.2025 till end of trading window closure.

4. **We would like to further inform that all designated persons (DPs) have to make "declarations" on the Portal [System Driven application for Prevention of Insider Trading and Maintenance of Structured Digital Database (SDD)] within 30 days from the end of financial year in terms of the requirements of SEBI (PIT) Regulations, 2015 [web address - <https://pitoil.oilindia.in/Login.aspx>]**
5. Any contravention of the above would attract penal actions as per the above SEBI Regulations and the Code of the Company. The Code of Conduct to Regulate, Monitor and Report Trading by Insiders' of the Company is hosted at https://www.oil-india.com/files/investor_services_documents/InsiderTradingCode_0.pdf
6. In case of any clarifications, please contact the undersigned.

A.K. Sahoo
Company Secretary
Email: cs@oilindia.in

CC: KFin Technologies Limited (RTA)
Statutory Auditor/Cost Auditor/Secretarial Auditor
CS, NRL } with a request to circulate amongst designated employees of NRL
Director (E-II), MoP&NG
Under Secretary, DIPAM



**Company's "Code of Conduct to Regulate,
Monitor and Report Trading by Insiders" [Code of Insider Trading]**

Definition of Designated Employees:

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| i. | All Heads of the Spheres. |
| ii. | All Finance Heads of Spheres [Grade E and above]. |
| iii. | All Chief General Managers and above. |
| iv. | Executives [Grade E and above] in Corporate Planning, Corporate Affairs, Business Development, and Corporate Finance & Accounts Department. |
| v. | All Executives Working in Secretariat of Chairman & Managing Director, Functional Directors, Resident Chief Executive (RCE), Chief Vigilance Officer and Company Secretary Department. |
| vi. | All Executives of Financial Reporting Management (FRM) Section of Finance and Accounts Department. |
| vii. | Designated Employees of NRL. |
| viii. | Any other employee which in opinion of Compliance Officer be covered under the definition of designated employee with the approval of Director(Finance) |

Definition of Designated Person:

- i. Promoter
- ii. Board of Directors
- iii. Key Managerial Personnel
- iv. Chief Vigilance Officer
- v. Designated Employees of the Company
- vi. Connected person(s)

Definition of Relative

- (i) Spouse of the person;
- (ii) Parent of the person and parent of its spouse;
- (iii) Sibling of the person and sibling of its spouse;
- (iv) Child of the person;
- (v) Spouse of the person listed at sub-clause (iii); and
- (vi) Spouse of the person listed at sub-clause (iv)