

CIRCULAR - CLOSURE OF TRADING WINDOW

[W.e.f. 1st April, 2024]

To : All Designated Persons/Insiders

From : Company Secretary & Compliance Officer

OIL/SEC/45/IT 26.03.2024

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 immediate relatives shall commence from 1st April, 2024 keeping in view approval of financial results for the quarter and year ended 31st March, 2024.

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 this 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 immediate 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. 01.04.2024 till completion of Closure of Trading Window Period, 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. 01.04.2024 till the end of trading window closure period.

- 4. We would like to further inform that all designated persons (DPs) have to make "declarations" on the Portal [the new 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.
- 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.oilindia.com/Document/Financial/Scan-Insider-Trading-Code-2019.pdf
- 6. In case of any clarifications, please contact the undersigned.

(A.K. Sahoo) Company Secretary Email: <u>cs@oilindia.in</u>

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