



इंडियन रेलवे कॅटरिंग एण्ड टूरिज्म कॉरपोरेशन लिमिटेड  
(भारत सरकार का उद्यम-मिनी रत्न)  
INDIAN RAILWAY CATERING AND TOURISM CORPORATION LTD.  
(A Govt. of India Enterprise-Mini Ratna)

"CIN-L74899DL1999GOI101707" E-mail : info@irctc.com Website : www.irctc.com

No. 2019/IRCTC/CS/PIT/355

Date: 13.03.2020

Office Order No: 10

To All Designated Employees'

- (a) All Directors and Chief Vigilance Officer
- (b) Key Managerial Personnel
- (c) All Group General Managers
- (d) All General Managers
- (e) All Heads of Finance of Units/Divisions/Regions
- (f) Heads of all Zones/Regions/Plants(irrespective of designation)
- (g) All employees of the level of DGM and above
- (h) All Employees working in Books, Budget, Financial Service and Direct Taxation Sections of Corporate Finance
- (i) All employees working in Company Secretariat & Legal Department.
- (j) All employees working in Secretariat of CMD/Functional Directors
- (k) Any support staff such as IT staff who have access to UPSI
- (l) Any other key person, who in the opinion of Compliance Officer be covered in the "Designated Employee"

**Sub: PENALTY PROVISIONS UNDER "THE IRCTC CODE OF CONDUCT FOR REGULATING & REPORTING TRADING BY DESIGNATED PERSONS & THEIR IMMEDIATE RELATIVES"**

**Ref: OFFICE ORDER/CIRCULARS ISSUED VIDE BULK EMAILS DATED 11.10.2019, 14.10.2019, 30.10.2019, 30.12.2019, 05.02.2020, 28.02.2020, 02.03.2020 & 06.03.2020.**

1. In pursuance of SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended up to date, IRCTC has formulated a Code called "The IRCTC Code of Conduct for Regulating & Reporting Trading by Designated Persons & their Immediate Relatives".

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2. This code has been framed with an aim that designated persons of the Company and their immediate relatives shall not derive any benefit or assist others to derive any benefit from the access to and possession of Unpublished Price Sensitive Information about the Company which is not in the public domain and thus constitutes insider information. This has become effective from the date of listing of IRCTC's shares on the stock exchanges viz. BSE and NSE. The same is posted at the website of the Company the website with web link <https://irctc.com/assets/images/IRCTC%20CODE%20OF%20CONDUCT%20FOR%20REGULATING%20&%20REPORTING%20TRADING%20BY%20DESIGNATED%20PERSONS%20&%20THEIR%20IMMEDIATE%20RELATIVES.pdf>. Any person desirous to know the details of the regulations / code may visit the website and keep themselves about aware about the provisions of the Code. **This advice has been issued to all the concerned employees by way of Office Orders/Circulars issued from time to time, by the undersigned as referred above.**

3. **Clause 13 of the aforesaid IRCTC code prescribes penalty for contravention of the code reproduced as under:**

13.1 All Designated Persons who trades in securities or communicates any information for trading in securities in contravention of the code of conduct may be penalized and appropriate action may be taken by the Company.

13.2 All Designated Persons who violate this Code of Conduct including leak of UPSI or suspected leak of UPSI shall also be subject to disciplinary action by the Company, which may include wage, salary freeze, suspension, recovery, claw back, withholding of promotions etc.

13.3 Employees shall report instances of leak of UPSI and the same may be done through the whistle-blower Policy of IRCTC.

13.4 On becoming aware of leak of UPSI or suspected leak of UPSI, the Compliance Officer shall initiate appropriate inquiries and the relevant Intermediaries and Fiduciaries shall co-operate with the Company in connection with such inquiry.

13.5 The action by the Company shall not preclude SEBI from taking any action in case of violation of the Regulations.

13.6 In case it is observed by the Company and/or Compliance Officer that there has been violation of the Regulations including leak of UPSI, SEBI shall be informed by the Company. The Company shall also inform SEBI promptly of inquiries conducted with regard to the violations and results of such inquiries.

4. **Penalty for insider trading under Securities and Exchange Board of India Act, 1992 amended up to date.**



According to Section 15G;

If any insider who,—

(i) either on his own behalf or on behalf of any other person, deals in securities of a body corporate listed on any stock exchange on the basis of any unpublished price-sensitive information; or

(ii) communicates any unpublished price-sensitive information to any person, with or without his request for such information except as required in the ordinary course of business or under any law; or

(iii) counsels, or procures for any other person to deal in any securities of anybody corporate on the basis of unpublished price-sensitive information, shall be liable to a penalty which shall not be less than ten lakh rupees but which may extend to twenty-five crore rupees or three times the amount of profits made out of insider trading, whichever is higher.

**5. Penalty for fraudulent and unfair trade practices under Securities and Exchange Board of India Act, 1992 amended up to date.**

According to Section 15HA;

If any person indulges in fraudulent and unfair trade practices relating to securities, he shall be liable to a penalty which shall not be less than five lakh rupees but which may extend to twenty-five crore rupees or three times the amount of profits made out of such practices, whichever is higher.

**6. This is for information of all.**

The Office Order is being issued for strict adherence.



**For and behalf of Indian Railway  
Catering and Tourism Corporation Limited**

  
(Suman Kalra)

**Company Secretary & Compliance Officer &  
Chief Investor Relation Officer**