



इंडियन रेलवे केटरिंग 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: 8

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: RESTRICTIONS ON CONTRA TRADE 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".
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relatives shall not derive any benefit or assist others to derive any benefit from the access to and possession of Unpublished Price Sensitive Information about the Company which is not in the public domain and thus constitutes insider information.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

Page 1 of 2



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%200REGULATING%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. *As per clause 10.7 of the aforesaid IRCTC code, All Designated Persons who buy or sell any number of shares of the company shall not execute a contra trade** i.e. sell or buy any number of shares during the next six months following the prior transaction. Provided that this shall not be applicable for trades pursuant to exercise of stock options.*
4. Further, as per clause 10.9 of the IRCTC code, Should a contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.
5. However, as per clause 11.4 of the IRCTC code, trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

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

[Handwritten signature]
13/3/20

*CONTRA TRADE

Contra trading involves buying and selling the same shares without paying for them. Most brokerages do not require you to deposit cash with them before buying a stock. But after a transaction, investors are given three days - known as the contra period - to transfer the cash to the brokerage as payment for the shares.