

CIRCULAR - CLOSURE OF TRADING WINDOW [W.e.f. 1st October, 2023]

To : All Designated Persons/Insiders

From: Company Secretary & Compliance Officer

OIL/SEC/45/IT 25.09.2023

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 October, 2023 keeping in view approval of financial results for the quarter and half-year ended 30th September, 2023.

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.
- 3. The definition of Designated Employees for the Code of Insider Trading of the Company is attached herewith for reference of the Employee Shareholders.
- 4. Kindly note that PAN no. of Designated Persons/Insiders will be freezed by depositories i.e. prohibiting for trading in OIL shares w.e.f. 01.10.2023 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. 01.10.2023 till the end of trading window closure period.

- 5. 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.
- 6. 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/10Investor-services.
- 7. 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.



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

Definition of Designated Employees:

- 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.
- Managing Director, Functional Directors, Resident Chief Executive (RCÉ), 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)