

HAP | Hatsun Agro Product Limited

CIN: L15499TN1986PLC012747

Registered Office:

No.41 (49), Janakiram Colony Main Road, Janakiram Colony,
Arumbakkam, Chennai - 600 106, Tamil Nadu.
E: info@hap.in | www.hap.in | Landline & Fax No - 044 4796 1124

Corporate Office:

Plot No 14, TNHB, TN Housing Board 'A' Road,
Sholinganallur, Chennai - 600 119, Tamil Nadu.
E: info@hap.in | www.hap.in | P: +91 44 2450 1622 | F: +91 44 2450 1422

HAPL\SEC\51\2025-26

January 13, 2026

BSE Limited
Corporate Relationship Department
2nd Floor, New Trading Ring,
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai - 400 001

National Stock Exchange of India Ltd
Exchange Plaza, 5th Floor,
Plot No. C/1, G Block,
Bandra Kurla Complex,
Bandra (E), Mumbai – 400 051

Stock Code: BSE: 531531
NSE: HATSUN

Dear Sir / Madam,

Sub: Action Taken Report on Temporary and unintentional posting of Financial Information on WhatsApp Status – Reg.

With reference to our earlier announcement dated 5th January 2026, we hereby submit the Action Taken Report received from the Insider Trading Investigation Committee of Hatsun Agro Product Limited, in terms of SEBI Master Circular No.SEBI/HO/ISD/ISD-PoD-2/P/CIR/2024/126 dated September 23, 2024 read with the Company's Code of Conduct under the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Please take this on record.

Thanking you.

Yours faithfully,
For Hatsun Agro Product Limited

C Subramaniam
Company Secretary and Compliance Officer

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Report by Hatsun Agro Product Limited (Listed Company) for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

Sr. No.	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	Hatsun Agro Product Limited
2	Please tick appropriate checkbox Reporting in capacity of : <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3	A. Details of Designated Person (DP)	
	i. Name of the DP	Mr. H Ramachandran
	ii. PAN of the DP	AAIPR0679J
	iii. Designation of DP	Chief Financial Officer (CFO) of the Company
	iv. Functional Role of DP	CFO leads Company's financial strategy, overseeing all financial activities, analysis, reporting to the Board of Directors.
	v. Whether DP is Promoter or belongs to Promoter Group	Not related to Promoter Group
	B. If Reporting is for immediate relative of DP	
	i. Name of the immediate relative of DP	Not applicable
	ii. PAN of the immediate relative of DP	
	C. Details of transaction(s)	
	i. Name of the scrip	Not applicable
	ii. No of shares traded and value (Rs.) (Date- wise)	
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter	
	i. Date of intimation of trade(s) by concerned DP/ director/ promoter/ promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	Not applicable

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	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	
4	Details of violations observed under Code of Conduct	The CFO while sharing (internally with the Accounts department of the company) the first cut draft of the unaudited financial statements of the Company for the quarter ended 31 December 2025, inadvertently uploaded the draft figures [which may constitute certain Unpublished Price Sensitive Information of the Company (UPSI)] to his personal Whatsapp Status at about 05.00 P.M. on 04 th January, 2026. This was seen by around 19 people in his contact list including some Insiders of the Company. Immediately on becoming aware of this incident, the CFO deleted the above WhatsApp Status within an hour's time from his phone.
5	Action taken by Listed company/ Intermediary/ Fiduciary	<ol style="list-style-type: none">1. On receipt of the information of the incident from CFO on 05th January, 2026 at 09.00 A.M, the Company Secretary and Compliance Officer, after internal verification (i.e., determining the accuracy of the numbers and materiality of the event occurred), intimated this incident to the Stock Exchanges at about 05:50 PM on 05th January 2026.2. The Company Secretary and Compliance Officer has also received the list of persons who viewed WhatsApp Status (including their PAN details) from the CFO and updated their details in the list of designated persons maintained in the Structured Digital Database (SDD) by the Company. The trading window was immediately closed for all the persons who were exposed to the Unpublished Price Sensitive Information (UPSI) and their PAN was also frozen at the NSDL Issuer Services Portal.3. Simultaneous with the announcement made to the Stock Exchanges, the Company Secretary and Compliance Officer informed this incident to the Board of Directors and Audit Committee of the Company.

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		<ol style="list-style-type: none">An Insider Trading Investigation Committee (ITIC), comprising of Mr. C Sathyan, Vice Chairman, Mr. J Shanmuga Priyan, Managing Director and Mr. C Subramaniam, Company Secretary and Compliance Officer, was constituted on 06th January 2026. All the actions taken, including the list of identified persons and the detailed timeline of events, have been documented by the Committee for compliance and monitoring purposes.A caution letter was issued to the CFO, highlighting the individual's obligations under the Company's Insider Trading Code, while also advising the CFO to exercise greater care and vigilance in handling such information and directing strict adherence to regulatory requirements to prevent recurrence.
6	Reasons recorded in writing for taking action stated above	<ol style="list-style-type: none">As a precautionary measure and in compliance with the philosophy of the Company of following the high degree of corporate governance, we have reported this incident to the Stock Exchanges.We had identified the 19 persons who had access to UPSI, added them to the SDD and closed the trading window and froze their PANs at the NSDL Issuer Services Portal to prevent the potential misuse of the alleged UPSI that was uploaded inadvertently.As per the Company's governance framework, we informed the Board of Directors and Audit Committee of the Company.In line with the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Insider Trading Code, an Insider Trading Investigation Committee (ITIC) was constituted in order to investigate the issue in a transparent and fair manner.Given the nature of the incident (the period for which the financials were available was for a short time) and the nature of the information shared (since they were only preliminary drafts

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		and not the final figures), we have issued a caution letter advising the CFO to exercise greater care and vigilance in handling such information and directing strict adherence to regulatory requirements to prevent recurrence.
7	Details of the previous instances of violations, if any, since last financial year	Nil
8	If any amount collected for Code of Conduct violation(s)	Nil
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	
	ii. Details of transfer/payment	
	In case of Online:	
	Particulars	Details
	Name of the transferor	
	Bank Name, branch and Account number	
	UTR/Transaction reference Number	
	Transaction date	
	Transaction Amount (in Rs.)	
	In case of Demand Draft (DD):	
	Particulars	Details
	Bank Name and branch	
	DD Number	
	DD date	
	DD amount (in Rs.)	

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Sr. No.	Particulars	Details
9	Any other information	Not Applicable

Yours faithfully,

Name of Compliance Officer: C. Subramaniam

PAN: AEOPC5174R

Email ID: secretarial@hap.in

Date: 13th January 2026

Place: Chennai

Hatsun Agro Product Limited

