

STAR CEMENT LIMITED
(Formerly CEMENT MANUFACTURING COMPANY LTD)

March 22, 2018

Corporate Finance Department
Division of Issues and Listing
Securities & Exchange Board of India,
'SEBI Bhavan', Plot C4-A, G Block,
BandraKurla Complex, Bandra (E)
Mumbai- 400051

Sub: Request for interpretive letter under SEBI (Informal Guidance) Scheme 2003, as amended (the " SEBI Scheme ") in relation to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 dated January 15, 2015 as amended.

Dear Sir,

This has further reference to our letter dated February 19, 2018 wherein we had requested for an interpretive letter under SEBI (Informal Guidance) Scheme 2003 in relation to the SEBI Insider Trading Regulations 2015.

Point no. 2(d) of our letter dated February 19, 2018 states as under:

(d) "Mr. Sajjan Bhajanka, a promoter has sold certain number of shares in the open market on 14th February, 2018. He proposes to acquire a certain number of shares from Mr. Rajendra Chamaria, another promoter through an off-market inter-se transfer of shares. However the proposed acquisition shall be within 6 months of the sale. The proposed transfer of shares would be subject to the applicable provisions of the SEBI SAST Regulations 2011."

We would like to inform that that the proposed inter-se transfer between the promoters shall now be executed on the stock exchange platform and not through an off-market mode.

Hence, point no. 2(d) should be read as under:

(d) "Mr. Sajjan Bhajanka, a promoter has sold certain number of shares in the open market on 14th February, 2018. He proposes to acquire a certain number of shares from Mr. Rajendra Chamaria, another promoter through an inter-se transfer of shares to be executed on the stock exchange platform instead of off-market inter-se transfer which is exempted. However the proposed acquisition shall be within 6 months of the sale. The proposed transfer of shares would be subject to the applicable provisions of the SEBI SAST Regulations 2011."

Our first query as stated in our earlier letter is as under:

1) "We would like to take a specific opinion whether the proposed inter-se transfer between the promoters within six months of sale in the open market by a promoter will violate any provision of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and attract any penal provisions."

We would like to again mention that the proposed inter-se transfer between the promoters shall be executed on the stock exchange platform.

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CIN NO. U26942ML2001PLC008663

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Hence, our first query on page no. 4 of our letter dated February 19, 2018 should be read as under”

- 1) “We would like to take a specific opinion whether the proposed inter-se transfer on the stock exchange platform between the promoters by way of purchase of shares by the same promoter who had sold shares within six months in the open market will violate any provision of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and attract any penal provisions.”

The other queries and contents of our earlier letter dated February 19, 2018 remain the same.

We would appreciate receiving the interpretive letter sought at your earliest convenience. For any assistance / clarification, we request you to kindly contact the person named below:

Yours truly,

For Star Cement Limited



Manoj Agarwal
Chief Financial Officer

E-mail id: magarwal@starcement.co.in



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