



SASKEN

BSE Limited,  
Department of Corporate Services – CRD  
Phiroze Jeejeebhoy Towers, Dalal Street  
Mumbai - 400 001

December 9, 2024

National Stock Exchange of India Limited  
Exchange Plaza, C-1, Block – G,  
Bandra Kurla Complex, Bandra (E)  
Mumbai - 400 051

By Web Upload

Dear Sir / Ma'am,

**Sub: Reporting of violations related to SEBI (Prohibition of Insider Trading) Regulations, 2015 and Code of Conduct of the Company made thereon**

**Ref: Scrip Code 532663/ SASKEN**

Pursuant to SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020 ("SEBI Circular"), the details of violations of the Company's Code of conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 by the Designated Persons (DPs) along with the action taken by the Company thereon is enclosed to this letter and marked as Annexure – 1 and 2.

Kindly take the same on record.

Thanking you,

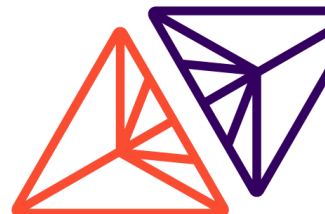
Yours faithfully  
For Sasken Technologies Limited

Paawan Bhargava  
Company Secretary

Encl. as above

**Sasken Technologies Limited**

139/25, Ring Road, Domlur, Bengaluru 560071, India  
T: +91 80 6694 3000, E: info@sasken.com  
CIN: L72100KA1989PLC014226 | www.sasken.com





**SASKEN**

**Annexure - 1**

Report by Sasken Technologies Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 (“PIT Regulations”).

*[Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]*

Sl. No.	Particulars	Details
1	Name of the listed company	Sasken Technologies 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	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	Mr. Amit Bhatt
	ii. PAN of the DP	A*****78L
	iii. Designation of the DP	Chief Architect, Global Delivery
	iv. Functional Role of DP	Chief Architect, Global Delivery
	v. Whether DP is Promoter or belongs to Promoter Group	No
	<b>B. If Reporting is for immediate relative of DP</b>	
	i. Name of the immediate relative of DP	Not applicable
	ii. PAN of the immediate relative of DP	Not applicable
	<b>C. Details of Transaction(s)</b>	
	i. Name of the Scrip	532663 / SASKEN
	ii. No. of shares traded and value (Rs.) (Date-wise)	4 <sup>th</sup> November 2024: Sale of 155 shares for Rs. 2,72,803
		5 <sup>th</sup> November 2024: Sale of 1,335 shares for Rs. 23,78,999
	<b>D. In case value of trade(s) is more than Rs. 10 lakhs in a calendar quarter</b>	
	i. Date of intimation of trade(s) by concerned DP / <del>director / promoter / promoter group</del> to Company under regulation 7 of SEBI (PIT) Regulations, 2015	10 <sup>th</sup> November 2024
	ii. Date of intimation of trade(s) by Company to Stock Exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	12 <sup>th</sup> November 2024
4	Details of violations observed under Code of Conduct	Mr. Amit has sold the shares of the Company as detailed above under 3C, during the trading window closure period and did not seek the mandatory pre-clearance from the Compliance Officer for trades exceeding INR 10 Lakhs, which is in violation of Clauses 4 & 5 of the Company’s Code.
5	Action taken by Listed Company / <del>Intermediary / Fiduciary</del>	Company has issued a warning letter to the DP and imposed a penalty of Rs. 50,000, which will be deposited by DP



SASKEN

		to Investor Education and Protection Fund (IEPF). Also, the DP shall be deemed ineligible for any issuance of future Employee Stock Options (ESOPs) for the next three years.												
6	Reasons recorded in writing for taking action stated above	Violation of Clause 4 – Trading Window and Window Closure & Clause 5 – Pre-clearance of Trades of the Company’s Code and PIT Regulations												
7	Details of the previous instances of violations, if any, since last financial year	None												
8	If any amount collected for Code of Conduct violation(s) i. Mode of transfer to SEBI – IEPF (Online / Demand Draft)	Not applicable												
	Details of transfer / payment, in case of Online: Not applicable													
	<table border="1"><thead><tr><th>Particulars</th><th>Details</th></tr></thead><tbody><tr><td>Name of the Transferor</td><td></td></tr><tr><td>Bank Name, Branch and Account Number</td><td></td></tr><tr><td>UTR / Transaction reference number</td><td></td></tr><tr><td>Transaction date</td><td></td></tr><tr><td>Transaction amount (Rs.)</td><td></td></tr></tbody></table>	Particulars	Details	Name of the Transferor		Bank Name, Branch and Account Number		UTR / Transaction reference number		Transaction date		Transaction amount (Rs.)		
Particulars	Details													
Name of the Transferor														
Bank Name, Branch and Account Number														
UTR / Transaction reference number														
Transaction date														
Transaction amount (Rs.)														
	In case of Demand Draft (DD): Not applicable													
	<table border="1"><thead><tr><th>Particulars</th><th>Details</th></tr></thead><tbody><tr><td>Bank and Branch</td><td></td></tr><tr><td>DD Number</td><td></td></tr><tr><td>DD Date</td><td></td></tr><tr><td>DD amount (Rs.)</td><td></td></tr></tbody></table>	Particulars	Details	Bank and Branch		DD Number		DD Date		DD amount (Rs.)				
Particulars	Details													
Bank and Branch														
DD Number														
DD Date														
DD amount (Rs.)														
9	Any other relevant information	Not applicable												



SASKEN

**Annexure - 2**

Report by Sasken Technologies Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

[Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

Sl. No.	Particulars	Details
1	Name of the listed company	Sasken Technologies 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	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	Ms. Lata Bhat
	ii. PAN of the DP	A*****51F
	iii. Designation of the DP	Global Head - Talent Acquisition
	iv. Functional Role of DP	Global Head - Talent Acquisition
	v. Whether DP is Promoter or belongs to Promoter Group	No
	<b>B. If Reporting is for immediate relative of DP</b>	
	i. Name of the immediate relative of DP	Not applicable
	ii. PAN of the immediate relative of DP	Not applicable
	<b>C. Details of Transaction(s)</b>	
	i. Name of the Scrip	532663 / SASKEN
	ii. No. of shares traded and value (Rs.) (Date-wise)	4 <sup>th</sup> November 2024: Sale of 1,000 shares for Rs. 16,82,500
	<b>D. In case value of trade(s) is more than Rs. 10 lakhs in a calendar quarter</b>	
	i. Date of intimation of trade(s) by concerned DP / <del>director / promoter / promoter group</del> to Company under regulation 7 of SEBI (PIT) Regulations, 2015	10 <sup>th</sup> November 2024
	ii. Date of intimation of trade(s) by Company to Stock Exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	12 <sup>th</sup> November 2024
4	Details of violations observed under Code of Conduct	Ms. Lata has sold the shares of the Company as detailed above under 3C, during the trading window closure period and did not seek the mandatory pre-clearance from the Compliance Officer for trades exceeding INR 10 Lakhs, which is in violation of Clause 4 & 5 of the Company's Code.
5	Action taken by Listed Company / <del>Intermediary / Fiduciary</del>	Company has issued a warning letter to the DP and imposed a penalty of Rs. 35,000, which will be deposited by DP to Investor Education and Protection Fund (IEPF).



SASKEN

		Also, the DP shall be deemed ineligible for any issuance of future Employee Stock Options (ESOPs) for the next three years.												
6	Reasons recorded in writing for taking action stated above	Violation of Clause 4 – Trading Window and Window Closure & Clause 5 – Pre-clearance of Trades of the Company’s Code and PIT Regulations												
7	Details of the previous instances of violations, if any, since last financial year	None												
8	If any amount collected for Code of Conduct violation(s) ii. Mode of transfer to SEBI – IEPF (Online / Demand Draft)	Not applicable												
	Details of transfer / payment, in case of Online: Not applicable													
	<table border="1"><thead><tr><th>Particulars</th><th>Details</th></tr></thead><tbody><tr><td>Name of the Transferor</td><td></td></tr><tr><td>Bank Name, Branch and Account Number</td><td></td></tr><tr><td>UTR / Transaction reference number</td><td></td></tr><tr><td>Transaction date</td><td></td></tr><tr><td>Transaction amount (Rs.)</td><td></td></tr></tbody></table>	Particulars	Details	Name of the Transferor		Bank Name, Branch and Account Number		UTR / Transaction reference number		Transaction date		Transaction amount (Rs.)		
Particulars	Details													
Name of the Transferor														
Bank Name, Branch and Account Number														
UTR / Transaction reference number														
Transaction date														
Transaction amount (Rs.)														
	In case of Demand Draft (DD): Not applicable													
	<table border="1"><thead><tr><th>Particulars</th><th>Details</th></tr></thead><tbody><tr><td>Bank and Branch</td><td></td></tr><tr><td>DD Number</td><td></td></tr><tr><td>DD Date</td><td></td></tr><tr><td>DD amount (Rs.)</td><td></td></tr></tbody></table>	Particulars	Details	Bank and Branch		DD Number		DD Date		DD amount (Rs.)				
Particulars	Details													
Bank and Branch														
DD Number														
DD Date														
DD amount (Rs.)														
9	Any other relevant information	Not applicable												