

Date: August 28, 2024

To,
Department of Corporate Services,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street
Mumbai - 400001
Scrip Code: 543333
ISIN: INE290S01011

To,
Listing Department,
National Stock Exchange of India Limited
Exchange plaza, Plot No. C/1, G Block
Bandra Kurla Complex, Bandra East,
Mumbai – 400051
Scrip Symbol: CARTRADE

Dear Sir/ Madam,

Subject: Reporting of violations related to the SEBI (Prohibition of Insider Trading) Regulations, 2015 read with CarTrade Tech Limited Code of Conduct for Prevention of Insider Trading (“Code of Conduct”) made thereon.

This is with reference to the Company’s Code of Conduct for Prevention of Insider Trading to regulate, monitor and report trading by Designated Persons and their Immediate Relatives pursuant to Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 read with Schedule B of the said regulations.

Please find enclosed herewith the report related to the violation of Company’s Code of Conduct for Prevention of Insider Trading (“**the Code**”) by one of the Designated Person, in the format prescribed by SEBI vide its Circular SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

The above information shall also be placed on the website of the Company at <https://www.cartradetech.com/>.

We request you to kindly take the above intimation on record.

Thanking you,

For CarTrade Tech Limited

Lalbahadur Pal
Company Secretary and Compliance Officer
Membership No. A40812

Enclosed a/a

CarTrade Tech Limited

Reg. Off. & Corp. Off.: 12th Floor, Vishwaroop IT Park, Sector 30A, Vashi, Navi Mumbai 400705.

W: cartradetech.com | T: +91 22 6739 8888 | E: investor@cartrade.com | CIN: L74900MH2000PLC126237



Annexure A

Report by CarTrade Tech 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]

Sr. No.	Particulars	Details
1.	Name of the listed Company/ Intermediary/ Fiduciary	CarTrade Tech Limited
2.	Please tick appropriate checkbox Reporting in capacity of : <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	
3.	A. Details of Designated Person (DP)	
	i. Name of the DP	Mr. Rajeev Kumar
	ii. PAN of the DP	ATAPK6235A
	iii. Designation of DP	Chief Technology Officer (CTO)
	iv. Functional Role of DP	Mr. Rajeev Kumar is the CTO of Company's consumer business.
	v. Whether DP is Promoter or belongs to Promoter Group	Not Applicable
	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	Not Applicable
	C. Details of transaction(s)	
	i. Name of the scrip	NSE : CARTRADE BSE: 543333
	ii. No of shares traded and value (Rs.) (Date - wise)	23/08/2024: Revocation of pledge of 2,000 Equity shares of the Company.
	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 – Since there is only revocation of pledge of 2,000 Equity shares of the Company without pre-clearance. There has been no fresh buying or selling by Mr. Rajeev Kumar.

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Sr. No.	Particulars	Details
	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	2,000 Equity Shares of Mr. Rajeev Kumar which were pledged earlier were released without obtaining pre-clearance from the Compliance Officer of the Company when the trading window for dealing in securities of the Company was open.
5.	Action taken by Listed company/ Intermediary/ Fiduciary	The Company warned Mr. Rajeev Kumar to observe the Company's Code of Conduct and ensure to take abundant precaution while dealing in securities of the Company. Further, he was Instructed to provide a written confirmation that he was not in possession of any Unpublished Price Sensitive Information (UPSI) at the time of revocation of pledge and that the pledge on the said shares was revoked without obtaining approval/confirmation from him by the DP/Broker.
6.	Reasons recorded in writing for taking action stated above	Mr. Rajeev Kumar was in violation of Code of Conduct of the Company inadvertently. Since the pledge on the shares was revoked by his broker without obtaining prior consent/instructions from Mr. Rajeev Kumar due to less margin requirement and he became aware of such revocation only after the same had happened and since there was no further purchase/sale of shares by him, it was thought to issue him warning and prohibit any further violations of the Code whether intentionally or unintentionally.
7.	Details of the previous instances of violations, if any, since last financial year	No previous violation
8.	If any amount collected for Code of Conduct violation(s)	Not Applicable
	i. Mode of transfer to SEBI – IPEF (Online/Demand Draft)	Not Applicable

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Sr. No.	Particulars	Details
	ii. Details of transfer/payment in case of Online:	
	Particulars	Details
	Name of the Transferor	Not Applicable
	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 and Branch	Not Applicable
	DD Number	
	DD Date	
	DD Amount (in Rs.)	
9.	Any other relevant information	None

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