



Ref: CEL/NSEBSE/CCV/10122020

10th December, 2020

To,

Listing Department National Stock Exchange of India Limited Exchange Plaza, Bandra Kurla Complex, Bandra (East), Mumbai – 400 051	Department of Corporate Services - Listing BSE Limited P. J. Towers, Dalal Street, Mumbai – 400 001
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Re: Scrip Symbol: CENTUM/ Scrip Code: 517544

Dear Sir/ Madam,

Sub: Report on violation related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

We are enclosing herewith the report on the violation by a Designated Person (employee) of the Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 along with the action taken by the Company for such violation.

Kindly take the same on your records.

Yours faithfully,
For **Centum Electronics Limited**

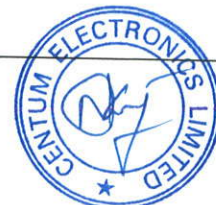
Nagaraj K V
Company Secretary & Compliance Officer


Encl: as above

Annexure A
Report by Centum Electronics Limited for violations of 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	Centum Electronics Limited
2	Please tick appropriate checkbox Reporting in capacity of : Listed Company/ Intermediary/ Fiduciary	Listed Company
3	A. Details of Designated Person (DP)	
	i. Name of the DP	Satish Gurpur Guni Prabhu
	ii. PAN of the DP	ABAPP1601P
	iii. Designation of DP	Senior Manager
	iv. Functional Role of DP	Strategic Sourcing
	v. Whether DP is Promoter or belongs to Promoter Group	No
	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 – CENTUM BSE – 517544
	ii. No of shares traded and value (Rs.) (Date- wise)	On 29 th October, 2020, bought 15 equity shares at Rs.272.24/- per share
	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
ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable	



4	Details of violations observed under Code of Conduct	The Designated Person has purchased 15 Equity Shares under DP ID: IN301549 Client ID: 60404613 of the Company on 29 th October, 2020 when the trading window was closed which is the violation of the Code of Conduct.												
5	Action taken by Listed company	Show cause notice dated 20 th November, 2020 has been issued to the designated person and in which the Company has given him a strict warning to adhere to the Code of Conduct provisions and further, he has been prohibited from selling the aforesaid 15 equity shares purchased by him for a period of 1 year from the date of purchase.												
6	Reasons recorded in writing for taking action stated above	Considering the reason quoted by the Designated Person as "in order to keep the continuity of his demat account, unintentionally the trading has been done during the trading window closure period" and considering the volume of shares being purchased, the above stated action has been taken.												
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)													
	i. Mode of transfer to SEBI – IPEF (Online/Demand Draft)	Not Applicable												
<p>ii. Details of transfer/payment</p> <p>In case of Online:</p> <table border="1" data-bbox="319 1489 997 1803"> <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 (in Rs.)</td> <td></td> </tr> </tbody> </table> <div data-bbox="957 1825 1173 2027" style="text-align: right;">  </div>			Particulars	Details	Name of the transferor		Bank Name, branch and Account number		UTR/Transaction reference Number		Transaction date		Transaction Amount (in Rs.)	
Particulars	Details													
Name of the transferor														
Bank Name, branch and Account number														
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Transaction Amount (in Rs.)														



In case of Demand Draft (DD):		
Particulars	Details	
Bank Name and branch		
DD Number		
DD date		
DD amount (in Rs.)		
9	Any other relevant information	Not Applicable

Yours faithfully,

For Centum Electronics Limited

Nagaraj K V

Company Secretary & Compliance Officer

PAN: APEPV1224Q

Email ID: nagarajkv@centumelectronics.com



Date: 10th December, 2020

Place: Bangalore