



Unleash your potential

Aptech Limited
Regd. office: Aptech House
A-65, MIDC, Marol, Andheri (E),
Mumbai - 400 093.
T: 91 22 2827 2300
F: 91 22 2827 2399
www.Aptech-worldwide.com

10th August, 2021

To,
BSE Limited
25th Floor, P J Towers,
Dalal Street,
Mumbai – 400 001
Scrip Code: 532475

To,
National Stock Exchange of India Limited
Exchange Plaza, Plot no. C/1, G Block,
Bandra-Kurla Complex
Bandra (E), Mumbai - 400 051.
Symbol: APTECHT

Dear Sir/Madam,

Sub.: Reporting to Stock Exchanges regarding violations under Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 relating to the Code of Conduct (CoC).

Ref.: SEBI/HO/ISD/ISD/CIR/P/2020/135 circular dated 23rd July, 2020

With reference to the above, enclosed herewith please find report on violations under SEBI (Prohibition of Insider Trading) Regulations, 2015 relating to the Code of Conduct by Designated person.

Kindly take the same on record.

Thanking you.

For Aptech Limited

A.K Biyani
Company Secretary & Compliance Officer
Place: Mumbai



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

Sr. No.	Particulars	Details
1	Name of the Listed Company/ Intermediary/Fiduciary	Aptech 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	Murli Mohan Malla
	ii. PAN of the DP	ALUPM1019L
	iii. Designation of DP	Vice President
	iv. Functional Role of DP	National Sales Head
	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	NA
	ii. PAN of the immediate relative of DP	NA
	C. Details of transaction(s)	
	i. Name of the scrip	Aptech Limited
	ii. No of shares traded and value (Rs.) (Date- wise)	Date: 28 th July, 2021 No. of shares: 600 equity shares Value: Rs. 1,66,068/-
	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, as the value of trade does not exceed Rs. 10 lacs in a calendar quarter
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable, as the value of trade does not exceed Rs. 10 lacs in a calendar quarter
4	Details of violations observed under Code of Conduct	Shares sold during trading window closure period.
5	Action taken by Listed company/ Intermediary/ Fiduciary	Warning letter has been issued to the Designated Person that he would not engage in any kind of dealings in the Equity Shares of the Company in violation of the Company's Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015 and a monetary penalty of Rs. 21,828/-



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		<p>(Rupees Twenty One Thousand Eight Hundred Twenty Eight Only) out of the profits so earned by him on the said shares, has been imposed.</p> <p>The aforesaid penalty has been duly submitted to the Investor Protection and Education Fund of SEBI.</p> <p>The designated person has also been provided again with a copy of Code of Conduct. He has been further advised that in case of any subsequent violation stricter action(s) would be taken by the Company.</p>											
6	Reasons recorded in writing for taking action stated above	Matter was discussed with the Chairman of the audit Committee immediately upon receipt of information about violation and it was suggested by the Audit committee Chairman to issue warning letter and levy penalty based on closing price of shares on the last day before closing of trading window.											
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)	Rs. 21,828/- was collected from Murli Malla as penalty towards the violation of CoC.											
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online Payment											
	ii. Details of transfer/payment	<table><tr><th>Particulars</th><th>Details</th></tr><tr><td>Name of the transferor</td><td>Aptech Limited</td></tr><tr><td>Bank Name, branch and Account number</td><td>HDFC Bank Limited, Nariman Point branch. Account no.: 00010110000364</td></tr><tr><td>UTR/Transaction reference Number</td><td>000250584014</td></tr><tr><td>Transaction date</td><td>10-08-2021</td></tr><tr><td>Transaction Amount (in Rs.)</td><td>21,828</td></tr></table>	Particulars	Details	Name of the transferor	Aptech Limited	Bank Name, branch and Account number	HDFC Bank Limited, Nariman Point branch. Account no.: 00010110000364	UTR/Transaction reference Number	000250584014	Transaction date	10-08-2021	Transaction Amount (in Rs.)
Particulars	Details												
Name of the transferor	Aptech Limited												
Bank Name, branch and Account number	HDFC Bank Limited, Nariman Point branch. Account no.: 00010110000364												
UTR/Transaction reference Number	000250584014												
Transaction date	10-08-2021												
Transaction Amount (in Rs.)	21,828												



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	In case of Demand Draft (DD):		NA
	Particulars	Details	
	Bank Name and branch		
	DD Number		
	DD date		
	DD amount (in Rs.)		
9	Any other relevant information		NIL

For Aptech Limited

A.K. Biyani
Company Secretary and Compliance officer
Membership no.: F 8378

Date : August 10, 2021
Place : Mumbai



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Sr. No.	Particulars	Details
1	Name of the Listed Company/ Intermediary/Fiduciary	Aptech 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	Details of Designated Person (DP)	
	Name of the DP	Saikat Banerjee
	PAN of the DP	AGNPB0599A
	Designation of DP	Manager
	Functional Role of DP	MIS, Corporate, Income, FA, Common Costs
	Whether DP is Promoter or belongs to Promoter Group	No
	If Reporting is for immediate relative of DP	
	Name of the immediate relative of DP	NA
	PAN of the immediate relative of DP	NA
	Details of transaction(s)	
	Name of the scrip	Aptech Limited
	No of shares traded and value (Rs.) (Date- wise)	Date: 13 th July, 2021 No. of shares: 250 equity shares Value: Rs. 62,500/-
	In case value of trade(s) is more than Rs.10 lacs in a calendar quarter	
	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, as the value of trade does not exceed Rs. 10 lacs in a calendar quarter
	Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable, as the value of trade does not exceed Rs. 10 lacs in a calendar quarter
4	Details of violations observed under Code of Conduct	Shares sold during trading window closure period.



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5	Action taken by Listed company/ Intermediary / Fiduciary	<p>Warning letter has been issued to the Designated Person that he would not engage in any kind of dealings in the Equity Shares of the Company in violation of the Company's Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015 and a monetary penalty of Rs. 2,400/- (Rupees Two Thousand Four Hundred Only) out of the profits so earned by him on the said shares, has been imposed.</p> <p>The aforesaid penalty has been duly submitted to the Investor Protection and Education Fund of SEBI.</p> <p>The designated person has also been provided again with a copy of Code of Conduct. He has been further advised that in case of any subsequent violation stricter action(s) would be taken by the Company.</p>
6	Reasons recorded in writing for taking action stated above	Matter was discussed with the Chairman of the audit Committee immediately upon receipt of information about violation and it was suggested by the Audit committee Chairman to issue warning letter and levy penalty based on closing price of shares on the last day before closing of trading window.
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)	Rs. 2,400/- was collected from Saikat Banerjee as penalty towards the violation of CoC.
	Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online Payment



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	Details of transfer/payment		
		Particulars	Details
		Name of the transferor	Aptech Limited
		Bank Name, branch and Account number	HDFC Bank Limited, Nariman Point branch. Account no.: 00010110000364
		UTR/Transaction reference Number	122117396047
		Transaction date	09-08-2021
		Transaction Amount (in Rs.)	2,400/-
	In case of Demand Draft (DD):	NA	
		Particulars	Details
		Bank Name and branch	
		DD Number	
		DD date	
		DD amount (in Rs.)	
9	Any other relevant information	NIL	

For Aptech Limited

A.K. Biyani
 Company Secretary and Compliance officer
 Membership no.: F 8378

Date : August 10, 2021

Place : Mumbai



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Sr. No.	Particulars	Details
1	Name of the Listed Company/ Intermediary/Fiduciary	Aptech 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	Details of Designated Person (DP)	
	Name of the DP	Sarwan Singh
	PAN of the DP	AAZPS0103R
	Designation of DP	Vice President
	Functional Role of DP	LF Centers & Audits
	Whether DP is Promoter or belongs to Promoter Group	No
	If Reporting is for immediate relative of DP	
	Name of the immediate relative of DP	NA
	PAN of the immediate relative of DP	NA
	Details of transaction(s)	
	Name of the scrip	Aptech Limited
	No of shares traded and value (Rs.) (Date- wise)	Date: 28 th July, 2021 No. of shares: 399 equity shares Value: Rs. 1,10,753/-
	In case value of trade(s) is more than Rs.10 lacs in a calendar quarter	
	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, as the value of trade does not exceed Rs. 10 lacs in a calendar quarter
	Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable, as the value of trade does not exceed Rs. 10 lacs in a calendar quarter
4	Details of violations observed under Code of Conduct	Shares sold during trading window closure period.



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5	Action taken by Listed company/ Intermediary/ Fiduciary	<p>Warning letter has been issued to the Designated Person that he would not engage in any kind of dealings in the Equity Shares of the Company in violation of the Company's Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015 and a monetary penalty of Rs. 14,833/- (Rupees Fourteen Thousand Eight Hundred Thirty Three Only) out of the profits so earned by him on the said shares, has been imposed.</p> <p>The aforesaid penalty has been duly submitted to the Investor Protection and Education Fund of SEBI.</p> <p>The designated person has also been provided again with a copy of Code of Conduct. He has been further advised that in case of any subsequent violation stricter action(s) would be taken by the Company.</p>
6	Reasons recorded in writing for taking action stated above	Matter was discussed with the Chairman of the audit Committee immediately upon receipt of information about violation and it was suggested by the Audit committee Chairman to issue warning letter and levy penalty based on closing price of shares on the last day before closing of trading window.
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)	Rs. 14,833/- was collected from Sarwan Singh as penalty towards the violation of CoC.
	Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online Payment



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	Details of transfer/payment		
		Particulars	Details
		Name of the transferor	Aptech Limited
		Bank Name, branch and Account number	HDFC Bank Limited, Nariman Point branch. Account no.: 00010110000364
		UTR/Transaction reference Number	122117803603
		Transaction date	09-08-2021
		Transaction Amount (in Rs.)	14,833/-
	In case of Demand Draft (DD):	NA	
		Particulars	Details
		Bank Name and branch	
		DD Number	
		DD date	
		DD amount (in Rs.)	
9	Any other relevant information	NIL	

For Aptech Limited

A.K. Biyani
 Company Secretary and Compliance officer
 Membership no.: F 8378

Date : August 10, 2021

Place : Mumbai



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Sr. No.	Particulars	Details
1	Name of the Listed Company/ Intermediary/Fiduciary	Aptech 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	Details of Designated Person (DP)	
	Name of the DP	Shajan Samuel
	PAN of the DP	AUVPS4664B
	Designation of DP	Vice President
	Functional Role of DP	National Sales Head
	Whether DP is Promoter or belongs to Promoter Group	No
	If Reporting is for immediate relative of DP	
	Name of the immediate relative of DP	NA
	PAN of the immediate relative of DP	NA
	Details of transaction(s)	
	Name of the scrip	Aptech Limited
	No of shares traded and value (Rs.) (Date- wise)	Date: 29 th July, 2021 No. of shares: 500 equity shares Value: Rs. 1,41,000/-
	In case value of trade(s) is more than Rs.10 lacs in a calendar quarter	
	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, as the value of trade does not exceed Rs. 10 lacs in a calendar quarter
	Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable, as the value of trade does not exceed Rs. 10 lacs in a calendar quarter
4	Details of violations observed under Code of Conduct	Shares sold during trading window closure period.



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5	Action taken by Listed company/ Intermediary/ Fiduciary	<p>Warning letter has been issued to the Designated Person that he would not engage in any kind of dealings in the Equity Shares of the Company in violation of the Company's Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015 and a monetary penalty of Rs. 20,800/- (Rupees Twenty Thousand Eight Hundred Only) out of the profits so earned by him on the said shares, has been imposed.</p> <p>The aforesaid penalty has been duly submitted to the Investor Protection and Education Fund of SEBI.</p> <p>The designated person has also been provided again with a copy of Code of Conduct. He has been further advised that in case of any subsequent violation stricter action(s) would be taken by the Company.</p>
6	Reasons recorded in writing for taking action stated above	Matter was discussed with the Chairman of the audit Committee immediately upon receipt of information about violation and it was suggested by the Audit committee Chairman to issue warning letter and levy penalty based on closing price of shares on the last day before closing of trading window.
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)	Rs. 20,800/- was collected from Shajan Samuel as penalty towards the violation of CoC.
	Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online Payment



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	Details of transfer/payment		
		Particulars	Details
		Name of the transferor	Aptech Limited
		Bank Name, branch and Account number	HDFC Bank Limited, Nariman Point branch. Account no.: 00010110000364
		UTR/Transaction reference Number	000145123206
		Transaction date	09-08-2021
		Transaction Amount (in Rs.)	20,800/-
	In case of Demand Draft (DD):	NA	
		Particulars	Details
		Bank Name and branch	
		DD Number	
		DD date	
		DD amount (in Rs.)	
9	Any other relevant information	NIL	

For Aptech Limited

A.K. Biyani
 Company Secretary and Compliance officer
 Membership no.: F 8378

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