

Intellect/SEC/2019-20

November 21, 2019

National Stock Exchange of India Ltd Exchange Plaza,5th Floor,PlotNo.C/1, G-Block, Bandra(E), Mumbai-400 051

BSE Ltd 1st Floor, New Trading Ring,Rotunda Building, PJ Towers, Dalal Street,Fort, Mumbai-400 001

Dear Sirs,

<u>Sub-Reporting of Violations related to Code of Conduct under SEBI(Prohibition of Insider Trading)</u>
<u>Regulations</u>, 2015

With Reference to SEBI Circular No. SEBI/HO/ISD/CIR/P/2019/82 dated July 19, 2019, please find enclosed herewith Report for Violations related to Code of Conduct under SEBI(Prohibition of Insider Trading) Regulations, 2015 in prescribed annexure —A for your kind information and records.

Kindly advise us in disposal of amount of fine collected/to be collected from the Designated Person to enable us to remit the same to appropriate authority.

Thanking You,

For Intellect Design Arena Ltd

VV Naresh

Company Secretary and Compliance officer

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Encl.A/a



[For listed Company: Schedule read with Regulation 9(1)of SEBI(Prohibition of Insider Trading)Regulations, 2015]

S.No	Particulars	Details
1	Name of the listed entity	Intellect Design Arena Limited
2	Please tick appropriate checkbox Reporting in capacity of: ✓ Listed Company Intermediary Fiduciary	Listed Company(BSE & NSE)
3	Name of the Designated Person(DP) Name of the immediate relative , in case report is for immediate relative	Ms. Shailee Awasthi
4	PAN of DP PAN of the immediate relative , in case report is for immediate relative	ACDPT8530B
5	Designation of DP	Vice President
6	Functional role of DP	Product Management head
7	Whether DP is promoter/Promoter Group/holding CXO position (eg. CEO,CFO,CTO etc.)	No
8	Transaction details	
	a) Name of the scrip	Intellect Design Arena Limited NSE Symbol-INTELLECT BSE Symbol-538835
	b) No. of shares traded(which includes pledge) and value (Rs)(Date-wise)	Acquired 300 Shares amounting to Rs. 60,000/. Between October 19, 2018 –Oct 26, 2018
9	In case value trade(s) is more than Rs. 10lacs in a calendar quarter- a) Date of intimation of trade(S) by concerned DP/Director/promoter/promoter group to Company under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015 b) Date of intimation of trade(S) by Company to Stock exchange under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015	Not applicable
10	Details of violations observed under SEBI(Prohibition of Insider Trading)Regulations, 2015	Traded in the shares of the Company during trading window closure.
11	Action taken by Listed Company /Intermediary/Fiduciary	This being the first incident, the Audit committee decided to impose a penalty of 150000

Intellect Design Arena Limited



		which is to be deposited within seven days from the date of this report.
12	Reasons observed in writing for taking action stated above	The Audit Committee, after consulting with Board reviewed and sought explanation from Ms. Shailee Awasthi through Video call.
13	Details of the previous instances of violations, if any. Since last financial year	Not applicable
14	Any other relevant information	None

Place-Chennai

No. 244 No. 244 Anna Salai Chennal 600 006 Yours faithfully

V V Naresh

Company Secretary and Compliance

officer

PAN-ABRPN0717F

EMAIL -naresh.vv@intellectdesign.com



[For listed Company: Schedule read with Regulation 9(1)of SEBI(Prohibition of Insider Trading)Regulations, 2015]

S.No	Particulars	Details
1	Name of the listed entity	Intellect Design Arena Limited
2	Please tick appropriate checkbox Reporting in capacity of: ✓ Listed Company Intermediary Fiduciary	Listed Company(BSE & NSE)
3	Name of the Designated Person(DP) Name of the immediate relative , in case report is for immediate relative	Mr. S Manikandan
4	PAN of DP PAN of the immediate-relative , in case report is for immediate relative	BNSPM3155Q
5	Designation of DP	Executive
6	Functional role of DP	Finance
7	Whether DP is promoter/Promoter Group/holding CXO position (eg. CEO,CFO,CTO etc.)	No
8	Transaction details	
	a) Name of the scrip	Intellect Design Arena Limited NSE Symbol-INTELLECT BSE Symbol-538835
	b) No. of shares traded(which includes pledge) and value (Rs)(Date-wise)	Acquired 5 Shares amounting to Rs. 960/. Date of Purchase- January 29, 2019
9	In case value trade(s) is more than Rs. 10lacs in a calendar quarter- a) Date of intimation of trade(S) by concerned DP/Director/promoter/promoter group to Company under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015 b) Date of intimation of trade(S) by Company to Stock exchange under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015	Not Applicable
10	Details of violations observed under SEBI(Prohibition of Insider Trading)Regulations, 2015	Traded in the shares of the Company during trading window closure.
11	Action taken by Listed Company/Intermediary/Fiduciary	This being the first incident, the Audit committee decides to

Intellect Design Arena Limited



		impose a penalty of Rs. 500/-, which is to be deposited within seven days from the date of this report.
12	Reasons observed in writing for taking action stated above	The Audit Committee, after consulting with Board reviewed and sought explanation from Mr. S Manikandan through Video call.
13	Details of the previous instances of violations, if any. Since last financial year	Not applicable
14	Any other relevant information	None

Place-Chennai

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S.No	Particulars	Details
1	Name of the listed entity	Intellect Design Arena Limited
2	Please tick appropriate checkbox Reporting in capacity of: ✓ Listed Company Intermediary Fiduciary	Listed Company(BSE & NSE)
3	Name of the Designated Person(DP) Name of the immediate relative , in case report is for immediate relative	Mr. P Shankar
4	PAN of DP PAN of the immediate relative , in case report is for immediate relative	APEPS9315R
5	Designation of DP	Vice President
6	Functional role of DP	Product Support Head
7	Whether DP is promoter/Promoter Group/holding CXO position (eg. CEO,CFO,CTO etc.)	No
8	Transaction details	
	a) Name of the scrip	Intellect Design Arena Limited NSE Symbol-INTELLECT BSE Symbol-538835
	b) No. of shares traded(which includes pledge) and value (Rs)(Date-wise)	Sold 800 Shares amounting to Rs. 1,60,000/. The date of sale-April 27, 2018
9	In case value trade(s) is more than Rs. 10 lacs in a calendar quarter- a) Date of intimation of trade(S) by concerned DP/Director/promoter/promoter group to Company under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015 b) Date of intimation of trade(S) by Company to Stock exchange under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015	Not applicable
10	Details of violations observed under SEBI(Prohibition of Insider Trading)Regulations, 2015	Traded in the shares of the Company during trading window closure.
11	Action taken by Listed Company /Intermediary/Fiduciary	This being the first incident, the Audit committee decided to impose

Intellect Design Arena Limited -



		a penalty of Rs. 2,500/-, which is to be deposited within seven days from the date of this report.
12	Reasons observed in writing for taking action stated above	The Audit Committee, after consulting with Board reviewed and sought explanation from Mr. P Shankar through Video call.
13	Details of the previous instances of violations, if any. Since last financial year	Not applicable
14	Any other relevant information	None

Place-Chennai



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[For listed Company: Schedule read with Regulation 9(1)of SEBI(Prohibition of Insider Trading)Regulations, 2015]

S.No	Particulars	Details
1	Name of the listed entity	Intellect Design Arena Limited
2	Please tick appropriate checkbox Reporting in capacity of: Listed Company Intermediary Fiduciary	Listed Company(BSE & NSE)
3	Name of the Designated Person(DP) Name of the immediate relative , in case report is for immediate relative	Mr. Saurabh Gupta
4	PAN of DP PAN of the immediate relative, in case report is for immediate relative	ADEPG4189P
5	Designation of DP	Senior Vice President
6	Functional role of DP	HR
7	Whether DP is promoter/Promoter Group/holding CXO position (eg. CEO,CFO,CTO etc.)	No
8	Transaction details	
	a) Name of the scrip	Intellect Design Arena Limited NSE Symbol-INTELLECT BSE Symbol-538835
	b) No. of shares traded(which includes pledge) and value (Rs)(Date-wise)	Sold 4250 Shares amounting to Rs. 10,15,000/. The date of sale- August 16, 2018
9	In case value trade(s) is more than Rs. 10lacs in a calendar quarter- a) Date of intimation of trade(S) by concerned DP/Director/promoter/promoter group to Company under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015 b) Date of intimation of trade(S) by Company to Stock exchange under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015	a) In compliance with Reg 7(2)(a) -The date that was supposed to be intimated by DP should be by August 20, 2018.But the same was not intimated to the Compliance officer within the prescribed time limit b) Since, the Compliance officer was not intimated about the trade, the same was not complied.
10	Details of violations observed under SEBI(Prohibition of Insider Trading)Regulations, 2015	As the traded vale exceed Rs.10 Lakhs, pre-clearance approval was not sought by him during the prescribed time period.
11	Action taken by Listed Company /Intermediary/Fiduciary	This being the first incident, the

Intellect Design Arena Limited



		Audit committee decided to impose a penalty of Rs. 10,000/-, which is to be deposited within seven days from the date of this report.
12	Reasons observed in writing for taking action stated above	The Audit Committee, after consulting with Board reviewed and sought explanation from Mr. Saurabh Gupta through Video cali.
13	Details of the previous instances of violations, if any. Since last financial year	Not applicable
14	Any other relevant information	None

Place-Chennai

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S.No	Particulars	Details
1	Name of the listed entity	Intellect Design Arena Limited
2	Please tick appropriate checkbox Reporting in capacity of: ✓ Listed Company Intermediary Fiduciary	Listed Company(BSE & NSE)
3	Name of the Designated Person(DP) Name of the immediate relative , in case report is for immediate relative	Mr. Subramanian Muthu
4	PAN of DP PAN of the immediate relative , in case report is for immediate relative	DMMPS7640F
5	Designation of DP	Vice President
6	Functional role of DP	Product Engineering Head
7	Whether DP is promoter/Promoter Group/holding CXO position (eg. CEO,CFO,CTO etc.)	No
8	Transaction details	
	a) Name of the scrip	Intellect Design Arena Limited NSE Symbol-INTELLECT BSE Symbol-538835
	b) No. of shares traded(which includes pledge) and value (Rs)(Date-wise)	Sold 134 Shares amounting to Rs. 28,810/The date of sale- January 25, 2019
9	In case value trade(s) is more than Rs. 10lacs in a calendar quarter- a) Date of intimation of trade(S) by concerned DP/Director/promoter/promoter group to Company under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015 b) Date of intimation of trade(S) by Company to Stock exchange under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015	Not applicable
10	Details of violations observed under SEBI(Prohibition of Insider Trading)Regulations, 2015	Traded in the shares of the Company during trading window closure.
11	Action taken by Listed Company / Intermediary/Fiduciary	This being the first incident, the Audit committee decided to

Intellect Design Arena Limited



		impose a penalty of Rs. 1000/-, which is to be deposited within
		seven days from the date of this
		report.
12	Reasons observed in writing for taking action stated above	The Audit Committee, after consulting with Board reviewed and sought explanation from explanation from Mr.
	*	Subramanian Muthu through Video call.
13	Details of the previous instances of violations, if any. Since last financial year	Not applicable
14	Any other relevant information	None

Place-Chennai

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