

eClerx/SECD/SE/2022/115

November 11, 2022

<b>BSE Limited</b> Corporate Relationship Department, Phiroze Jeejeebhoy Towers, 25 <sup>th</sup> Floor, Dalal Street, Fort, Mumbai - 400 001	<b>National Stock Exchange of India Limited</b> Exchange Plaza, Plot No. C/1, Block G, Bandra - Kurla Complex Bandra (East), Mumbai – 400 051
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Dear Sir/Madam,

**Sub: Violation of Code of Conduct formulated under Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.**

**Ref: SEBI circular no. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020**

**Scrip Code: BSE - 532927**

**NSE – ECLERX**

In compliance of the above-referred SEBI Circular, please find enclosed, the report of violation of the Company's Code of Conduct for Prohibition of Insider trading and Code for Fair Disclosure as formulated under the SEBI (Prohibition of Insider Trading) Regulations, 2015, along with the action taken by the Company.

Request you to kindly take this on your record.

Thanking you,

Yours faithfully

For **eClerx Services Limited**



**Pratik Bhanushali**

**Company Secretary & Compliance Officer**

**F8538**

Encl: As above



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

**[For listed companies: 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	eClerx Services 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	Mr. Govinda Reddy Papasanipalli
	ii. PAN of the DP	CKJPP1058C
	iii. Designation of DP	Associate Process Manager
	iv. Functional Role of DP	Software Services
	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	ECLERX SERVICES LIMITED BSE Code: 532927 NSE SYMBOL: ECLERX	

	ii. No of shares traded and value (Rs.) (Date- wise)	<b>Date of transaction (Purchase)</b>	<b>No. of shares (Qty)</b>	<b>Price per share (Rs.)</b>	<b>Value (Rs.)</b>
		Oct 4, 2022	10	1,408.975	14,089.75
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	Trading during trading window closure period.			
5.	Action taken by Listed company/ Intermediary/ Fiduciary	Considering the afore-mentioned first-time inadvertent violation of Company's Code of Conduct for Prohibition of Insider trading and Code for Fair Disclosure, the Audit Committee of the Company, at its meeting held on November 10, 2022, levied a penalty of Rs. 5,000.00/- (Rupees Five Thousand only), to be paid to SEBI - Investor Protection and Education Fund (IPEF) account.			
6.	Reasons recorded in writing for taking action stated above	Violation of clause B.I of Company's Code of Conduct for Prohibition of Insider trading and Code for Fair Disclosure regarding trading during trading window closure period .			
7.	Details of the previous instances of violations, if any, since last financial year	Not Applicable			
8.	If any amount collected for Code of Conduct violation(s)				
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online			

ii. Details of transfer/payment:	
Particulars	Details
Name of the transferor	Mr. Govinda Reddy Papasanipalli
Bank Name, Branch and Account number	Standard Chartered Bank Breach Candy branch 24110408724
UTR/Transaction reference Number	2211-111501681500
Transaction date	November 11, 2022
Transaction Amount (in Rs.)	5,000.00/-
9.	Any other relevant information
	Concerned Designated Person confirmed that it was an inadvertent trade made by him without any intention of violating Company's Code of Conduct for Prohibition of Insider trading and Code for Fair Disclosure.

Yours faithfully,



**Pratik Bhanushali**  
**Company Secretary & Compliance Officer**  
**PAN: AMMPB6578N**  
**Email ID: [Pratik.Bhanushali@eclerx.com](mailto:Pratik.Bhanushali@eclerx.com)**

**Date:** November 11, 2022

**Place:** Mumbai