

**INTELLECT/SEC/2021-22**

**February 14, 2022**

**The National Stock Exchange of India Ltd.,**  
Exchange Plaza, 5<sup>th</sup> Floor, Plot No. C/1, G Block, Bandra Kurla Complex,  
Bandra (E), Mumbai – 400 051.

**Scrip Code :**

INTELLECT

**The BSE Ltd.**  
1<sup>st</sup> Floor, New Trade Ring, Rotunda Building, PJ Towers,  
Dalal Street, Fort, Mumbai – 400 001.

**Scrip Code :**

538835

**Dear Sir,**

**Sub-Reporting of Violation relating to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015**

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

With respect to the above subject and reference, enclosed find the report of Violation relating to Code of Conduct under SEBI(Prohibition of Insider Trading) Regulations, 2015 in the prescribed format Annexure –A.

The undersigned has brought the violations to the notice of the Audit Committee of the Board of Directors of the company. The Committee authorised one Independent Director and the Compliance officer to look into these violations who provided an opportunity of being heard to those violators and then reported back to the Committee which suo- motto imposed penalty for the alleged violations.

Accordingly, an online transfer was made for aggregate value of Rs. 35,000 /- to the said account of SEBI on January 20, 2022. Details of the transfer is enclosed at the appropriate fields.

Kindly take the above information on record and confirm Compliance.

**Thanking you,  
For Intellect Design Arena Ltd**



**V V Naresh  
Company Secretary and Compliance officer**

**Annexure -A**

**Reporting of Insider Trading violation under Regulation 9(1) of SEBI(PIT)Regulations, 2015**

S.No	Particulars	Details
1	Name of the listed entity	Intellect Design Arena Ltd
2	Please tick the appropriate box  Reporting in the capacity of :  <input checked="" type="checkbox"/> Listed entity <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed on BSE Ltd & National Stock Exchange of India Ltd
3	Name of the Designated person	V Venkatesh
4	PAN of DP	ADQPV2470C
5	Designation of DP	Senior Vice President
6	Functional role	Delivery & Global Support Head-iGTB
7	Whether DP is a promoter/promoter group/holding CXO position	No
8	Transaction details	
	a)Name of the scrip	Intellect Design Arena Ltd  NSE-INTELLECT  BSE-538835
	b)No. of shares traded(which includes pledge) and value in Rs	Sold 1000 equity shares amounting to Rs.7,10,022/- between July 02, 2021 to July 09, 2021
9	In case value of trade 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	Nil

10	Details of violations observed under SEBI(PIT)Regulations, 2015	Sold shares of the Company during the period of Trading window closure. The window was closed from July 01, 2021 to July 30, 2021 for considering and approval of Q1 FY 2021-22 financial results.
11	Action taken by the listed entity	<ol style="list-style-type: none"> <li>1. The Audit Committee is empowered to take action on the violations of Insider Trading. An opportunity of being heard was provided to the employee.</li> <li>2. Severe warning was given by the members of Audit Committee.</li> <li>3. It was decided to impose monetary penalty of Rs 10,000.</li> </ol>
12	Reason observed in writing for taking action as stated above	Explanation was sought from Mr. V Venkatesh on August 18, 2021 through video conference held with Ms. Vijaya Sampath, Independent Director and member of the Audit Committee. He admitted for the violation as it was done inadvertently.
13	Details of previous instances of violations, if any	Nil
14	Any other relevant information	None
15	If any amount collected for code of conduct violations(s)	<p>Rs. 10,000(Ten thousand only)</p> <p>Date of transfer- January 20, 2022</p> <p>Bank name-HDFC Ltd</p> <p>UTR/Bank reference no.- N020221800968796</p>

**Date-February 14, 2022**

**Yours truly,**

**Place-Chennai**




**V V Naresh**  
**Company Secretary and Compliance officer**  
 PAN-- ABRPN0717F  
[Email- naresh.vv@intellectdesign.com](mailto:naresh.vv@intellectdesign.com)  
 Contact No. 8939748427

Annexure -A

**Reporting of Insider Trading violation under Regulation 9(1) of SEBI(PIT)Regulations, 2015**

S.No	Particulars	Details
<u>1</u>	Name of the listed entity	Intellect Design Arena Ltd
2	Please tick the appropriate box  Reporting in the capacity of :  <input checked="" type="checkbox"/> Listed entity <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed on BSE Ltd & National Stock Exchange of India Ltd
3	Name of the Designated person	K. Venkatasubramanian
4	PAN of DP	ACHPV4247M
5	Designation of DP	Senior Vice President
6	Functional role	Service Delivery-iGCB
7	Whether DP is a promoter/promoter group/holding CXO position	No
8	Transaction details	
	a)Name of the scrip	Intellect Design Arena Ltd  NSE-INTELLECT  BSE-538835
	b)No. of shares traded(which includes pledge) and value in Rs	1. Sold 1000 shares on October 12, 2021 amounting to Rs. 710,000 2. Sold 500 shares on October 18, 2021 amounting to Rs 3,60,000.
9	In case value of trade 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	Date of intimation of trade -October 18, 2021  Date of dissemination to the Stock exchange- October 19, 2021

10	Details of violations observed under SEBI(PIT)Regulations, 2015	Sold shares of the Company during the period of Trading window closure. The window was closed from October 01, 2021 to October 30, 2021 for considering and approval of Q2 FY 2021-22 financial results.
11	Action taken by the listed entity	<ol style="list-style-type: none"> <li>1. The Audit Committee is empowered to take action on the violations of Insider Trading. An opportunity of being heard was provided to the employee.</li> <li>2. Severe warning was given by the members of Audit Committee.</li> <li>3. It was decided to impose monetary penalty of Rs 10,000.</li> </ol>
12	Reason observed in writing for taking action as stated above	Explanation was sought from Mr. K Venkatasubramanian by the Compliance Officer. He admitted for the violation as it was done inadvertently.
13	Details of previous instances of violations, if any	Nil
14	Any other relevant information	None
15	If any amount collected for code of conduct violations(s)	<p>Rs. 10,000(Ten thousand only)</p> <p>Date of transfer- January 20, 2022</p> <p>Bank name-HDFC Ltd</p> <p>UTR/Bank reference no.-</p> <p>N020221800968796</p>

**Date-** February 14, 2022

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**Annexure -A**

**Reporting of Insider Trading violation under Regulation 9(1) of SEBI(PIT)Regulations, 2015**

S.No	Particulars	Details
1	Name of the listed entity	Intellect Design Arena Ltd
2	Please tick the appropriate box  Reporting in the capacity of :  <input checked="" type="checkbox"/> Listed entity <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed on BSE Ltd & National Stock Exchange of India Ltd
3	Name of the Designated person	Nellesserry Sankaran Sivaraman
4	PAN of DP	ANGPS2315B
5	Designation of DP	Senior Vice President
6	Functional role	Partner-iGCB
7	Whether DP is a promoter/promoter group/holding CXO position	No
8	Transaction details	
	a)Name of the scrip	Intellect Design Arena Ltd  NSE-INTELLECT  BSE-538835
	b)No. of shares traded(which includes pledge) and value in Rs	Sold 1500 shares amounting to Rs 11,40,000
9	In case value of trade is more than Rs.10lacs in a calendar quarter-  c) 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  d) Date of intimation of trade(S) by Company to Stock exchange under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015	The Designated person dealt in the shares of the Company when the trading window was still closed.

10	Details of violations observed under SEBI(PIT)Regulations, 2015	Sold shares of the Company during the period of Trading window closure. The window was closed from July 01, 2021 to July 30, 2021 for considering and approval of Q1 of FY 2021-22 financial results.
11	Action taken by the listed entity	<ol style="list-style-type: none"> <li>1. The Audit Committee is empowered to take action on the violations of Insider Trading. An opportunity of being heard was provided to the employee.</li> <li>2. Severe warning was given by the members of Audit Committee.</li> <li>3. It was decided to impose monetary penalty of Rs 10,000.</li> </ol>
12	Reason observed in writing for taking action as stated above	Explanation was sought from Mr. Nelleserry Sankaran Sivaraman by the Compliance Officer. He admitted for the violation as it was done inadvertently.
13	Details of previous instances of violations, if any	Nil
14	Any other relevant information	None
15	If any amount collected for code of conduct violations(s)	<p>Rs. 10,000(Ten thousand only)</p> <p>Date of transfer- January 20, 2022</p> <p>Bank name-HDFC Ltd</p> <p>UTR/Bank reference no.- N020221800968796</p>

**Date-** February 14,2022

**Yours truly,**

**Place-Chennai**




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S.No	Particulars	Details
1	Name of the listed entity	Intellect Design Arena Ltd
2	Please tick the appropriate box  Reporting in the capacity of :  <input checked="" type="checkbox"/> Listed entity <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed on BSE Ltd & National Stock Exchange of India Ltd
3	Name of the Designated person	Karthik R
4	PAN of DP	ASWPK5418Q
5	Designation of DP	Manager
6	Functional role	Pre sales-iGCB
7	Whether DP is a promoter/promoter group/holding CXO position	No
8	Transaction details	
	a)Name of the scrip	Intellect Design Arena Ltd  NSE-INTELLECT  BSE-538835
	b)No. of shares traded(which includes pledge) and value in Rs	Sold 625 shares on July 28, 2021 on the day of the Board Meeting held to consider Q1 results.
9	In case value of trade is more than Rs.10lacs in a calendar quarter-  e) 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  f) Date of intimation of trade(S) by Company to Stock exchange under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015	Nil



10	Details of violations observed under SEBI(PIT)Regulations, 2015	Sold shares of the Company during the period of Trading window closure. The window was closed from July 01, 2021 to July 30, 2021 for considering and approval of Q1 FY 2021-22 Financial results.
11	Action taken by the listed entity	<ol style="list-style-type: none"> <li>1. The Audit Committee is empowered to take action on the violations of Insider Trading. An opportunity of being heard was provided to the employee.</li> <li>2. Severe warning was given by the members of Audit Committee.</li> <li>3. It was decided to impose monetary penalty of Rs 5000.</li> </ol>
12	Reason observed in writing for taking action as stated above	Explanation was sought from Mr. Karthik by the Compliance Officer. He admitted for the violation as it was done inadvertently.
13	Details of previous instances of violations, if any	Nil
14	Any other relevant information	None
15	If any amount collected for code of conduct violations(s)	<p>Rs. 5,000(Five thousand only)</p> <p>Date of transfer- January 20, 2022</p> <p>Bank name-HDFC Ltd</p> <p>UTR/Bank reference no.- N020221800968796</p>

**Date-** February 14, 2022

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