

Registered Office : Zensar Technologies Limited Zensar Knoewledge Park, Plot No. 4, MIDC Kharadi, Off Nagar Road, Pune 411014, India. Tel: +91 (20) 6607 4000, 27004000 Fax: +91 (20) 6605 7888, CIN: L72200PN1963PLC012621

Date: December 12, 2020

BSE Limited Corporate Service Department, 01st Floor, P. J. Towers, Dalal Street, Mumbai 400 001 **The National Stock Exchange of India Ltd.** Exchange Plaza, 03rd floor, Plot No. C/1, 'G' block, Bandra Kurla Complex, Bandra (E), Mumbai 400 051

Fax: (022) 2272 2039/2272 3121

Scrip ID: ZENSARTECH Scrip Code: 504067 Fax: (022) 26598237/26598238

Symbol: ZENSARTECH Series: EQ

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

Dear Sir,

We wish to report violation of the Company's Code of Conduct, by a Designated Person.

Details of such violation are provided in "Annexure-A" in accordance with SEBI circular no. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

It is requested to take this intimation on record and acknowledge receipt of the same.

Thanking you,

Yours sincerely,

For Zensar Technologies Limited

Gaurav Tongia Company Secretary



Encl.: As above



Annexure-A

Report by Zensar Technologies Limited for violations 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]

| S. No. | Particulars | Details |
|--------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|
| 1. | Name of the Listed Company/ Intermediary/Fiduciary | Zensar Technologies Limited |
| 2. | Reporting in capacity of: Listed Company Intermediary | Listed Company |
| 3. | Fiduciary | |
| 5. | A. Details of Designated Person (DP) i. Name of the Designated Person (DP) | Ms. Sneha Nawani |
| | ii. PAN of the DP | AOBPN9294E |
| | iii. Designation of DP | Associate Manager |
| | iv. Functional Role of DP | Finance |
| | v. Whether DP is Promoter or belongs to Promoter Group | None |
| | 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 | 504067 (BSE) ZENSARTECH (NSE) |
| | ii. No. of shares traded and value (Rs.) (date-wise) | November 3, 2020: Bought 200 shares @ Rs. 177.50/share December 1, 2020: Sold 200 shares @ Rs. 231.00/share |
| | D. In case value of trade(s) is more than | Rs. 10 lakhs 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 (Prohibition of Insider Trading) Regulations, 2015 ii. Date of intimation of trade(s) by Company | NA |
| | to stock exchanges under regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015 | |
| 4. | Details of violations observed under Code of Conduct | Contra trade in shares of the Company |
| 5. | Action taken by Listed Company | • Employee has been asked to transfer the entire profit to Investor Protection and Education Fund administered by SEBI. |
| | | • A warning letter cautioning about due compliance has also been issued. |





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| 6. | Reasons recorded in writing for taking action stated above | Ms. Sneha Nawani has expressed that: "I am aware of the polices and framework. However, the transaction was inadvertently entered by me. Also confirming that I did not have any price sensitive information while entering into the transaction." It was also noted that it's a first instance of |
|----|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | non-compliance by the concerned employee. |
| 7. | Details of previous instances of violations, if | |
| | any, since last financial year | |
| 8. | If any amount collected for Code of Conduct | violation(s) |
| | i. Mode of transfer to SEBI - IPEF | Online |
| | (Online/Demand Draft) | |
| | ii. Details of transfer/payment | |
| | In case of Online | |
| | | |
| | Particulars | Details |
| | Name of the transferor | Ms. Sneha Nawani |
| | | Ms. Sneha Nawani HDFC Bank, Mindspace Malad west, |
| | Name of the transferor | Ms. Sneha Nawani HDFC Bank, Mindspace Malad west, Mumbai |
| | Name of the transferor Bank name, branch and account number | Ms. Sneha Nawani HDFC Bank, Mindspace Malad west, Mumbai Ac no. 50100160676000 |
| | Name of the transferor Bank name, branch and account number UTR/Transaction reference number | Ms. Sneha Nawani HDFC Bank, Mindspace Malad west, Mumbai Ac no. 50100160676000 034519127938 |
| | Name of the transferor Bank name, branch and account number UTR/Transaction reference number Transaction date | Ms. Sneha Nawani HDFC Bank, Mindspace Malad west, Mumbai Ac no. 50100160676000 034519127938 December 10, 2020 |
| | Name of the transferor Bank name, branch and account number UTR/Transaction reference number | Ms. Sneha Nawani HDFC Bank, Mindspace Malad west, Mumbai Ac no. 50100160676000 034519127938 |
| | Name of the transferor Bank name, branch and account number UTR/Transaction reference number Transaction date Transaction amount (in Rs.) In case of Demand Draft (DD) | Ms. Sneha Nawani HDFC Bank, Mindspace Malad west, Mumbai Ac no. 50100160676000 034519127938 December 10, 2020 |
| | Name of the transferor Bank name, branch and account number UTR/Transaction reference number Transaction date Transaction amount (in Rs.) In case of Demand Draft (DD) Particulars | Ms. Sneha Nawani HDFC Bank, Mindspace Malad west, Mumbai Ac no. 50100160676000 034519127938 December 10, 2020 |
| | Name of the transferor Bank name, branch and account number UTR/Transaction reference number Transaction date Transaction amount (in Rs.) In case of Demand Draft (DD) Particulars Bank name and branch | Ms. Sneha Nawani HDFC Bank, Mindspace Malad west, Mumbai Ac no. 50100160676000 034519127938 December 10, 2020 10,700.00 |
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| 9. | Name of the transferor Bank name, branch and account number UTR/Transaction reference number Transaction date Transaction amount (in Rs.) In case of Demand Draft (DD) Particulars Bank name and branch DD number DD date | Ms. Sneha Nawani HDFC Bank, Mindspace Malad west, Mumbai Ac no. 50100160676000 034519127938 December 10, 2020 10,700.00 Details |

Yours faithfully, For Zensar Technologies Limited



Gaurav Tongia Company Secretary

PAN: ADAPT6954D Email ID: <u>companysecretarial@zensar.com</u>

Date: December 12, 2020 Place: Pune