

May 28, 2021

To

<b>BSE Limited</b> Department of Corporate Services Listing Department P J Towers, Dalal Street, Mumbai – 400001 <i>Scrip Code: 535648</i>	<b>National Stock Exchange of India Limited</b> Listing Department Exchange Plaza, Plot no. C/1, G Block, Bandra-Kurla Complex, Bandra (East), Mumbai – 400051 <i>Scrip Symbol: JUSTDIAL</i>	<b>Metropolitan Stock Exchange of India Limited</b> 4 <sup>th</sup> Floor, Vibgyor Towers, Plot No. C 62, G Block, Opp. Trident Hotel, Bandra Kurla Complex, Bandra (East), Mumbai – 400098 <i>Scrip Symbol: JUSTDIAL</i>
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Dear Sir/Madam,

**Sub.: Reporting regarding Violation of Company's Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015**

This is to inform that in terms of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (the "SEBI Regulations"), Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of trading by Designated Persons, their Immediate Relatives and other insiders of Just Dial Limited ("Company's Code of Conduct") and SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, the details of violation of the Company's Code of Conduct by the Designated Person and his Immediate Relative along with the action taken by the Company thereon is enclosed as "**Annexure A**" to this letter.

Further, we would like to submit that the reported deviation is not material in relation to the paid up equity share capital of the Company.

Kindly take the same on record.

Thanking You,

Yours truly,

**For Just Dial Limited**

**Manan Udani**  
**Company Secretary**

**Encl: As above**

**Just Dial Limited**

CIN: L74140MH1993PLC150054

Registered & Corporate Office : Palm Court Building M, 501/B, 5th Floor, New Link Road, Besides Goregaon Sports Complex, Malad West, Mumbai - 400064

Tel. : 022-28884060 / 66976666 • Fax : 022-28823789

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## Annexure A

### Report by Just Dial 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

Sr. No.	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	Just Dial Limited
2	<i>Please tick appropriate checkbox</i> Reporting in capacity of : <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	
3	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	Mr. Bharat Sharma
	ii. PAN of the DP	AYPPS6370L
	iii. Designation of DP	GM- Software testing
	iv. Functional Role of DP	Mr. Bharat Sharma is part of engineering team and his primary responsibility is ensuring Testing and Quality Assurance of all software features available on JD across platforms
	v. Whether DP is Promoter or belongs to Promoter Group	No
	<b>B. If Reporting is for immediate relative of DP</b>	
	i. Name of the immediate relative of DP	Mrs. Santosh Sharma

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	ii. PAN of the immediate relative of DP	CBMPS1151B
	<b>C. Details of transaction(s)</b>	
	i. Name of the scrip	Just Dial Limited
	ii. No of shares traded and value (Rs.) (Date- wise)	On May 4, 2021, 1,000 Equity Shares were gifted. Hence, the Transaction value is Nil.
	<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar Quarter</b>	
	i. Date of intimation of trade(s) 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	During the trading window closure period, Mr. Bharat Sharma has gifted 1,000 equity shares to his wife Mrs. Santosh Sharma. The aforesaid transaction falls under off-market inter-se transfer between insiders. However, the same was not reported by him and his immediate relative within two working days to the Company as required under Regulation 4 (1) (i) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.
5	Action taken by Listed company/ <del>Intermediary</del> /Fiduciary	A Warning Letter has been given to him for adhering the Code of Conduct for Prevention of Insider

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		Trading strictly to avoid situations where the Company can levy penalties and take strict disciplinary actions as per Company's Code of Conduct.
6	Reasons recorded in writing for taking action stated above	Considering the explanation of Mr. Bharat Sharma that the reporting of said transaction which was required to be made by him and his immediate relative to the Company within two working days was inadvertently missed by them and the same was instead reported to the Company within four working days. Further, also considering that the said transaction was of gift of the shares and no monetary value was involved and the aforesaid violation being his first transgression of the Code of Conduct for Prevention of Insider Trading of the Company, a warning letter has been issued to him. He has also agreed to take extra precaution next time onwards.
7	Details of the previous instances of violations, if any, since last financial year	No

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8	If any amount collected for Code of Conduct violation(s)													
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Not Applicable												
	ii. Details of transfer/payment In case of Online:	Not Applicable												
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DD amount (in Rs.)	-													
9	Any other relevant information	-												

Yours sincerely,

Date: May 28, 2021  
Place: Mumbai

Name of Compliance Officer: Manan Udani  
PAN: AAVPU2410K  
Email id: manan.udani@justdial.com

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