

February 02, 2022

The Manager,
Department of Corporate Services
BSE Limited
Floor 25, P.J. Towers,
Dalal Street, Mumbai – 400 001
BSE Scrip code – [532541]
Non-Convertible Bond ISIN INE591G08012

The General Manager,
Department of Corporate Services
The National Stock Exchange of India
Limited
Exchange Plaza,
Plot No. C/1, G Block, Bandra Kurla Complex,
Bandra, Mumbai – 400 051
NSE Scrip code – [COFORGE]

Subject: Reporting regarding violations of Code of Conduct under SEBI
(Prohibition of Insider Trading) Regulations, 2015

Dear Sir(s),

With reference to SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, please find enclosed herewith report for violation related to code of conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 in prescribed Annexure – A.

This is for your information and record.

Thanking you,

For Coforge Limited
[Erstwhile NIIT Technologies Limited]



Barkha Sharma
Company Secretary & **Chief Financial Officer**



Encl: Annexure A

Report 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	Coforge 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	A. Details of Designated Person (DP)	
	i. Name of the DP	Mr. Milan Gandhi
	ii. PAN of the DP	AHMPG1209J
	iii. Designation of DP	Senior Vice President
	iv. Functional Role of DP	TTH Management (Global Practice head)
	v. Whether DP is Promoter or belongs to Promoter Group	No
	B. If Reporting is for immediate relative of DP No	
	i. Name of the immediate relative of DP	N.A.
	ii. PAN of the immediate relative of DP	N.A.
	C. Details of transaction(s)	
	i. Name of the scrip	COFORGE
	ii. No of shares traded and value (Rs.) (Date- wise)	He had bought 40 shares in last quarter on the day of the Board meeting (October 25, 2021 for a total consideration of Rs. 1,99,374.35) assuming that window was open.
	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/promotor group to Company under regulation 7 of SEBI	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	Upon investigation Mr. Milan Gandhi has informed to the Company the transaction was made inadvertently that he bought 40 shares inadvertently in last quarter assuming that the trading window was open after the Board meeting, however the trading window was closed.
5	Action taken by Listed company/ Intermediary/ Fiduciary	Warning letter is issued to Mr. Milan Gandhi forbidding him from entering into any such transaction in future and a fine amounting to Rs. 39,875 is collected from him. The said amount is deposited in SEBI's IEPF Account.
6	Reasons recorded in writing for taking action stated above	<p>The Management/Audit Committee members have deliberated on the matter and upon investigation found that the violation is during the trading window closure period and hence a fine of Rs. 39,875 (20% of the transaction value) should be atleast levied.</p> <p>Additionally, the management has also issued a warning letter forbidding him from entering into any such transaction in future.</p>
7	Details of the previous instances of violations, if any, since last financial year	No such previous instance

8	<p>If any amount collected for Code of Conduct violation(s) –</p> <p>As mentioned above, a penalty of amounting to Rs. 39,875 (20% of the transaction value) has also been imposed on him, which is deposited in the IEPF Account of Securities and Exchange Board of India.</p>		
i. Mode of transfer to SEBI - IEPF (Online/ Demand Draft)			
ii. Details of transfer/payment		Online	
In case of Online:			
	Particulars	Details	
	Name of the transferor	Coforge Limited (the amount has been taken from Milan Gandhi by the Company)	
	Bank Name, branch and Account number, IFSC.	ICICI BANK LIMITED CONNAUGHT PLACE 000751000255 ICIC0000007	
	UTR/Transaction reference Number	INF/NEFT/026214380921/B KID0000122/SEBI	
	Transaction Date	February 02, 2022	
	Transaction Amount (in Rs)	1,99,374.35*20/100= 39,875 (Rounded Off)	
In case of Demand Draft (DD): NA			
	Particulars	Details	
	Bank Name and branch	NA	
	DD Number		
	DD date		
	DD amount (in Rs.)		
9	Any other relevant information		NIL

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1	Name of the listed company/ Intermediary/Fiduciary	Coforge 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	A. Details of Designated Person (DP)	
	i. Name of the DP	Mr. Nigah Ahmad
	ii. PAN of the DP	AIZPA5164E
	iii. Designation of DP	SENIOR ASSOCIATE - IT OPS SERVICES
	iv. Functional Role of DP	INTERNAL IT
	v. Whether DP is Promoter or belongs to Promoter Group	No
	B. If Reporting is for immediate relative of DP No	
	i. Name of the immediate relative of DP	N.A.
	ii. PAN of the immediate relative of DP	N.A.
	C. Details of transaction(s)	
	i. Name of the scrip	COFORGE
	ii. No of shares traded and value (Rs.) (Date- wise)	He bought 1 share in the week ending September 2021 and inadvertently sold 1 equity share during the trading window closure period in last quarter
	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/promotor group to Company under regulation 7 of SEBI	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	Upon investigation Mr. Nigah Ahmad has informed to the Company that he bought 1 share in the week ending September 2021 and inadvertently sold 1 equity share during the trading window closure period in last quarter and also leading to contra trade.
5	Action taken by Listed company/ Intermediary/ Fiduciary	Warning letter is issued to Mr. Nigah Ahmad forbidding him from entering into any such transaction in future and a fine amounting to Rs. 1150 is collected from him. The said amount is also deposited in SEBI's IEPF Account.
6	Reasons recorded in writing for taking action stated above	<p>The Management/Audit Committee members have deliberated on the matter and upon investigation found that based on the violation by him and one share involved in the transaction a penalty of 1150 (20% of the transaction value and profit earned) should be levied.</p> <p>Additionally, the management has also issued a warning letter forbidding her from entering into any such transaction in future.</p>
7	Details of the previous instances of violations, if any, since last financial year	No such previous instance

8	<p>If any amount collected for Code of Conduct violation(s) –</p> <p>As mentioned above, a penalty of amounting to Rs. 1150 (20% of the transaction value and profit earned) has also been imposed on him, which has been deposited in the IEPF Account of Securities and Exchange Board of India.</p>																				
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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	A. Details of Designated Person (DP)	
	i. Name of the DP	Ms. Anuradha Sehgal
	ii. PAN of the DP	AASPS8859D
	iii. Designation of DP	SVP
	iv. Functional Role of DP	Chief Marketing Officer
	v. Whether DP is Promoter or belongs to Promoter Group	No
	B. If Reporting is for immediate relative of DP No	
	i. Name of the immediate relative of DP	N.A.
	ii. PAN of the immediate relative of DP	N.A.
	C. Details of transaction(s)	
	i. Name of the scrip	COFORGE
	ii. No of shares traded and value (Rs.) (Date- wise)	Purchased 10 shares of Coforge on January 25, 2022; 2 shares at Rs. 4691 per share amounting to Rs. 9382 8 shares of Rs. 4690.95 per share amounting to Rs. 37,527.60
	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/promotor group to Company under regulation 7 of SEBI	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	Ms. Anuradha Sehgal has intimated to the Company that the transaction of purchase of 10 equity shares from her demat account was made inadvertently by her father through her account. She was travelling from USA to Delhi and was unaware of the transaction and she informed us suo-motto immediately.
5	Action taken by Listed company/ Intermediary/ Fiduciary	Warning letter is issued to Ms. Anuradha Sehgal forbidding her from entering into any such transaction in future and a fine amounting to Rs. 9382 is collected as fine by the Company. The said amount is deposited in SEBI's IEPF Account.
6	Reasons recorded in writing for taking action stated above	<p>The Management/Audit Committee members have deliberated on the matter and based on promptness of informing about the violation and small number of shares involved in the transaction a penalty of 9382 (20% of the transaction value) should be levied.</p> <p>In addition, the management has also issued a warning letter forbidding her from entering into any such transaction in future.</p>
7	Details of the previous instances of violations, if any, since last financial year	No such previous instance

8	<p>If any amount collected for Code of Conduct violation(s) –</p> <p>As mentioned above, a penalty of amounting to Rs. 9382 (20% of the transaction value) has also been imposed on her, which has been deposited in the IEPF Account of Securities and Exchange Board of India.</p> <p>i. Mode of transfer to SEBI - IEPF (Online/Demand Draft)</p> <p>ii. Details of transfer/payment</p> <p>In case of Online:</p> <table border="1" data-bbox="329 541 1239 1102"> <thead> <tr> <th data-bbox="329 541 808 583">Particulars</th> <th data-bbox="808 541 1239 583">Details</th> </tr> </thead> <tbody> <tr> <td data-bbox="329 583 808 730">Name of the transferor</td> <td data-bbox="808 583 1239 730">Coforge Limited (the amount has been taken from Anuradha Sehgal by the Company)</td> </tr> <tr> <td data-bbox="329 730 808 877">Bank Name, branch and Account number, IFSC</td> <td data-bbox="808 730 1239 877">ICICI BANK LIMITED CONNAUGHT PLACE 000751000255 ICIC0000007</td> </tr> <tr> <td data-bbox="329 877 808 951">UTR/Transaction reference Number</td> <td data-bbox="808 877 1239 951">INF/NEFT/026214380921/BKID 0000122/SEBI</td> </tr> <tr> <td data-bbox="329 951 808 1024">Transaction Date</td> <td data-bbox="808 951 1239 1024">February 02, 2022</td> </tr> <tr> <td data-bbox="329 1024 808 1102">Transaction Amount (in Rs)</td> <td data-bbox="808 1024 1239 1102">46909.60*20/100= 9382 (Rounded Off)</td> </tr> </tbody> </table> <p>In case of Demand Draft (DD): NA</p> <table border="1" data-bbox="329 1140 1239 1350"> <thead> <tr> <th data-bbox="329 1140 808 1182">Particulars</th> <th data-bbox="808 1140 1239 1182">Details</th> </tr> </thead> <tbody> <tr> <td data-bbox="329 1182 808 1224">Bank Name and branch</td> <td data-bbox="808 1182 1239 1224" rowspan="5">NA</td> </tr> <tr> <td data-bbox="329 1224 808 1266">DD Number</td> </tr> <tr> <td data-bbox="329 1266 808 1308">DD date</td> </tr> <tr> <td data-bbox="329 1308 808 1350">DD amount (in Rs.)</td> </tr> <tr> <td data-bbox="329 1350 808 1350"></td> </tr> </tbody> </table>	Particulars	Details	Name of the transferor	Coforge Limited (the amount has been taken from Anuradha Sehgal by the Company)	Bank Name, branch and Account number, IFSC	ICICI BANK LIMITED CONNAUGHT PLACE 000751000255 ICIC0000007	UTR/Transaction reference Number	INF/NEFT/026214380921/BKID 0000122/SEBI	Transaction Date	February 02, 2022	Transaction Amount (in Rs)	46909.60*20/100= 9382 (Rounded Off)	Particulars	Details	Bank Name and branch	NA	DD Number	DD date	DD amount (in Rs.)		online
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