



**Tanla Platforms Limited**  
(Formerly known as Tanla Solutions Limited)  
Tanla Technology Center  
Hi-tech city Road, Madhapur,  
Hyderabad, India - 500081  
CIN: L72200TG1995PLC021262

T: +91-40-40099999  
info@tanla.com  
www.tanla.com

August 19, 2022

To,

BSE Limited Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai - 400 001 Scrip Code: <b>532790</b>	National Stock Exchange of India Ltd. Exchange Plaza, Plot No. C/1, Block-G, Bandra Kurla Complex, Bandra (East), Mumbai - 400 051 Symbol: <b>TANLA</b>
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Dear Sir / Madam,

**Sub: Trading by a designated person of Tanla Platforms Limited (the “Company”).**

Please find enclosed herewith the report in the format prescribed by SEBI Circular SEBI/ HO/ ISD/ ISD/ CIR/ P/ 2020/ 135 dated July 23, 2020 related to the breach of Company’s Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 by a Designated Person.

Kindly take the same on record.

Thanking you,

Yours faithfully,

For **Tanla Platforms Limited**  
(Formerly known as Tanla Solutions Limited)



Seshanuradha Chava  
Company Secretary

Annexure A

Report by Tanla Platforms 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	Tanla Platforms Limited (Formerly known as Tanla Solutions Limited)																												
2.	Please tick appropriate checkbox Reporting in capacity of: <input 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. Srinivas Gunupudi Kamoji																												
	ii. PAN of the DP	AFFPG4635M																												
	iii. Designation of the DP	VP – Finance & Accounts																												
	iv. Functional Role of DP	Finance & Accounts																												
	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	NSE: TANLA BSE: 532790																												
	ii. No of shares traded and value (Rs.) (Date-wise)	Mr. Srinivas Kamoji received 4715 ( <i>Four Thousand Seven Hundred and Fifteen</i> ) shares on [01-Aug-2022] from the following individuals through an off-market transaction (“ <b>Transaction</b> ”).																												
		<table border="1"> <thead> <tr> <th>Name of the transferor</th> <th>No. of Shares acquired (as per Benpos on Aug 05, 2022)</th> <th>Amount transferred in INR</th> <th>Date of transfer of consideration</th> </tr> </thead> <tbody> <tr> <td>Sandeep Padmawar</td> <td>1042</td> <td>6,50,000</td> <td>04-07-2022</td> </tr> <tr> <td>Anjani Devi Kota</td> <td>1762</td> <td>9,85,000</td> <td>05-07-2022</td> </tr> <tr> <td>Roja Padmawar</td> <td>1000</td> <td>9,20,000</td> <td>05-07-2022</td> </tr> <tr> <td>Srinivas Padmawar</td> <td>174</td> <td>5,50,000</td> <td>04-07-2022</td> </tr> <tr> <td>Vattamwar Sandeep</td> <td>197</td> <td>NIL</td> <td>NIL</td> </tr> <tr> <td><b>Total</b></td> <td><b>4,175</b></td> <td><b>1,02,41,846</b></td> <td></td> </tr> </tbody> </table>	Name of the transferor	No. of Shares acquired (as per Benpos on Aug 05, 2022)	Amount transferred in INR	Date of transfer of consideration	Sandeep Padmawar	1042	6,50,000	04-07-2022	Anjani Devi Kota	1762	9,85,000	05-07-2022	Roja Padmawar	1000	9,20,000	05-07-2022	Srinivas Padmawar	174	5,50,000	04-07-2022	Vattamwar Sandeep	197	NIL	NIL	<b>Total</b>	<b>4,175</b>	<b>1,02,41,846</b>	
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	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	Mr. Srinivas Kamoji sent an email to the Company on August 2, 2022 seeking a pre-clearance for the Transaction.
	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.	<p>(i) Undertaking contra-trades within six-month time period</p> <p>(ii) Failure to seek pre-clearance from the compliance officer of the Company</p> <p>(iii) Payment of purchase consideration towards 4,175 equity shares of the Company when the trading window was closed for Designated Persons.</p>
5.	Actions taken by Listed company	<p>The Audit Committee noted following violations of the Code of Conduct of the Company in its meeting held on August 16, 2022</p> <p>(i) Undertaking contra-trades within six-month time period. On June 29, 2022, Mr. Kamoji sold shares and received shares on Aug 1<sup>st</sup>, 2022.</p> <p>(ii) Failure to seek pre-clearance from the compliance officer of the Company.</p> <p>(iii) Payment of purchase consideration towards 4,175 equity shares of the Company when the trading window was closed for specified persons.</p> <p>The Audit Committee directed the Designated Person to pay an amount equivalent to the market value (opening + closing/2) of the 4,175 shares as on 16<sup>th</sup> August 2022, i.e. INR 31,44,714 (<i>Indian Rupees Thirty One Lakhs Forty Four Thousand Seven Hundred and Fourteen</i>) to the Company which shall be deposited to IEPF as per SEBI guidelines for contravention of the Code of Conduct of the Company.</p>
6.	Reasons recorded in writing for taking action stated above	The Designated Person has acted in contravention with the Code of Conduct. Accordingly, a monetary penalty in reference to the trading price of the equity shares of the Company is levied. The amount of INR 31,44,714 ( <i>Indian Rupees Thirty-One Lakhs Forty Four Thousand Seven Hundred and Fourteen</i> ) once collected from the Designated Person shall be transferred to IEPF as per SEBI guidelines.
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)	
9.	i. Mode of transfer to	Once the amount of INR 31,44,714 ( <i>Indian Rupees Thirty One</i>

	SEBI - IPEF	<i>Lakhs Forty Four Thousand Seven Hundred and Fourteen</i> ) is received from the Designated Person, the Company shall transfer it to SEBI – IPEF
10.	ii. Details of transfer / payment: Refer to response in 9 (i) above	
11.	Any other relevant information	Not Applicable

Yours faithfully,



Name and Signature of Compliance Officer: Seshanuradha Chava

PAN: ADHPC2054J

Email ID: secretarial@tanla.com

Date: 19-08-2022

Place: Hyderabad