

ZAGGLE/23-24/09

October 11, 2023

To Listing Department, NATIONAL STOCK EXCHANGE OF INDIA LIMITED Exchange Plaza, Plot No C/1, G Block Bandra Kurla Complex, Bandra (East), Mumbai -400 051, Maharashtra	To The Corporate Relations Department BSE LIMITED Phiroz Jeejeebhoy Towers, 25 th Floor, Dalal Street, Mumbai -400 001, Maharashtra
Company Symbol: ZAGGLE	Company Scrip Code: 543985

Dear Sir / Madam,

Sub: Reporting of violation by the Company under the SEBI (Prohibition of Insider Trading) Regulations, 2015

Pursuant to the captioned subject, we enclose herewith the report of violation related to Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons and their Immediate Relatives (“**Code of Conduct**”) formulated under SEBI (Prohibition of Insider Trading) Regulations, 2015 as **Annexure A** prescribed by SEBI vide its Circular SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

Please take the information on record.

Yours faithfully,

For Zaggle Prepaid Ocean Services Limited**Hari Priya**
Company Secretary and Compliance Officer

Annexure A

Report by Zaggle Prepaid Ocean Services 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	Zaggle Prepaid Ocean Services Limited
2	Please tick appropriate checkbox Reporting in capacity of : <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Entity
3	A. Details of Designated Person (DP)	
	i. Name of the DP	1. Pranjal Date 2. Sanjeev Deeti
	ii. PAN of the DP	1. ALOPD5909J 2. GOFPS4661A
	iii. Designation of DP	1. Head Product & Portfolio 2. Senior Executive- Accounts & Finance
	iv. Functional Role of DP	1. Product 2. Accounts & Finance
	v. Whether DP is Promoter or belongs to Promoter group	No
	B. If Reporting is for immediate relatives 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	Zaggle Prepaid Ocean Services Limited BSE Scrip Code:543985 NSE Symbol: ZAGGLE
	ii. No of shares traded and value (Rs.) (Date- wise)	1. 200 shares (purchased) Value (in Rs.): 32,310/- Date:22-09-2023 2. Contra Trade: a. 6 shares (purchased) Value (in Rs.): 1,002/- Date: 22-09-2023 b. 6 Shares (Sold) Value (in Rs.):



Zaggle Prepaid Ocean Services Limited

(formerly known as Zaggle Prepaid Ocean Services Private Limited)

Regd. Office: 301, III Floor, CSR Estate, Plot No.8, Sector 1, HUDA Techno Enclave, Madhapur Main Road, Hyderabad, Rangareddi – 500081, Telangana. Ph.: 040 23119049

CIN : U65999TG2011PLC074795 | PAN : AAACZ4965E | accounts.hyd@zaggle.in | www.zaggle.in

		1,182.30/- Date: 28-09-2023
	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	Not Applicable
	i. 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	<ol style="list-style-type: none"> 1. Bought 200 shares during the period of Closure of Trading window 2. Contra Trade of 6 shares during the period of closure of Trading Window
5	Action taken by Listed company/ Intermediary/ Fiduciary	<p>The Company issued a Show Cause Notice to Ms. Pranjal Date and Mr. Sanjeev Deeti and sought Clarification from them on the violation and the matter was referred to the audit committee and followed by a review by the Board of Directors (“Board”) on the matter.</p> <p>The Board, based on the recommendation of the Audit Committee and in view that this was the first offence, decided to take a lenient view issue a warning letter, advising them to refrain from entering into any such transactions in future otherwise more stringent actions can be taken against them as per the Code of Conduct</p>
6	Reasons recorded in writing for taking action stated above	In view of the submissions made by Ms. Pranjal Date and Mr. Sanjeev Deeti in response to the Show Cause Notice issued to them, the Company noted that it was the first violation by both of them.

		<p>Since the amounts involved were small and the non-disclosure was inadvertent and un-intentional.</p> <p>A warning letter has been issued, advising them to refrain from entering into any such transactions in future otherwise more stringent actions can be taken against them as per the Code of Conduct.</p>
7	Details of the previous instances of violations, if any, since last financial year	None
8	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI – IPEF (Online/Demand Draft)	None
	ii. Details of transfer/payment	
	In Case of Online: None	
	Particulars	Details
	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: None	
	Particulars	Details
	Bank Name and branch	
	DD Number	
	DD date	
	DD amount (in Rs.)	
9	Any other Relevant Information	Not Applicable

Yours faithfully,

For Zaggle Prepaid Ocean Services Limited

Hari Priya
Company Secretary and Compliance Officer
PAN: AYMPP5225G
Email ID: haripriya.singh@zaggle.in

Date: 11.10.2023
Place: Hyderabad



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