



IndiaMART InterMESH Ltd.
6th floor, Tower 2, Assotech Business Cresterra,
Plot No.22, Sec 135, Noida-201305, U.P.
Call Us: +91 - 9696969696
E: customercare@indiamart.com
Website: www.indiamart.com

Date: August 14, 2020

**The Manager – Listing
BSE Limited
(BSE: 542726)**

**The Manager – Listing
National Stock Exchange of India Limited
(NSE: INDIAMART)**

Dear Sir/Madam,

Sub: Reporting of violations under SEBI (Prohibition of Insider Trading) Regulations, 2015

We are writing in reference to the Companies Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons and their Immediate Relatives read with Schedule B and Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

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

You are requested to take the same on record.

Yours faithfully,
For Indiamart InterMesh Limited

**(Manoj Bhargava)
Sr. Vice President (Legal & Secretarial),
Company Secretary & Compliance Officer**

ANNEXURE

**Report by Indiamart InterMesh Limited for violation related Code of Conduct under SEBI
 (Prohibition of Insider Trading) Regulation, 2015
 Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulation,
 2015**

S. No.	Particulars	Details
1.	Name of the Listed Company	Indiamart InterMesh Limited
2.	Please tick the 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 DP	Mr. Vinay Kaushal
	ii. PAN of DP	AVKPK0582G
	iii. Designation of DP	Manager
	iv. Functional role of DP	Data Analytics
	v. Whether DP is Promoter or belongs to Promoter Group	No
	B. Reporting is for immediate relative of DP	
	i. Name of the immediate relative of DP	Ms. Jyoti Kaushal (W/o. Mr. Vinay Kaushal)
	ii. PAN of the immediate relative of DP	FBIPS8937N
	C. Details of transaction(s)	
	i. Name of the Scrip	Indiamart InterMesh Limited
	ii. No of shares traded and value (Rs.) (Date-wise)	Date: 08/07/2020 No of Shares: 43 (Forty Three) Equity Shares were debited on account of Margin Facility Date: 14/07/2020 No of Shares: 43 (Forty Three) Equity Shares were credited on account of Margin Facility Total Value: Rs. 1,88,217.45/-*
	D. In case the 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, as the value of trade does not exceed Rs. 10 lacs in a calendar quarter
ii. Date of intimation of trade(s) by	Not Applicable, as the value of trade does not	

	Company to stock exchanges under Regulation 7 of SEBI (PIT) Regulations, 2015	exceed Rs. 10 lacs in a calendar quarter
4.	Details of violations observed under Code of Conduct	<p>Transfer of 43 (Forty Three) equity shares from the demat account of Ms. Jyoti Kaushal, Immediate Relative of Designated Person on July 08, 2020, to the margin account of Angel Broking Private Limited (Depository Participant) upon invocation of pledge and subsequent credit of said 43 (Forty Three) Equity Shares consequent to release of pledged shares on July 14, 2020.</p> <p>The above transaction has resulted into dealing of Equity Shares of the Company during trading window closure period i.e. July 01, 2020 till July 23, 2020 and also amounted to execution of Contra transaction in Equity Shares of the Company.</p>
5.	Action taken by Listed Company	<p>Warning letter has been issued to the Designated Person that he would not engage in any kind of dealings in the Equity Shares of the Company in violation of the Company's Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015 and also ensure the compliance of the same by his immediate relatives and dependents.</p> <p>Further, as invocation of pledge and subsequent release of pledged shares has resulted in contra trade, therefore Ms. Jyoti Kaushal, Immediate Relative of the Designated Person is prohibited, via same communication to the designated person, from executing an opposite transaction for the next 6 (six) months from the date of the last transaction, i.e. execution of a sell transaction upto January 13, 2021.</p> <p>The designated person has also been provided again with a copy of Code of Conduct alongwith presentation on compliance of SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>
6.	Reasons recorded in writing for taking action stated above	It was noted that this incidence was the first instance of violation on account of the margin

		<p>trading facility/limit being availed in the demat account of the immediate relative of the Designated Person for trading in securities.</p> <p>While executing transactions in other securities the said margin facility has been used and the consequent invocation and subsequent revocation of pledge lead to violation of the Companys' Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.</p> <p>The Designated Person has clarified that the intent to revoke margin facility has been communicated and the same has been acknowledged by the Depository Participant.</p> <p>Further, the Designated Person has undertaken to be extra cautious while executing transactions in future and ensure compliance of Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015 for himself, immediate relatives and dependents.</p>
7.	Details of the previous instances of violations, if any, since last financial year	No
8.	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/ Demand Draft)	N.A.
	ii. Details of transfer/payment	
	In case of Online:	
	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 (DD):	
	Particulars	Details
	Bank Name and branch	



IndiaMART InterMESH Ltd.
6th floor, Tower 2, Assotech Business Cresterra,
Plot No.22, Sec 135, Noida-201305, U.P.
Call Us: +91 - 9696969696
E: customercare@indiamart.com
Website: www.indiamart.com

	DD Number	
	DD Date	
	DD amount (in Rs.)	
9.	Any other relevant information	N.A.

**As the nature of transaction is pledge, therefore total value of securities (Rs. 1,88,217.45) has been calculated as per NSE closing price of equity shares of the Company as on July 08, 2020 i.e. Rs. 2,212.05 /- per share and as on July 14, 2020 i.e. Rs. 2,165.10 /- per share.*

Yours faithfully,
For Indiamart InterMesh Limited

Manoj Bhargava
Compliance Officer

PAN: AGGPB9543D
Email id: manoj.bhargava@indiamart.com
Date: August 14, 2020
Place: Ghaziabad, UP