



Ref: BCG/SE/2023/Aug-04

Date: August 08, 2023

To
BSE Limited
P. J. Towers, 25th Floor,
Dalal Street, Mumbai - 400001.
BSE Scrip Code: 532368

To
National Stock Exchange of India Limited
Exchange Plaza, Bandra Kurla Complex,
Bandra (E), Mumbai – 400 051.
NSE Symbol: BCG

Sub: Reporting on Violations relating code of conduct under SEBI (Prohibition of Insider) Regulations, 2015

Ref: SEBI Circular #SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020

Dear Sir/Ma'am,

In terms of Company's Code of Conduct (To Regulate, Monitor and Report of Trading by Promoter Group) ("Insider Trading Code ") read with Schedule B and Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015, we hereby submit a report in respect of violations as per that section in format specified by SEBI vide its Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

Please make a note of this above information for your records.

Thanking you,

Yours Truly,

For Brightcom Group Limited

Rajesh Vankadara

Company Secretary





Report by Brightcom Group Limited for violations related to Code of Conduct under SEBI (PIT) Regulations, 2015.

[For listed companies: Schedule B read with Regulation 9 (1) of SEBI (PIT) Regulations, 2015]

#	Particulars	Details			
1.	Name of the Listed Company/Intermediary/Fiduciary	Brightcom Group 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	SARITA COMMOSALES LLP			
	ii. PAN of the DP	ACPFS8147K			
	iii. Designation of DP	Not Applicable			
	iv. Functional role of DP	Not Applicable			
	v. Whether DP is Promoter or belongs to Promoter Group	Promoter Group			
	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	Brightcom Group Limited BSE Scrip Code: 532368 NSE Scrip Code: BCG			
	ii. No of shares traded and value (Rs.) (Date- wise)	Date	Transaction Type	# of Shares	Value in Rs.
		24-11-2022	Sell	150,000	53,92,500
		02-02-2023	Buy	1,000,000	27,800,000
		16-02-2023	Sell	1,000,000	26,973,662
	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 intimated			
	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	Execution of Contra Trades in shares of the Company by the DP and also execute			





		trade during the closure of trading window.
5.	Action taken by Listed company/ Intermediary/ Fiduciary	The Company had issued a warning letter and instructed to remit 100% of the profit made i.e Rs. 6.5 Lakhs plus Rs.25,000/- for the violation of the provisions to SEBI for credit to the Investor Protection and Education Fund. Cautioned them not to repeat any violation in future under the Code.
6.	Reasons recorded in writing for taking action stated above	Violation of Insider Trading Code of Company execution of contra trade and execute trade during the closure of trading window.
7.	Details of the previous instances of violations, if any, since last financial year	First-time identification of violation of the Insider Trading Code and SEBI (PIT) regulations, 2015.
8.	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online Payment
	ii. Details of transfer/payment	
	In case of Online	
	Name of the Transferor	Sarita Commosales LLP
	Bank Name, Branch and Account Number	Yes Bank
	UTR/Transaction #	RTGS - YESBR12023080200008489
	Transaction Date	August 02, 2023
	Transaction Amount in Rs.	Rs.675,000/-
	In Case of Demand Draft (DD)	
	Bank Name & Branch	
	DD #	
	DD Date	
	DD Amount in Rs.	
9.	Any other Relevant Information	Nil

Yours Faithfully

For Brightcom Group Limited

Rajesh Vankadara

Company Secretary

Place: Hyderabad

Date: August 08, 2023





Report by Brightcom Group Limited for violations related to Code of Conduct under SEBI (PIT) Regulations, 2015.

[For listed companies: Schedule B read with Regulation 9 (1) of SEBI (PIT) Regulations, 2015]

#	Particulars	Details			
1.	Name of the Listed Company/Intermediary/Fiduciary	Brightcom Group 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)				
	vi. Name of the DP	KALPANA COMMOSALES LLP			
	vii. PAN of the DP	AAOFK4643H			
	viii. Designation of DP	Not Applicable			
	ix. Functional role of DP	Not Applicable			
	x. Whether DP is Promoter or belongs to Promoter Group	Promoter Group			
	B. If Reporting is for immediate relative of DP				
	iii. Name of the immediate relative of DP	Not Applicable			
	iv. PAN of the immediate relative of DP	Not Applicable			
	C. Details of transaction(s)				
	iii. Name of the scrip	Brightcom Group Limited BSE Scrip Code: 532368 NSE Scrip Code: BCG			
	iv. No of shares traded and value (Rs.) (Date- wise)	Date	Transaction Type	# of Shares	Value in Rs.
		19-12-22022	Sell	25,000	702,500
		10-01-2023	Buy	100,000	2,751,872
		17-01-2023	Buy	552,000	15,814,800
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar Quarter				
	iii. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	Not intimated			
	iv. 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	Execution of Contra Trades in shares of the Company by the DP and also execute trade during the closure of trading			





		window.
5.	Action taken by Listed company/ Intermediary/ Fiduciary	The Company had issued a warning letter and instructed to remit 100% of the profit made i.e Rs.0.93 Lakh plus Rs.25,000/- for the violation of the provisions to SEBI for credit to the Investor Protection and Education Fund. Cautioned them not to repeat any violation in future under the Code.
6.	Reasons recorded in writing for taking action stated above	Violation of Insider Trading Code of Company execution of contra trade and execute trade during the closure of trading window.
7.	Details of the previous instances of violations, if any, since last financial year	First-time identification of violation of the Insider Trading Code and SEBI (PIT) regulations, 2015.
8.	If any amount collected for Code of Conduct violation(s)	
	iii. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online Payment
	iv. Details of transfer/payment	
	In case of Online	
	Name of the Transferor	Kalpna Commosales LLP
	Bank Name, Branch and Account Number	Yes Bank
	UTR/Transaction #	NEFT - YESIB32140047850
	Transaction Date	August 02, 2023
	Transaction Amount in Rs.	Rs.118,000/-
	In Case of Demand Draft (DD)	
	Bank Name & Branch	
	DD #	
	DD Date	
	DD Amount in Rs.	
9.	Any other Relevant Information	Nil

Yours Faithfully

For Brightcom Group Limited

Rajesh Vankadara

Company Secretary

Place: Hyderabad

Date: August 08, 2023

