



**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](mailto:customercare@indiamart.com)  
Website: [www.indiamart.com](http://www.indiamart.com)

**Date: May 24, 2021**

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

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

**Dear Sir/Madam,**

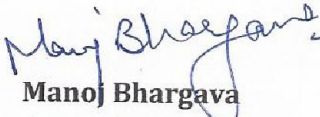
**Sub: Reporting of violations under SEBI (Prohibition of Insider Trading) Regulations, 2015**

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 a Designated Person, 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  
Compliance Officer**



**PAN: AGGPB9543D**  
**Email id: manoj.bhargava@indiamart.com**  
**Date: May 24, 2021**  
**Place: Ghaziabad**

**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.	<b>A. Details of Designated Person (DP)</b>	
	i. Name of DP	Rajesh Sawhney
	ii. PAN of DP	AICPS9783N
	iii. Designation of DP	Independent Director
	iv. Functional role of DP	N.A. (As he is an Independent Director)
	v. Whether DP is Promoter or belongs to Promoter Group	No
	<b>B. Reporting is for immediate relative of DP</b>	
	i. Name of the immediate relative of DP	-
	ii. PAN of the immediate relative of DP	-
	<b>C. Details of transaction(s)</b>	
	i. Name of the Scrip	Indiamart InterMesh Limited
	ii. No of shares traded and value (Rs.) (Date-wise)	Date: May 04, 2021 No of Shares: 80 (Eighty Only) Equity Shares Bought: 40 Shares for Rs. 3,07,421/- Sold: 40 Shares for Rs. 2,94,405/-  Date: May 10, 2021 No of Shares: 100 (Hundred Only) Equity Shares Bought 50 Shares for Rs. 3,72,237/- Sold 50 Shares* for Rs. 3,69,363/-  <i>*The Consolidated Sale transaction on May 10, 2021 was of 100 Equity Shares, including the sale of 50 Shares bought inadvertently and 50 ESOP shares.</i>
	<b>D. In case the value of trade(s) is more than Rs. 10 lakhs in a calendar quarter</b>	
	i. Date of intimation of trade(s) by	Trade executed on May 04, 2021 was intimated

	<p>concerned DP / director / promoter / promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015</p>	<p>on May 07, 2021# whereas trade executed on May 10, 2021 was intimated on May 11, 2021 to Company under regulation 7 of SEBI (PIT) Regulations, 2015.</p> <p><i>#As the limit of Rs. 10 Lakhs was breached subsequent to further sale of ESOP Shares on May 06, 2021.</i></p>
	<p>ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015</p>	<p>Trades intimated to the Company, as above, on May 07, 2021 and May 11, 2021 were duly intimated to the Stock Exchanges on May 11, 2021 and May 13, 2021, respectively, under Regulation 7 of SEBI (PIT) Regulations, 2015.</p>
<p>4.</p>	<p>Details of violations observed under Code of Conduct</p>	<p>He had obtained pre-clearance for sale of 1000 ESOP shares, which was valid from May 3, 2021 to May 11, 2021. While trying to place a Sell transaction(s) during such period, of 40 equity shares on May 04, 2021 and 50 equity share on May 10, 2021, through the application of his Depository Participant - HDFC Securities, he inadvertently and unintentionally got placed buy order(s), without obtaining pre-clearance, of total value amounting to Rs. 6,79,658/- (Rupees Six Lakh Seventy Nine Thousand Six Hundred and Fifty Eight Only).</p> <p>Since, he intended to do a sale of shares from inception, the subsequent sale of those shares inadvertently purchased by him fell into the ambit of Contra Trade. On account of the said Contra Trade, he suffered a total loss of Rs. 15,890/- (Rupees Fifteen Thousand Eight Hundred Ninety Only).</p>
<p>5.</p>	<p>Action taken by Listed Company</p>	<p>Though the Designated Person has suffered a loss in inadvertent transaction of buying and selling of some shares (i.e. 40+50) without prior clearance and in violation of the provisions related to contra transactions, a monetary penalty of Rs. 1,00,000/- (Rupees One Lakh Only), has been imposed and he has also been</p>

		<p>advised not to 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.</p> <p>The aforesaid penalty has been duly submitted to the Investor Protection and Education Fund of SEBI.</p>
6.	<p>Reasons recorded in writing for taking action stated above</p>	<p>It has been considered that the Designated Person had obtained a valid pre-clearance for sale of 1,000 ESOP Shares on May 03, 2021 which was valid till May 11, 2021.</p> <p>While trying to place a Sell transaction(s), based on the aforesaid valid pre-clearance, he inadvertently executed buy transaction(s) resulting in the violation as detailed above.</p> <p>It was noted that he had suo-moto came forward to intimate the above transaction(s) to the Compliance Officer and acknowledged his mistake, which was partly on account of some technical issued in the application of HDFC Securities. He has also shared an email raising his concern to the services team of HDFC securities at services@hdfcsec.com about the technical glitch in the said mobile application. He has also confirmed that he was not in possession of any Unpublished Price Sensitive Information (UPSI) and he raised his concern on above issue to Depository Participant for necessary action.</p> <p>He has also undertaken that he would be extra cautious and ensure the compliance of Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015 for any dealings in equity shares of the Company in future.</p>
7.	<p>Details of the previous instances of violations, if any, since last financial year</p>	<p>Yes, delay in disclosure (Form-C) under Regulation 7(2) of the SEBI (Prohibition of</p>





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		Insider Trading) Regulations, 2015, for reporting of trade in 1,344 equity shares executed on February 04, 2020. A monetary penalty of Rs. 6,00,000/-, being part of the profits so earned by him on the said transaction, has been imposed which was duly submitted to the Investor Protection and Education Fund of SEBI. The said violation was duly reported to SEBI on February 17, 2020.
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:	
	<b>Particulars</b>	<b>Details</b>
	Name of the transferor	Indiamart Intermesh Limited
	Bank Name, branch and Account number	Bank Name: Yes bank Ltd Branch: South Extension, Delhi Account No.: 001681300007477
	UTR/Transaction reference Number	NEFT- N14121602032371-2105201817390001
	Transaction date	May 21, 2021
	Transaction Amount (in Rs.)	Rs. 1,00,000/- (Rupees One Lakh Only)
	In case of Demand Draft (DD): <b>Not Applicable</b>	
	<b>Particulars</b>	<b>Details</b>
	Bank Name and branch	
	DD Number	
	DD Date	
	DD amount (in Rs.)	
9.	Any other relevant information	N.A.

Yours faithfully,

**For Indiamart Intermesh Limited**

*Manoj Bhargava*  
**Manoj Bhargava**  
**Compliance Officer**

**PAN:** AGGPB9543D  
**Email id:** manoj.bhargava@indiamart.com  
**Date:** May 24, 2021  
**Place:** Ghaziabad

