



Aptech Limited
Regd. office: Aptech House
A-65, MIDC, Marol, Andheri (E),
Mumbai - 400 093.
T: 91 22 2827 2300
F: 91 22 2827 2399
www.Aptech-worldwide.com

26th August, 2022

**To,
BSE Limited
25th Floor, P J Towers,
Dalal Street,
Mumbai – 400 001
Scrip Code: 532475**

**To,
National Stock Exchange of India Limited
Exchange Plaza, Plot no. C/1, G Block,
Bandra-Kurla Complex
Bandra (E), Mumbai - 400 051.
Symbol: APTECHT**

Dear Sir/Madam,

Sub.: Reporting to Stock Exchanges regarding violations under Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 relating to the Code of Conduct (CoC).

Ref.: SEBI/HO/ISD/ISD/CIR/P/2020/135 circular dated 23rd July, 2020

With reference to the above, enclosed herewith please find report on violations under SEBI (Prohibition of Insider Trading) Regulations, 2015 relating to the Code of Conduct by Designated person.

Kindly take the same on record.

Thanking you.

For Aptech Limited

A handwritten signature in blue ink, appearing to read "A.K. Biyani", is written over a faint, light blue circular stamp.

**A.K Biyani
Company Secretary & Compliance Officer
Place: Mumbai**



Unleash your potential

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Report by Aptech Limited for violations related to Code of Conduct under the SEBI (Prohibition of Insider Trading) Regulations, 2015

Sr. No.	Particulars	Details
1	Name of the Listed Company/ Intermediary/Fiduciary	Aptech 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 Company
3	A. Details of Designated Person (DP)	
	i. Name of the DP	Neeraj Malik
	PAN of the DP	AKOPM5989J
	ii. Designation of DP	Executive Director – MEL Training & Assessments Limited
	iii. Functional Role of DP	EBG BUSINESS
	iv. 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	NA
	ii. PAN of the immediate relative of DP	NA
	C. Details of transaction(s)	
	i. Name of the scrip	Aptech Limited
	ii. No of shares traded and value (Rs.) (Date- wise)	Date: 15/07/2022 to 22/07/2022 No. of shares: 10,000 equity shares were been purchased Value: 24,91,700/-
	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	09-08-2022
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	09-08-2022
4	Details of violations observed under Code of Conduct	Shares sold during trading window closure period.



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5	Action taken by Listed company/ Intermediary/ Fiduciary	<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 a monetary penalty of Rs. 3,42,950/- (Rupees Three Lakhs Forty Two thousand Nine hundred and fifty Only), has been imposed having value of trade.</p> <p>The aforesaid penalty has been duly submitted to the Investor Protection and Education Fund of SEBI.</p> <p>The designated person has also been provided again with a copy of Code of Conduct. He has been further advised that in case of any subsequent violation stricter action(s) would be taken by the Company.</p>											
6	Reasons recorded in writing for taking action stated above	Matter was discussed with the Chairman of the audit Committee immediately upon receipt of information about violation and it was suggested by the Audit committee Chairman based on counsel advise to issue warning letter and levy penalty based on value of trade.											
7	Details of the previous instances of violations, if any, since last financial year	NIL											
8	If any amount collected for Code of Conduct violation(s)	Rs. 3,42,950/- was collected/ received from Neeraj Malik on 10-08-2022 as penalty towards the violation of CoC.											
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online Payment											
	ii. Details of transfer/payment	<table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Name of the transferor</td> <td>Aptech Limited</td> </tr> <tr> <td>Bank Name, branch and Account number</td> <td>HDFC Bank Limited, Nariman Point branch. Account no.: 00600330009091</td> </tr> <tr> <td>UTR/Transaction reference Number</td> <td>N237222090623173</td> </tr> <tr> <td>Transaction date</td> <td>25/8/2022</td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td>3,42,950/-</td> </tr> </tbody> </table>	Particulars	Details	Name of the transferor	Aptech Limited	Bank Name, branch and Account number	HDFC Bank Limited, Nariman Point branch. Account no.: 00600330009091	UTR/Transaction reference Number	N237222090623173	Transaction date	25/8/2022	Transaction Amount (in Rs.)
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	In case of Demand Draft (DD): <table border="1"><thead><tr><th>Particulars</th><th>Details</th></tr></thead><tbody><tr><td>Bank Name and branch</td><td></td></tr><tr><td>DD Number</td><td></td></tr><tr><td>DD date</td><td></td></tr><tr><td>DD amount (in Rs.)</td><td></td></tr></tbody></table>	Particulars	Details	Bank Name and branch		DD Number		DD date		DD amount (in Rs.)		NA
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9	Any other relevant information	NIL										

For Aptech Limited

A.K. Biyani
Company Secretary and Compliance officer
Membership no.: F 8378

Date : September 05,2022
Place : Mumbai