



29<sup>th</sup> June 2020

1. The Secretary  
Bombay Stock Exchange Limited  
Phiroze Jeejeebhoy Towers  
Dalal Street, MUMBAI 400 001.  
Fax No. 022 - 2272 3121 / 3719 / 2037 / 2039 / 2041 / 2061
2. The Secretary  
National Stock Exchange of India Limited  
"Exchange Plaza", Bandra-Kurla Complex  
Bandra East, MUMBAI 400 051.  
Fax No.022 – 26598237 / 38 / 26598346

**Sub:** Impounding Order issued by SEBI for Insider Trading

Dear Sir/Madam,

In continuation with the letter dated 17<sup>th</sup> June 2020, we would like to provide you further update on the aforesaid subject matter as detailed in the enclosed letter.

We request you to take this on record.

Sincerely,  
For **Dynamatic Technologies Limited**

**Shivaram V**  
**Head- Legal, Compliance Officer and Company Secretary**

# UDAYANT MALHOUTRA

To,  
**Mr. Shivaram V**  
Head – Legal, Compliance and Company Secretary  
Dynamatic Technologies Limited  
Bangalore -560058

29<sup>th</sup> June 2020

**Sub:** Impounding Order No: WTM/GM/IVD/11/2020-21 dated 15<sup>th</sup> June 2020, issued in my name by Securities and Exchange Board of India (SEBI).

Dear Shivaram,

Further to my letter dated 17<sup>th</sup> June 2020 on the captioned subject, I am happy to update you that the Hon'ble Securities Appellate Tribunal (SAT), was pleased to quash the Impounding Order at the admission stage itself on the following grounds:

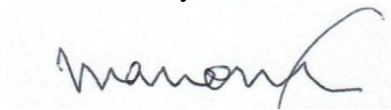
1. The reason given by SEBI for justifying its action to pass an ex-parte interim order is patently erroneous and cannot be sustained;
2. No amount of disgorgement can be directed to be deposited in advance unless it is adjudicated and quantified unless there is some evidence to show and justify the action taken;
3. No order of the like nature can be passed without recording it's satisfaction and cannot be based on the basis of possibility;
4. There is no case of extreme urgency which warranted the passing of the ex-parte order only on arriving at the prima facie case that I am an "Insider" under the SEBI Regulations without considering balance of convenience or irreparable injury.

I have now been given four weeks to file a response to the Show Cause Notice and SEBI has been directed to decide the matter finally within 6 months, after given me an opportunity of being heard.

I am confident that once SEBI is fully seized of the factual position, they will be satisfied about the bonafides' of the transaction.

This is for your information and record.

Your sincerely,



Udayant Malhoutra