



***Unleash your potential***

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

**20<sup>th</sup> August, 2021**

**To,**  
**BSE Limited**  
25<sup>th</sup> 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 23<sup>rd</sup> 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.K Biyani**  
**Company Secretary & Compliance Officer**  
**Place: Mumbai**



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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	<b>A. Details of Designated Person (DP)</b>	
	I. Name of the DP	Pooja Mukandan
	II. PAN of the DP	BLSPM0540F
	III. Designation of DP	Senior Manager
	IV. Functional Role of DP	Marketing Head
	V. Whether DP is Promoter or belongs to Promoter Group	No
	<b>B. If Reporting is for immediate relative of DP</b>	
	I. Name of the immediate relative of DP	NA
	II. PAN of the immediate relative of DP	NA
	<b>C. Details of transaction(s)</b>	
	I. Name of the scrip	Aptech Limited
	II. No of shares traded and value (Rs.) (Date- wise)	Date: 3 <sup>rd</sup> August, 2021 No. of shares: 45 equity shares Value: Rs 12,726/-
	<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter</b>	
	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 Company to stock exchanges 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



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4	Details of violations observed under Code of Conduct	Shares sold during trading window closure period.
5	Action taken by Listed company/ <del>Intermediary/</del> Fiduciary	<p>Warning letter has been issued to the Designated Person that she 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. 1980/- (Rupees One thousand nine hundred and eighty) out of the profits so earned by her on the said shares, has been imposed.</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. She 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 to issue warning letter and levy penalty based on closing price of shares on the last day before closing of trading window.
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. 1980/- was collected from Pooja Mukandan as penalty towards the violation of CoC.
	I. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online Payment



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	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.: 00010110000364</td> </tr> <tr> <td>UTR/Transaction reference Number</td> <td>000121704572</td> </tr> <tr> <td>Transaction date</td> <td>19-08-2021</td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td>1980/-</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.: 00010110000364	UTR/Transaction reference Number	000121704572	Transaction date	19-08-2021	Transaction Amount (in Rs.)	1980/-
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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 : August 20, 2021  
 Place : Mumbai