

February 10, 2022

To,  
The Manager (Listing Department)  
**BSE Limited,**  
Floor No.25, Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai – 400 001

To,  
The Manager (Listing Department),  
**National Stock Exchange of India Ltd,**  
Exchange Plaza, C-1, Block G,  
Bandra Kurla Complex,  
Bandra (East)  
Mumbai – 400 051

Scrip Code: 511194

Script Symbol: ICDSLTD

**Subject :** Reporting to Stock Exchanges regarding violation under SEBI (Prohibition of Insider Trading) Regulations, 2015

**Reference :** SEBI circular no. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020 (“SEBI Circular”)

Respected Sir/Madam,


We, the ICDS Limited (the “Company”) refer to the captioned subject and enclose herewith the report on intimation and action taken by the Company for the violation relating to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 in the format of **Annexure-A** as prescribed by the SEBI circular no. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

Further, the reported deviation is not material in relation to the total paid up equity share capital of the Company.

Please take the same on record.

Thanking You,

For, ICDS Limited.

  
Bharath Krishna Nayak  
Managing Director  
DIN: 00776729



Place: Manipal

Encl: As Above

Regd. and Admn. Offices :

Syndicate House, P.B. No. 46, Upendra Nagar, Manipal - 576 104

Phone : EPABX 0820-2701500 Fax : 0820-2571137 Website : www.icdslimited.com CIN : L65993KA1971PLC002106

GSTIN: 29AAAC14355W131

## Annexure A

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

(Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015)

Sr. No.	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	ICDS 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	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	Mrs Roopa M Pai K
	ii. PAN of the DP	ACOPP0248B
	iii. Designation of DP	Not applicable
	iv. Functional Role of DP	Not Applicable
	v. Whether DP is Promoter or belongs to Promoter Group	Yes. DP belongs to the Promoter Group of the Company.
	<b>B. If Reporting is for immediate relative of DP</b>	
	i. Name of the immediate relative of DP	Not Applicable
	ii. PAN of the immediate relative of DP	Not Applicable
	<b>C. Details of transaction(s)</b>	
	i. Name of the scrip	ICDS Limited NSE Script Symbol: ICDSLTD BSE Scrip Code: 511194
	ii. No of shares traded and value (Rs.) (Date- wise)	Sold 25 (Twenty Five) Equity shares @ Rs. 51.10/- per share, aggregating Rs.1277.50/- on February 01, 2022.



<b>D. In case value of trade(s) is more than Rs. 10 lacs in a calendar Quarter</b>		
	<p>i. Date of intimation of trade(s) by _____ concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015</p> <p>ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015</p>	<p>Not Applicable</p> <p>Not Applicable</p>
4	Details of violations observed under Code of Conduct	Sold 25 equity shares of the Company during the trading window closure period. (Trading window was closed from 1 <sup>st</sup> January, 2022 till the completion of 48 hours after declaration of the Audited Financial Results for the quarter ended December 31, 2021)
5	Action taken by Listed company/ Intermediary/ Fiduciary	A warning letter is issued to Mrs Roopa M Pai K for strictly adhering to the Code of Conduct for prevention of Insider Trading to avoid situations where the Company can levy penalties and take strict disciplinary actions as stipulated in clause 13 of Company's Code of Conduct.
6	Reasons recorded in writing for taking action stated above.	The DP is a part of the 'Promoter Group' of the Company. Notwithstanding the above, the DP is neither involved in any of the decisions of the Company nor takes part in control of any affairs of the Company. As submitted by her, the sale of shares by her during the period of closure of Trading Window was entirely inadvertent. However, the same is a violation in terms of the provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and considering all aspects including her submission that she was inadvertently not aware of the closure of Trading window and the sold at such time was unintentional and also the fact that it is the first case of violation, the Company has taken the aforesaid action.



7	Details of the previous instances of violations, if any, since last financial year	None
8	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Not Applicable
	ii. Details of transfer/payment In case of Online:	
	<b>Particulars</b>	<b>Details</b>
	Name of the transferor	Not Applicable
	Bank Name, branch and Account number	
	UTR/Transaction reference Number	
	Transaction date	
	In case of Demand Draft (DD):	
	<b>Particulars</b>	<b>Details</b>
	Bank Name and branch	Not Applicable
	DD Number	
DD date		
DD amount (in Rs.)		
9	Any other relevant information	None

For, ICDS Limited.

  
**Bharath Krishna Nayak**  
**Managing Director**  
**DIN: 00776729**

