

NIIT Limited

85, Sector 32 Institutional
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Tel: +91 (124) 4293000
Fax: +91 (124) 4293333
Email: info@niit.com

Registered Office:
8, Balaji Estate, First Floor
Guru Ravi Das Marg, Kalkaji
New Delhi 110 019, India
CIN: L74899DL1981PLC015865

www.niit.com

December 11, 2020

The Manager
National Stock Exchange of India Ltd
Listing Department
Exchange Plaza
5th Floor, Plot no C/1, G Block
Bandra Kurla Complex
Bandra (E), Mumbai – 400 051

The Manager
BSE Limited
Corporate Relationship Department,
1st Floor, New Trading Ring,
Rotunda Building
Phiroze Jeejeebhoy Towers,
Dalal Street, Mumbai- 400 001

Sub: Reporting of non-compliance by Designated Person of NIIT Code of Conduct to Regulate, Monitor and Report Trading by Designated Person as required by SEBI (Prohibition of Insider Trading) Regulations, 2015
Scrip Code : BSE – 500304; NSE – NIITLTD

Dear Sir,

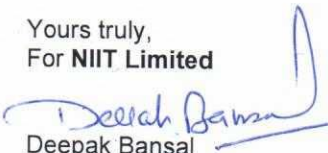
This is with reference to the above-mentioned subject.

Please find attached herewith a Report (in prescribed format) on non-compliance by Designated Persons of NIIT Code of Conduct to Regulate, Monitor and Report Trading by Designated Person as required by SEBI (Prohibition of Insider Trading) Regulations, 2015.

Kindly acknowledge the receipt.

Thanking you,

Yours truly,
For **NIIT Limited**


Deepak Bansal
Company Secretary &
Compliance Officer

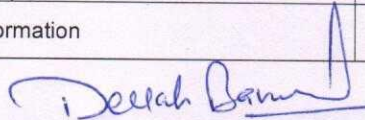
Encs: a/a

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

S.No.	Particulars	Details
1.	Name of the listed company/Intermediary/Fiduciary	NIIT 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	Bimal Kumar Jain
	ii. PAN of the DP	ABSPJ6776D
	iii. Designation of DP	Regional Vice President in a subsidiary company
	iv. Functional Role of DP	Client engagement manager for business development & delivery for few customers in subsidiary of the Company in USA
	v. Whether DP is Promoter or belongs to Promoter Group	No
	B. If Reporting is for immediate relative of DP	Not applicable
	i. Name of the immediate relative of DP	
	ii. PAN of the immediate relative of DP	
	C. Details of transaction(s)	
	i. Name of the scrip	Equity Share of NIIT Limited
	ii. No. of shares traded and value (Rs.) (Date- wise)	Sale: Nov 2, 2020; - 4000 equity shares; Rs 558,219/- Nov 13, 2020; - 3500 equity shares; Rs 503,649/-
	D. In case value of trade(s) is more than Rs. 10 lacs in a calendar quarter -	
	a. Date of intimation of trade(s) by concerned DP/ director/ Promoter/ Promoter Group to Company under regulation 7 of SEBI (Prohibition of Insider Trading) Regulations 2015	November 17, 2020
	b. Date of intimation of trade(s) by Company to Stock Exchange under regulation 7 of SEBI (Prohibition of Insider Trading) Regulations 2015	November 18, 2020
4.	Details of violations observed under SEBI (Prohibition of Insider Trading) Regulations 2015	Mr. Bimal Kumar Jain did not obtain pre-clearance as per Clause 8.1 of NIIT Code (as per compliance of Clause 6 of Schedule B of SEBI (Prohibition of Insider Trading) Regulations, 2015).

5.	Action taken by Listed Company/ Intermediary / Fiduciary	The Company has taken following actions against Mr. Bimal Kumar Jain: <ul style="list-style-type: none"> - Levied a monetary penalty of Rs. 100,000/-, to be deposited in SEBI-IPEF. - Issue of a warning to be more cautious in future and to comply with the provisions of the Code in letter and spirit.
6.	Reasons recorded in writing for taking action stated above	<ul style="list-style-type: none"> - Mr. Bimal Jain had acquired these equity shares through ESOP of the Company and transaction was executed by him during the period when the trading window was open. he had confirmed that was not in possession of any UPSI at the time of the trades. - The transaction was carried out owing to his financial need i.e. to meet with tax liability owing to ESOP exercise. - He was holding 60000 ESOP equity shares. Though he had sold only 7500 shares to meet his tax obligation. - Present lapse appeared to be procedural and technical in nature and did not reflect any mala-fide intent on the part of the employee. - The disciplinary action taken to ensure that proper procedures are followed as laid down in NIIT Code of the Company.
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)	Yes
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online transfer
	ii. Details of transfer/payment In case of Online: <ul style="list-style-type: none"> • Name of the transferor • Bank Name, branch and Account number • UTR/Transaction reference Number • Transaction date • Transaction Amount (in Rs.) In case of Demand Draft (DD): <ul style="list-style-type: none"> • Bank Name and branch • DD Number • DD date • DD amount (in Rs.) 	Bimal K Jain ICICI Bank Limited, xxxxxxxxx40 Transaction Reference Number: 2142452224 11-12-2020 Rs. 100,000.00 (Rs one lac only)
9.	Any other relevant information	N.A.

Yours faithfully,



Name of Compliance Officer: Deepak Bansal

PAN: ABTPB4125B

Email ID: deepak.bansal@niit.com

Date: December 11, 2020 **Place:** Delhi