



11th November 2020

To:

National Stock Exchange of India Limited (stock code: "FSL")

Exchange Plaza, Plot no. C/1, G Block, Bandra-Kurla Complex, Bandra (East) Mumbai - 400 051. BSE Limited (stock code: 532809)

Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai - 400 001

Dear Madam/Sir,

## Sub.: Inadvertent Trading by the DP's

This is to inform you that in terms of the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("the SEBI Regulations"), Firstsource Solutions Code of Conduct for Prohibition of Insider Trading ("the Code"), and SEBI Circular No. SEBI/HO/ISD/CIR/P/2020/135 dated 23<sup>rd</sup> July, 2020; the details of violation of the Code by the Designated Person along with the action taken by the Company thereon are enclosed as "**Annexure A**" to this letter.

We would like to submit that the reported deviation is not material in relation to the total paid up equity share capital of the Company.

You are kindly requested to take the above on record.

Thanking you,

For Firstsource Solutions Limited

Pooja Nambiar

Company Secretary & Compliance Officer





## Annexure A

## Report by Firstsource Solutions Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider trading) Regulations, 2015

| Sr.           | Particulars  | Details  |  |  |
|---------------|--|--|--|--|
| <b>No.</b> 1. | Name of the listed Commonsy/Intermedians/Fiducians   | Firstsource Solutions Limited  |  |  |
| 2.            | Name of the listed Company/ Intermediary/Fiduciary   | - Firstsource Solutions Limited  |  |  |
| 2.            | Please tick appropriate Checkbox.  | -  |  |  |
|               | Reporting in capacity of:  |  |  |  |
|               | ✓ Listed Company   |  |  |  |
|               | Intermediary   |  |  |  |
|               | Fiduciary  |  |  |  |
| 3.            | A. Details of Designated Person (DP)   |  |  |  |
|               | i. Name of the Designated Person (DP)  | Mr. Prashanth Nandella   |  |  |
|               | ii. Name of the Designated Person (DP)   | Mr. Saratchandra Gupta   |  |  |
|               | i. PAN of the DP   | ACGPN0599R   |  |  |
|               | ii. PAN of the DP  | FAEPS3096D   |  |  |
|               | iii. Designation of DP   | Mr. Prashanth Nandella- President (Date of Joining- 25 <sup>th</sup> June 2020)<br>Mr. Saratchandra Gupta- Asst. Manager-Finance   |  |  |
|               | iv. Functional Role of DP  | Mr. Prashanth Nandella- COO<br>Mr. Saratchandra Gupta- Asst. Manager-<br>Finance   |  |  |
|               | v. Whether DP is Promoter or belongs to Promoter   | No   |  |  |
|               | B. If Reporting is for immediate relative of DP  |  |  |  |
|               | 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   | FSL  |  |  |
|               | ii. No of shares traded and value (Rs.) (Date- wise)   | Mr. Prashanth Nandella:<br>5,000 shares purchased from 6 <sup>th</sup> August<br>2020 to 12 <sup>th</sup> August 2020<br>Mr. Saratchandra Gupta:<br>500 shares sold on 30 <sup>th</sup> October 2020 |  |  |
|               | D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter   |  |  |  |
|               | <ul> <li>Date of intimation of trade(s) by concerned<br/>DP/director/promoter/promoter group to Company<br/>under Regulation 7 of SEBI (PIT) Regulations, 2015.</li> </ul> | N.A.   |  |  |
|               | ii. Date of intimation of trade(s) by Company to Stock<br>Exchanges under Regulation 7 of SEBI (PIT)<br>Regulations, 2015.   | N.A.   |  |  |

FIRSTSOURCE SOLUTIONS LTD.,

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| 4. | Details of violations observed                                  | under Code of Conduct        | Transaction done during closure of         |
|----|---|------------------------------|--|
| т. | Details of violations observed                                  | and Code of Conduct          | Trading Window Period                      |
|    |   |                              | Trading Willdow Feriod                     |
| 5. | Action taken by Listed Company/ Intermediary/ Fiduciary         |                              | A warning notice was issued to the DP's.   |
| 6. | Reasons recorded in writing for taking action stated above      |                              | The aforesaid action was taken after       |
|    |   | _                            | taking into account the following factors: |
|    |   |                              | 1. the quantum of shares involved and      |
|    |   |                              | 2. it being first instance of non-         |
|    |   |                              | compliance (procedural) on the part        |
| 7  | D + '1 C · · · ·  | 6 : 1 :: : : : : 1 ::        | of the DP.                                 |
| 7. | Details of previous instances of violations, if any, since last |                              | None                                       |
| 8. | financial year  If any amount collected for Co                  | ode of Conduct violation(s): |  |
| ŏ. | i. Mode of transfer to SEBI - I                                 |                              | N.A.                                       |
|    |   | , ,                          |  |
|    | ii. Details of transfer/paymen                                  | t                            | N.A.                                       |
|    | In case of Online.  |                              |  |
|    | In case of Online: Particulars                                  | Details                      |  |
|    | Name of the transferor  | Details                      |  |
|    | Bank Name, branch   |                              |  |
|    | and Account number  |                              |  |
|    | UTR/Transaction reference                                       |                              |  |
|    | Transaction date  |                              |  |
|    | Transaction Amount (in Rs.)                                     | <del> </del>                 |  |
|    |   |                              |  |
| l  |   |                              |  |
|    | In case of Demand Draft (DI                                     |                              |  |
|    | Particulars   | Details                      |  |
|    | Bank Name and branch  |                              |  |
|    | DD Number   |                              |  |
|    | DD date   |                              |  |
|    | DD amount (in Rs.)  |                              |  |
|    |   |                              |  |
|    |   |                              |  |
|    |   |                              |  |
|    | I A   |                              | TA T                                       |
| 9. | Any other relevant informatio                                   | n                            | None                                       |
| 9. | Any other relevant informatio                                   | n<br>                        | None                                       |

Yours Faithfully,

Name and signature of Compliance Officer: Ms. Pooja Nambiar

Email id: Pooja.nambiar@firstsource.com

Date: 11th November 2020

Place: Mumbai