

29th July 2022

To:

**National Stock Exchange of
India Limited (Scrip Code: FSL)**
Exchange Plaza,
Plot no. C/1, G Block,
Bandra-Kurla Complex
Bandra (East),
Mumbai - 400 051

**BSE Limited (Scrip Code:
532809)**
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400 001

Dear Madam/ Sir,

**Sub: Reporting of violations under SEBI (Prohibition of Insider Trading)
Regulations, 2015 and action taken by the Company**

We refer to our letter dated January 25, 2022 on the caption subject. Accordingly, we would like to inform you that Mr. Randall Shafer has transferred penalty amount of Rs. 16,32,960 to the Company and the Company in turn has transferred the said amount to IPEF account on 28th July 2022 as per the details mentioned in Annexure A as enclosed to this letter.

We request you to take the above on record.

Thanking you,
For **Firstsource Solutions Limited**

Pooja Nambiar
Company Secretary

Encl.: A/a

Firstsource Solutions Ltd.

5th Floor, Paradigm 'B' Wing, Mindspace, Link Road, Malad (West), Mumbai - 400 064 India.
Tel: +91 (22) 6666 0888 | Fax: +91 (22) 6666 08887 | Web: www.firstsource.com

(CIN: L64202MH2001PLC134147)

Annexure A

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

Sr. No.	Particulars	Details
1.	Name of the listed Company/ Intermediary/ Fiduciary	Firstsource Solutions Limited
2.	<i>Please tick appropriate Checkbox.</i> 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 Designated Person (DP)	Mr. Randall Shafer
	i. PAN of the DP	KECPS9381N
	iii. Designation of DP	EVP
	iv. Functional Role of DP	EVP & Global Head of Hospital Business, Eligibility Services.
	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	N.A.
	ii. PAN of the immediate relative of DP	N.A.
	C. Details of transaction(s)	
	i. Name of the scrip	FSL
	ii. No of shares traded and value (Rs.) (Date- wise)	81,000 shares sold at a price of 215.66 per share on 18 th October 2021.
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter	
	i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under Regulation 7 of SEBI (PIT) Regulations, 2015.	N.A.
	ii. Date of intimation of trade(s) by Company to Stock Exchanges under Regulation 7 of SEBI (PIT) Regulations, 2015.	N.A.

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4.	Details of violations observed under Code of Conduct	Transaction done during closure of Trading Window Period.
5.	Action taken by Listed Company/ Intermediary/ Fiduciary	<p>The matter was referred to the Audit Committee of the Company and accordingly a stern warning letter has been issued to the Designated Person that he should 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 INR 1,632,960/- (Rupees Sixteen Lakhs Thirty Two Thousand Nine Hundred Sixty Only) as agreed by the Audit Committee of the Company, has been imposed. The aforesaid penalty has been transferred to the Investor Protection and Education Fund of SEBI on 28th July 2022.</p> <p>He 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	<p>Based on our findings and the response received from the Designated Person, it was noted that this incidence was the first instance of violation on the part of the Designated Person wherein he liquidated the holdings during closure of trading window period.</p> <p>The penalty levied on the Designated Person is commensurate to the nature of violation and the quantum of shares involved.</p> <p>Further, the Designated Person has been warned to be extra cautious while executing transactions in future and ensure compliance of Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015 for himself, immediate relatives and dependents and he has been advised to undergo a training for compliances to be adhered under SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>
7.	Details of previous instances of violations, if any, since last financial year	None

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8.	If any amount collected for Code of Conduct violation(s):	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online Mode
	ii. Details of transfer/payment	
	In case of Online:	
	Particulars	Details
	Name of the transferor	Firstsource Solutions Limited
	Bank Name, branch and Account number	ICICI Bank Ltd, MIDC Branch, A/C no 000405011069
	UTR/Transaction reference	INF/NEFT/028732540451/BKID0000122/SEBI
	Transaction date	July 28, 2022
	Transaction Amount (in Rs.)	Rs. 16,32,960
9.	Any other relevant information	None

Yours Faithfully,

Pooja Nambiar
Company Secretary

Email id: Pooja.nambiar@firstsource.com

Contact No.: 022 66660888

Date: 29th July 2022

Place: Mumbai

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