

FC/SE/2024-25/11

Date: September 13, 2024

**National Stock Exchange of India Limited** 

Exchange Plaza, C – 1, Block G, Bandra-Kurla Complex, Bandra (E), Mumbai-400051

Symbol: FIRSTCRY

**BSE Limited** 

Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai-400001

Scrip Code: 544226

Subject: Reporting of inadvertent trade by a Designated Person

Dear Sir/Ma'am,

We enclose herewith the details of inadvertent trade by a Designated Person under clause 6(c) of the "Code of Conduct to regulate, monitor and report trading by Insiders" ("Code of Conduct"), in terms of the SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020 read with SEBI Master Circular No. SEBI/HO/ISD/ISD-PoD-2/P/CIR/2023/039 dated March 23, 2023 This is for your information and dissemination.

Kindly take the above on record.

Thanking you,

Yours faithfully,

**For Brainbees Solutions Limited** 

Neelam Jethani Company Secretary and Compliance Officer ICSI Membership No.: A35831



## Report by Brainbees Solutions Limited for violation related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

[For listed companies: 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	Brainbees Solutions Limited		
2	Please tick appropriate checkbox Reporting in capacity of:			
	☐ Listed Company	Listed Company		
	☐ Intermediary			
	☐ Fiduciary			
3	A. Details of Designated Person (DP)	<u></u>		
	i. Name of the DP	Vivek Goel		
	ii. PAN of the DP	ADOPV2344R		
	iii. Designation of DP	Chief Business Officer (Online)		
	iv. Functional Role of DP	Digital Marketing		
	v. Whether DP is Promoter or belongs to Promoter Group	No		
	B. If Reporting is for immediate relative of DP			
	i. Name of the immediate relative of DP	Not Applicable		
	ii. PAN of the immediate relative of DP	Not Applicable		
	C. Details of transaction(s)			
	i. Name of the scrip	Brainbees Solutions Limited NSE: FIRSTCRY BSE: 544226		
	ii. No of shares traded and value (Rs.) (Date- wise)	Mr. Vivek Goel took pre-clearance for selling of Company's shares on September 12, 2024 and sold 100 shares at price of Rs. 646.20/- on the same day.		



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	D. In case value of trade(s) is more than Rs.10	Subsequently, the earlier transaction of sale of 100 shares got reversed inadvertently by him and the transaction reflected that 100 shares were bought at a price of Rs. 646.75 on September 12, 2024 thereby entering into contra trade.  Further, on same date, he sold 800 shares in tranche of 200 shares each at following prices: Sell:- 200 Shares – Rs. 646.33/- per share Sell:- 200 Shares – Rs. 646.30/- per share Sell:- 200 Shares – Rs. 654.83/- per share Sell:- 200 Shares – Rs. 654.60/- per share Contra trade came to his knowledge only after the sale of 800 shares. He immediately made a suo-moto disclosure of the same to the Company.
	D. In case value of trade(s) is more than Rs.10	Jiacs 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	Not Applicable
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable
4	Details of violations observed under Code of Conduct	Execution of Contra Trade by the DP
5	Action taken by Listed company/ Intermediary/ Fiduciary	<ol> <li>The Company has taken a detailed explanation of the transaction and thereafter issued a written warning, not to repeat any such actions in the future and to ensure strict compliance with the Code of Conduct;</li> <li>The Company has directed to disgorge the</li> </ol>
		profits from the trade amounting to Rs. 808/-, by way of online remittance to SEBI - Investor



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			Protection and Education Fund, in terms of the	
			SEBI Circular dated September 4, 2023; and	
			·	
			3) The details of the same will be placed	
			before the Audit Committee and Board of	
			Directors in the next meeting.	
			birectors in the next meeting.	
6	Reasons recorded in writing for taking action		Violation of clause 6 of the Code of Conduct –	
	stated above		Execution of Contra trade	
7	Details of the previous instances of violations,		Not Applicable	
	if any, since last financial year	,		
	,,,			
8	If any amount collected for Code of C	onduct vio	lation(s):	
	if any amount confected for conduct violation(s).			
	i. Mode of transfer to SEBI - IPEF		Online	
	(Online/Demand Draft) :			
	ii. Details of transfer/payment In case of Online:			
	ii. Details of transfer/payment iii case of Offline.			
	Particulars	Details		
	Name of the transferor	Mr. Vive	k Goel	
	Thank of the transferor	10111. 0100	ik doei	
	Bank Name, branch and Account	Through	IIDI	
	number	Illiougii	011	
	UTR/Transaction reference	Transact	ion ID:	
	Number		96704393	
	Number	2409131	30/04535	
	Transaction data	Combonolo	2024	
	Transaction date	Septemb	per 13, 2024	
	Transaction Amount (in Rs.)	Rs. 808/-	•	
	In case of Demand Draft (DD): Not Applicable			
9	Any other relevant information		No	



## Yours faithfully, **For Brainbees Solutions Limited**

Neelam Jethani Company Secretary and Compliance Officer ICSI Membership No.: A35831

PAN: AJTPJ8524G

Email ID: Neelam.jethani@firstcry.com

Date: September 13, 2024

Place: Pune