

INTELLECT/SEC/2020-21

October 08, 2020

BSE Ltd.

538835

1st Floor, New Trade Ring, Rotunda Building, PJ Towers,
Dalal Street, Fort,
Mumbai — 400 001.

Dear Sir/Madam,

Sub-Reporting of Violation related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

Ref: SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020

In continuation with our intimation dated November 21, 2019 and June 24, 2020, with respect to the above subject and reference, enclosed please find the report of Violation relating to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 in the prescribed form **Annexure –A**.

The compliance officer of the company brought the violations to the notice of the Audit Committee of the Board of Directors of the company. The Committee authorised one Independent Director to look into these violations who has provided an opportunity of being heard to those violators and then reported back to the Committee which suo- motto imposed penalty for the alleged violations.

Accordingly, a sum of Rs.708,500/- has been collected from 10 associates and credited to the designated A/c of SEBI- IPEF.

Kindly take the above information on record.

Yours Truly

For Intellect Design Arena Ltd



V V Naresh

Company Secretary and Compliance officer

Encl: a/a

Annexure -A
Reporting of Insider Trading violation under Regulation 9(1) of SEBI(PIT)Regulations, 2015

S.No	Particulars	Details
1	Name of the listed entity	Intellect Design Arena Ltd
2	Please tick the appropriate box Reporting in the capacity of : <input checked="" type="checkbox"/> Listed entity <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed in BSE&NSE
3	Name of the Designated person	Mr. Apurva Shah
4	PAN of DP	AAAPS5117F
5	Designation of DP	Senior Vice President
6	Functional role	Product Delivery Head-iGTB
7	Whether DP is a promoter/promoter group/holding CXO position	No
8	Transaction details	
	a)Name of the scrip	Intellect Design Arena Ltd NSE-INTELLECT BSE-538835
	b)No. of shares traded(which includes pledge) and value in Rs	Sold 22,577equity shares amounting to Rs.38,74,450/- on January 27, 2020
9	In case value of trade is more than Rs.10lacs 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 b) Date of intimation of trade(S) by Company to Stock exchange under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015	a) Date of intimation of trade by DP- February 05, 2020. b) Date of intimation of trade by Company to Stock Exchanges –February 06, 2020.
10	Details of violations observed under SEBI(PIT)Regulations, 2015	1. Had indulged in contra trade within a period of 6 months. 2. Sold the shares of the Company on January 27, 2020 during trading window closure.(Trading window was closed from January 01, to February 16, 2020) 3. No pre- clearance of trade was obtained from the Compliance officer for sale of shares in excess of 5000 or the value of sale exceeding Rs.10 lakhs in a calendar quarter. 4. Had gone ahead for the sale of shares without waiting for the

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		approval of sale from the Compliance Officer. 5. Has not intimated the Company the details of sale value exceeding Rs.10 lakhs in a calendar quarter within 2 trading days from the date of sale.
11	Action taken by the listed entity	The Audit Committee is empowered to take action on the violations of Insider Trading. An opportunity was provided of being heard. Accordingly, it was decided to impose a penalty of Rs.6,50,000/- which was paid by the violator within the timeline prescribed
12	Reason observed in writing for taking action as stated above	Explanation was sought from Mr.Apurva Shah through video conference held with Ms. Vijaya Sampath, Independent Director and member of the Audit Committee on February 28, 2020. He admitted for the violation of Insider Trading and the same was not intentional but due to ignorance.
13	Details of previous instances of violations, if any	Nil
14	Any other relevant information	None
15	If any amount collected for code of conduct violations(s)	
	i. Mode of payment	Demand Draft
	Particulars: i. Bank Name and Branch ii. DD Number iii. DD Date iv. DD amount	IDFC First Bank, RK Salai 0361944 24/09/2020 Rs.650,000/-

Date- October 08, 2020

Yours truly,

Place-Chennai




V VNaresh
Company Secretary and Compliance officer
 PAN-- ABRPN0717F
[Email- naresh.vv@intellectdesign.com](mailto:naresh.vv@intellectdesign.com)
 Contact No. 8939748427

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Reporting of Insider Trading violation under Regulation 9(1) of SEBI(PIT)Regulations, 2015

S.No	Particulars	Details
1	Name of the listed entity	Intellect Design Arena Ltd
2	Please tick the appropriate box Reporting in the capacity of : <input checked="" type="checkbox"/> Listed entity <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed in BSE&NSE
3	Name of the Designated person	Mr. Bijaya Das
4	PAN of DP	AHQPB6133J
5	Designation of DP	Vice President
6	Functional role	Product Delivery, iGTB
7	Whether DP is a promoter/promoter group/holding CXO position	No
8	Transaction details	
	a)Name of the scrip	Intellect Design Arena Ltd NSE-INTELLECT BSE-538835
	b)No. of shares traded(which includes pledge) and value in Rs	Acquired 600 equity shares amounting to Rs.96,000 on February 11, 2020
9	In case value of trade is more than Rs.10lacs in a calendar quarter- c) 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 d) Date of intimation of trade(S) by Company to Stock exchange under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015	Not applicable
10	Details of violations observed under SEBI(PIT)Regulations, 2015	1. Acquired shares of the Company on February 11, 2020 during the trading window closure.(Trading window was closed from January 01, 2020 to February 16, 2020)
11	Action taken by the listed entity	The Audit Committee is empowered to take action on the violations of Insider Trading. Accordingly, it was decided to impose a penalty of Rs.5,000/- which was paid by the violator within the prescribed timeline.
12	Reason observed in writing for taking action as stated above	Explanation was sought from Mr. Bijaya Das through a video-

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		Conference held with Ms. Vijaya Sampath, Independent Director and Member of the Audit Committee on February 28, 2020.
13	Details of previous instances of violations, if any	Not applicable
14	Any other relevant information	None
15	If any amount collected for code of conduct violations(s)	
	i. Mode of payment	Demand Draft
	Particulars: ii. Bank Name and Branch iii. DD Number iv. DD Date v. DD amount	IDFC First Bank, RK Salai 0361944 24/09/2020 Rs.5,000

Date- October 08, 2020

Yours truly,

Place-Chennai




V VNaresh

Company Secretary and Compliance officer

PAN-- ABRPN0717F

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1	Name of the listed entity	Intellect Design Arena Ltd
2	Please tick the appropriate box Reporting in the capacity of : <input checked="" type="checkbox"/> Listed entity <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed in BSE&NSE
3	Name of the Designated person	Punkaj Shankar
4	PAN of DP	ACCPS4087P
5	Designation of DP	Senior Vice President
6	Functional role	Head-HR
7	Whether DP is a promoter/promoter group/holding CXO position	No
8	Transaction details	
	a)Name of the scrip	Intellect Design Arena Ltd NSE-INTELLECT BSE-538835
	b)No. of shares traded(which includes pledge) and value in Rs	Sold 2500 equity shares amounting to Rs.6,85,833/- on between July 12, 2019 to July 19, 2019
9	In case value of trade is more than Rs.10lacs in a calendar quarter- e) 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 f) Date of intimation of trade(S) by Company to Stock exchange under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015	Nil
10	Details of violations observed under SEBI(PIT)Regulations, 2015	Has traded during Trading window closure. The Window was closed from July 01, 2019 to July 26, 2019 for quarterly financial results
11	Action taken by the listed entity	The Audit Committee is empowered to take action on the violations of Insider Trading. An opportunity was provided of being heard. Accordingly, it was decided to impose a penalty of Rs.10,000/- which was paid by the violator within the timeline prescribed.
12	Reason observed in writing for taking action as stated above	Explanation was sought from Mr. Punkaj Shankar. He admitted for the violation of Insider Trading and the same was not intentional but due to ignorance.

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13	Details of previous instances of violations, if any	Nil
14	Any other relevant information	None
15	If any amount collected for code of conduct violations(s)	
	i. Mode of payment	Demand Draft
	Particulars:	
	ii. Bank Name and Branch	IDFC First Bank, RK Salai
	iii. DD Number	0361944
	iv. DD Date	24/09/2020
	v. DD amount	Rs.10,000/-

Date- October 08, 2020

Yours truly,

Place-Chennai



V VNaresh

Company Secretary and Compliance officer

PAN-- ABRPN0717F

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S.No	Particulars	Details
1	Name of the listed entity	Intellect Design Arena Ltd
2	Please tick the appropriate box Reporting in the capacity of : <input checked="" type="checkbox"/> Listed entity <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed in BSE&NSE
3	Name of the Designated person	Sudhakar Gopanna
4	PAN of DP	AJRPS6801M
5	Designation of DP	Senior Vice President
6	Functional role	Igtb
7	Whether DP is a promoter/promoter group/holding CXO position	No
8	Transaction details	
	a)Name of the scrip	Intellect Design Arena Ltd NSE-INTELLECT BSE-538835
	b)No. of shares traded(which includes pledge) and value in Rs	Sold 2000 equity shares amounting to Rs.5,26,000/- between July 05, 2019 to July 12, 2019
9	In case value of trade is more than Rs.10lacs in a calendar quarter- g) 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 h) Date of intimation of trade(S) by Company to Stock exchange under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015	Nil
10	Details of violations observed under SEBI(PIT)Regulations, 2015	Has traded during Trading window closure. The Window was closed from July 01, 2019 to July 26, 2019 for quarterly financial results
11	Action taken by the listed entity	The Audit Committee is empowered to take action on the violations of Insider Trading. An opportunity was provided of being heard. Accordingly, it was decided to impose a penalty of Rs.10,000/- which was paid by the violator within the timeline prescribed.

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12	Reason observed in writing for taking action as stated above	Explanation was sought from Mr. Sudhakar Gopanna . He admitted for the violation of Insider Trading and the same was not intentional but due to ignorance.
13	Details of previous instances of violations, if any	Nil
14	Any other relevant information	None
15	If any amount collected for code of conduct violations(s)	
	i. Mode of payment	Demand Draft
	Particulars: ii. Bank Name and Branch iii. DD Number iv. DD Date v. DD amount	IDFC First Bank, RK Salai 0361944 24/09/2020 Rs.10,000/-

Date- October 08, 2020

Yours truly,

Place-Chennai




V Naresh

Company Secretary and Compliance officer

PAN-- ABRPN0717F

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2	Please tick the appropriate box Reporting in the capacity of : <input checked="" type="checkbox"/> Listed entity <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed in BSE&NSE
3	Name of the Designated person	Venkatesh Chillara
4	PAN of DP	ABVPC7728H
5	Designation of DP	Executive Vice President
6	Functional role	Head-Service delivery
7	Whether DP is a promoter/promoter group/holding CXO position	No
8	Transaction details	
	a)Name of the scrip	Intellect Design Arena Ltd NSE-INTELLECT BSE-538835
	b)No. of shares traded(which includes pledge) and value in Rs	(a) Sold 135 equity shares amounting to Rs.35,775/- between July 05, 2019 to July 12, 2019 (b) Sold 50 equity shares amounting to Rs.14,150/- between July 12, 2019 to July 19,2019 (c) Sold 25 equity shares amounting to Rs.12,375/- between July 19, 2019 to July 26,2019 (d) Sold 75 equity shares amounting to Rs.13,875/- between October 25, 2019 to November 01, 2019 (e) Sold 200 equity shares amounting to Rs.33,000/- between January 31, 2020 to February 07, 2020
9	In case value of trade is more than Rs.10lacs 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(Prohibition of Insider Trading)Regulations, 2015 j) Date of intimation of trade(S) by Company to Stock exchange under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015	Nil
10	Details of violations observed under SEBI(PIT)Regulations, 2015	(a)Has traded all shares during series of Trading window closures. The Window was closed from July 01, 2019 to July 26, 2020 ; October 01, 2019 till November 06, 2019; January 01, 2020 to February

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		16, 2020 for quarterly financial results. (b)Has repeatedly traded during trading window closure.
11	Action taken by the listed entity	The Audit Committee is empowered to take action on the violations of Insider Trading. An opportunity was provided of being heard. Accordingly, it was decided to impose a penalty of Rs.10,000/- which was paid by the violator within the timeline prescribed.
12	Reason observed in writing for taking action as stated above	Explanation was sought from Mr.Venkatesh Chillara. He admitted for the violation of Insider Trading and the same was not intentional but due to ignorance.
13	Details of previous instances of violations, if any	Nil
14	Any other relevant information	None
15	If any amount collected for code of conduct violations(s)	
	i. Mode of payment	Demand Draft
	Particulars: ii. Bank Name and Branch iii. DD Number iv. DD Date v. DD amount	IDFC First Bank, RK Salai 0361944 24/09/2020 Rs.10,000/-

Date- October 08, 2020

Yours truly,

Place-Chennai




V Naresh

Company Secretary and Compliance officer

PAN-- ABRPN0717F

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S.No	Particulars	Details
1	Name of the listed entity	Intellect Design Arena Ltd
2	Please tick the appropriate box Reporting in the capacity of : <input checked="" type="checkbox"/> Listed entity <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed in BSE&NSE
3	Name of the Designated person	S Selvakumaran
4	PAN of DP	AUKPS8115J
5	Designation of DP	Senior Vice President
6	Functional role	Head-Sales
7	Whether DP is a promoter/promoter group/holding CXO position	No
8	Transaction details	
	a)Name of the scrip	Intellect Design Arena Ltd NSE-INTELLECT BSE-538835
	b)No. of shares traded(which includes pledge) and value in Rs	Acquired 5000 shares between March 13, 2020 to March 20, 2020 and further acquired 3000 shares between March 20, 2020 to March 27, 2020 amounting to Rs.4,80,000 approximately.
9	In case value of trade is more than Rs.10lacs in a calendar quarter- k) 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 l) Date of intimation of trade(S) by Company to Stock exchange under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015	Nil
10	Details of violations observed under SEBI(PIT)Regulations, 2015	Has dealt in the shares of the Company in excess of 5000 spread over 5 trading days without obtaining pre-clearance approval from the designated Compliance officer.
11	Action taken by the listed entity	The Audit Committee is empowered to take action on the violations of Insider Trading. An opportunity was provided of being heard. Accordingly, it was decided to impose a penalty of Rs.5,000/- which was paid by the violator within the timeline prescribed.

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12	Reason observed in writing for taking action as stated above	Explanation was sought from Mr S Selvakumaran. He admitted for the violation of Insider Trading and the same was not intentional but due to ignorance.
13	Details of previous instances of violations, if any	Nil
14	Any other relevant information	None
15	If any amount collected for code of conduct violations(s)	
	i. Mode of payment	Demand Draft
	Particulars: ii. Bank Name and Branch iii. DD Number iv. DD Date v. DD amount	IDFC First Bank, RK Salai 0361944 24/09/2020 Rs.5,000/-

Date- October 08, 2020

Yours truly,

Place-Chennai




V Naresh

Company Secretary and Compliance officer

PAN-- ABRPN0717F

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S.No	Particulars	Details
1	Name of the listed entity	Intellect Design Arena Ltd
2	Please tick the appropriate box Reporting in the capacity of : <input checked="" type="checkbox"/> Listed entity <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed in BSE&NSE
3	Name of the Designated person	Subramanian Muthu
4	PAN of DP	DMMP57640F
5	Designation of DP	Vice President
6	Functional role	Product engineering head
7	Whether DP is a promoter/promoter group/holding CXO position	No
8	Transaction details	
	a)Name of the scrip	Intellect Design Arena Ltd NSE-INTELLECT BSE-538835
	b)No. of shares traded(which includes pledge) and value in Rs	Sold 134 shares amounting to Rs28,810/- on January 25, 2019
9	In case value of trade is more than Rs.10lacs in a calendar quarter- m) 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 n) Date of intimation of trade(S) by Company to Stock exchange under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015	Nil
10	Details of violations observed under SEBI(PIT)Regulations, 2015	Has traded on Trading window closures. The Window was closed from January 01, 2019 to January 30, 2019 for quarterly financial results.
11	Action taken by the listed entity	The Audit Committee is empowered to take action on the violations of Insider Trading. An opportunity was provided of being heard. Accordingly, it was decided to impose a penalty of Rs.1,000/- which was paid by the violator within the timeline prescribed.

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12	Reason observed in writing for taking action as stated above	Explanation was sought from Mr Subramanian Muthu. He admitted for the violation of Insider Trading and the same was not intentional but due to ignorance.
13	Details of previous instances of violations, if any	Nil
14	Any other relevant information	None
15	If any amount collected for code of conduct violations(s)	
	i. Mode of payment	Demand Draft
	Particulars: ii. Bank Name and Branch iii. DD Number iv. DD Date v. DD amount	IDFC First Bank, RK Salai 0361944 24/09/2020 Rs.1,000/-

Date- October 08, 2020

Yours truly,

Place-Chennai




V Naresh

Company Secretary and Compliance officer

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S.No	Particulars	Details
1	Name of the listed entity	Intellect Design Arena Ltd
2	Please tick the appropriate box Reporting in the capacity of : <input checked="" type="checkbox"/> Listed entity <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed in BSE&NSE
3	Name of the Designated person	Saurabh Gupta
4	PAN of DP	ADEPG4189P
5	Designation of DP	Senior Vice President
6	Functional role	HR
7	Whether DP is a promoter/promoter group/holding CXO position	No
8	Transaction details	
	a)Name of the scrip	Intellect Design Arena Ltd NSE-INTELLECT BSE-538835
	b)No. of shares traded(which includes pledge) and value in Rs	Sold 4250 shares amounting to Rs.10,15,000/ on August 16, 2018
9	In case value of trade is more than Rs.10lacs in a calendar quarter- o) 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 p) Date of intimation of trade(S) by Company to Stock exchange under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015	a) In Compliance with Reg 7(2)(a)- The date that was supposed to be intimated by DP should be by August 20, 2018. But the same was not intimated to the Compliance officer within the prescribed timelines. b) Since, the Compliance officer was not intimated about the trade, the same was not complied.
10	Details of violations observed under SEBI(PIT)Regulations, 2015	As the traded value exceeds Rs 10 lakhs, pre-clearance approval was not sought by him during the timeperiod.
11	Action taken by the listed entity	The Audit Committee is empowered to take action on the violations of Insider Trading. An opportunity was provided of being heard. Accordingly, it was decided to impose a penalty of Rs.10,000/- which was paid by the violator within the timeline prescribed.

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12	Reason observed in writing for taking action as stated above	Explanation was sought from Mr Saurabh Gupta. He admitted for the violation of Insider Trading and the same was not intentional but due to ignorance.
13	Details of previous instances of violations, if any	Nil
14	Any other relevant information	None
15	If any amount collected for code of conduct violations(s)	
	i. Mode of payment	Demand Draft
	Particulars: ii. Bank Name and Branch iii. DD Number iv. DD Date v. DD amount	IDFC First Bank, RK Salai 0361944 24/09/2020 Rs.10,000/-

Date- October 08, 2020

Yours truly,

Place-Chennai




V Naresh

Company Secretary and Compliance officer

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Intellect Design Arena Limited

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 Corporate Headquarters: SIPCOT IT Park Siruseri, Chennai - 600 130, India | Ph: +91-44-6700 8000 | Fax: +91-44-6700 8874
 E-mail: contact@intellectdesign.com | www.intellectdesign.com

S.No	Particulars	Details
1	Name of the listed entity	Intellect Design Arena Ltd
2	Please tick the appropriate box Reporting in the capacity of : <input checked="" type="checkbox"/> Listed entity <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed in BSE&NSE
3	Name of the Designated person	Shaili Awasthi
4	PAN of DP	ACDPT8530B
5	Designation of DP	Vice President
6	Functional role	Product Management Head
7	Whether DP is a promoter/promoter group/holding CXO position	No
8	Transaction details	
	a)Name of the scrip	Intellect Design Arena Ltd NSE-INTELLECT BSE-538835
	b)No. of shares traded(which includes pledge) and value in Rs	Acquired 300 shares amounting to Rs. 60,000 between October 19, 2018 to October 26, 2018.
9	In case value of trade is more than Rs.10lacs in a calendar quarter- q) 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 r) Date of intimation of trade(S) by Company to Stock exchange under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015	Nil
10	Details of violations observed under SEBI(PIT)Regulations, 2015	Has traded on Trading window closures.
11	Action taken by the listed entity	The Audit Committee is empowered to take action on the violations of Insider Trading. An opportunity was provided of being heard. Accordingly, it was decided to impose a penalty of Rs.5,000/- which was paid by the violator within the timeline prescribed.
12	Reason observed in writing for taking action as stated above	Explanation was sought from Mr Shaili Awasthi. She has admitted for the violation of Insider Trading and the same was not intentional but due to ignorance.

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13	Details of previous instances of violations, if any	Nil
14	Any other relevant information	None
15	If any amount collected for code of conduct violations(s)	
	i. Mode of payment	Demand Draft
	Particulars: ii. Bank Name and Branch iii. DD Number iv. DD Date v. DD amount	IDFC First Bank, RK Salai 0361944 24/09/2020 Rs.5,000/-

Date- October 08, 2020

Yours truly,

Place-Chennai



V VNaresh

Company Secretary and Compliance officer

PAN-- ABRPN0717F

[Email- naresh.vv@intellectdesign.com](mailto:naresh.vv@intellectdesign.com)

Contact No. 8939748427

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S.No	Particulars	Details
1	Name of the listed entity	Intellect Design Arena Ltd
2	Please tick the appropriate box Reporting in the capacity of : <input checked="" type="checkbox"/> Listed entity <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed in BSE&NSE
3	Name of the Designated person	P Shankar
4	PAN of DP	APEPS9315R
5	Designation of DP	Vice President
6	Functional role	Product Support Head
7	Whether DP is a promoter/promoter group/holding CXO position	No
8	Transaction details	
	a)Name of the scrip	Intellect Design Arena Ltd NSE-INTELLECT BSE-538835
	b)No. of shares traded(which includes pledge) and value in Rs	Sold 800 shares amounting to Rs 1,60,000 on April 27, 2018
9	In case value of trade is more than Rs.10lacs in a calendar quarter- s) 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 t) Date of intimation of trade(S) by Company to Stock exchange under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015	Nil
10	Details of violations observed under SEBI(PIT)Regulations, 2015	Has traded during trading window closures.
11	Action taken by the listed entity	The Audit Committee is empowered to take action on the violations of Insider Trading. An opportunity was provided of being heard. Accordingly, it was decided to impose a penalty of Rs.2,500/- which was paid by the violator within the timeline prescribed.

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12	Reason observed in writing for taking action as stated above	Explanation was sought from Mr P Shankar. He admitted for the violation of Insider Trading and the same was not intentional but due to ignorance.
13	Details of previous instances of violations, if any	Nil
14	Any other relevant information	None
15	If any amount collected for code of conduct violations(s)	
	i. Mode of payment	Demand Draft
	Particulars: ii. Bank Name and Branch iii. DD Number iv. DD Date v. DD amount	IDFC First Bank, RK Salai 0361944 24/09/2020 Rs.2,500/-

Date- October 08, 2020

Yours truly,

Place-Chennai




V Naresh

Company Secretary and Compliance officer

PAN-- ABRPN0717F

[Email- naresh.vv@intellectdesign.com](mailto:naresh.vv@intellectdesign.com)

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