

Date: August 28, 2020

Listing Department
BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street, Fort
Mumbai – 400 001

Listing Department
National Stock Exchange of India Limited
Bandra Kurla Complex
Bandra East
Mumbai – 400 051

BSE Script Code: 539289

NSE Symbol: MAJESCO

Dear Sir/ Madam,

Sub: Reporting under SEBI (Prohibition of Insider Trading) Regulations, 2015

Re: Majesco Limited Code of Conduct for regulating, monitoring and reporting of trading by designated persons and immediate relatives

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015, Majesco Limited code of conduct for regulating, monitoring and reporting of trading by designated persons and immediate relatives (“Majesco Insider Trading Code”) and SEBI Circular no. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, the details of violation of the Company’s Code of Conduct by the Designated Person along with the action taken by the Company thereon is enclosed as “Annexure A” to this letter.

We hereby bring to your kind attention that reported deviation by the Designated Person is not material in relation to total paid-up equity share capital of the Company.

You are requested to take the same on record.

Thanking you.

Yours faithfully,
For **Majesco Limited**

Varika Rastogi
Company Secretary

Encl: as above

Annexure A

Report by Majesco Limited (“the Company”) 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	Majesco 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	-
3	A. Details of Designated Person (“DP”)	
	i. Name of the DP	Mr. Easow Daniel
	ii. PAN of the DP	AABPD6757G
	iii. Designation of DP	Manager, Finance
	iv. Functional Role of DP	Responsible for Treasury operations (investment of surplus funds, hedging etc.)
	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	-
	ii. PAN of the immediate relative of DP	-
	C. Details of transaction(s)	
	i. Name of the scrip	MAJESCO
	ii. No. of shares traded and value (Rs.) (Date- wise)	1600 equity shares purchased on August 18, 2020 at total cost of Rs. 12,03,072.25/- (after trading window was opened by the Company on August 17, 2020)
	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	August 24, 2020
	ii. Date of intimation of trade(s) by Company to stock exchanges under Regulation 7 of SEBI (PIT) Regulations, 2015	August 25, 2020

4	Details of violations observed under Code of Conduct	(i) Pre-clearance was not obtained by the DP for executing the above transaction (ii) Delay of two trading days in reporting of the above transaction to the Company.												
5	Action taken by Listed Company/ Intermediary/ Fiduciary	A warning notice has been issued to the DP.												
6	Reasons recorded in writing for taking action stated above	The aforesaid action was taken after considering following factors: (i) Number of shares bought; and (ii) It being first instance of non-compliance on the part of the DP.												
7	Details of the previous instances of violations, if any, since last financial year	None												
8	If any amount collected for Code of Conduct violation(s)													
	i. Mode of transfer to SEBI – IPEF (Online/ Demand Draft)	N.A.												
	ii. Details of transfer/ payment In case of Online:	N.A.												
	<table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Name of the transferor</td> <td></td> </tr> <tr> <td>Bank Name, branch and Account number</td> <td></td> </tr> <tr> <td>UTR/ Transaction reference Number</td> <td></td> </tr> <tr> <td>Transaction date</td> <td></td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td></td> </tr> </tbody> </table>	Particulars	Details	Name of the transferor		Bank Name, branch and Account number		UTR/ Transaction reference Number		Transaction date		Transaction Amount (in Rs.)		
Particulars	Details													
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):													
	<table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Bank Name and branch</td> <td></td> </tr> <tr> <td>DD Number</td> <td></td> </tr> <tr> <td>DD date</td> <td></td> </tr> <tr> <td>DD amount (in Rs.)</td> <td></td> </tr> </tbody> </table>	Particulars	Details	Bank Name and branch		DD Number		DD date		DD amount (in Rs.)				
Particulars	Details													
Bank Name and branch														
DD Number														
DD date														
DD amount (in Rs.)														
9	Any other relevant information	None												

Yours faithfully,

Name and Signature of Compliance Officer: Mrs. Varika Rastogi
 PAN: AFRPR3745R
 Email ID: Varika.Rastogi@majesco.com

Date: August 28, 2020
 Place: Navi Mumbai

CIN: L72300MH2013PLC244874