



IndiaMART InterMESH Ltd.
6th floor, Tower 2, Assotech Business Cresterra,
Plot No.22, Sec 135, Noida-201305, U.P.
Call Us: +91 - 9696969696
E: customercare@indiamart.com
Website: www.indiamart.com

Date: September 21, 2020

**The Manager – Listing
BSE Limited
(BSE: 542726)**

**The Manager – Listing
National Stock Exchange of India Limited
(NSE: INDIAMART)**

Dear Sir/Madam,


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

We are writing in reference to the Companies Code of Conduct to Regulate, Monitor and Report trading by Designated Persons and their Immediate Relatives read with Schedule B and Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Please find enclosed herewith a report related to the violation of Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 by one of the Designated Person, in the format prescribed by SEBI Circular SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

You are requested to take the same on record.

Yours faithfully,
For Indiamart Intermesh Limited


**Manoj Bhargava
Compliance Officer**

**PAN: AGGPB9543D
Email id: manoj.bhargava@indiamart.com
Date: September 21, 2020
Place: Ghaziabad**

**Report by Indiamart InterMesh Limited for violation related Code of Conduct under SEBI (Prohibition of Insider Trading) Regulation, 2015
 Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulation, 2015**

S. No.	Particulars	Details
1.	Name of the Listed Company	Indiamart InterMesh Limited
2.	Please tick the appropriate checkbox Reporting in capacity of: Listed Company Intermediary Fiduciary	Listed Company
3.	A. Details of Designated Person (DP)	
	i. Name of DP	Dinesh Gulati
	ii. PAN of DP	ACFPG9805Q
	iii. Designation of DP	Chief Operating Officer
	iv. Functional role of DP	Operations Management
	v. Whether DP is Promoter or belongs to Promoter Group	No
	B. 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	Indiamart InterMesh Limited
	ii. No of shares traded and value (Rs.) (Date-wise)	Date: August 24, 2020 No of Shares: 800 Equity Shares (Eight Hundred Only) Total Value: Rs. 28,79,200/- (Rupees Twenty Eight Lakh Seventy Nine Thousand and Two Hundred Only)
	D. In case the 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 26, 2020
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	August 28, 2020
4.	Details of violations observed under Code of Conduct	As the internal limit for obtaining pre-clearance, in accordance with the Companies' Code of Conduct, is Rs. 5 Lakhs during a calendar quarter, the Designated Person obtained a pre-clearance for sale of 15,000 Equity Shares from

		<p>August 17, 2020 to August 25, 2020. Subsequently, he traded in 15,800 Equity Shares during the said period, exceeding the pre-clearance limit.</p> <p>The sale of 800 (Eight Hundred Only) Equity shares on August 24, 2020 @ Rs. 3,599/- per Equity Share amounting to Rs. 28,79,200/-, without obtaining pre-clearance resulted in violation of provisions of the Company's Code of Conduct read with SEBI (Prohibition of Insider Trading) Regulation, 2015.</p>
5.	Action taken by Listed Company	<p>Warning letter has been issued to the Designated Person that he would 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 Rs. 14,10,000/- (Rupees Fourteen Lakh Ten Thousand Only) being part of the profits so earned by him on the said shares, has been imposed. The aforesaid penalty has been duly submitted to the Investor Protection and Education Fund of SEBI.</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 unintentional and had occurred purely on account of calculation error and upon realising the error he suo-moto acknowledged his mistake to the Compliance Officer.</p> <p>Further, the Designated Person has undertaken not to trade in the equity shares of the Company for a period of two months i.e. upto November 08, 2020 and to be extra cautious while executing transactions in future and ensure compliance of Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015.</p>
7.	Details of the previous instances of violations, if any, since last financial year	<p>Yes, delay in disclosure (Form-C) under Regulation 7(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 for reporting of trade in 2,579 equity shares executed on February 01, 2020. A monetary penalty of Rs. 11,25,000/-, being part of the profits so earned by him on the said transaction, has been</p>

		imposed which was duly submitted to the Investor Protection and Education Fund of SEBI. The reporting of same violation was done to SEBI on February 14, 2020.
8.	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/ Demand Draft)	Online Payment
	ii. Details of transfer/payment	
	In case of Online:	
	Particulars	Details
	Name of the transferor	Indiamart Intermesh Limited
	Bank Name, branch and Account number	Bank Name: ICICI Bank Limited Branch: Bahadur Shah Zafar Marg, Delhi Account No.: 038605004065
	UTR/Transaction reference Number	CMS/000689971803
	Transaction date	September 21, 2020
	Transaction Amount (in Rs.)	Rs. 14,10,000/-
	In case of Demand Draft (DD): Not Applicable	
	Particulars	Details
	Bank Name and branch	
	DD Number	
	DD Date	
	DD amount (in Rs.)	
9.	Any other relevant information	N.A.

Yours faithfully,
For Indiamart Intermesh Limited

Manoj Bhargava
Manoj Bhargava
Compliance Officer

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Email id: manoj.bhargava@indiamart.com
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