



Date: August 25, 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 Company's 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 the reports related to the violation of Company's Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 by two Designated Persons, 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)
Sr. Vice President (Legal & Secretarial),
Company Secretary & Compliance Officer**

Encl: As above

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: <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3.	A. Details of Designated Person (DP)	
	i. Name of DP	Amar Kumar Yadav
	ii. PAN of DP	ACDPY9808R
	iii. Designation of DP	Regional Manager
	iv. Functional role of DP	Client Servicing
	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	Not Applicable
	ii. PAN of the immediate relative of DP	Not Applicable
	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 05, 2020 No of Shares: 316 (Three Hundred Sixteen) Value: Rs. 9,68,540/- (Rupees Nine Lakh Sixty Eight Thousand Five Hundred and Forty 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	Not Applicable, as the value of trade does not exceed Rs. 10 lacs in a calendar quarter
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable, as the value of trade does not exceed Rs. 10 lacs in a calendar quarter
4.	Details of violations observed under Code of Conduct	Delay in reporting of trades, executed pursuant to a valid pre-clearance, for sale of 316 Equity Shares executed on August 05, 2020, as detailed above.
5.	Action taken by Listed Company	Warning letter has been issued to the Designated Person that he would not engage in any kind of

		<p>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. 1,89,000/- (Rupees One Lakh Eighty Nine Thousand Only) out 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> <p>The designated person has also been provided again with a copy of Code of Conduct alongwith presentation on compliances under SEBI (Prohibition of Insider Trading) Regulations, 2015. 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 delayed in reporting the sale of 316 Equity Shares on August 05, 2020 amounting to total value of Rs. 9,68,540/-. It was also noted that he had a valid pre-clearance and was aware of the said compliances.</p> <p>Further, the Designated Person has undertaken 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.</p>
7.	Details of the previous instances of violations, if any, since last financial year	No
8.	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/ Demand Draft) ii. Details of transfer/payment	Online 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	CMS1587135564	
Transaction date	August 24, 2020	
Transaction Amount (in Rs.)	Rs. 1,89,000	
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	Not Applicable

Yours faithfully,

For Indiamart Intermesh Limited

(Manoj Bhargava)

**Sr. Vice President (Legal & Secretarial),
Company Secretary & Compliance Officer**

PAN: AGGPB9543D

Email id: manoj.bhargava@indiamart.com

Date: August 25, 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

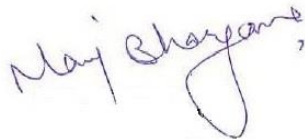
S. No.	Particulars	Details
1.	Name of the Listed Company	Indiamart Intermesh Limited
2.	Please tick the appropriate checkbox Reporting in capacity of: <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3.	A. Details of Designated Person (DP)	
	i. Name of DP	Avijit Vikram
	ii. PAN of DP	AFGPV6791Q
	iii. Designation of DP	Vice President
	iv. Functional role of DP	Finance & Accounts
	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	Not Applicable
	ii. PAN of the immediate relative of DP	Not Applicable
	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 04, 2020 No of Shares: 200 Equity Share (Two Hundred) Value: Rs. 5,75,500/- (Rupees Five Lakh Seventy Five Thousand and Five Hundred Only) Date: August 06, 2020 No of Shares: 200 Equity Share (Two Hundred) Value: Rs. 6,15,500/- (Rupees Six Lakh Fifteen Thousand and Five 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 11, 2020
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	August 12, 2020

4.	Details of violations observed under Code of Conduct	Delay in reporting of trades executed pursuant to a valid pre-clearance and submission of disclosure (Form-C) under Regulation 7(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, for sale of 400 Equity Shares i.e. 200 Equity Shares each on August 04, 2020 and August 06, 2020, as detailed above.
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. 2,30,200/- (Rupees Two Lakh Thirty Thousand Two Hundred Only) out 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> <p>The designated person has also been provided again with a copy of Code of Conduct alongwith presentation on compliances under SEBI (Prohibition of Insider Trading) Regulations, 2015. 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 delayed in reporting the sale of 400 Equity Shares i.e. 200 Equity Shares each on August 04, 2020 and August 06, 2020 aggregating to total value of Rs. 11,91,000/-. The Designated Person has also failed to submit the disclosure (Form-C) under Regulation 7(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 within a period of two trading days. It was also noted that he had a valid pre-clearance and was aware of the said compliances.</p> <p>Further, the Designated Person has undertaken to be extra cautious while executing transactions in</p>

		future and ensure compliance of Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015 for himself, immediate relatives and dependents.
7.	Details of the previous instances of violations, if any, since last financial year	No
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	CMS1587135562
	Transaction date	August 24, 2020
	Transaction Amount (in Rs.)	Rs. 2,30,200
	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	Not Applicable

Yours faithfully,

For Indiamart Intermesh Limited



(Manoj Bhargava)

Sr. Vice President (Legal & Secretarial),

Company Secretary & Compliance Officer

PAN: AGGPB9543D

Email id: manoj.bhargava@indiamart.com

Date: August 25, 2020

Place: Ghaziabad