

November 9, 2020

To

<b>BSE Limited</b> Department of Corporate Services Listing Department P J Towers, Dalal Street, Mumbai – 400001 <i>Scrip Code: 535648</i>	<b>National Stock Exchange of India Limited</b> Listing Department Exchange Plaza, Plot no. C/1, G Block, Bandra-Kurla Complex, Bandra (East), Mumbai – 400051 <i>Scrip Symbol: JUSTDIAL</i>	<b>Metropolitan Stock Exchange of India Limited</b> 4 <sup>th</sup> Floor, Vibgyor Towers, Plot No. C 62, G Block, Opp. Trident Hotel, Bandra Kurla Complex, Bandra (East), Mumbai – 400098 <i>Scrip Symbol: JUSTDIAL</i>
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Dear Sir/Madam,

**Sub.: Reporting regarding Violation of Company's Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015**

This is to inform that in terms of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (the "SEBI Regulations"), Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of trading by Designated Persons, their Immediate Relatives and other insiders of Just Dial Limited ("Company's Code of Conduct") 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.

Further, we would like to submit that the reported deviation is not material in relation to the paid up equity share capital of the Company.

Kindly take the same on record.

Thanking You,

Yours truly,

**For Just Dial Limited**

**Manan Udani**  
**Company Secretary**

**Encl: As above**

**Just Dial Limited**

CIN: L74140MH1993PLC150054

Registered & Corporate Office : Palm Court Building M, 501/B, 5th Floor, New Link Road, Besides Goregaon Sports Complex, Malad West, Mumbai - 400064

Tel. : 022-28884060 / 66976666 • Fax : 022-28823789

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## Annexure A

### Report by Just Dial Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

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	Just Dial 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	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	Mr. Rahul Shukla
	ii. PAN of the DP	EGFPS7034P
	iii. Designation of DP	Technical Lead
	iv. Functional Role of DP	Mr. Rahul Shukla is part of engineering team and his primary responsibility is roll out of all Jd features on iOS platform.
	v. Whether DP is Promoter or belongs to Promoter Group	No
	<b>B. If Reporting is for immediate relative of DP</b>	
	i. Name of the immediate relative of DP	-
	ii. PAN of the immediate relative of DP	-

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<b>C. Details of transaction(s)</b>		
	i. Name of the scrip	Just Dial Limited
	ii. No of shares traded and value (Rs.) (Date- wise)	On October 26, 2020, 145 Equity Shares were purchased at Rs. 634.00/- per share aggregating to Rs. 91,930.00/-.
<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter</b>		
	i. Date of intimation of trade(s) 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	Mr. Rahul Shukla has purchased 145 equity shares of the Company on October 26, 2020 i.e. during the period, when the Trading Window was closed for Designated Persons and their immediate relatives.
5	Action taken by Listed company/ Intermediary/ <del>Fiduciary</del>	A penalty of Rs. 5,000/- has been imposed for the said violation and a warning has also been given to him for adhering the Code of Conduct for prevention of Insider Trading strictly to avoid situations where the Company can levy penalties and take strict disciplinary actions as per Company's Code of Conduct.

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6	Reasons recorded in writing for taking action stated above	Considering the explanation of Mr. Rahul Shukla that the said transaction was done unintentionally as the intimation mail of the Compliance Officer with respect to closure of trading window was genuinely missed out by him and he was not aware that the trading window was closed when he entered into the transaction in shares of the Company and further, also considering the quantum and value of said transaction and the aforesaid violation being his first transgression of the Code of Conduct for prevention of Insider Trading of the Company, a penalty of Rs. 5,000/- has been imposed. He has also agreed to take extra precaution next time onwards.
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)	Demand Draft

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9	<p>ii. Details of transfer/payment In case of Online:</p> <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> <p>In case of Demand Draft (DD):</p> <table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Bank Name and branch</td> <td>Axis Bank - Vidyaranyapura Branch, Bangalore</td> </tr> <tr> <td>DD Number</td> <td>11243</td> </tr> <tr> <td>DD date</td> <td>06/11/2020</td> </tr> <tr> <td>DD amount (in Rs.)</td> <td>5,000/-</td> </tr> </tbody> </table> <p>Any other relevant information</p>	Particulars	Details	Name of the transferor	-	Bank Name, branch and Account number	-	UTR/Transaction reference Number	-	Transaction date	-	Transaction Amount (in Rs.)	-	Particulars	Details	Bank Name and branch	Axis Bank - Vidyaranyapura Branch, Bangalore	DD Number	11243	DD date	06/11/2020	DD amount (in Rs.)	5,000/-	<p>Yes</p> <p>-</p>
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Yours sincerely,

Date: November 9, 2020  
Place: Mumbai

Name of Compliance Officer: Manan Udani  
PAN: AAVPU2410K  
Email id: manan.udani@justdial.com

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