



Ref: CEL/NSEBSE/01082023

1st August, 2023

To,

Listing Department National Stock Exchange of India Limited Exchange Plaza, Bandra Kurla Complex, Bandra (East), Mumbai – 400 051	Department of Corporate Services - Listing BSE Limited P. J. Towers, Dalal Street, Mumbai – 400 001
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Re: Scrip Symbol: CENTUM/ Scrip Code: 517544

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

This is to inform you that in terms of the 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 under the SEBI (Prohibition of Insider Trading) Regulations, 2015 by the Designated Person (DP) along with the action taken by the Company thereon is enclosed to this letter.

Yours faithfully,

For **Centum Electronics Limited**

Indu H S

Company Secretary & Compliance Officer

Encl: as above

Centum Electronics Limited

44, KHB Industrial Area, Yelahanka New Town, Bangalore - 560 106, Karnataka, India

Tel +91-(0)80-4143-6000 **Fax** +91-(0)80-4143-6005 **Website** www.centumelectronics.com **E-mail** info@centumelectronics.com

CIN - L85110KA1993PLC013869

**Report by Centum Electronics Limited 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	Centum Electronics Limited
2	Please tick appropriate checkbox Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	
3	A. Details of Designated Person (DP)	
	i. Name of the DP	Ms.Sandhya Thyagarajan
	ii. PAN of the DP	AMMPS8501N
	iii. Designation of DP	Vice President
	iv. Functional Role of DP	Vice President
	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	NA
	ii. PAN of the immediate relative of DP	NA
	C. Details of transaction(s)	
	i. Name of the scrip	Centum Electronics Limited BSE Scrip Code: 517544 NSE Symbol: CENTUM ISIN: INE320B01020
	ii. No of shares traded and value (Rs.) (Date - wise)	The contra trades which are executed in violation of code of conduct are enclosed as Annexure - 1
	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	Date of intimation of trades executed in a calendar quarter which has resulted in value more than Rs.10 lakhs is enclosed as Annexure 2

	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Date of intimation of trades executed in a calendar quarter which has resulted in value more than Rs.10 lakhs is enclosed as Annexure 2
4	Details of violations observed under Code of Conduct	Execution of certain Contra Trades in shares of the Company by the said DP in violation of clause VI (a) of code of conduct
5	Action taken by Listed company/ Intermediary/ Fiduciary	Advised to remit the profits made in violation of Code of Conduct to IPEF
6	Reasons recorded in writing for taking action stated above	Violation of Clause VI (a) – Code of Conduct
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)	Online
	ii. Details of transfer/payment: In case of Online: Name of the Transferor: Sandhya Thyagarajan Bank Name, branch and Account number: HDFC Bank, Yelahanka, 03711050012066 UTR/Transaction reference Number: N212232571452193 Transaction date: 31 st July, 2023 Transaction Amount (in Rs.): 9,259/-	
9	Any other relevant information	

Thanking you,

Yours Sincerely,

For Centum Electronics Limited

Indu H S

Company Secretary and Compliance Officer

PAN: ABCPI6776Q

Email ID: induhs@centumelectronics.com

Annexure – 1

Details of Contra Trade

Buy			Sell		
Date	No. of Shares	Value	Date	No. of Shares	Value
05-06-2023	500	5,62,902.05	06-06-2023	500	5,75,133.90
07-06-2023	500	5,99,981.15	07-06-2023	500	5,97,007.50
Total	1,000	11,62,883.20	Total	1,000	11,72,141.40

Gain of Rs.9,259 arising out of the above contra trades are transferred to IPEF

Annexure – 2

Trades in a calendar quarter which has resulted in value more than Rs.10 lakhs:

Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	Trade Date	Transaction type	Intimation
	30.05.2023	Sell	01.06.2023
	31.05.2023	Sell	01.06.2023
	01.06.2023	Sell	02.06.2023
	05.06.2023	Purchase(contra)	31.07.2023
	06.06.2023	Sell (contra)	
	07.06.2023	Purchase(contra)	
	07.06.2023	Sell (contra)	
07.06.2023	Sell (non-contra)	09.06.2023	
Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Trade Date	Transaction type	Intimation
	30.05.2023	Sell	01.06.2023
	31.05.2023	Sell	01.06.2023
	01.06.2023	Sell	02.06.2023
	05.06.2023	Purchase(contra)	01.08.2023
	06.06.2023	Sell (contra)	
	07.06.2023	Purchase(contra)	
	07.06.2023	Sell (contra)	
07.06.2023	Sell (non-contra)	09.06.2023	