

Intellect/SEC/2020-21

June 24, 2020

National Stock Exchange of India Ltd.,

Exchange Plaza, 5th Floor, Plot No. C/1, G Block,
Bandra Kurla Complex,
Bandra (E), Mumbai — 400 051.

INTELLECT

BSE Ltd.

1st Floor, New Trade Ring, Rotunda Building, PJ Towers,
Dalal Street, Fort,
Mumbai — 400 001.

538835

Dear Sir/Madam,

Sub-Reporting of Violation related to Code of Conduct under SEBI(Prohibition of Insider Trading) Regulations, 2015

Ref: SEBI Circular No. SEBI/HO/ISD/CIR/P/2019/82 dated July 19, 2019

With respect to the above subject and reference, enclosed please find the report of Violation relating to Code of Conduct under SEBI(Prohibition of Insider Trading) Regulations, 2015 in the prescribed form **Annexure –A.**

The compliance officer of the company brought the violations to the notice of the Audit Committee of the Board of Directors of the company. The Committee authorised one Independent Director to look into these violations who has provided an opportunity of being heard to those violators and then reported back to the Committee which suo- motto imposed penalty for the alleged violations.

Accordingly, we are in the process of disposing the amount of penalty collected by crediting the amount to IEPF Authorities.

Kindly take the above information on record.

Yours Truly

For Intellect Design Arena Ltd



V V Naresh

Company Secretary and Compliance officer

Encl:a/a

Annexure -A

Reporting of Insider Trading violation under Regulation 9(1) of SEBI(PIT)Regulations, 2015

S.No	Particulars	Details
1	Name of the listed entity	Intellect Design Arena Ltd
2	Please tick the appropriate box Reporting in the capacity of : <input checked="" type="checkbox"/> Listed entity <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed in BSE&NSE
3	Name of the Designated person	Mr. Apurva Shah
4	PAN of DP	AAAPS5117F
5	Designation of DP	Senior Vice President
6	Functional role	Product Delivery Head-iGTB
7	Whether DP is a promoter/promoter group/holding CXO position	No
8	Transaction details	
	a)Name of the scrip	Intellect Design Arena Ltd NSE-INTELLECT BSE-538835
	b)No. of shares traded(which includes pledge) and value in Rs	Sold 22,577equity shares amounting to Rs.38,74,450/- on January 27, 2020
9	In case value of trade is more than Rs.10lacs in a calendar quarter- a) Date of intimation of trade(S) by concerned DP/Director/promoter/promoter group to Company under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015 b) Date of intimation of trade(S) by Company to Stock exchange under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015	a) Date of intimation of trade by DP- February 05, 2020. b) Date of intimation of trade by Company to Stock Exchanges –February 06, 2020.
10	Details of violations observed under SEBI(PIT)Regulations, 2015	<ol style="list-style-type: none"> Had indulged in contra trade within a period of 6 months. Sold the shares of the Company on January 27, 2020 during trading window closure.(Trading window was closed from January 01, to February 16, 2020) No pre- clearance of trade was obtained from the Compliance officer for sale of shares in excess of 5000 or the value of sale exceeding Rs.10 lakhs in a calendar quarter. Had gone ahead for the sale of shares without waiting for the approval of sale from the Compliance Officer.

Intellect Design Arena Limited

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Corporate Headquarters: SIPCOT IT Park Siruseri, Chennai - 600 130, India | Ph: +91-44-6700 8000 | Fax: +91-44-6700 8874

E-mail: contact@intellectdesign.com | www.intellectdesign.com

		5. Has not intimated the Company the details of sale value exceeding Rs.10 lakhs in a calendar quarter within 2 trading days from the date of sale.
11	Action taken by the listed entity	The Audit Committee is empowered to take action on the violations of Insider Trading. An opportunity was provided of being heard. Accordingly, it was decided to impose a penalty of Rs.6,50,000/- which was paid by the violator within the timeline prescribed
12	Reason observed in writing for taking action as stated above	Explanation was sought from Mr. Apurva Shah through video conference held with Ms. Vijaya Sampath, Independent Director and member of the Audit Committee on February 28, 2020. He admitted for the violation of Insider Trading and the same was not intentional but due to ignorance.
13	Details of previous instances of violations, if any	Nil
14	Any other relevant information	None

Date- 24th June, 2020

Yours truly,

Place-Chennai




V Naresh

Company Secretary and Compliance officer

PAN-- ABRPN0717F

[Email- naresh.vv@intellectdesign.com](mailto:naresh.vv@intellectdesign.com)

Contact No. 8939748427

Reporting of Insider Trading violation under Regulation 9(1) of SEBI(PIT)Regulations, 2015

S.No	Particulars	Details
1	Name of the listed entity	Intellect Design Arena Ltd
2	Please tick the appropriate box Reporting in the capacity of : <input checked="" type="checkbox"/> Listed entity <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed in BSE&NSE
3	Name of the Designated person	Mr. Bijaya Das
4	PAN of DP	AHQPB6133J
5	Designation of DP	Vice President
6	Functional role	Product Delivery,iGTB
7	Whether DP is a promoter/promoter group/holding CXO position	No
8	Transaction details	
	a)Name of the scrip	Intellect Design Arena Ltd NSE-INTELLECT BSE-538835
	b)No. of shares traded(which includes pledge) and value in Rs	Acquired 600 equity shares amounting to Rs.96,000 on February 11, 2020
9	In case value of trade is more than Rs.10lacs in a calendar quarter- c) Date of intimation of trade(S) by concerned DP/Director/promoter/promoter group to Company under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015 d) Date of intimation of trade(S) by Company to Stock exchange under regulation 7 of SEBI(Prohibition of Insider Trading)Regulations, 2015	Not applicable
10	Details of violations observed under SEBI(PIT)Regulations, 2015	1. Acquired shares of the Company on February 11, 2020 during the trading window closure.(Trading window was closed from January 01, 2020 to February 16, 2020)
11	Action taken by the listed entity	The Audit Committee is empowered to take action on the violations of Insider Trading. Accordingly, it was decided to impose a penalty of Rs.5,000/- which was paid by the violator within the prescribed timeline.
12	Reason observed in writing for taking action as stated above	Explanation was sought from Mr. Bijaya Das through a video-

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		Conference held with Ms. VijayaSampath, Independent Director and Member of the Audit Committee on February 28, 2020.
13	Details of previous instances of violations, if any	Not applicable
14	Any other relevant information	None

Date- 24th June, 2020

Yours truly,

Place-Chennai



V VNaresh

Company Secretary and Compliance officer

PAN-- ABRPN0717F

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