

June 08, 2022

BSE Limited Department of Corporate Services Listing Department P J Towers, Dalal Street, Mumbai - 400001 <i>Scrip Code: 542367</i>	National Stock Exchange of India Limited Listing Department Exchange Plaza Plot no. C/1, G Block, Bandra-Kurla Complex, Bandra (E), Mumbai - 400051 <i>Scrip Symbol: XELPMOC</i>
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Dear Sir/Madam,

Reporting regarding 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 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 Xelpmoc Design and Tech 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 Persons along with the action taken by the Company thereon is enclosed as "Annexure A" to this letter.

Further, the reported deviation is not material in relation to the paid up equity share capital of the Company.

Kindly take the same on record.

Yours truly,

For Xelpmoc Design and Tech Limited

Vaishali Kondbhar
Company Secretary & Compliance Officer
Encl: As above



Annexure A

Report by Xelpmoc Design and Tech 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	Xelpmoc Design and Tech Limited
2	Please tick appropriate checkbox Reporting in capacity of: <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3	A. Details of Designated Person (DP)	
	i. Name of the DP	Ms. Arunima Jain
	ii. PAN of the DP	AXMPJ1596M
	iii. Designation of DP	Programme Manager
	iv. Functional Role of DP	Ms. Arunima Jain is a Programme Manager of the Company.
	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	-
	ii PAN of the immediate relative of DP	-
	C. Details of transaction(s)	
	i Name of the Scrip	Xelpmoc Design and Tech Limited BSE: 542367 NSE: XELPMOC
	ii No. of shares traded and value (Rs.) (Date-wise)	May 25, 2022: 250 equity shares were purchased for Rs.50,207.18/-.

XELPMOC DESIGN AND TECH LIMITEDRegd & Corp Address: #17, 4th Floor, Agies Building, 1st A Cross, 5th Block, Koramangala, Bengaluru - 560034
Phone number: 080 4370 8360 | Website: www.xelpmoc.in | Email: vaishali.kondbhar@xelpmoc.in

CIN NO: L72200KA2015PLC082873 | GST NO: 29AAACX1880G1Z5



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 (Prohibition of Insider Trading) Regulations, 2015	Not Applicable
	ii Date of intimation of trades(s) by Company to stock exchanges under regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015	Not Applicable
4.	Details of violations observed under Code of Conduct.	Ms. Arunima Jain had purchased 250 Equity Shares of the Company on May 25, 2022 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/Fiduciary	A warning letter is issued to Ms. Arunima Jain for strictly adhering to the Code of Conduct for prevention of Insider Trading to avoid situations where the Company can levy penalties and take strict disciplinary actions as stipulated in clauses 17(b) and 17(c) of Company's Code of Conduct, respectively.
6.	Reasons recorded in writing for taking action stated above.	Considering the explanation of Ms. Arunima Jain that said transaction was undertaken by her inadvertently under genuine belief that the trading window was opened and also considering the quantum and value of said transaction and the aforesaid violation being her first transgression of the Code of Conduct for prevention of Insider Trading of the Company, a warning letter has been issued.
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)	N.A.												
	ii Details of transfer to SEBI - IPEF (Online/Demand Draft) In case of online:	N.A.												
	<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>	Particulars	Details	Name of the transferor		Bank Name, branch and Account number		UTR/Transaction reference Number		Transaction date		Transaction Amount (in Rs.)		
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9.	Any other relevant information	None												

Yours sincerely,

Vaishali Kondbhar



Date: June 08, 2022
Place: Mumbai

Name of Compliance Officer: Vaishali Kondbhar
PAN: DDZPK3658B
Email id: vaishali.kondbhar@xelpmoc.in
Mobile Number: 8657345037