

TRACXN TECHNOLOGIES LIMITED
(Formerly Known as “Tracxn Technologies Private Limited”)

March 06, 2023

To,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai- 400001
Scrip Code: 543638

To,
National Stock Exchange of India Ltd.
Exchange Plaza, Plot no. C/1, G Block,
Bandra-Kurla Complex,
Bandra (E), Mumbai - 400051
Company Code: TRACXN

Sub: Update on Violation of Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

This is in continuation to our earlier reporting on the captioned subject submitted by the Company on February 15, 2023 wherein the Company has submitted the reporting of violation of the Code of Conduct under the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

Disclosure pertaining to update on the matter has been enclosed herewith as **Annexure A**.

We request you to kindly take the above on record.

Thanking you.

Yours faithfully,
For **Tracxn Technologies Limited**

Pranav Koranne
Interim Company Secretary cum Interim Compliance Officer
ACS-39485

Encl.: A/a

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Annexure A

**Report by Tracxn Technologies 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	Tracxn Technologies Limited
2	Please tick appropriate checkbox Reporting in capacity of: <input checked="" type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	
3	A. Details of Designated Person (DP)	
	i. Name of the DP	Mr. Shivam Kumar
	ii. PAN of the DP	GIVPS3114N
	iii. Designation of DP	Manager
	iv. Functional Role of DP	Business Development
	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	N.A.
	ii. PAN of the immediate relative of DP	
	C. Details of transaction(s)	
	i. Name of the scrip	TRACXN/543638
	ii. No of shares traded and value (Rs.)(Date- wise)	Purchased 5 equity shares at Rs. 91.95 on 10/02/2023 Total traded value Rs. 459.75
	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	NA
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	NA

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4	Details of violations observed under Code of Conduct	Mr. Shivam Kumar has bought 5 Equity Shares of the Company on February 10, 2023 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	1. A formal warning letter has been issued to the Designated Person for the said violation, and he was asked to refrain from committing any further violations of the Code of Conduct set by the Company. 2. A monetary penalty equivalent to the traded value (Rs. 459.75) has been imposed on the Designated Person, and he has been instructed to deposit the penalty amount in the account as mandated by the SEBI circular SEBI/HO/ISD/ISD/CIR/P/2020/135, by Wednesday, March 08, 2023.
6	Reasons recorded in writing for taking action stated above	The action stated above was taken after considering the trade was done inadvertently and intention was not to violate any regulations or codes set by the Company.
7	Details of the previous instances of violations, if any, since last financial year	NA
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 In case of Online:	

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Particulars	Details
Name of the transferor	Mr. Shivam Kumar
Bank Name, branch and Account number	Bank of India, Bandra Kurla Complex (BKC), SEBI - IPEF Account No.- 012210210000008
UTR/Transaction reference Number	UTR-306542282150
Transaction date	06/03/2023
Transaction Amount (in Rs.)	Rs. 460/-

In case of Demand Draft (DD):

Particulars	Details
Bank Name and branch	NA
DD Number	
DD Date	
DD amount (in Rs.)	

9	Any other relevant information	No
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Yours faithfully,

Date: March 06, 2023

Name and Signature of Compliance Officer

Place: Bengaluru

PAN: BVYPK5850Q

Email ID: pranav.koranne@tracxn.com