

August 20, 2020

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

Dear Sir/Madam,

<u>Reporting regarding Violation of Company's Code of Conduct under SEBI</u> (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 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 total 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

XELPMOC DESIGN AND TECH LIMITED



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: √□Listed Company ☐ Intermediary ☐ Fiduciary		
3	A. Details of Designated Person (DP)		
	i. Name of the DP	Mr. Premal Vinod Mehta	
	ii. PAN of the DP	AAVPM4861C	
	iii. Designation of DP	Independent Director	
	iv. Functional Role of DP	Mr. Premal Mehta is a Non Executive Independent Director 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	-	
	li PAN of the immediate relative of DP	-	
	C. Details of transaction(s)		
	i Name of the Scrip	Xelpmoc Design and Tech Limited	
	ii No. of shares traded and value (Rs.) (Date- wise)	101 equity shares traded for Rs.11,574.6/- on August 04, 2020.	
	D. In case value of trade(s) is more than Rs 10 lac	cs in a calendar quarter –	
	i Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to	Not Applicable	

XELPMOC DESIGN AND TECH LIMITED

Regd & 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: 29AAACX1880G125

	Company under regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015	
	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.	Mr. Premal Mehta has acquired 101 Equity Shares of the Company on August 04, 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/Fiduciary	A warning letter is issued to Mr. Premal Vinod Mehta 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 Mr. Premal Vinod Mehta that said transaction was not done intentionally, due to some miscommunication his trader inadvertently entered into the transaction in shares of the Company and 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 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 (Online/Demand Draft) In case of online:	to SEBI – IEPI	- N.A.
	Particulars	Details	1
	Name of the transferor		-
	Bank Name, branch and		-
	Account number		
	UTR/Transaction reference		
	Number		
	Transaction date		
	Transaction Amount (in Rs.)		
	In case of Demand Draft (DD):		
	Particulars	Details	
	Bank Name and branch		
	DD Number]
	DD date		1
	DD amount (in Rs.)		1
9.	Any other relevant information	I	None

Yours sincerely,

Date: August 20, 2020 Place: Bengaluru Name of Compliance Officer: Vaishali Kondbhar PAN: DDZPK3658B Email id: vaishali.kondbhar@xelpmoc.in Mobile Number: 8657345037