

**INTELLECT/SEC/2021-22**

**August 18, 2021**

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

**538835**

**Dear Sir / Madam,**

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

**Ref: SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020**

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

The undersigned 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 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, a demand draft was taken in favour of SEBI-IPEF A/c and credited a sum total of Rs. 179,870/- on August 06, 2021.

Kindly take the above information on record.

**Yours Truly**

**For Intellect Design Arena Limited,**



**V V Naresh**  
**Company Secretary and Compliance officer**  
**Encl :a/a**

**Intellect Design Arena Limited**

Registered Office: 244 Anna Salai, Chennai - 600 006, India | Ph: +91-44-6615 5100 | Fax: +91-44-6615 5123  
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](mailto:contact@intellectdesign.com) | [www.intellectdesign.com](http://www.intellectdesign.com)

**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. Rajesh Pahilajrai Motwani
4	PAN of DP	AKCPM2614E
5	Designation of DP	Vice President
6	Functional role	iGTB-Enterprise Architect
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 248 shares during the period July 09, 2021 to July 16, 2021 amounting to Rs. 191,952.
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	Nil
10	Details of violations observed under SEBI(PIT)Regulations, 2015	Sold 248 shares of the Company during Trading window closure. The window was closed from July 01, 2021 till July 30, 2021 for considering Q1 financial results for the FY 2021-22.
11	Action taken by the listed entity	1. The Audit Committee is empowered to take action on the violations of Insider Trading. An opportunity of being heard was provided to the employee. 2. Ms. Vijaya Sampath, Independent Director and member of Audit Committee had a video-call on July 27, 2021 with the concerned

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		employee to ascertain the reason for committing the violation. 3. It was decided to disgorge the entire profit earned amounting to Rs. 103,995.
12	Reason observed in writing for taking action as stated above	Mr. Rajesh Motwani apologised for the violation as the same was due to ignorance and lack of adequate awareness. The penalty was paid by the violator within the timelines prescribed.
13	Details of previous instances of violations, if any	<b><u>Non-disclosure of Form C within 2 trading days:</u></b>  Mr. Rajesh Motwani did not disclose the sale of 3252 shares of the Company within two trading days from the date of sale i.e. June 08, 2021 amounting to Rs. 24,82,398. It was later disclosed to the Company by sending Form C on June 14, 2021 and the Company intimated the Stock Exchanges on the same day.
14	Any other relevant information	None
15	If any amount collected for code of conduct violations(s)	Yes
	Mode of payment	Demand draft
	Particulars i. Bank name and branch ii. DD Number iii. DD date iv. DD amount	IDFC-First Bank, BKC-NAMAN Branch 00398281 August 06, 2021 Rs.103,995(Rupees one lakh three thousand nine hundred and ninety five only)

**Date-** August 18, 2021

**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

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**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. Theodore Antony
4	PAN of DP	AFUPA8449L
5	Designation of DP	Assistant Vice President
6	Functional role	iGCB-Service Delivery
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 125 shares of Intellect during the period July 09, 2021 to July 16, 2021 amounting to Rs.100,000.
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	Nil
10	Details of violations observed under SEBI(PIT)Regulations, 2015	Sold shares of the Company during Trading window closure. The window was closed from July 01, 2021 till July 30, 2021 for considering Q1 financial results for the FY 2021-22.
11	Action taken by the listed entity	1. The Audit Committee is empowered to take action on the violations of Insider Trading. An opportunity of being heard was provided to the employee. 2. Ms. Vijaya Sampath, Independent Director and member of Audit Committee had a video-call on July 27, 2021 with the concerned employee to ascertain the reasons for committing the violation.

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		3. It was decided to disgorge the entire profit earned amounting to Rs. 75,875.
12	Reason observed in writing for taking action as stated above	Mr. Theodore Antony apologised for the violation and the same was due to ignorance of law and lack of adequate awareness. The penalty was paid by the violator within the timelines prescribed.
13	Details of previous instances of violations, if any	Nil
14	Any other relevant information	None
15	If any amount collected for code of conduct violations(s)	Yes
	Mode of payment	Demand draft
	Particulars i. Bank name and branch ii. DD Number iii. DD date iv. DD amount	IDFC-First Bank, BKC-NAMAN Branch 00398281 August 06, 2021 Rs.75,875(Seventy five thousand eight hundred and seventy five only)

**Date-** August 18, 2021

**Yours truly,**

**Place-Chennai**




**V VNaresh**  
**Company Secretary and Compliance officer**  
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