

November 26, 2021

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,

Sub.: 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 & Annexure B" 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.

Thanking you,

Yours truly,

For Xelpmoc Design and Tech Limited

Vaishali Kondbhar
Company Secretary & Compliance Officer

Encl: As above

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: 29AAACX1880G1Z5

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	Mr. Harish B P
	ii. PAN of the DP	AJWPH2004C
	iii. Designation of DP	Assistant Finance Manager
	iv. Functional Role of DP	Mr. Harish B P is responsible for takes care of end to end accounting, payments and filing of taxes, handling billing and collection of money.
	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)	November 16, 2021: 1 equity share was

XELPMOC DESIGN AND TECH LIMITED

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		sold at Rs.400.10/-
	D. In case value of trade(s) is more than Rs 10 lacs in a calendar quarter –	
	iDate 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
	iiDate 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.	The aforesaid transactions i.e. sale of 1 equity share falls under the Contra Trade as during the period of last 6 months on August 17, 2021, 1 equity share was purchased by him at Rs.369/- .
5.	Action taken by Listed company/ Intermediary/Fiduciary	The Company has directed to disgorge the amount of profit derived from aforesaid transaction i.e. Rs.31.10 (Rs.400.10 - Rs.369/-) to Investors Protection and Education Fund (IPEF) administered by SEBI and also given warning to him for adhering the Code of Conduct for prevention of Insider Trading strictly to avoid situations where the Company can levy penalties and take strict disciplinary actions as per Company's Code of Conduct.
6.	Reasons recorded in writing for taking action stated above.	Considering the explanation of Mr. Harish B P that his intention was to buy the equity share however inadvertently clicked on sale tab which result into contra trade and the aforesaid violation being his first transgression of the Code of Conduct.
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)	
	iMode of transfer to SEBI - IPEF (Online/Demand Draft)	Online

	<p>ii Details of transfer to SEBI – IEPF (Online/Demand Draft)</p> <p>In case of online:</p> <table border="1" data-bbox="337 348 938 821"> <thead> <tr> <th data-bbox="337 348 938 411">Particulars</th> </tr> </thead> <tbody> <tr> <td data-bbox="337 411 938 474">Name of the transferor</td> </tr> <tr> <td data-bbox="337 474 938 636">Bank Name, branch and Account number</td> </tr> <tr> <td data-bbox="337 636 938 699">UTR/Transaction referenceNumber</td> </tr> <tr> <td data-bbox="337 699 938 751">Transaction date</td> </tr> <tr> <td data-bbox="337 751 938 821">Transaction Amount (in Rs.)</td> </tr> </tbody> </table> <p>In case of Demand Draft (DD):</p>	Particulars	Name of the transferor	Bank Name, branch and Account number	UTR/Transaction referenceNumber	Transaction date	Transaction Amount (in Rs.)	<table border="1" data-bbox="971 327 1398 814"> <thead> <tr> <th data-bbox="971 327 1398 411">Details</th> </tr> </thead> <tbody> <tr> <td data-bbox="971 411 1398 474">Mr. Harish B P</td> </tr> <tr> <td data-bbox="971 474 1398 636">Bank Of India, Bandra Kurla Complex (BKC) 012210210000008</td> </tr> <tr> <td data-bbox="971 636 1398 699">IMPS/132815587309</td> </tr> <tr> <td data-bbox="971 699 1398 751">24.11.2021</td> </tr> <tr> <td data-bbox="971 751 1398 814">35/-</td> </tr> </tbody> </table> <p>Not applicable</p>	Details	Mr. Harish B P	Bank Of India, Bandra Kurla Complex (BKC) 012210210000008	IMPS/132815587309	24.11.2021	35/-
Particulars														
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IMPS/132815587309														
24.11.2021														
35/-														
9.	Any other relevant information	None												

Yours sincerely,

Date: November 26, 2021
Place: Mumbai

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

Annexure B

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	Mr. Sambit Mukherjee
	ii. PAN of the DP	BXFPM5429L
	iii. Designation of DP	Vice President - Project
	iv. Functional Role of DP	Mr. Sambit Mukherjee is software developer and he is responsible for software analysis, code analysis, requirement analysis, software review, identification of code metrics, system risk analysis, software reliability analysis and software modelling and simulation etc.
	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

XELPMOC DESIGN AND TECH LIMITED

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	ii No. of shares traded and value (Rs.) (Date-wise)	October 28, 2021: 10 equity shares were sold aggregating to Rs.4076.15/-.
	D. In case value of trade(s) is more than Rs 10 lacs in a calendar quarter –	
	iDate 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
	iiDate 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. Sambit Mukherjee had sold 10 equity shares of the Company on October 28, 2021 i.e. during the period, when the Trading Window was closed for Designated Persons and their immediate relatives and the said transaction of 10 equity shares was also falling under the Contra Trade as during the period of last 6 months on August 23, 2021, 10 equity shares were purchased by him at Rs.350/- per share aggregating to Rs.3,500/-
5.	Action taken by Listed company/ Intermediary / Fiduciary	The Company has directed to disgorge the amount of profit derived from aforesaid transaction i.e. Rs.576.15 (Rs.4076.15 – Rs.3,500/-) to Investors Protection and Education Fund (IPEF) administered by SEBI and also given warning to him for adhering the Code of Conduct for prevention of Insider Trading strictly to avoid situations where the Company can levy penalties and take strict disciplinary actions as per Company's Code of Conduct.
6.	Reasons recorded in writing for taking action stated above.	Considering the explanation of Mr. Sambit Mukherjee that said transaction was undertaken by him inadvertently under genuine belief that the trading window was opened and was not aware that the said transaction result into contra trade and the aforesaid violation being his first transgression of the Code of Conduct.
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)													
	iMode of transfer to SEBI - IPEF (Online/Demand Draft)	Online												
	ii Details of transfer to SEBI – IEPF (Online/Demand Draft) In case of online: <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 60%;">Particulars</th> <th style="width: 40%;">Details</th> </tr> </thead> <tbody> <tr> <td>Name of the transferor</td> <td>Mr. Sambit Mukherjee</td> </tr> <tr> <td>Bank Name, branch and Account number</td> <td>Axis Bank, Electronic Complex, Salt Lake City Branch, IFSC Code: UTIB0000319</td> </tr> <tr> <td>UTR/Transaction reference Number</td> <td>1. 9C8VKYKX5720 -Rs.575/- 2. MN6L54KX7703 - Rs.10/-</td> </tr> <tr> <td>Transaction date</td> <td>24.11.2021 / 26.11.2021</td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td>585/-</td> </tr> </tbody> </table> In case of Demand Draft (DD):	Particulars	Details	Name of the transferor	Mr. Sambit Mukherjee	Bank Name, branch and Account number	Axis Bank, Electronic Complex, Salt Lake City Branch, IFSC Code: UTIB0000319	UTR/Transaction reference Number	1. 9C8VKYKX5720 -Rs.575/- 2. MN6L54KX7703 - Rs.10/-	Transaction date	24.11.2021 / 26.11.2021	Transaction Amount (in Rs.)	585/-	 Not applicable
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9.	Any other relevant information	None												

Yours sincerely,

Date: November 26, 2021
Place: Mumbai

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