

AGC/SD/SE/2020/42

June 3, 2020

To,

Corporate Relationship Department Bombay Stock Exchange Limited P.J. Tower, Dalal Street, Fort, Mumbai 400001	Corporate Relationship Department The National Stock Exchange of India Limited Exchange Plaza, Bandra Kurla Complex, Bandra East, Mumbai 400051
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Sub: Submission of Report for violation of Code of Conduct under SEBI (Prohibition of Insider Trading) Regulation ("PIT Regulation")

Ref: AGC Networks Limited—Script Code: 5000463 NSE Symbol: AGCNET

Dear Sir/Madam,

Pursuant to SEBI Circular No. SEBI/HO/ISD/CIR/P/2019/82 dated July 19, 2019 on Standardisation Reporting of violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulation ("PIT Regulation") read with the applicable provisions of Schedule B of said Regulations, we wish to submit herewith a report on inadvertent violation by an Employee of AGC Networks Limited ("the Company") of the Code of Conduct adopted by the Company in accordance with said Regulations.

As directed in the said circular, we enclose herewith the report in the prescribed format as "Annexure A".

This is for your information and records.

Thanking you.

Yours Faithfully,

For AGC Networks Limited

Aditya Goswami
Company Secretary & Compliance Officer

Encl.: A./a.

Annexure A

Report by AGC Networks Limited (“Listed Company”) for violation related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations (“PIT Regulations”)

[Schedule B readwith Regulation 9(1) of SEBI (Prohibition of Insider Trading) Regulations (“PIT Regulations”)]

Sr. No.	Particulars	Details
1.	Name of the Listed Company/ intermediary/fiduciary	AGC Networks Limited
2.	Reporting in capacity of: - Listed Company - Intermediary - Fiduciary	Listed Company
3.	Name of the Designated Person (DP) Name of Immediate Relative of DP if reporting is for relative	Ms. Neelam Kapoor (DP) --
4.	PAN of the Designated Person (DP) PAN of Immediate Relative of DP if reporting is for relative	ADIPK8894P
5.	Designation of DP	Vice President & Head Marketing
6.	Functional Role of DP	Heads the Marketing, Communications and Public Relation function including Presence Marketing (Events, Website, Business Analyst outreach, Communications), Alliance marketing, PR and internal communications for the Company
7.	Whether DP is Promoter/Promoter Group/holding CXO level position (e.g. CEO,CFO,CTO etc.)	No
8.	Transaction Details (date-wise)	
	a) Date of Transaction b) Name of Scrip c) No of Shares traded (which includes pledge) and value (in Rs.)	9/04/2020 AGC Networks Limited Purchased 20 equity shares of the Company at the aggregate value of Rs. 4,807.46 (incl. of all taxes, charges & brokerage) from the market
9.	In case value of trade(s) is more than Rs. 10 Lacs in a calendar quarter – a) Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of PIT Regulations b) Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of PIT Regulations	Not Applicable

10.	Details of violations observed under PIT Regulations	Purchase of shares of the Company during trading window closure
11.	Action taken by Listed Company/Intermediary/ Fiduciary	Based on the directions of the Audit Committee, the management has directed the DP to sell off the said shares immediately upon expiry of period of Six months from the date of said acquisition/purchase. Provided that such date of sale transaction does not fall under any period of Trading Window Closure for said shares of the Company. Further, it is decided that in the event the DP makes a profit out of such sale transaction, an amount equivalent to the profit earned by her for sale of said shares will be deducted from her salary by the management of the Company.
12.	Reasons recorded in writing for taking actions stated above	The Company acknowledges that this was the first instance of violation done without any malafide intention. However, it was felt that the actions taken would be an appropriate measure to rectify to full extent the violation of the Code committed by the DP. The Company also believed that such action will serve to discourage any future instances of violation by any Designated Person or their relatives as well.
13.	Details of the previous instances of violations, if any, since last financial year	No
14.	Any other relevant information	--

Yours Faithfully,

For **AGC Networks Limited**

Aditya Goswami
Company Secretary & Compliance Officer

Date: June 3, 2020

Place: Mumbai