Aptech Limited
Regd. office: Aptech House
A-65, MIDC, Moroi, Andheri (E),
Mumbai - 400 093.
T: 91 22 2827 2300
F: 91 22 2827 2399
www aptech-worldwide corn

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3rd February, 2021

To,
BSE Limited
25th Floor, P J Towers,
Dalal Street,
Mumbai – 400 001
Scrip Code: 532475

To,
National Stock Exchange of India Limited
Exchange Plaza, Plot no. C/1, G Block,
Bandra-Kurla Complex
Bandra (E), Mumbai - 400 051.
Symbol: APTECHT

Dear Sir/Madam,

Sub.: Reporting to Stock Exchanges regarding violations under Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 relating to the Code of Conduct (CoC).

Ref.: SEBI/HO/ISD/ISD/CIR/P/2020/135 circular dated 23rd July, 2020

With reference to the above, enclosed herewith please find report on violations under SEBI (Prohibition of Insider Trading) Regulations, 2015 relating to the Code of Conduct by Designated person.

Kindly take the same on record.

Thanking you.

For Aptech Limited



Jagruti Shah
Company Secretary & Compliance Officer
Membership no.: F10909
Place: Mumbai

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Report by Aptech Limited for violations related to Code of Conduct under the SEBI (Prohibition of Insider Trading) Regulations, 2015

Sr. No.	Particulars	Details
1	Name of the Listed Company~~/ Intermediary/Fiduciary~~	Aptech Limited
2	Please tick appropriate checkbox Reporting in capacity of : √ Listed Company Intermediary Fiduciary	Listed Company
3	**A. Details of Designated Person (DP)**	
	i. Name of the DP	Shivom Nautiyal
	ii. PAN of the DP	ANCPN0353N
	iii. Designation of DP	Senior Executive - Finance & Accounts
	iv. Functional Role of DP	Senior Executive - Finance & Accounts
	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	NA
	ii. PAN of the immediate relative of DP	NA
	C. Details of transaction(s)	
	i. Name of the scrip	Aptech Limited
	ii. No of shares traded and value (Rs.) (Date-wise)	Date: 18th January, 2021 No. of shares: 50 Value: Rs. 9160/- Date: 25th January, 2021 No. of shares: 100 Value: Rs. 19,995/-
	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	Not Applicable, as the value of trade does not exceed Rs. 10 lacs in a calendar quarter
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable, as the value of trade does not exceed Rs. 10 lacs in a calendar quarter
4	Details of violations observed under Code of Conduct	Shares sold during trading window closure period.
5	Action taken by Listed company~~/ Intermediary/ Fiduciary~~	Warning letter has been issued to the Designated Person that he would not engage in any kind of dealings in the Equity Shares of the Company in violation of the Company's Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations,

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<table>
<tr><td></td><td></td><td>2015 and a monetary penalty of Rs. 6000/- (Rupees Six Thousand Only) out of the profits so earned by him on the said shares, has been imposed.

The aforesaid penalty has been duly submitted to the Investor Protection and Education Fund of SEBI.

The designated person has also been provided again with a copy of Code of Conduct. He has been further advised that in case of any subsequent violation stricter action(s) would be taken by the Company.</td></tr>
<tr><td>6</td><td>Reasons recorded in writing for taking action stated above</td><td>Matter was discussed with the Chairman of the Audit Committee immediately upon receipt of information about violation and it was suggested by the Audit committee Chairman to issue warning letter and levy penalty based on closing price of shares on the last day prior to closing of trading window.</td></tr>
<tr><td>7</td><td>Details of the previous instances of violations, if any, since last financial year</td><td>NIL</td></tr>
<tr><td rowspan="3">8</td><td>If any amount collected for Code of Conduct violation(s)</td><td>Rs. 6000/- was collected from Shivom Nautiyal as penalty towards the violation of CoC.</td></tr>
<tr><td>i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)</td><td>Online Payment</td></tr>
<tr><td>ii. Details of transfer/payment</td><td>
<table>
<tr><th>Particulars</th><th>Details</th></tr>
<tr><td>Name of the transferor</td><td>Aptech Limited</td></tr>
<tr><td>Bank Name, branch and Account number</td><td>HDFC Bank Limited, Nariman Point branch. Account no.: 00010110000364</td></tr>
<tr><td>UTR/Transaction reference Number</td><td>N033211392801812</td></tr>
<tr><td>Transaction date</td><td>2nd February, 2021</td></tr>
<tr><td>Transaction Amount (in Rs.)</td><td>6000/-</td></tr>
</table>
</td></tr>
</table>

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	In case of Demand Draft (DD): **Particulars** / **Details** Bank Name and branch DD Number DD date DD amount (in Rs.)	NA
9	Any other relevant information	NIL

Yours faithfully,



Jagruti Shah
Company Secretary & Compliance Officer
PAN: ADWPD1514B
Email ID: jagruti.shah@aptech.ac.in

Date: 3rd February, 2021
Place: Mumbai