



DCX SYSTEMS LIMITED
CIN: L31908KA2011PLC061686

(Formerly known as DCX Cable Assemblies Pvt Ltd)

An AS 9100D

Certified

Regd. Off. Add.: Aerospace SEZ Sector, Plot Nos. 29,30 and
107, Hitech Defence and Aerospace Park, Kavadasanahalli,
Bengaluru Rural – 562110, Karnataka, India

Email:cs@dexindia.com

Tel: 080-67119555

Web:www.dexindia.com

Date: 13-09-2023

The Manager Corporate Relationship Department BSE Limited Floor 25, Phiroze Jeejeebhoy Towers Dalal Street, Mumbai- 400001 Scrip: 543650	The Manager – Listing Department National Stock Exchange of India Limited Exchange Plaza, Bandra Kurla Complex, Bandra (East), Mumbai- 400051 Symbol: DCXINDIA
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Dear Sir/Madam,

Subject: Reporting of non-compliance by Designated Person of DCX Code of Conduct to Regulate, Monitor and Report Trading by Designated Person as required by SEBI (Prohibition of Insider Trading) Regulations, 2015

This is with reference to the above-mentioned subject.

Please find attached herewith a Report (in prescribed format) on non-compliance by Designated Persons of DCX Code of Conduct to Regulate, Monitor and Report Trading by Designated Person as required by SEBI (Prohibition of Insider Trading) Regulations, 2015.

Kindly acknowledge the receipt.

Yours Faithfully,
For **DCX Systems Limited**

Nagaraj R. Dhavaskar
Company Secretary, Legal and Compliance Officer
M. No: F12503



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Report by DCX Systems Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations 2015		
S. No.	Particulars	Details
1.	Name of the listed company/ Intermediary / Fiduciary	DCX Systems Limited
2.	Please tick appropriate checkbox Reporting in Capacity of: <ul style="list-style-type: none"> • Listed Company • Intermediary • Fiduciary 	Listed Company
3.	A. Details of Designated Person (DP)	
	i. Name of the DP	Mr. Atul Dhondiram Mutthe
	ii. PAN of the DP	BFKPM8140R
	iii. Designation of DP	Quality Manager
	v. Functional Role of DP	Quality Management
	v. Whether DP is Promoter or belongs to Promoter Group	No
	B. If Reporting is for immediate relative of DP	NA
	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	NSE: DCXINDIA / BSE:543650
	ii. No. of shares traded and value (Rs.) (Date- wise)	Purchase: March 29, 2023: 10 equity shares, @ Rs. 141.45 per share, Valuing Rs. 1414.50. Sale: June 20, 2023; 10 equity shares, @ Rs. 284.20 per share, valuing Rs. 2842.00.
	D. In case value of trade(s) is more than Rs. 10 lacs in a calendar quarter	NA



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	i. 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	NA
	ii. Date of intimation of trade(s) by Company to Stock Exchange under regulation 7 of SEBI (Prohibition of Insider Trading) Regulations 2015	NA
4.	Details of violations observed under SEBI (Prohibition of Insider Trading) Regulations 2015	Contra Trade i.e., selling shares held within 6 months of buying the same as against the provisions of Code of Conduct - Insider Trading Policy of DCX Systems Limited (as per compliance of Clause 10 of Schedule B of SEBI (Prohibition of Insider Trading) Regulations, 2015)
5.	Action taken by Listed Company/ Intermediary/ Fiduciary	The Company has taken the following actions against Mr. Atul Mutthe: i. Instructed to transfer the profit amount of Rs. 1,427.50/- of such contra trade to be deposited in SEBI-IPEF account. ii. Issued warning letter and requested him to be more cautious and to adhere to the Code of Conduct Policy in future or face severe consequences and to comply with the provisions of the Code in letter and spirit.
6.	Reasons recorded in writing for taking action stated above	i. The first transaction of PURCHASE & the contra trade of SALE transaction were done within 6 months, instead of giving a gap of six months, as per the Company's PIT Code. ii. Both transactions were done while trading window was open.



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		<ul style="list-style-type: none"> iii. Taken together, DP made profit of Rs. 1,427.50/- iv. DP confirmed that he was not holding any UPSI. v. The value of the transactions was lower than the threshold set for taking pre-clearance from the Company. vi. This was the first time this DP has dealt in the Company's shares. vii. First instance of non-compliance by this DP. viii. Present lapse appeared to be an inadvertent action and did not seem to reflect any mala-fide intent on the part of DP.
7.	Details of the previous instances of violations, if any, since last financial year	None
8.	If any amount collected for Code of Conduct violation(s)	Yes, the profit made to be transferred to SEBI-IPEF account
	i. Mode of transfer to SEBI - IPEF	Online transfer
	ii. Details of transfer/payment made On-line	<ul style="list-style-type: none"> i. Name of the transferor: Mr. Atul Dhondiram Mutthe ii. Bank Name, branch and Account number & Transaction details: Bank Name: ICICI Bank Account Number: 343901516639 IFSC Code: ICIC0003439 Branch: Koramangala Transaction ID: T2309081656421246622427 UTR:325105919379 iii. Transaction date 07-09-2023 iv. Transaction Amount (in Rs) - 1,427.50/-
9.	Any other relevant information	NA