



Date: 05-01-2022

To  
**National Stock Exchange of India Limited**  
**Compliance Department,**  
Exchange Plaza, Bandra Kurla Complex,  
Bandra (East), Mumbai – 400 0051,  
Maharashtra, India

To  
**BSE Limited**  
**Compliance Department,**  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai – 400 001,  
Maharashtra, India

**Subject: Report on violation of code of conduct under SEBI (Prohibition of Insider Trading) Regulation, 2015**

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

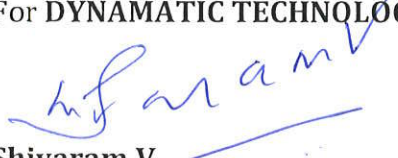
Dear Sir/Madam,

With reference to the captioned subject, please find enclosed a report on violation of Company's Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

Kindly take this on record.

Thanking you,

For **DYNAMATIC TECHNOLOGIES LIMITED**

  
**Shivaram V**  
Head – Legal, Compliance & Company Secretary

Enclosure: as above



**Report by Dynamatic Technologies Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.**

| Sr. No. | Particulars                                                                                                                                                                                    | Details                                                                                                    |
|---------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------|
| 1       | Name of the listed company/<br>Intermediary/Fiduciary                                                                                                                                          | Dynamatic Technologies Limited                                                                             |
| 2       | <i>Please tick appropriate checkbox</i><br>Reporting in capacity of:<br><input type="checkbox"/> Listed Company<br><input type="checkbox"/> Intermediary<br><input type="checkbox"/> Fiduciary | Listed Company                                                                                             |
| 3       | <b>A. Details of Designated Person (DP)</b>                                                                                                                                                    |                                                                                                            |
|         | i. Name of the DP                                                                                                                                                                              | Suresh J Naidu                                                                                             |
|         | ii. PAN of the DP                                                                                                                                                                              | ABCPN0050E                                                                                                 |
|         | iii. Designation of DP                                                                                                                                                                         | Retainer                                                                                                   |
|         | iv. Functional Role of DP                                                                                                                                                                      | Retainer                                                                                                   |
|         | v. Whether DP is Promoter or belongs to Promoter Group                                                                                                                                         | No                                                                                                         |
|         | <b>B. If Reporting is for immediate relative of DP</b>                                                                                                                                         |                                                                                                            |
|         | i. Name of the immediate relative of DP                                                                                                                                                        | Not Applicable                                                                                             |
|         | ii. PAN of the immediate relative of DP                                                                                                                                                        | Not Applicable                                                                                             |
|         | <b>C. Details of transaction(s)</b>                                                                                                                                                            |                                                                                                            |
|         | i. Name of the scrip                                                                                                                                                                           | NSE: DYNAMATECH<br>BSE: 505242                                                                             |
|         | ii. No of shares traded and value (Rs.)<br>(Date- wise)                                                                                                                                        | Sold 850 Shares of the Company on 1 <sup>st</sup> December, 2021, @ 2152.73 aggregating to Rs. 18,29,821/- |
|         | <b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar Quarter</b>                                                                                                              |                                                                                                            |



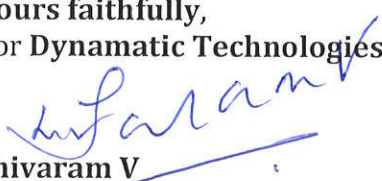
| Sr. No. | Particulars                                                                                                                                      | Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|---------|--------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|         | i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015 | 4 <sup>th</sup> Jan 2022                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|         | ii. Date of intimation of trade(s) by Company to stock Exchanges under regulation 7 of SEBI (PIT) Regulations, 2015                              | 5 <sup>th</sup> Jan 2022                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| 4       | Details of violations observed under Code of Conduct                                                                                             | Violation of clause 8 & clause 11 of the Company's code of conduct for Prevention of Insider Trading and clause 7(2) of SEBI (PIT) Regulations 2015. Delayed Reporting.                                                                                                                                                                                                                                                                                                                                                                                           |
| 5       | Action taken by Listed company/ Intermediary/ Fiduciary                                                                                          | <p>Company has issued a warning letter to Mr. Suresh J Naidu for violations provided above and a lump sum penalty of Rs. 20,000/- is imposed upon DP which is commensurate with default committed by DP and the same has been remitted to IEPPF account.</p> <p>The DP has also been provided again with a copy of Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015. He has been further advised that in case of any subsequent violation stricter action(s) will be taken by the Company including termination of retainership.</p> |
| 6       | Reasons recorded in writing for taking action stated above                                                                                       | <p>Considering the fact that Mr. Suresh J Naidu had no previous instances of violations under the Code of Conduct, the company has issued a warning letter with a lump sum penalty of Rs. 20,000/- based on the following observations:</p> <p>DP has sold the shares when the trading window was open.</p> <p>DP is only a retainer and not a regular employee of the company.</p> <p>DP did not possess any unpublished price sensitive information.</p>                                                                                                        |

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|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|   |                                                                                                                                                                                                                                                                                                                                                                 | <p>The reporting was inadvertently missed by the DP and is procedural lapse from his side.</p> <p>The DP has agreed that in the future he will not carry out any trade without ascertaining appropriate approvals.</p> |
| 7 | Details of the previous instances of violations, if any, since last financial year                                                                                                                                                                                                                                                                              | Nil                                                                                                                                                                                                                    |
| 8 | <p>If any amount collected for Code of Conduct violation(s): The lump sum penalty of Rs. 20,000/- has been collected from DP and the same will be remitted via online to SEBI – IPEF.</p> <p>i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)</p> <p>ii. Details of transfer/payment</p> <p>In case of Online:</p> <p>In case of Demand Draft (DD):</p> | <p>Will be transferred through online shortly</p>                                                                                                                                                                      |
| 9 | Any other relevant information: None                                                                                                                                                                                                                                                                                                                            |                                                                                                                                                                                                                        |

**Yours faithfully,**  
**For Dynamatic Technologies Limited**

  
**Shivaram V**  
**Head – Legal, Compliance & Company Secretary**  
**PAN: ADSPV9179N**  
**Email ID: [shivaram.v@dynamatics.net](mailto:shivaram.v@dynamatics.net)**