



9<sup>th</sup> May 2024

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

**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 herewith a report on violations of Company's Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 by the Designated Persons and/or their immediate relatives.

Kindly take this on record.

Thanking you,

For **DYNAMATIC TECHNOLOGIES LIMITED**

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

Enclosure: as above

Registered Office  
Dynamatic Technologies Limited  
JKM Plaza Dynamatic Aerotropolis  
55 KIADB Aerospace Park  
Bangalore 562 149 India  
Tel +91 80 2111 1223 +91 80 2204 0535

[www.dynamics.com](http://www.dynamics.com)

Corporate Identity Number: L72200KA1973PLC002308



**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/ Intermediary/Fiduciary	Dynamatic Technologies Limited
2	Please tick appropriate checkbox Reporting in capacity of: <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <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	ROOPESH SURESH NAIDU (Son of DP)
	ii. PAN of the immediate relative of DP	AFUPN2050G
	<b>C. Details of transaction(s)</b>	
	i. Name of the scrip	NSE: DYNAMATECH BSE: 505242
	ii. No of shares traded and value (Rs.) (Date- wise)	Attached as Annexure 1
	<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar Quarter</b>	

Registered Office  
Dynamatic Technologies Limited  
JKM Plaza Dynamatic Aerotropolis  
55 KIADB Aerospace Park  
Bangalore 562 149 India  
Tel +91 80 2111 1223 +91 80 2204 0535

www.dynamatics.com

Corporate Identity Number: L72200KA1973PLC002308

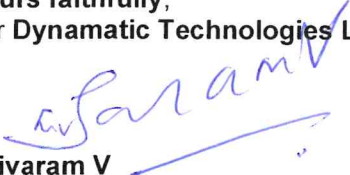


Sr. No.	Particulars	Details
	i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	2 <sup>nd</sup> May 2024
	ii. Date of intimation of trade(s) by Company to Stock Exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	3 <sup>rd</sup> May 2024
4	Details of violations observed under Code of Conduct	a) Immediate Relative executed trade in excess of Rs. 10 lakhs in a calendar quarter without obtaining pre-clearance; and failed to make requisite disclosures to the company within a period of two trading days of the transaction(s). b) Immediate Relative executed contra trade.
5	Action taken by Listed company/ Intermediary/ Fiduciary	The company took the following actions:  a. Sought explanation for the said violation. b. Issued warning letter against any future violation. c. The company has levied a penalty of Rs. 40,000/- upon the immediate relative of the DP which is commensurate with the default committed by DP and instructed to disgorge profit accrued through the transactions amounting to Rs. 33,374/- and directed to deposit the same to Investors Protection and Education Fund (IPEF) administered by SEBI.
6	Reasons recorded in writing for taking action stated above	The Company took aforesaid actions considering the following:  a. Immediate Relative of DP has traded inadvertently without obtaining preclearance of trade. b. Immediate Relative of DP did not possess any UPSI at the time of trade. c. Immediate Relative of DP and DP have agreed that in future they will not carry out any trades without ascertaining appropriate approvals.  Registered Office Dynamatic Technologies Limited JKM Plaza Dynamatic Aerotropolis 55 KIADB Aerospace Park Bangalore 562 149 India Tel +91 80 2111 1223 +91 80 2204 0535



7	Details of the previous instances of violations, if any, since last financial year	Nil
8	If any amount collected for Code of Conduct violation(s): The penalty of Rs. 73,374/- has been remitted via online to SEBI – IPEF.	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Transferred through online
	ii. Details of transfer/payment In case of Online: UTR No: <b>Particulars Details:</b> Name of the transferor: Roopesh Suresh Naidu Bank Name: HDFC Bank, Branch: Marathahalli, Bangalore Account number: 50100084234331 UTR/Transaction reference Number: 449546473582 Transaction date: 08-05-2024 Transaction Amount (in ₹) : 73,374/- In case of Demand Draft (DD): NA  In case of Demand Draft (DD):	
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)

Registered Office  
Dynamatic Technologies Limited  
JKM Plaza Dynamatic Aerotropolis  
55 KIADB Aerospace Park  
Bangalore 562 149 India  
Tel +91 80 2111 1223 +91 80 2204 0535

[www.dynamatics.com](http://www.dynamatics.com)

Corporate Identity Number: L72200KA1973PLC002308

**Annexure 1**

Date	Nature of Transaction (Buy / Sell)	No of shares	Value
13-06-2023	Buy	33	113849.2
14-06-2023	Buy	20	69126.45
15-06-2023	Buy	3	10824.3
16-06-2023	Buy	8	29304.1
21-06-2023	Sold	64	232515.6
21-06-2023	Buy	70	263132.8
22-06-2023	Buy	5	18803.75
13-03-2024	Sold	75	492551.5
14-03-2024	Buy	140	918339.2
15-03-2024	Buy	15	102463.6
19-03-2024	Sold	155	1044766

Registered Office  
Dynamatic Technologies Limited  
JKM Plaza Dynamatic Aerotropolis  
55 KIADB Aerospace Park  
Bangalore 562 149 India  
Tel +91 80 2111 1223 +91 80 2204 0535

[www.dynamics.com](http://www.dynamics.com)

Corporate Identity Number: L72200KA1973PLC002308



**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/ Intermediary/Fiduciary	Dynamatic Technologies Limited
2	<i>Please tick appropriate checkbox</i> Reporting in capacity of: <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	Padmaprabha
	ii. PAN of the DP	AHEPP6117C
	iii. Designation of DP	General Manager
	iv. Functional Role of DP	General Manager
	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	T S Ramesh (Spouse of DP)
	ii. PAN of the immediate relative of DP	AAPPR3601R
	<b>C. Details of transaction(s)</b>	
	i. Name of the scrip	NSE: DYNAMATECH BSE: 505242
	ii. No of shares traded and value (Rs.) (Date- wise)	Attached as Annexure 1.
	<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar Quarter</b>	

Registered Office  
Dynamatic Technologies Limited  
JKM Plaza Dynamatic Aerotropolis  
55 KIADB Aerospace Park  
Bangalore 562 149 India  
Tel +91 80 2111 1223 +91 80 2204 0535

www.dynamatics.com

Corporate Identity Number: L72200KA1973PLC002308



Sr. No.	Particulars	Details
	i. Date of intimation of trade(s) DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	2 <sup>nd</sup> May 2024
	ii. Date of intimation of trade(s) by Company to Stock Exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	3 <sup>rd</sup> May 2024
4	Details of violations observed under Code of Conduct	<p>a) Immediate Relative executed trade in excess of Rs. 10 lakhs in a calendar quarter without obtaining pre-clearance; and failed to make requisite disclosures to the company within a period of two trading days of the transaction(s).</p> <p>b) Immediate Relative executed contra trade.</p>
5	Action taken by Listed company/ Intermediary/ Fiduciary	<p>The company took the following actions:</p> <p>a. Sought explanation for the said violation.</p> <p>b. Issued warning letter against any future violation.</p> <p>c. The company has levied a penalty of Rs. 20,000/- upon the immediate relative of the DP which is commensurate with the default committed by DP and directed to deposit the same to Investors Protection and Education Fund (IPEF) administered by SEBI.</p>
6	Reasons recorded in writing for taking action stated above	<p>The Company took aforesaid actions considering the following:</p> <p>a. First time violation of the immediate relative of DP.</p> <p>b. Immediate Relative of DP did not possess any UPSI at the time of trade.</p> <p>Registered Office                      Dynamatic Technologies Limited                      JKM Plaza Dynamatic Aerotropolis                      55 KIADB Aerospace Park                      Bangalore 562 149 India                      Tel +91 80 2111 1223 +91 80 2204 0535</p>



7	Details of the previous instances of violations, if any, since last financial year	Nil
8	If any amount collected for Code of Conduct violation(s): The lump sum penalty of Rs. 20,000/- has been remitted via online to SEBI – IPEF.	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Transferred through online
	ii. Details of transfer/payment In case of Online: <b>Particulars Details:</b> Name of the transferor: T S Ramesh Bank Name: Canara Bank, Branch: NH branch, Bangalore Account number: 3021101111557 UTR/Transaction reference Number: 240508184700538 Transaction date: 08-05-2024 Transaction Amount (in ₹) : 20,000/- In case of Demand Draft (DD): NA	
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)**

Registered Office  
Dynamatic Technologies Limited  
JKM Plaza Dynamatic Aerotropolis  
55 KIADB Aerospace Park  
Bangalore 562 149 India  
Tel +91 80 2111 1223 +91 80 2204 0535

[www.dynamatics.com](http://www.dynamatics.com)

Corporate Identity Number: L72200KA1973PLC002308



### Annexure 1

Date	Nature of Transaction (Buy / Sell)	No of shares	Value
<b>ICICI Sec</b>			
16.02.2024	Buy	10	69701.65
05.03.2024	Buy	4	29708
18.03.2024	Sold	14	94396.1
<b>HDFC Sec</b>			
16.02.2024	Buy	29	201136.3
20.02.2024	Sold	15	103980.8
21.02.2024	Sold	14	98067.55
27.02.2024	Buy	7	52189.38
28.02.2024	Buy	3	22849.3
29.02.2024	Buy	3	21770.49
05.03.2024	Buy	17	128337.2
06.03.2024	Buy	2	15042.57
11.03.2024	Buy	8	57767.07
12.03.2024	Buy	3	21164.7
13.03.2024	Buy	2	13687.77
18.03.2024	Sold	15	102318.7
21.03.2024	Sold	10	66626.65
27.03.2024	Sold	20	145695.1

Registered Office  
Dynamatic Technologies Limited  
JKM Plaza Dynamatic Aerotropolis  
55 KIADB Aerospace Park  
Bangalore 562 149 India  
Tel +91 80 2111 1223 +91 80 2204 0535

[www.dynamics.com](http://www.dynamics.com)

Corporate Identity Number: L72200KA1973PLC002308



**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/ Intermediary/Fiduciary	Dynamatic Technologies Limited
2	Please tick appropriate checkbox Reporting in capacity of: <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	Listed Company
3	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	Ajay Kumar
	ii. PAN of the DP	AELPA7132C
	iii. Designation of DP	ID
	iv. Functional Role of DP	Director
	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 BSE: 505242
	ii. No of shares traded and value (Rs.) (Date- wise)	Bought 10 shares on 25.01.2024
	<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar Quarter</b>	

Registered Office  
Dynamatic Technologies Limited  
JKM Plaza Dynamatic Aerotropolis  
55 KIADB Aerospace Park  
Bangalore 562 149 India  
Tel +91 80 2111 1223 +91 80 2204 0535

www.dynamatics.com

Corporate Identity Number: L72200KA1973PLC002308



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	Not Applicable
	ii. Date of intimation of trade(s) by Company to stock Exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable
4	Details of violations observed under Code of Conduct	DP traded during the trading window closure period.
5	Action taken by Listed company/ Intermediary/ Fiduciary	The company took the following actions: a. Sought explanation for the said violation. b. Cautioned DP not to repeat any violation in future under the Code.
6	Reasons recorded in writing for taking action stated above	Since this was only a first instance, and the quantity being very minimal and considering that the trade had happened inadvertently as informed by DP, the Company cautioned him to not to execute any trades in the future.
7	Details of the previous instances of violations, if any, since last financial year	Nil
8	If any amount collected for Code of Conduct violation(s): NA	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	NA
	ii. Details of transfer/payment  In case of Online:  In case of Demand Draft (DD):	
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)

Registered Office  
Dynamatic Technologies Limited  
JKM Plaza Dynamatic Aerotropolis  
55 KIADB Aerospace Park  
Bangalore 562 149 India  
Tel +91 80 2111 1223 +91 80 2204 0535

[www.dynamatics.com](http://www.dynamatics.com)

Corporate Identity Number: L72200KA1973PLC002308