

19<sup>th</sup> April 2021

To:

**National Stock Exchange of  
India Limited (stock code:  
“FSL”)**

Exchange Plaza,  
Plot no. C/1, G Block,  
Bandra-Kurla Complex,  
Bandra (East)  
Mumbai - 400 051.

**BSE Limited (stock code:  
532809)**

Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai - 400 001

Dear Madam/ Sir,

**Sub.: Inadvertent Trading by the Connected Person**

This is to inform you that in terms of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“the SEBI Regulations”), Firstsource Solutions Code of Conduct for Prohibition of Insider Trading (“the Code”), and SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated 23<sup>rd</sup> July, 2020; the details of violation of the Code by the Immediate Relative of the Designated Person along with the action taken by the Company thereon are enclosed as “**Annexure A**” to this letter.


We would like to submit that the reported deviation is not material in relation to the total paid up equity share capital of the Company.

You are kindly requested to take the above on record.

**Thanking you,**

For **Firstsource Solutions Limited**

POOJA  
SURESH  
NAMBIAR

 Digitally signed by  
POOJA SURESH NAMBIAR  
Date: 2021.04.19 21:27:02  
+05'30'

**Pooja Nambiar**  
**Company Secretary & Compliance Officer**

**FIRSTSOURCE SOLUTIONS LTD.,**

Paradigm B, 5th Floor, Mindspace, New Link Road, Malad (W), Mumbai - 400 064, India.  
Tel: +91 22 6666 0888 | Fax: +91 22 6666 0887 | Web: www.firstsource.com

**Annexure A**

**Report by Firstsource Solutions Limited for violations related to Code of Conduct under SEBI  
(Prohibition of Insider trading) Regulations, 2015**

| <b>Sr. No.</b> | <b>Particulars</b>   | <b>Details</b>                |
|----------------|--|-------------------------------|
| 1.             | Name of the listed Company/ <del>Intermediary</del> /Fiduciary   | Firstsource Solutions Limited |
| 2.             | <i>Please tick appropriate Checkbox.</i><br>Reporting in capacity of:<br><input checked="" type="checkbox"/> Listed Company<br><input type="checkbox"/> Intermediary<br><input type="checkbox"/> Fiduciary | -                             |
| 3.             | <b>A. Details of Designated Person (DP)</b>  |                               |
|                | i. Name of the Designated Person (DP)  | Ms. Neha Jain                 |
|                | i. PAN of the DP   | ATPPJ8774J                    |
|                | iii. Designation of DP   | Senior Manager- Finance       |
|                | iv. Functional Role of DP  | Corporate Planning            |
|                | v. Whether DP is Promoter or belongs to Promoter   | No                            |
|                | <b>B. If Reporting is for immediate relative of DP</b>   |                               |
|                | i. Name of the immediate relative of DP  | Mr. Rahul Jain                |
|                | ii. PAN of the immediate relative of DP  | ANGPJ8060Q                    |
|                | <b>C. Details of transaction(s)</b>  |                               |
|                | i. Name of the scrip   | FSL                           |
|                | ii. No of shares traded and value (Rs.) (Date- wise)   | As per <b>Annexure I</b>      |
|                | <b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter</b>  |                               |
|                | i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under Regulation 7 of SEBI (PIT) Regulations, 2015.  | N.A.                          |
|                | ii. Date of intimation of trade(s) by Company to Stock Exchanges under Regulation 7 of SEBI (PIT) Regulations, 2015.   | N.A.                          |
| 4.             | Details of violations observed under Code of Conduct   | Contra Trades executed        |

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| 5.                                   | Action taken by Listed Company/ <del>Intermediary/ Fiduciary</del>  | A warning notice was issued to the DP.   |         |                        |  |                                      |  |                           |  |                    |  |                             |  |  |
|--------------------------------------|---|--|---------|------------------------|--|--------------------------------------|--|---------------------------|--|--------------------|--|-----------------------------|--|--|
| 6.                                   | Reasons recorded in writing for taking action stated above  | The aforesaid action was taken after taking into account the following factors:<br>1. the quantum of shares involved and<br>2. it being first instance of non-compliance (procedural) on the part of the immediate relative of DP. |         |                        |  |                                      |  |                           |  |                    |  |                             |  |  |
| 7.                                   | Details of previous instances of violations, if any, since last financial year  | None   |         |                        |  |                                      |  |                           |  |                    |  |                             |  |  |
| 8.                                   | If any amount collected for Code of Conduct violation(s):   |  |         |                        |  |                                      |  |                           |  |                    |  |                             |  |  |
|                                      | i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)  | N.A.   |         |                        |  |                                      |  |                           |  |                    |  |                             |  |  |
|                                      | ii. Details of transfer/payment   | N.A.   |         |                        |  |                                      |  |                           |  |                    |  |                             |  |  |
|                                      | <b>In case of Online:</b>   |  |         |                        |  |                                      |  |                           |  |                    |  |                             |  |  |
|                                      | <table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Name of the transferor</td> <td></td> </tr> <tr> <td>Bank Name, branch and Account number</td> <td></td> </tr> <tr> <td>UTR/Transaction reference</td> <td></td> </tr> <tr> <td>Transaction date</td> <td></td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td></td> </tr> </tbody> </table> | Particulars  | Details | Name of the transferor |  | Bank Name, branch and Account number |  | UTR/Transaction reference |  | Transaction date   |  | Transaction Amount (in Rs.) |  |  |
| Particulars                          | Details   |  |         |                        |  |                                      |  |                           |  |                    |  |                             |  |  |
| Name of the transferor               |   |  |         |                        |  |                                      |  |                           |  |                    |  |                             |  |  |
| Bank Name, branch and Account number |   |  |         |                        |  |                                      |  |                           |  |                    |  |                             |  |  |
| UTR/Transaction reference            |   |  |         |                        |  |                                      |  |                           |  |                    |  |                             |  |  |
| Transaction date                     |   |  |         |                        |  |                                      |  |                           |  |                    |  |                             |  |  |
| Transaction Amount (in Rs.)          |   |  |         |                        |  |                                      |  |                           |  |                    |  |                             |  |  |
|                                      | <b>In case of Demand Draft (DD):</b>  |  |         |                        |  |                                      |  |                           |  |                    |  |                             |  |  |
|                                      | <table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Bank Name and branch</td> <td></td> </tr> <tr> <td>DD Number</td> <td></td> </tr> <tr> <td>DD date</td> <td></td> </tr> <tr> <td>DD amount (in Rs.)</td> <td></td> </tr> </tbody> </table>  | Particulars  | Details | Bank Name and branch   |  | DD Number                            |  | DD date                   |  | DD amount (in Rs.) |  |                             |  |  |
| Particulars                          | Details   |  |         |                        |  |                                      |  |                           |  |                    |  |                             |  |  |
| Bank Name and branch                 |   |  |         |                        |  |                                      |  |                           |  |                    |  |                             |  |  |
| DD Number                            |   |  |         |                        |  |                                      |  |                           |  |                    |  |                             |  |  |
| DD date                              |   |  |         |                        |  |                                      |  |                           |  |                    |  |                             |  |  |
| DD amount (in Rs.)                   |   |  |         |                        |  |                                      |  |                           |  |                    |  |                             |  |  |
| 9.                                   | Any other relevant information  | None   |         |                        |  |                                      |  |                           |  |                    |  |                             |  |  |

Yours Faithfully,

**POOJA SURESH NAMBIAR**  
Digitally signed by POOJA SURESH NAMBIAR  
Date: 2021.04.19 21:27:21 +05'30'

Name and signature of Compliance Officer: Ms. Pooja Nambiar

Email id: [Pooja.nambiar@firstsource.com](mailto:Pooja.nambiar@firstsource.com)

Contact No.: 022 66660888

Date: 19<sup>th</sup> April 2021

Place: Mumbai

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### Annexure I

| Date       | Exchange | Action | Quantity | Ord. Price |
|------------|----------|--------|----------|------------|
| 25/08/2020 | NSE      | BUY    | 500      | 62         |
| 26/08/2020 | NSE      | BUY    | 100      | 67         |
| 26/08/2020 | NSE      | BUY    | 100      | 66.5       |
| 26/08/2020 | NSE      | BUY    | 200      | 66         |
| 27/08/2020 | NSE      | BUY    | 100      | 63         |
| 27/08/2020 | NSE      | BUY    | 100      | 63.5       |
| 31/08/2020 | NSE      | BUY    | 400      | 62         |
| 08/09/2020 | NSE      | SELL   | 1500     | 66         |
| 08/09/2020 | NSE      | BUY    | 1000     | 63         |
| 14/09/2020 | NSE      | SELL   | 1000     | 69         |
| 30/09/2020 | NSE      | BUY    | 500      | 72.15      |
| 30/09/2020 | NSE      | BUY    | 500      | 72         |
| 21/12/2020 | NSE      | BUY    | 300      | 71.5       |
| 28/12/2020 | NSE      | SELL   | 800      | 99         |
| 28/12/2020 | NSE      | SELL   | 300      | 100        |
| 26/02/2021 | NSE      | BUY    | 300      | 98         |

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