



**NIIT Limited**

Registered Office:  
Plot No 85, Sector 32,  
Institutional Area,  
Gurugram 122 001,  
(Haryana) India  
Tel:+91 (124) 4293000  
Fax:+91 (124) 4293333  
Email: info@niit.com

CIN: L74899DL1981PLC015865

www.niit.com

August 4, 2022

The Manager  
**National Stock Exchange of India Ltd**  
Listing Department  
Exchange Plaza  
5<sup>th</sup> Floor, Plot no C/1, G Block  
Bandra Kurla Complex  
Bandra (E), Mumbai – 400 051

**The Manager**  
**BSE Limited**  
Corporate Relationship Department,  
1<sup>st</sup> Floor, New Trading Ring,  
Rotunda Building  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Mumbai- 400 001

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

**Scrip Code : BSE – 500304; NSE – NIITLTD**

Dear Sir,


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 NIIT 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.

Thanking you,

Yours truly,  
For **NIIT Limited**

  
Deepak Bansal  
Company Secretary &  
Compliance Officer

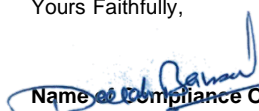
Encs: a/a

**Report by NIIT 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/ <del>Intermediary</del> /Fiduciary	NIIT Limited
2.	<i>Please tick appropriate checkbox</i> Reporting In Capacity Of: <input checked="" 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	Vaibhav Behl
	ii. PAN of the DP	AOZPB7685M
	iii. Designation of DP	Senior Manager
	iv. Functional Role of DP	Member - Internal Audit Team
	v. Whether DP is Promoter or belongs to Promoter Group	No
	<b>B. If Reporting is for immediate relative of DP</b>	Not applicable
	i. Name of the immediate relative of DP	-
	ii. PAN of the immediate relative of DP	-
	<b>C. Details of transaction(s)</b>	
	i. Name of the scrip	Equity Share of NIIT Limited
	ii. No. of shares traded and value (Rs.) (Date- wise)	Purchase : June 01, 2022: 409 equity shares, Rs. 194,286.85  Sale: June 17, 2022; 409 equity shares; Rs. 152,016.05
	<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 (Prohibition of Insider Trading) Regulations 2015	Not applicable
	ii. Date of intimation of trade(s) by Company to Stock Exchange under regulation 7 of SEBI (Prohibition of Insider Trading) Regulations 2015	Not applicable

4.	Details of violations observed under SEBI (Prohibition of Insider Trading) Regulations 2015	Contra Trade i.e., selling Company shares within 6 months of buying the same as per Clause 11.1 of NIIT Code (as per compliance of Clause 10 of Schedule B of SEBI (Prohibition of Insider Trading) Regulations, 2015)												
5.	Action taken by Listed Company/ <del>Intermediary/</del> <del>Fiduciary</del>	The Company has taken following actions against Mr. Vaibhav Behl: <ul style="list-style-type: none"> <li>- Levied a monetary penalty of Rs. 10,000/-, to be deposited in SEBI-IPEF account.</li> <li>- Issued warning letter to be more cautious in future or face severe consequences and to comply with the provisions of the Code in letter and spirit.</li> </ul>												
6.	Reasons recorded in writing for taking action stated above	<ul style="list-style-type: none"> <li>- The first transaction of PURCHASE &amp; the contra trade of SALE transaction were done in the same month instead of giving a gap of six months, as per the Company's PIT Code.</li> <li>- Both transactions were done while trading window was open</li> <li>- Taken together, DP did not make any profit; instead, a loss of Rs. 42,270.80</li> <li>- DP confirmed that he was not holding UPSI</li> <li>- The value of the transactions were lower than the threshold set for taking pre-clearance from the CO</li> <li>- This was the first time this DP has dealt in the Company's shares</li> <li>- First instance of non-compliance by this DP</li> <li>- Present lapse appeared to be an inadvertent action and did not seem to reflect any mala-fide intent on the part of DP</li> </ul>												
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												
	i. Mode of transfer to SEBI - IPEF	Online transfer												
	ii. Details of transfer/payment <b>made On-line</b>	<table border="1"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Name of the transferor</td> <td>Vaibhav Behl</td> </tr> <tr> <td>Bank Name, branch and Account number</td> <td>ICICI Bank - xxxxxxxx48</td> </tr> <tr> <td>UTR/ Transaction reference number</td> <td>456947034</td> </tr> <tr> <td>Transaction date</td> <td>01-08-2022</td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td>Rs. 10,000.00</td> </tr> </tbody> </table>	Particulars	Details	Name of the transferor	Vaibhav Behl	Bank Name, branch and Account number	ICICI Bank - xxxxxxxx48	UTR/ Transaction reference number	456947034	Transaction date	01-08-2022	Transaction Amount (in Rs.)	Rs. 10,000.00
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Transaction date	01-08-2022													
Transaction Amount (in Rs.)	Rs. 10,000.00													
9.	Any other relevant information	N.A.												

Yours Faithfully,



Name of Compliance Officer: Deepak Bansal

PAN: ABTPB4125B

Email ID: [deepak.bansal@niit.com](mailto:deepak.bansal@niit.com)

Date: August 4, 2022

Place: Delhi