



AIL/SE/PIT/2024-25/01

July 27, 2024

To

<b>BSE Limited</b> <b>Phiroze Jeejeebhoy Towers,</b> <b>Dalal Street, Mumbai 400 001</b>	<b>National Stock Exchange of India Ltd</b> <b>Exchange Plaza, 5th Floor, Plot No. C-1, G</b> <b>Block, Bandra Kurla Complex, Bandra (East),</b> <b>Mumbai - 400 051</b>
<b>Scrip Code: 542752</b>	<b>Symbol: AFFLE</b>

Dear Sir/ Madam,

**Sub: Reporting of violations under SEBI (Prohibition of Insider Trading) Regulations, 2015**

In line with SEBI circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 July 23, 2020, we hereby report violation related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015. The report for the trade is attached as Annexure A.

Thanking you,

**Yours Faithfully,**  
**For Affle (India) Limited**

**Parmita Choudhury**  
**Company Secretary & Compliance Officer**

**Affle (India) Limited**

**Regd. Office** | A47 Lower Ground Floor, Hauz Khas, Off Amar Bhawan, New Delhi-110016  
**Communication Office** | 8th floor, Unitech Commercial Tower - 2, Sector - 45, Gurugram - 122003, Haryana  
(P) 0124-4598749 (W) [www.affle.com](http://www.affle.com); CIN: L65990DL1994PLC408172

**Report by Affle (India) 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	Affle (India) 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	Anuj Khanna Sohum																																																												
	ii. PAN of the DP	AZPPK7552F																																																												
	iii. Designation of DP	Managing Director & Chief Executive Officer																																																												
	iv. Functional Role of DP	Promoter																																																												
	v. Whether DP is Promoter or belongs to Promoter Group	Yes																																																												
	<b>B. If Reporting is for immediate relative of DP</b>																																																													
	i. Name of the immediate relative of DP	Nalen Goyall																																																												
	ii. PAN of the immediate relative of DP	ABJPG6908M																																																												
	<b>C. Details of transaction(s)</b>																																																													
	i. Name of the scrip	Affle (India) Limited																																																												
	ii. No of shares traded and value (Rs.) (Date- wise)	<table border="1"> <thead> <tr> <th>Date</th> <th>Buy/Sell</th> <th>No. of shares</th> <th>Price per share (in Rs.)</th> </tr> </thead> <tbody> <tr><td>27-04-2021</td><td>Buy</td><td>37</td><td>5665.41</td></tr> <tr><td>27-04-2021</td><td>Buy</td><td>50</td><td>5682.33</td></tr> <tr><td>27-04-2021</td><td>Sell</td><td>87</td><td>5651.81</td></tr> <tr><td>28-04-2021</td><td>Buy</td><td>100</td><td>5565.4</td></tr> <tr><td>28-04-2021</td><td>Sell</td><td>100</td><td>5523.88</td></tr> <tr><td>24-08-2021</td><td>Buy</td><td>25</td><td>4040.61</td></tr> <tr><td>24-08-2021</td><td>Buy</td><td>25</td><td>4040.61</td></tr> <tr><td>31-08-2021</td><td>Buy</td><td>30</td><td>4652.63</td></tr> <tr><td>31-08-2021</td><td>Buy</td><td>70</td><td>4788.97</td></tr> <tr><td>01-09-2021</td><td>Buy</td><td>100</td><td>4639.53</td></tr> <tr><td>02-09-2021</td><td>Buy</td><td>100</td><td>4544.46</td></tr> <tr><td>26-12-2022</td><td>Sell</td><td>521</td><td>1046.66</td></tr> <tr><td>24-03-2023</td><td>Sell</td><td>686</td><td>965.09</td></tr> <tr><td><b>Balance as on</b></td><td></td><td><b>543</b></td><td></td></tr> </tbody> </table>	Date	Buy/Sell	No. of shares	Price per share (in Rs.)	27-04-2021	Buy	37	5665.41	27-04-2021	Buy	50	5682.33	27-04-2021	Sell	87	5651.81	28-04-2021	Buy	100	5565.4	28-04-2021	Sell	100	5523.88	24-08-2021	Buy	25	4040.61	24-08-2021	Buy	25	4040.61	31-08-2021	Buy	30	4652.63	31-08-2021	Buy	70	4788.97	01-09-2021	Buy	100	4639.53	02-09-2021	Buy	100	4544.46	26-12-2022	Sell	521	1046.66	24-03-2023	Sell	686	965.09	<b>Balance as on</b>		<b>543</b>	
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**Affle (India) Limited**

		date (taking into consideration split of shares on Oct 8, 2021)			
<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter:-</b>					
	<b>Particulars</b>	<b>Details</b>			
	i. Date of intimation of trade(s) by the 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	<p>The Company became aware of 543 shares of the Company held by Pranay Goyal, son of Nalen Goyall who is an immediate relative of promoter. Upon inquiry it was known that these shares were purchased in 2021 and Nalin Goyal (now Nalen Goyall), had not disclosed these holdings while giving declaration in 2021 as Pranay Goyal was dependent at the time these shares were purchased. Further these shares were used as collateral for margin money for the trading account. And these shares were sold by the broker for a shortfall in margin money in December 2022 and March 2023.</p> <p>Nalen Goyall is found in breach of insider trading policy for</p> <p>(a) Non-disclosure of shares held by his son, a dependent in 2021;</p> <p>(b) Collateralising shares of the Company against margin money; and</p> <p>(c) Sale of shares in December 2022 and March 2023 without any disclosures and/or any pre-clearance.</p>			
5.	Action taken by Listed company	<p>A penalty of Rs. 106,471 (100% on profits earned) for sale of shares in December 2022 and March 2023 has been imposed on Nalen Goyall.</p> <p>The aforesaid penalty of Rs.106,471 has been</p>			

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		<p>duly submitted to the Investor Protection and Education Fund of SEBI.</p> <p>Also, immediate family members of Nalen Goyall i.e wife and children have been restricted to trade in shares of the Company and their PAN nos will be monitored and/or blocked for trading in shares of the Company.</p>
6.	Reasons recorded in writing for taking action stated above	<p>In addition to what is stated in Point no.4 above, it was also found that registered email id in the demat account of Pranay Goyal is that of his mother Anjuu Goyall and that she operated his account for convenience, hence there are reasonable grounds to believe that these transactions are not done by Pranay Goyal on own volition.</p> <p>Hence, Nalen Goyall is found in breach of insider trading policy for</p> <p>(a) Non-disclosure of shares held by his son, a dependent in 2021;</p> <p>(b) Collateralising shares of the Company against margin money; and</p> <p>(c) Sale of shares in December 2022 and March 2023 without any disclosures and/or any pre-clearance.</p>
7.	Details of the previous instances of violations, if any, since last financial year	Not applicable
8.	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	Online
	<b>ii. Details of transfer/payment</b>	
	<b>In case of Online:</b>	
	<b>Particulars</b>	<b>Details</b>
	Name of the transferor	Nalen Goyall
	Bank Name, Branch and account No.	IndusInd Bank Chandigarh Branch, SCO No. 53-54, Sector 8C, Madhya Marg, Chandhigarh 160018 Account No.159814080848
	UTR/Transaction reference Number	240726191496394
	Transaction date	July 26, 2024
	Transaction Amount (in Rs.)	Rs. 106,476/- (including GST & convenience fee)

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<b>In case of Demand Draft (DD):</b>		
	<b>Particulars</b>	<b>Details</b>
	Bank Name and branch	Not applicable
	DD Number	Not applicable
	DD date	Not applicable
	DD amount (in Rs.)	Not applicable
9.	Any other relevant information	None

**For Affle (India) Limited**

**Parmita Choudhury**  
**Company Secretary & Compliance Officer**  
**PAN: AODPC7650P**  
**email ID: [parmita.choudhury@affle.com](mailto:parmita.choudhury@affle.com)**

Date: 27/07/2024  
Place: Gurugram

**Affle (India) Limited**

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