



HQ/CS/CL.24B/17223

October 22, 2021

National Stock Exchange of India Limited
Exchange Plaza, Bandra Kurla Complex,
Mumbai – 400 051
SYMBOL: TATACOMM

BSE Limited
P.J. Towers, Dalal Street,
Mumbai – 400 001
Scrip Code: 500483

Dear Sir / Madam,

Sub: Reporting Violation of Company's Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

This is to inform you that in terms of the SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020, the details of violation of the Company's code of conduct under the SEBI (Prohibition of Insider Trading) Regulations, 2015 by the Designated Person along with the action taken by the Company thereon is enclosed 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.

Kindly take the same on your records.

Thanking you,

Yours faithfully,
For Tata Communications Limited

Zubin Adil Patel
Company Secretary and
Compliance Officer

TATA COMMUNICATIONS

Tata Communications Limited

Regd. Office: VSB Mahatma Gandhi Road Fort Mumbai – 400 001

Tel: 91 22 6659 1968 email: zubin.patel@tatacommunications.com

CIN: L64200MH1986PLC039266 website: www.tatacommunications.com

Report by Tata Communications Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015
[Schedule B read with Regulation 9 (1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, ("PIT Regulations")]

SN	Particulars	Details																									
1.	Name of the Listed Company/ Intermediary/ Fideuciary <i>Please tick appropriate checkbox</i>	Tata Communications Limited (the 'Company')																									
2.	Reporting in Capacity of: <input type="checkbox"/> Listed Company <input checked="" type="checkbox"/> Intermediary <input checked="" type="checkbox"/> Fideuciary	Listed Company																									
3.	A. Details of Designated Person (DP)																										
	i. Name of DP	Mr. Manish Kumar Jha ('DP')																									
	ii. PAN of DP	ARLPJ0204H																									
	iii. Designation of DP	Assistant Manager																									
	iv. Functional Role of DP	The DP is working as an Assistant Manager in the Supply Chain Management team of the Company																									
	v. Whether DP is Promoter or belongs to Promoter Group	No																									
	B. If Reporting is for immediate relative of DP																										
	i. Name of the immediate relative of DP	NA																									
	ii. PAN of the immediate relative of DP																										
	C. Details of transaction(s)																										
	i. Name of the scrip:	BSE: 500483 NSE: TATACOMM																									
	ii. No of Shares traded and value (Rs.) (Date-wise):	<table border="1"> <thead> <tr> <th>Date</th> <th>Rate</th> <th>Shares</th> <th>Transaction</th> <th>Amount</th> </tr> </thead> <tbody> <tr> <td>15-Jun-21</td> <td>1,325</td> <td>20</td> <td>buy</td> <td>26,500</td> </tr> <tr> <td>16-Jun-21</td> <td>1,290</td> <td>5</td> <td>buy</td> <td>6,450</td> </tr> <tr> <td></td> <td></td> <td></td> <td>Total</td> <td>32,950</td> </tr> <tr> <td>22-Sep-21</td> <td>1,451</td> <td>8</td> <td>sell</td> <td>11,608</td> </tr> </tbody> </table>	Date	Rate	Shares	Transaction	Amount	15-Jun-21	1,325	20	buy	26,500	16-Jun-21	1,290	5	buy	6,450				Total	32,950	22-Sep-21	1,451	8	sell	11,608
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Particulars		Details			
SN		22-Sep-21	1450.95	17 sell	24,666.15
				Total	36,274.15
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter				
	a) Date of intimation of trade(s) by concerned DP/director /promoter /Promoter group to company under regulation 7 of SEBI (PIT) Regulations, 2015				
	b) Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT), Regulations, 2015				
					NA
					NA
4	Details of violations observed under Code of Conduct	<p>The DP purchased 25 equity shares of Tata Communications Limited between June 15 and 16, 2021 (20 shares at Rs. 1,325 per share and 5 shares at Rs. 1,290 per share). On September 22, 2021, the concerned DP sold these 25 equity shares held by him at ₹1,451 per share, making a profit of Rs.3,325. Though each of the transactions were undertaken while the trading window was open, by selling the shares within a period of six months from date of purchase, the concerned DP entered into an opposite transaction or contra trade which is prohibited under the Company's Code of Conduct.</p>			
5.	Action taken by Listed Company/ Intermediary/Fiduciary	<p>The Audit Committee has directed the following actions on the DP:</p> <p>a) The profit of ₹3,325 earned from the contra trade be deposited to the Investor Protection and Education Fund of SEBI (IPEF);</p> <p>b) An additional penalty of 50% of the profits made (subject to a minimum penalty of ₹5,000) be deposited with IPEF</p>			
6.	Reasons recorded in writing for taking action stated above	<p>The violation was reported to the Audit Committee at its meeting held on October 20, 2021. The Audit Committee considered the following:</p> <p>A) The DP was not in possession of any UPSI at the time of his tradings;</p> <p>B) The DP carried out the sell transactions due to urgent requirement of funds;</p> <p>C) The DP had inadvertently overlooked the requirement of not entering into contra trade during 6-month period;</p> <p>D) The DP has expressed his deep regret at the inadvertent violation and has assured that such oversight would not be repeated.</p> <p>Based on the above, the Audit Committee imposed the penalty stated in point 5 above.</p>			

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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)	<table border="1"> <thead> <tr> <th align="center">Particulars</th> <th align="center">Details</th> </tr> </thead> <tbody> <tr> <td>Name of the transferor</td> <td>Manish Kumar Jha</td> </tr> <tr> <td>Transferor's Bank Name</td> <td>ICICI Bank</td> </tr> <tr> <td>Transferee Name</td> <td>SEBI – IPEF</td> </tr> <tr> <td>Transferee Bank name</td> <td>Bank of India</td> </tr> <tr> <td>Transferee Account number/ IFSC</td> <td>122102100000008/ BKID0000122</td> </tr> <tr> <td>UTR / Transaction reference number</td> <td>129409987753</td> </tr> <tr> <td>Transaction date</td> <td>October 21, 2021</td> </tr> <tr> <td>Transaction amount</td> <td>INR8,325/-</td> </tr> </tbody> </table>	Particulars	Details	Name of the transferor	Manish Kumar Jha	Transferor's Bank Name	ICICI Bank	Transferee Name	SEBI – IPEF	Transferee Bank name	Bank of India	Transferee Account number/ IFSC	122102100000008/ BKID0000122	UTR / Transaction reference number	129409987753	Transaction date	October 21, 2021	Transaction amount	INR8,325/-
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9.	Any other relevant information	NA																		

NA-Not applicable

Yours Faithfully
For Tata Communications Limited



Zubin Adil Patel
 Company Secretary & Compliance Officer

PAN: BGAPP0670G
 Email id: zubin.patel@tatacommunications.com
 Date: October 22, 2021
 Place: Mumbai