

Ref: BCG/SE/2023/Aug-04 Date: August 08, 2023

To

BSE Limited

P. J. Towers, 25th Floor, Dalal Street, Mumbai - 400001. BSE Scrip Code: 532368 To

National Stock Exchange of India Limited

Exchange Plaza, Bandra Kurla Complex,

Bandra (E), Mumbai – 400 051.

NSE Symbol: BCG

Sub: Reporting on Violations relating code of conduct under SEBI (Prohibition

of Insider) Regulations, 2015

Ref: SEBI Circular #SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020

Dear Sir/Ma'am,

In terms of Company's Code of Conduct (To Regulate, Monitor and Report of Trading by Promoter Group) ("Insider Trading Code ") read with Schedule B and Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015, we hereby submit a report in respect of violations as per that section in format specified by SEBI vide its Circular No. SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020.

Please make a note of this above information for your records.

Thanking you,

Yours Truly,

For Brightcom Group Limited

Rajesh Vankadara Company Secretary

brightcom group limited (Formerly Lycos Internet Limited)





Report by Brightcom Group Limited for violations related to Code of Conduct under SEBI (PIT) Regulations, 2015.

[For listed companies: Schedule B read with Regulation 9 (1) of SEBI (PIT) Regulations, 2015]

#	Particulars	Details			
1.	Name of the Listed				
	Company/Intermediary/Fiduciary		Brightcom G	roup Limi	tea
2.	Please tick Appropriate Checkbox				
	Reporting in capacity of:				
	□ Listed Company√		Listed C	Company	
	☐ Intermediary				
	□ Fiduciary				
3.	A. Details of Designated Person (DP)				
	i. Name of the DP	SARITA COMMOSALES LLP			
	ii. PAN of the DP	ACPFS8147K			
	iii. Designation of DP	Not Applicable			
	iv. Functional role of DP	Not Applicable			
	v. Whether DP is Promoter or	Promoter Group			
	belongs to Promoter Group		Fromoter Group		
	B. If Reporting is for immediate relative of DP				
	i. Name of the immediate relative		Not An	nlicable	
	of DP		ног Ар	plicable	
	ii. PAN of the immediate relative of		Not An	plicable	
	DP		not np	pheable	
	C. Details of transaction(s)	_			
	i. Name of the scrip		Brightcom G		
			BSE Scrip C		
	:: NIC -1	Date	NSE Scrip	# of	Value in
	ii. No of shares traded and value	Date	Type	Shares	Rs.
	(Rs.) (Date- wise)	24-11-	Sell	150,000	53,92,500
		2022 02-02-	Buy	1,000,000	27,800,000
		2023	Buy		
		16-02- 2023	Sell	1,000,000	26,973,662
	D. In case value of trade(s) is more		l.	<u> </u>	<u> </u>
	than Rs.10 lacs in a calendar				
	Quarter				
	i. Date of intimation of trade(s) by				
	concerned				
	DP/director/promoter/promote	Not intimated			
	r group to Company under		1100 1111	umated	
	regulation 7 of SEBI (PIT)				
	Regulations, 2015				
	ii. Date of intimation of trade(s) by				
	Company to stock exchanges	Not Applicable			
	under regulation 7 of SEBI (PIT)		P	1 ======	
	Regulations, 2015	D		<i>m</i> 1 '	1 0
4.	Details of violations observed under		on of Contra		
	Code of Conduct	tne Com	pany by the	שר and a	iso execute

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		trade during the closure of trading
		window.
5.	Action talen by Listed company	The Company had issued a warning
5.	Action taken by Listed company/ Intermediary/ Fiduciary	letter and instructed to remit 100% of
	intermediary/ Fludciary	the profit made i.e Rs. 6.5 Lakhs plus
		Rs.25,000/- for the violation of the
		provisions to SEBI for credit to the
		Investor Protection and Education Fund.
		investor rotection and Education rund.
		Cautioned them not to repeat any
		violation in future under the Code.
6.	Reasons recorded in writing for taking	Violation of Insider Trading Code of
0.	action stated above	Company execution of contra trade and
	delien stated above	execute trade during the closure of
		trading window.
7.	Details of the previous instances of	First-time identification of violation of
	violations, if any, since	the Insider Trading Code and SEBI (PIT)
	last financial year	regulations, 2015.
	, and the second	
8.	If any amount collected for Code of	
	Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF	Online Payment
	(Online/Demand Draft)	
	ii. Details of transfer/payment	
	In case of Online	
	Name of the Transferor	Sarita Commosales LLP
	Bank Name, Branch and	Yes Bank
	Account Number	DTGG VEGDD1000000000000000000
	UTR/Transaction #	RTGS - YESBR12023080200008489
	Transaction Date	August 02, 2023
	Transaction Amount in Rs.	Rs.675,000/-
	In Case of Demand Draft (DD) Bank Name & Branch	
	DD #	
	DD # DD Date	
	DD Date DD Amount in Rs.	
9.	Any other Relevant Information	Nil
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Yours Faithfully

For Brightcom Group Limited

Rajesh Vankadara

Company Secretary

Place: Hyderabad Date: August 08, 2023

brightcom group limited (Formerly Lycos Internet Limited)



EMAIL: IR@BRIGHTCOMGROUP.COM WEB: WWW.BRIGHTCOMGROUP.COM CIN: L64203TG1999PLC030996

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Report by Brightcom Group Limited for violations related to Code of Conduct under SEBI (PIT) Regulations, 2015.

[For listed companies: Schedule B read with Regulation 9 (1) of SEBI (PIT) Regulations, 2015]

#	Particulars	Details			
1.	Name of the Listed				
	Company/Intermediary/Fiduciary	Brightcom Group Limited		ited	
2.	Please tick Appropriate Checkbox				
	Reporting in capacity of:				
	□ Listed Company√		Listed C	company	
	□ Intermediary				
	□ Fiduciary				
3.	A. Details of Designated Person (DP)				
	vi. Name of the DP	KA	LPANA COM		S LLP
	vii. PAN of the DP			4643H	
	viii. Designation of DP	Not Applicable Not Applicable			
	ix. Functional role of DP				
	x. Whether DP is Promoter or	Promoter Group			
	belongs to Promoter Group	Fromoter Group			
	B. If Reporting is for immediate relative of DP				
	iii. Name of the immediate relative				
	of DP		Not Ap	plicable	
	iv. PAN of the immediate relative of				
	DP		Not Ap	plicable	
	C. Details of transaction(s)				
	iii. Name of the scrip	I	Brightcom G	roup Limi	ted
			BSE Scrip C		
			NSE Scrip		
	iv. No of shares traded and value	Date	Transaction Type	# of Shares	Value in Rs.
	(Rs.) (Date- wise)	19-12-	Sell	25,000	702,500
		22022	-	100.000	0.751.070
		10-01- 2023	Buy	100,000	2,751,872
		17-01-	Buy	552,000	15,814,800
		2023			
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar				
	Quarter				
	iii. Date of intimation of trade(s) by				
	concerned				
	DP/director/promoter/promote	Not intimated			
	r group to Company under		not in	macca	
	regulation 7 of SEBI (PIT)				
	Regulations, 2015				
	iv. Date of intimation of trade(s) by	Not Applicable			
	Company to stock exchanges				
	under regulation 7 of SEBI (PIT)	The rippincusic			
	Regulations, 2015	D		/D 1 '	1 0
4.	Details of violations observed under	Execution of Contra Trades in shares of the Company by the DP and also execute trade during the closure of trading			
	Code of Conduct				
		trade du	ring the clos	sure of tra	.ding

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		window.	
5.	Action taken by Listed company/	The Company had issued a warning	
0.	Intermediary/ Fiduciary	letter and instructed to remit 100% of	
	intermediary/ riddelary	the profit made i.e Rs.0.93 Lakh plus	
		Rs.25,000/- for the violation of the	
		provisions to SEBI for credit to the	
		Investor Protection and Education Fund.	
		Cautioned them not to repeat any	
		violation in future under the Code.	
6.	Reasons recorded in writing for taking	Violation of Insider Trading Code of	
	action stated above	Company execution of contra trade and	
		execute trade during the closure of	
		trading window.	
7.	Details of the previous instances of	First-time identification of violation of	
	violations, if any, since	the Insider Trading Code and SEBI (PIT)	
	last financial year	regulations, 2015.	
8.	If any amount collected for Code of		
	Conduct violation(s)	0.41. 7	
	iii. Mode of transfer to SEBI - IPEF	Online Payment	
	(Online/Demand Draft)		
	iv. Details of transfer/payment		
	In case of Online		
	Name of the Transferor	Kalpana Commosales LLP	
	Bank Name, Branch and	Yes Bank	
	Account Number	MEET VEOIDOOLAGOAROS	
	UTR/Transaction #	NEFT - YESIB32140047850	
	Transaction Date	August 02, 2023	
	Transaction Amount in Rs.	Rs.118,000/-	
	In Case of Demand Draft (DD)		
	Bank Name & Branch		
	DD #		
	DD Date		
	DD Amount in Rs.	27.1	
9.	Any other Relevant Information	Nil	

Yours Faithfully

For Brightcom Group Limited

Rajesh Vankadara

Company Secretary

Place: Hyderabad Date: August 08, 2023

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