

JOINDRE CAPITAL SERVICES LIMITED

CODE OF CONDUCT AND INTERNAL PROCEDURE FOR REGULATING, MONITORING AND REPORTING OF TRADING BY INSIDERS UNDER THE SECURITIES AND EXCHANGE BOARD OF INDIA (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015

The objective of the Policy is to prevent the Insiders to deal in its securities, while in possession of unpublished price sensitive information, thereby ensuring transparency and fair play in securities transaction(s). In terms of SEBI (Prohibition of Insider Trading) Regulations, 2015, it is mandatory for every listed company, market intermediary and other persons who is required to handle Unpublished Price Sensitive Information, to formulate a code of conduct for prevention of Insider Trading to regulate, monitor and report trading by its Directors, Employees and other connected persons. Further it is required to formulate code of practice and procedure for fair disclosure of unpublished price sensitive information.

1. APPLICABILITY:

This policy shall come into effect from 15-5-2015

2 DEFINITIONS USED IN THE POLICY

2.1 “**Act**” means the Securities and Exchange Board of India Act, 1992 (15 of 1992).

2.2 “**Code**” or “**Code of Conduct**” shall mean the Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of trading by insiders.

2.3 “**Compliance Officer**” means Company Secretary or such other senior officer, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations designated so and reporting to the Board of Directors and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board of Directors of the Company.

2.4 “**Connected Person**” means:

(i) any person who is or has during the six months prior to the concerned act been associated with a company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the Company or holds any position including a professional or business relationship between himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.

(ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established,

(a) an immediate relative of connected persons specified in clause (i); or

(b) a holding company or associate company or subsidiary company; or

(c) an intermediary as specified in Section 12 of the Act or an employee or director thereof; or

(d) an investment company, trustee company, asset management company or an employee or director thereof; or

(e) an official of a stock exchange or of clearing house or corporation; or

(f) a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or

(g) a member of the Board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or

(h) an official or an employee of a self-regulatory organization recognised or authorized by the Board; or

(i) a banker of the Company; or

(j) a concern, firm, trust, hindu undivided family, company or association of persons wherein a director of the Company or his immediate relative or banker of the Company, has more than ten per cent, of the holding or interest.

- 2.5 **"Immediate Relative"** means a spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities
- 2.6 **"Insider"** means any person who,
- (i) a connected person; or
 - (ii) in possession of or having access to unpublished price sensitive information.
- 2.7 **"Trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly
- 2.8 **"Unpublished Price Sensitive Information"** means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following:
- (i) financial results;
 - (ii) dividends;
 - (iii) change in capital structure;
 - (iv) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
 - (v) changes in key managerial personnel; and
 - (vi) material events in accordance with the listing agreement
- 2.9 **"Specified Persons"** means the Directors, connected persons, the insiders, the Designated Employees and the promoters and immediate relatives are collectively referred to as Specified Persons.

Words and expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation.

CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

3. COMPLIANCE OFFICER

The Company Secretary of the Company shall act as the Compliance Officer of the Company for effective implementation and compliance of these regulations. The Compliance Officer shall be under the overall supervision of the Board of Directors of the Company.

- 3.1 The compliance officer shall comply with the policies and procedures and grant pre-trading approvals and monitor such trading.
- 3.2 The Compliance Officer shall report on insider trading to the Board of Directors of the Company/the Chairman of the Audit Committee, at such frequency as may be stipulated by the Board of Directors.
- 3.3 The Compliance Officer and/or any other person authorised by the Board, shall assist all employees/connected persons/Directors/KeyManagerial Persons etc. in addressing any clarifications regarding the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct.

4. MAINTENANCE OF/FURNISHING OF PRICE SENSITIVE INFORMATION

- 4.1 No unpublished price sensitive information shall be communicated to any person except in furtherance of the insider's legitimate performance of duties and discharge of his legal obligations.

Unpublished price sensitive information may be communicated, provided, allowed in connection with a transaction which involves:

- an obligation to make an open offer under the takeover regulations where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the Company; or
- where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the Company and the information that constitute unpublished price sensitive information is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the Board of Directors may determine.

In such events, the Board of Directors shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the limited purpose and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information

- 4.2 Specific or Need to know basis

(i) "Specific or need to know Basis" means that Unpublished Price Sensitive Information should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.

(ii) All non-public information directly received by any employee should immediately be reported to the head of the department.

- 4.3 Limited access to confidential information

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password, etc.

5. PREVENTION OF MISUSE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

- 5.1 The persons who may be perpetually in possession of unpublished price sensitive information and enabling them to trade in securities in a complied manner, has to formulate a trading plan for dealing in securities of the Company and present it to the Compliance Officer for approval and public disclosure.

- 5.2 Such Trading Plan shall :

(i) not entail commencement of trading on behalf of the insider earlier than 6 months from the public disclosure of the plan

(ii) not entail trading for the period between the 20th trading day prior to the last day of any financial period for which results are required to be announced by the issuer of the securities and the 2nd trading day after the disclosure of such financial results;

(iii) entail trading for a period of not less than Twelve months

(iv) not entail overlap of any period for which another trading plan is already in existence;

(v) not entail trading in securities for market abuse.

5.3 The Compliance Officer shall consider the Trading Plan and approve it by taking suitable undertakings for monitoring and implementation of plan as may be necessary and intimate its approval .

5.4 The Trading Plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.

However, the implementation of the trading plan shall not be commenced, if at the time of formulation of the plan, the Insider is in possession of any unpublished price sensitive information and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Plan shall be deferred until such unpublished price sensitive information becomes generally available information. Further, the Insider shall also not be allowed to deal in securities of the Company, if the date of trading in securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.

5.5 Upon approval of the trading plan, the compliance officer shall notify the plan to the BSE Ltd.- **Annexure-E**

6. TRADING WINDOW AND WINDOW CLOSURE

Trading Window is the period during which trading in company's securities is allowed by the Stock Exchange.

The trading window shall be, closed atleast **7 days** prior to and during the time the unpublished price sensitive information is published, particularly including for the following purposes:

a) Declaration of financial results, b) declaration of dividend, c) change in capital structure, d) merger, de-merger, delisting , e)change in key managerial personnel , f) material even in accordance with the listing agreement.

When the trading window is closed, the Specified Persons shall not trade in the Company's securities.

All Specified Persons shall conduct all their dealings in the securities of the Company only in a valid trading window and shall not deal in any transaction involving the purchase or sale of the Company's securities during the periods when the trading window is closed.

In case of ESOPs, exercise of option may be allowed in the period when the trading window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when trading is closed.

The Compliance Officer shall intimate the closure of trading window to all the designated employees of the company/concerned persons..

The Trading Window shall be opened 48 Hours after the information referred above become generally available .

The trading window shall also be applicable to any person having contractual or fiduciary relation with the Company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the Company.

7 PRE-CLARANCE TRADES

7.1 All Specified Persons, who intend to deal in the securities of the Company when the trading window is opened should seek approval for the proposed transaction if the value of the proposed trades, whether in one transaction or series of transactions over any calendar quarter aggregates to a traded value in excess of Rs. 10 lakhs. However, no designated person shall be entitled to apply for pre-clearance of any proposed trade if such designated person is in possession of unpublished price sensitive information even if the trading window is not closed

and hence he shall not be allowed to trade. The pre- clearance trade procedure shall be hereunder:

- 7.2 (i) For obtaining pre-trading approval, an application to be made in the prescribed Form (**Annexure A**) to the Compliance officer by the specified employee/person/director indicating the estimated number of securities, proposed date of dealing, whether transaction will be through Stock Exchange or off- market deal etc. along with an undertaking (**Annexure B**) to be executed in favour of the Company by such Specified Employee/person/director , incorporating, the following clauses, as may be applicable:
- (a) That he/she does not have any access or has not received “Price Sensitive Information” up to the time of signing the undertaking.
 - (b) That in case he/she has access to or receives “Price Sensitive Information” after the signing of the undertaking but before the execution of the transaction he/she shall inform the Compliance Officer of the change in his position and that he/she would completely refrain from dealing in the securities of the Company till the time such information becomes public.
 - (c) That he/she has not contravened the code of conduct for prevention of insider trading as notified by the Company from time to time.
 - (d) That he/she has made a full and true disclosure in the matter.
- (ii) All Specified Persons shall execute their order in respect of securities of the Company within 7 trading days after the approval of pre-clearance is given as per **Annexure - C**. The Specified Person shall file within 2 (two) days of the execution of the deal, the details of such deal with the Compliance Officer in the prescribed form (**Annexure D**). In case the transaction is not undertaken, a report to that effect shall be filed.
- (iii) If the order is not executed within seven trading days after the approval is given, the employee/director must pre-clear the transaction again.
- (iv) All Specified Persons who buy or sell any number of shares of the Company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction.
- (v) The Compliance Officer may waive off the holding period in case of sale of securities in personal emergency after recording reasons for the same. However, no such sale will be permitted when the Trading window is closed.

7.3 The disclosures made under this Code shall be maintained for a period of five years.

8 REPORTING REQUIREMENTS FOR TRANSACTIONS UNDER SEBI REGULATIONS

a) Initial Disclosure –Regulation 7(1)(a) read with Regulation 6(2) and 7(1)(b)of SEBI (Prohibition of Insider Trading) Regulation 2015

8.1 Every promoter/ Key Managerial Personnel / Director / Employees of the Company and such persons as mentioned in sebi regulation 6(2), **within 30days of these** regulations taking effect, shall forward to the Company the details of all holdings in securities of the Company presently held by them including the statement of holdings of dependent family members in the prescribed **Form – A**

8.2 Every person on appointment as a key managerial personnel/director of the Company or upon becoming a promoter shall disclose his/her holding of securities of the Company as on the date of appointment or becoming a promoter, to the Company within **7 days** of such appointment or becoming a promoter in the prescribed **Form-B**

b) Continual Disclosure Regulation 7(2)(b) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulation 2015

8.3 Every promoter, employee and director of the Company shall disclose to the Company the number of such securities acquired or disposed of **within 2 trading days** of such transaction. if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 10 lakhs-

The disclosure shall be made within 2 working days in **Form -C** :

- (a) on the receipt of intimation of allotment of shares, or
- (b) on the acquisition or sale of shares or voting rights, as the case may be.

c) Disclosure by the Company to the Stock Exchange(s) Regulation 7(2)(b) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulation 2015

8.4 Within **2 days** of the receipt of intimation under Clause 8.3, the Compliance Officer shall disclose to Stock Exchanges on which the Company is listed, the information received in the **Form -C**.

d) Disclosure by other Concerned persons –Regulation 7(3)

8.5 At the discretion of the Company require any other connected persons or class of connected persons to make disclosure of holding and trading in securities of the Company, the disclosure should be made within 2 working days in Form –D

9. PRESERVATION OF RECORDS

The Compliance officer shall maintain records of all the declarations in the appropriate form given by the directors / officers / designated employees for a minimum period of five years.

10. DISSEMINATION OF PRICE SENSITIVE INFORMATION

No information shall be passed by Specified Persons by way of making a recommendation for the purchase or sale of securities of the Company.

The following guidelines shall be followed while dealing with analysts and institutional investors

- Only public information to be provided.
- At least two Company representatives be present at meetings with analysts, media persons and institutional investors.
- Unanticipated questions may be taken on notice and a considered response given later. If the answer includes price sensitive information, a public announcement should be made before responding.
- Simultaneous release of information after every such meet.

11. PENALTY FOR CONTRAVENTION OF THE CODE OF CONDUCT

11.1 Every Specified Person shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her dependents).

11.2 Any Specified Person who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalised and appropriate action may be taken by the Company.

11.3 Specified Persons who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligibility for future participation in employee stock option plans, etc.

11.4 The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

12. CODE OF PRACTICE AND PROCEDURE FOR FAIR DISCLOSURE

A code of practices and procedures for fair disclosure of unpublished price sensitive information for adhering each of the principles is set out below:

1. Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
3. Designation of a senior officer as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.
7. Developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
8. Handling of all unpublished price sensitive information on a need-to-know basis.
9. Every code of practices and procedures for fair disclosure of unpublished price sensitive information and amendment thereto shall be intimated to the BSE Ltd.

ANNEXURE - A
APPLICATION FOR PRE-DEALING APPROVAL

Date:

To,

The Compliance Officer,

Joindre Capital Services Limited,

32, Raja Bahadur Mansion, Ground Floor, Mumbai Samachar Marg,

Fort, Mumbai -400 023

Dear Sir,

Application for Pre-dealing approval in securities of the Company

Pursuant to the SEBI (prohibition of Insider Trading) Regulations, 2015 and the Company's **Code of Conduct for Prevention of Insider Trading**, I seek approval for purchase/sale/subscription of _____ equity shares of the Company as per details given below

Sr No.	Particulars	
1	Name of the applicant/Employee	
2	Designation/Department	
3	Number of securities held as on date	
4	Folio No. / DP ID / Client ID No.)	
5	The proposal is for (a) Purchase of securities (b) Subscription to securities (c) Sale of securities	
6	Proposed date of dealing in securities	
7	Estimated number of securities proposed to be acquired/subscribed/sold	
8	Price at which the transaction is proposed	
9	Current market price (as on date of application)	
10	Whether the proposed transaction will be through stock exchange or off-market deal	
11	Folio No. / DP ID / Client ID No. where the securities will be credited / debited	

I enclose herewith the form of undertaking signed by me

Yours faithfully

(Name: _____)

(Signature)_____

ANNEXURE- B
UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-CLEARANCE

UNDERTAKING

To,
Joindre Capital Services Limited,
Joindre Capital Services Limited,
32, Raja Bahadur Mansion, Ground Floor, Mumbai Samachar Marg,
Fort, Mumbai -400 023

I, _____, Son/wife/daughter of _____ r/o _____, am desirous of dealing in _____ * shares of the Company as mentioned in my application dated _____ for pre-clearance of the transaction.

I further declare that I am not in possession of or otherwise privy to any unpublished Price Sensitive Information (as defined in the Company's Code of Conduct for prevention of Insider Trading (the Code) up to the time of signing this Undertaking.

In case I have access to or receive any "Unpublished Price Sensitive Information" after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public.

I declare that I have not contravened the provisions of the Code as notified by the Company from time to time.

I undertake to submit the necessary report within two days of execution of the transaction / a 'Nil' report if the transaction is not undertaken.

If approval is granted, I shall execute the deal within 7 days of the receipt of approval failing which I shall seek pre-clearance.

I declare that I have made full and true disclosure in the matter.

(Name _____)

Signature : _____

Date :

Place:

* Indicate number of shares

ANNEXURE C
PRE- CLEARANCE APPROVAL/DISAPPROVAL

Date:

To,

Name : Mr./Mrs/M/s. _____

Designation : _____

Address: _____

Dear sirs,

Sub: Pre-clearance Approval/Disapproval

This is to inform you that your request for dealing in _____ (nos) shares of the Company as mentioned in your application dated _____ is approved/dis-approved.

Please note that the said transaction must be completed on or before _____ (date) that is within 7 trading days from the date of approval. In case you do not execute the approved transaction /deal on or before the aforesaid date you would have to seek fresh pre-clearance before executing any transaction/deal in the securities of the Company. Further, you are required to file the details of the executed transactions in the attached format within 2 days from the date of transaction/deal. In case the transaction is not undertaken a 'Nil' report shall be furnished to the Comapny.

Yours faithfully,

FOR JOINDRE CAPITAL SERVICES LIMITED

(COMPLIANCE OFFICER)

Date : _____

Encl: Format for submission of details of transaction-Annexure-D

ANNEXURE D
FORMAT FOR DISCLOSURE OF TRANSACTIONS

(To be submitted within 2 days of transaction / dealing in securities of the Company)

Date:

The Compliance Officer,
Joindre Capital Services Limited,
32, Raja Bahadur Mansion, Ground Floor, Mumbai Samachar Marg,
Fort, Mumbai -400 023

Dear sir,

Sub: Disclosure of transaction – Ref: Approval letter No.____ dated _____

I hereby inform that , I

- have not bought / sold/ subscribed any securities of the Company
- have bought/sold/subscribed to _____ securities as mentioned below on ____ (date)

Name of holder	No of Securiteis dealt with	Bought/sold/subscribed	DP ID/Client ID/Folio	Price Rs.

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 5 years and produce to the Compliance officer / SEBI any of the following documents:

1. Broker's contract note.
2. Proof of payment to/from brokers.
3. Extract of bank passbook/statement (to be submitted in case of demat transactions).
4. Copy of Delivery instruction slip (applicable in case of sale transaction).

I agree to hold the above securities for a minimum period of six months. In case there is any urgent need to sell these securities within the said period, I shall approach the Compliance Officer for necessary approval. *(applicable in case of purchase / subscription).*

I declare that the above information is correct and that no provisions of the Company's Code and/or applicable laws/regulations have been contravened for effecting the above said transactions(s).

Signature : _____

Name : _____

Designation _____

Place:

ANNEXURE- E

**INTIMATION TO THE STOCK EXCHANGE BY THE COMPANY -APPROVAL OF TRADING
PLAN-REGULATION 5 (5) OF SEBI (PROHIBITION OF INSIDER TRADING)REGULATIONS
2015**

Date:

To,
BSE Limited.,
P.J. Towers, Dalal Street,
Mumbai -400 001

Dear Sir,

Sub: Intimation of approval of trading plan – Regulation 5(5) of SEBI (Prohibition of Insider Trading) Regulation 2015

Kindly note that the Company has granted approval for the trading plan of the following persons for purchase/sale/subscripion of Equity shares of the Company as under:

Name	Designation	Folio No./DPID/ Client ID	No of Securities dealt with	Buy/Sell/ subscribe	Price Rs.	Mode of acquisition –Stock Exchange/ off market	Proposed date of dealing

The intimation is being given pursuant to Regulation 5 (5) of Sebi (Prohibition of Insider Trading) Regulation 2015.

Thanking you,
Yours faithfully,
FOR JOINDRE CAPITAL SERVICES LTD

Company Secretary

FORM A

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (1) (a) read with Regulation 6 (2)]

Name of the company: _____

ISIN of the company: _____

Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relatives/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding	Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option Contracts held as on the date of regulation coming into force	
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	6	7	8	9

Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Signature:

Designation:

Date:

Place:

FORM B

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (1) (b) read with Regulation 6(2)]

Name of the company: _____

ISIN of the company: _____

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN No., CIN/DIN & Address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relatives/others etc.)	Date of appointment of Director /KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP		% of Shareholding	Open Interest of the Future contracts held at the time of becoming Promoter/appointme nt of Director/KMP		Open Interest of the Option Contracts held at the time of becoming Promoter/appointme nt of Director/KMP	
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	5	6	7		

Note: “Securities” shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Signature:

Designation:

Date:

Place:

FORM C

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (2) read with Regulation 6(2)]

Name of the company: _____

ISIN of the company: _____

Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN No., CIN/DIN, & address of Promoter/ Employee / Director with contact nos.	Category of Person (Promoters/ KMP / Directors/ immediate relatives/ others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed		% of shareholding		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition (market purchase/public rights/preferential offer / off market/ Inter-se transfer etc.)	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Pre transaction	Post transaction	From	To			Buy		Sell		
												Value	Number of units (contracts * lot size)	Value	Number of units (contracts * lot size)	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Signature:

Designation:

Date:

Place:

Form D (Indicative format)

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

Regulation 7(3) – Transactions by Other connected persons as identified by the company

1	2	3		4		5		6		7	8	9	10	11	12	13				14	15	16	17	
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Pre transaction	Post transaction	From	To							Buy		Sell						
																Value	Number of units (contracts * lot size)	Value	Number of units (contracts * lot size)					

Note: “Securities” shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Name:

Signature:

Date:

Place:
