

Code Of Conduct For Prevention Of Insider Trading

Introduction

Trading in a listed Company's securities by insiders who enjoy a special status on account of access to price sensitive information and as a result thereof, are able to use their special status for individual benefit, at the expense of the general investor at large is referred to as Insider Trading.

In view of the substantial changes in the securities trading environment, and possible avenues for communication of price sensitive information, which provides an opportunity for insiders to gain an advantage there from as compared to the general investor at large, SEBI has notified the SEBI (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as the 'Regulations') to put a curb on this malpractice.

These Regulations contain a comprehensive code for regulation, disclosures and approvals within a company, for Directors, Managers, Company Secretary, Auditors and 'Designated Employees', which needs to be followed **if these categories of personnel acquire, hold, purchase sell or otherwise deal in the Company's securities**. The Regulations also require the Company to frame and implement a Code of Conduct for prevention of Insider Trading.

The enclosed Code has been approved by the Board of the Company and it is warranted that all employees should abide by the provisions of the same. The Part 'A' of the Code is applicable to all employees whereas the contents of parts 'C' and 'D' are applicable to Directors, Officers and Designated Employees' (as referred to in Clause 2 of this Code).

Terms, Definitions, its Interpretation and Scope

The Code on Insider Trading has been formulated to comply with the various requirements as laid down under the SEBI Regulations on Insider Trading and going further, this code shall govern all acquisitions, purchases, sale and otherwise trading by the directors/designated employees in the Securities of Spentex Industries Limited. Adherence to the Code is mandatory for all employees. However, more detailed disclosures and approvals as contained in parts 'C' and 'D' are required from the Directors, Officers and Designated Employees

For the purpose of this Code of Conduct:-

- a. **"Act"** means the Securities and Exchange Board of India Act, 1992 (15 of 1992)
- b. **"Board"** means the Board of Directors of **SPENDEX INDUSTRIES LIMITED**
- c. **"Code"** means this Code of Conduct for Prevention of Insider Trading including modifications made thereto from time-to-time.
- d. **"Connected Person"** shall have the same meaning as provided in the SEBI (Prohibition of Insider Trading) Regulations, 2015
- e. **"Designated Employee"** means-.

- (i) All Directors, Executive and Non-Executive
- (ii) All General Managers of the Company Management.
- (iii) Other employees as may be designated by the Compliance Officer in consultation with the Chairman and Managing Director of the Company from time to time.

To whom the trading restrictions shall be applicable.

- f. **"generally available information"** means information that is accessible to the public on a non-discriminatory basis;
- g. **"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;
- h. **"Insider"** means any person who is:
 - i) a connected person; or
 - ii) in possession of or having access to unpublished price sensitive information;
- i. **"Securities"** includes:- shares, bonds, debentures or other marketable securities of a like nature; any kind of derivatives in the Securities of the Company; and such other instruments recognized as securities under the Securities Contracts (Regulation) Act, 1956 and issued by the Company from time-to-time;
- j. **"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.
- k. **"Stock Exchange"** means, the Stock Exchange, where the shares of the Company are listed.
- l. **"Trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;
- m. **"Trading Day"** means a day on which the recognized stock exchanges are open for trading where securities of the Company are listed;
- n. **"Trading Window"** means trading period for trading in the Company's Securities. All days shall be the trading periods except when trading window is closed
- o. **"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 include 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.

- p. All other words and phrases will have the same meaning as defined under the “Regulations” as amended from time to time and also under the “Act”.

This code can be modified/amended/alterd only by Board of Directors of the Company.

1. Compliance Officer

The Company has appointed SR. Manager Secretarial as Compliance Officer, who shall report to the Director Finance & Company Secretary of the Company.

1.1. Duties of Compliance Officer:-

He/ she shall maintain a record of designated employees and any changes made therein.

He/she may in consultation with the Managing Director and as directed by the Board, Specify prohibited period from time to time and immediately make an announcement thereof.

He/she shall maintain a record of Prohibited Period specified from time to time.

He/ She shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of ‘Price Sensitive Information’ ‘Pre-clearing of ‘designated employee’ and their dependents’ trades, monitoring of trades and the implementation of the Code of Conduct under the overall supervision of the Board of the Company.

2. Preservation of “Price Sensitive Information

Directors, Designated Employees, Business Associates or Other persons dealing with **SPENTEX INDUSTRIES LIMITED** in any other capacity having access to any Unpublished Price Sensitive Information (UPSI) shall maintain the confidentiality of all Price Sensitive Information. Employees/Directors shall not pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sale of securities.

Following practices should be followed in this regard:-

- 2.1. **Restrictions** - Every person preparing and circulating any Unpublished Price Sensitive Information (UPSI) as defined under the Regulations shall ensure to notify the following notation “Private, privileged and Confidential” on each such document/statement.

- 2.2. **Need to Know** - Unpublished Price Sensitive Information is to be handle on a “need to know” basis i.e. 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 conflict of interest or appearance of misuse of information. All Non-public information directly received by any employee shall immediately be reported to the respective head of the department.

- 2.3. **Limited access to confidential information** - Files containing confidential information shall be kept secure by the concerned department; Computer files must have adequate security of login and password, etc. Files containing confidential information should be deleted/destroyed after its use.
- 2.4. UPSI shall not be disclosed/ communicated to any person within Company or outside except when the concerned person reasonably believes that such disclosure is required to enable proper and effective conduct of business and that they will have no reason to believe that the information will be misused or improperly disclosed by the recipient.
- 2.5. Not to advise or induce, communicate, counsel any other person to deal in shares of the company on the basis of UPSI.
- 2.6. Not to trade (buy/sell) in securities of the Company either directly or through relatives, friends etc. on the basis of any UPSI.
- 2.7. Not to trade (buy/sell) in securities of the Company directly or through relatives, friends etc during closure of trading window as announced by compliance officer from time to time.
- 2.8. To comply with the norms under the code including disclosure of the transactions to the Compliance Officer.

3. **Prevention of misuse of “Unpublished Price Sensitive Information”**

Employees and connected persons designated on the basis of their functional role ("designated persons") in the Company shall be governed by an internal code of conduct governing dealing in securities.

- 3.1 Trading Plan - An insider shall be entitled to formulate a trading plan for dealing in securities of the Company and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.
- 3.2 Trading Plan shall:
 - (i) not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
 - (ii) not entail trading for the period between the twentieth 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 second 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) set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
 - (vi) not entail trading in securities for market abuse.

4. **Trading Window and Window Closure**

4.1.

- (i) The trading period, i.e. the trading period of the stock exchanges, called ‘trading window’, available for trading in the Company’s securities.
- (ii) The trading window shall be, inter alia, closed 7 days prior to and during the time the unpublished price sensitive information is published.
- (iii) When the trading window is closed, the Specified Persons shall not trade in the Company’s securities in such period.
- (iv) 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, as referred to in Point No. (ii) above or during any other period as may be specified by the Company from time to time.
- (v) 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.

4.2. The Compliance Officer shall intimate the closure of trading window to all the designated employees of the Company when he determines that a designated person or class of designated persons can reasonably be expected to have possession of unpublished price sensitive information. Such closure shall be imposed in relation to such securities to which such unpublished price sensitive information relates.

4.3. The Compliance Officer after taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, shall decide the timing for re-opening of the trading window, however in any event it shall not be earlier than forty-eight hours after the information becomes generally available.

4.4. 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

5. Pre-clearance of trades

5.1. All Specified Persons, who intend to deal in the securities of the Company when the trading window is opened and if the value of the proposed trades is above 50,000 shares or up to Rs. 10 Lakhs (market value) or 1% of total shareholding, whichever is less, should pre-clear the transaction. 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-dealing procedure shall be hereunder:

- (i) An application may be made in the prescribed Form (**Annexure 1**) to the Compliance officer indicating the estimated number of securities that the Specified Employee intends to deal in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the company in this behalf.

- (ii) An undertaking (**Annexure 2**) shall be executed in favour of the Company by such Specified Employee incorporating, *inter alia*, the following clauses, as may be applicable:
- (a) That the employee/director/officer does not have any access or has not received “Price Sensitive Information” up to the time of signing the undertaking.
 - (b) That in case the Specified Employee 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.
- (iii) All Specified Persons and their immediate relatives shall execute their order in respect of securities of the Company within one week after the approval of pre-clearance is given by the Compliance Officer in the prescribed form (**Annexure -3**). 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 – 4**). In case the transaction is not undertaken, a report to that effect shall be filed.
- (iv) If the order is not executed within seven days after the approval is given, the employee/director must pre-clear the transaction again.
- (v) 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. All Specified Persons shall also not take positions in derivative transactions in the shares of the Company at any time. In case of any contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund administered by SEBI under the Act.
- In case of subscription in the primary market (initial public offers), the above mentioned entities shall hold their investments for a minimum period of 30 days. The holding period would commence when the securities are actually allotted.
- (vi) 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.

6. Other Restrictions

- 6.1. The disclosures to be made by any person under this Code shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.
- 6.2. The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account for purposes of this Code.
- 6.3. The disclosures made under this Code shall be maintained for a period of five years.

7. Reporting Requirements for transactions in securities

Initial Disclosure

- 7.1. Every promoter/ Key Managerial Personnel / Director / Officers / Designated Employees of the Company, within thirty days 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 format prescribed by SEBI (**FORM A**).
- 7.2. Every person on appointment as a key managerial personnel or a director of the Company or upon becoming a promoter shall disclose his holding of securities of the Company as on the date of appointment or becoming a promoter, to the Company within seven days of such appointment or becoming a promoter in the format prescribed by SEBI (**FORM B**).

Continual Disclosure

- 7.3. Every promoter, employee and director of the Company shall disclose to the Company the number of such securities acquired or disposed of within two 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. Ten lakhs in the format prescribed by SEBI. (**FORM C**)

The disclosure shall be made within 2 working days of:

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

Annual Disclosure

- 7.4. Every promoter, employee and director of the Company shall disclose to the Company his/ her holding of securities of the Company as on date of every financial year ending 31st March, to the Company within 30 days from the end of the financial year in the prescribed form.

8. Disclosure by the Company to the Stock Exchange(s)

- 8.1. Within 2 days of the receipt of intimation under Clause 7.3, the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received in the format prescribed by SEBI (**FORM C**).
- 8.2. 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.

9. Dissemination of Price Sensitive Information

- 9.1. No information shall be passed by Specified Persons by way of making a recommendation for the purchase or sale of securities of the Company.
- 9.2. Disclosure/dissemination of Price Sensitive Information with special reference to analysts, media persons and institutional investors:

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.

10. Penalty for contravention of the code of conduct

- 10.1. 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).
- 10.2. 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.
- 10.3. 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.
- 10.4. 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.

ANNEXURE 1

Dated :

The Compliance Officer
 Spentex Industries Limited
 A- 60 Okhala Industrial Area, Phase II
 New Delhi 110 020

Re : Application for seeking Pre Clearance of transactions in terms of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Dear Sir / Madam,

In terms of SEBI (Prohibition of Insider Trading) Regulations, 2015, I _____
 S/D/W/o _____, being a Director / Officer / Designated Employee of SPENTEX
 Industries Limited hereby seek your approval for buying / selling _____ (number and type of Security) of
 the Company standing in my / dependent family members' name.

As on date I/my dependent family members hold the under mentioned securities (give description of security)
 of the Company in paper form / electronic form :

Name of the holder	Folio No of Securities held in Paper	No of Securities held in Paper form	DP & Client ID No. and name of Depository Participant	No of Securities held in Electronic form

The details of the Securities to be bought are as under :

Sellers's Name	Type of Security to be sold	Folio No. / DP & Client ID No. and name of Depository	No of Securities to be sold

I enclose herewith the form of Undertaking signed by me.

Yours Faithfully

Name
 Designation
 Deptt / Unit
 Signature

ANNEXURE 2

Dated :

The Compliance Officer
Spentex Industries Limited
A- 60 Okhala Industrial Area, Phase II
New Delhi 110 020

Re : Undertaking To Be Accompanied With The Application For Pre-Clearance

Dear Sir / Madam,

I, _____, _____ of the Company residing at _____, 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 the event that I have access to or received any information that could be construed as "Price Sensitive Information" as defined in the Code, 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 four 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 again seek pre-clearance.

In case the securities so bought by me / my immediate relative, I / my immediate relative undertake to hold the said securities for a minimum period of 30 days in order to be considered as being held for investment purposes. The holding period shall also apply to subscription in the primary market

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

Yours Faithfully

Name
Designation
Deptt / Unit
Signature

ANNEXURE-3

Dated :

To,

Re : Pre-Clearance Approval Letter under code of conduct for regulating & reporting trading by insiders

Dear Sir/ Madam

With reference, to your application dated _____ seeking approval for undertaking certain transactions in the securities of the Company, please be informed that you are hereby permitted to undertake the said transaction(s). You may buy/sell not more than _____ number of securities pursuant to this approval letter.

This approval is being issued relying on the various declarations and indemnities made by you in your said application.

This approval letter is valid till _____ (i.e. for 7 days). If you don't execute the approved transaction /deal on or before this date you would have to seek fresh pre-dealing approval before executing any transaction/ deal.

Further, you are required to file the details of the executed transactions in the attached format (Annexure - 4) within 2 working days from the date of transaction/deal. In case the transaction is not undertaken a –Nil report shall be necessary.

Yours Truly

For **SPENDEX INDUSTRIES LIMITED**

COMPLIANCE OFFICER

Encl: Format for submission of details of transaction (Annexure 4)

ANNEXURE 4

Dated :

The Compliance Officer
Spentex Industries Limited
A- 60 Okhala Industrial Area, Phase II
New Delhi 110 020

Re : Disclosure of Pre-cleared transactions

Dear Sir / Madam,

In terms of SEBI (Prohibition of Insider Trading) Regulations, 2015, I _____
S/D/W/o _____, being a Director / Officer / Designated Employee of SPENDEX
Industries Limited wish to inform that I have done the following transactions as per following details:

As per Pre-Clearance Approval Letter			Details of transaction made				Remarks, if any
Nature of Transaction (Buy/ Sell)	Nature of Securities	No. of Securities	Nature of Transaction (Buy/ Sell)	Nature of Securities	No. of Securities	Transaction Value (Rs.)	

In this connection, I undertake to preserve the relevant documents relating to the aforesaid transaction, for a minimum period of five years and produce to the Compliance Officer/ SEBI (if required).

I declare that the above information is correct and that no provisions of the Company's Code of Conduct for prevention of Insider Trading and/or applicable laws have been contravened in relation to conduct or completion of the above transaction(s).

Yours Faithfully

Name
Designation
Deptt / Unit
Signature

ANNEXURE 5

Dated :

The Compliance Officer
Spentex Industries Limited
 A- 60 Okhala Industrial Area, Phase II
 New Delhi 110 020

Re: Annual Statement of Shareholding in terms of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Dear Sir/Madam,

I _____ S/D/W/o _____, being a Director / Officer / Designated Employee of SPENTEX Industries Limited hereby confirm that the following Equity Shares / Voting Rights / Securities of the Company were held by me/ my dependent family members as on 31st March, 2016:

Name & PAN of the Holder	Category of Person (Directors/KMP/ Senior Management Personnel/ employees/immediate relatives/ others etc.)	No. of Shares held on 1st April, 2015	No. of Shares held as on 31st March, 2016	Folio No. / DP & Client ID No. and name of Depository

Yours Faithfully

Name :
 Designation :
 Deptt / Unit :

Signature

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			3	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 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/appointment of Director/KMP		Open Interest of the Option Contracts held at the time of becoming Promoter/appointment 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	7	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.					Buy	Sell	Value of units (contracts * lot size)	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

Name, PAN No., CIN/DIN & address of connected persons, as identified by the company with contact nos.	Connection with company	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			Buy	Sell	Value	Number of units (contracts * lot size)		Value
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.

Name:

Signature:

Date:

Place:
