

CODE OF CONDUCT FOR INSIDER TRADING

1. Code of Conduct

This Code shall be called 'Code of Conduct for Regulating, Monitoring and Reporting of Trading by Insiders of the Company'. This Code shall come into force with immediate effect.

2. Definitions

"Board" means the board of directors of the Company.

"Company" means ACS Technologies Limited.

"Compliance Officer" means the Company Secretary or such other senior officer, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under the Regulations 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policies, procedures, maintenance of records, monitoring adherence to the rules laid hereunder for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the Code under the overall supervision of the Board of Directors of the Company.

"Code" shall mean this Code of Conduct for Regulating, Monitoring and Reporting of Trading by Insiders of the Company, as amended from time to time.

"Connected Person" includes-

- i. A director of the company;
- ii. A Key Managerial Personnel of the Company;
- iii. An officer of the Company;
- iv. Any person who is or has been in contractual or fiduciary or employment relationship at any time in the six-month period prior to the date of determining whether that person, as a result of such relationship, was, directly or indirectly, (x) allowed access to UPSI or (y) reasonably expected to be allowed access to UPSI;
- v. Any person who is or has been in frequent communication with an Officer of the Company at any time in the six-month period prior to the date of determining



- whether that person, as a result of such frequent communication, was, directly or indirectly, (x) allowed access to UPSI or (y) reasonably expected to be allowed access to UPSI;
- vi. An employee of the Company who has access to UPSI or is reasonably expected to have access to UPSI;
 - vii. Any person who has a professional or business relationship with the Company, such that the person, directly or indirectly, (x) is allowed access to UPSI or (y) is reasonably expected to allow access to UPSI;

The persons enumerated below shall be deemed to be Connected Persons if such person has access to UPSI or is reasonably expected to have access to UPSI –

- a) An Immediate Relative of Connected Persons;
- b) A holding company or associate company or subsidiary company;
- c) An intermediary as specified in Section 12 of the SEBI Act or an employee or director thereof;
- d) An investment company, trustee company, asset management company or an employee or director thereof;
- e) An official of a stock exchange or of clearing house or corporation;
- f) A member of Board of Trustee 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;
- 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;
- h) An official or an employee of a self-regulatory organization recognized or authorized by the SEBI;
- i) A banker of the Company;
- 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 percent of the holding or interest.

“Designated Persons” shall consist of, Connected Persons who are:

- i. Promoters of the Company;
- ii. Directors of the Company and its subsidiaries;
- iii. Executive Officers of the Company;
- iv. All Grade [●] employees and above in the Finance and Accounts Department and Legal Department;
- v. Executive Secretaries of Directors and Executive Officers of the Company;
- vi. Any other Connected Person designated by the Company on the basis of their functional role, from time to time;
- vii. Immediate Relatives of (i) to (vi) above;



“Generally Available Information” means information that is accessible to the public on a non-discriminatory basis.

“Director” shall have the same meaning assigned to it under the Companies Act, 2013.

“Immediate Relative” of a person means a spouse, or the parent, sibling or child of that person or his or spouse, if they are either dependent financially on such person or consult such person in taking decisions relating to Trading in securities.

“Insider” means any person who is:

- i. A Connected Person or
- ii. In possession of or having access to UPSI

“Key Managerial Personnel” shall have the meaning assigned to it under the Companies Act, 2013.

“Officer” shall have the meaning assigned to it under the Companies Act, 2013.

“Prohibited Period” shall mean the period when the trading window is closed.

“Promoter” shall have the meaning assigned to it under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof.

“Regulations” shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.

“Securities” shall have the meaning assigned to it under the Securities Contract (Regulations) Act, 1956 or any modification thereof except units of a mutual fund.

“Trading” means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and **“trade”** shall be construed accordingly.

“Unpublished Price Sensitive Information” or **“UPSI”** shall mean any information, relating to the Company or its listed 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, delisting, disposals and expansion of business and such other transactions;
- (v) changes in key managerial personnel;
- (vi) material events in accordance with the listing agreement

Words and expressions used and not defined in this Code 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 legislations.

3. Prohibition on communicating or procuring UPSI

An Insider shall not –

- i. Communicate, provide, or allow access to any UPSI, relating to the Company or its securities, to any person including other insiders, except to the extent allowed by this Code;
- ii. Procure from or cause the communication by an Insider of UPSI, relating to the Company or its securities:

Provided that nothing contained above shall be applicable when an UPSI is communicated, provided, allowed access to or procured:

- i. In furtherance of legitimate purposes, performance of duties or discharge of legal obligations pursuant to appropriate confidentiality and non-disclosure agreements being executed; or
- ii. In the event the Board of Directors direct or cause the public disclosures of UPSI in the best interest of the Company; or
- iii. Within a group of persons if such persons have been identified and secluded within a “Chinese wall” or information barrier by the Compliance Officer from the rest of the Company for a particular purpose or for a specified period of time in furtherance of legitimate purposes, performance of duties or discharge of legal obligations, and are subjected to, among other conditions, additional confidentiality obligations, information barriers designed to prevent exchanges of UPSI outside the “Chinese wall”, and the execution of an undertaking by such persons to abstain and/ or forego Trading during such seclusion or till the UPSI no longer constitutes UPSI.

4. Prohibition on Insider Trading

An Insider shall not, directly or indirectly, -



- i. Trade in securities that are listed or proposed to be listed when in possession of UPSI;
- ii. Trade in securities of the Company except when the Trading Window is open and the Insider is not in possession of UPSI.

Provided the restriction in 4(i) shall not apply to:

- (a) A transaction that is an off-market inter-se transfer between Promoters who were in possession of the same UPSI without being in breach of this Code and both parties had made a conscious and informed trade decision; and
- (b) Trades pursuant to a Trading Plan set up in accordance with this Code.

5. Duties of Compliance Officer

- 1) The Compliance Officer shall report on the compliance and implementation of the Regulations and the Code to the Board and in particular, shall provide reports to the Chairman of the Audit Committee, if any, or to the Chairman of the Board as and when directed by the Board or Audit Committee.
- 2) The Compliance Officer may, in consultation with the Chairman, and shall as and when directed by the Board, specify Prohibited Period from time to time during which trade by Designated Persons shall not be effected;
- 3) The Compliance Officer shall be responsible for setting forth Policies, Procedures, Monitoring adherence to the rules for the preservation of 'Unpublished Price Sensitive Information', 'Pre-clearing of trades of Designated Persons and their immediate relatives', monitoring of Trades and the implementation of this Code under the overall supervision of the Board of Directors of the Company;
- 4) The Compliance Officer shall be responsible for overseeing and coordinating disclosure of price sensitive information to Stock Exchanges, analysts, shareholders and media, and educating staff on the disclosure policies and procedure; and
- 5) The Compliance Officer shall inform SEBI of any violation of SEBI (Prohibition of Insider Trading) Regulations, 2015 within seven days of knowledge of any such violation.
- 6) The Compliance Officer shall maintain:
 - i. updated list of Designated Persons,
 - ii. records of disclosures and pre-clearance applications and undertakings for a period of five years;
 - iii. a confidential list of any 'restricted securities'; and
 - iv. a record of Prohibited Period specified from time to time.



6. Trading Restrictions

All Designated Persons of the Company shall be subject to trading restrictions as enumerated below:

1) Trading Window:

- a. The period prior to declaration of Unpublished Price Sensitive Information is particularly sensitive for transactions in the Company's securities. This sensitivity is due to the fact that the Designated Persons will, during that period, often possess such Unpublished Price Sensitive Information. To ensure that the public interest is not prejudiced during such sensitive times, the Designated Persons shall forego the opportunity of trading in Company's securities. The Directors and Designated Persons of the Company shall not deal in the securities of the Company when the trading window is closed. The period during which the trading window is closed shall be termed as '**Prohibited Period**'.
- b. Without prejudice to the foregoing provisions, the trading window shall be closed at the time of:
 - i. Declaration of Financial results (quarterly, half-yearly and annual);
 - ii. Declaration of dividends (interim and final);
 - iii. Issue of securities by way of public/ rights/ bonus issue, etc.;
 - iv. Any major acquisition/ expansion plans or execution of new projects;
 - v. Amalgamations, mergers, takeovers and buy-back;
 - vi. Disposal of whole or substantially the whole of the undertaking;
 - vii. Commencement of any new commercial production/ commercial operations where the contribution therefrom is likely to exceed ten percent of the last audited consolidated turnover of the Company during that financial year;
 - viii. Litigation/ Dispute with a material impact;
 - ix. Material events as per SEBI (Listing Obligations & Disclosure Requirements), 2015;
 - x. Any other information which, if disclosed, in the opinion of the person disclosing the same is likely to materially affect the prices of the securities of the Company.
- c. The period of closure shall be effective from the date on which the Company sends intimation to the Stock Exchange advising the date of the Board Meeting, up to 48 hours after the Unpublished Price Sensitive Information is submitted to the Stock Exchange.

- 2) All Designated Persons of the Company shall conduct all their dealings in the Securities of the Company only during the period when the Trading Window is open and shall not deal in any transaction involving the purchase or sale of the Company's



securities during the Prohibited Period as may be specified by the Company from time to time.

7. Pre-clearance of Trading

- 1) All Designated Persons, who intend to Trade in the securities of the Company when the trading window is open and if the value of the aggregate proposed trades is in excess of Rs.5,00,000 (Rupees Five Lakhs only) during any calendar quarter, may do so after obtaining approval of the Compliance Officer by submitting an application for pre-clearance in the form prescribed in Annexure 1 alongwith a duly executed undertaking as per Annexure 2 hereto. 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.
- 2) The Compliance Officer shall not approve any proposed Trade by Designated Person if the Compliance Officer determines that such Designated Person is in possession of UPSI even though the trading window is open.
- 3) The Compliance Officer may, after being satisfied that the application and undertaking are true and accurate, approve Trading by a Designated Person, on the condition that the Trade so approved shall be executed within seven trading days following the date of approval.
- 4) The Designated Person shall, within two days of the execution of the Trade, submit the details of such Trade to the Compliance Officer as per Annexure 3. In case the transaction is not undertaken, a report to that effect shall be filed.
- 5) If the pre-cleared Trade is not executed within seven trading days after the approval is given, the Designated Person must secure pre-clearance of the transaction again.
- 6) A Designated Person who Trades in securities without complying with the pre-clearance procedure as envisaged in this Code or gives false undertakings and/or makes misrepresentations in the undertakings executed by him/ her while complying with the pre-clearance procedure shall be subjected to the penalties envisaged in this Code.

8. Additional trading restrictions on Designated Persons

- 1) No Director or Key Managerial Personnel shall enter into derivative transactions in respect of the securities of the Company.



- 2) All Designated Persons who Trade in the securities of the company shall not enter into an opposite transaction during the next six months following the prior transaction. In case of any contra trade be executed, inadvertently or otherwise, in violation of such restriction, the profits from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund administered by SEBI.

9. Trading Plan

- 1) A Designated Person shall be entitled to formulate a Trading Plan that complies with the Regulations (a "**Trading Plan**") and present it to the Compliance Officer for approval and public disclosure pursuant to which Trades may be carried out in his behalf in accordance with such plan.
- 2) The Compliance Officer shall review and approve the Trading Plan if it complies with the Regulations and shall disclose the Trading Plan to the stock exchanges.
- 3) The Trading Plan once approved shall be irrevocable and the Designated Person 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 Designated Person is in possession of UPSI and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Trading Plan shall be deferred until such UPSI becomes generally available information.

10. Penalty for Insider Trading

- 1) An Insider who acts in contravention of this Code shall be liable to have his services or relationship with the Company, as the case may be, terminated.
- 2) Any Designated Person who violate this Code shall be subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligibility for future participation in the Company's stock option plans or termination.
- 3) The SEBI or any other appropriate regulatory authority would also be informed of the violation of this Code so that appropriate action may be taken.

11. Disclosure Requirements

- 1) General Provisions:



- a. Every public disclosure shall be made in the Form/s as prescribed under the Insider Trading Regulations from time to time.
- b. 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.
- c. The disclosure of trading in securities shall also include trading in derivatives of securities and traded value of the derivatives shall be taken into account, provided that trading in derivatives of securities is permitted by any law for the time being in force.
- d. The disclosures made hereunder shall be maintained by the Company, for a minimum period of five years, in such form as may be prescribed.

2) Initial Disclosure:

- a. Every Promoter, Key Managerial Personnel, director of the Company and each of their Immediate Relatives shall disclose his holding of securities of the Company within thirty days of this Code taking effect as per Form A set out in Annexure 4.
- b. Every person on appointment as a Key Managerial Personnel or a director of the Company or upon becoming a Promoter shall disclose his/her and Immediate Relatives' 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, as per Form B set out in Annexure 5.

3) Continual Disclosure:

- a. Every Promoter, employee, director of the Company and each of their Immediate Relatives shall disclose as per Form C set out in Annexure 6 to the Company the number of such securities acquired or disposed of within two trading days of such transaction if the value of securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rupees Ten Lakhs.
- b. The disclosure shall be made within two working days of:
 - i. The receipt of intimation of allotment of shares. Or
 - ii. The acquisition or sale of shares or voting rights, as the case may be.

4) Disclosure to the Stock Exchange:

The Compliance Officer shall notify the stock exchanges, particulars of the Trades, within two trading days of the receipt of the Continual Disclosure or from becoming aware of such information.



5) Disclosure by other Connected Persons:

The Compliance Officer may, require any other Connected Person to disclose the holdings and trading in securities of the Company at such frequency, as he may determine.

12. Preservation of “Price Sensitive Information”

A. Designated Persons shall maintain the confidentiality of all Unpublished Price Sensitive Information. Directors/ Designated Persons shall not communicate, provide or allow access to an Unpublished Price Sensitive Information to any person directly or indirectly except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

B. Need to Know

Unpublished Price Sensitive Information is to be handled on a “need to know” basis, i.e., 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 information.

C. Limited access to confidential information

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password. Files containing confidential information should be deleted/destroyed after its use. Shredder should be used for the destruction of physical files.

13. Miscellaneous

7) The Board of Directors shall be empowered to amend, modify, interpret this Code and such amendments, modifications or interpretations shall be effective from such date that the Board may notify in this behalf.

14. Penalty for contravention of this Code

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

Designated Persons of the Company who violate this Code shall also be subject to disciplinary action by the Company, which may include wage/ salary freeze, suspension,



withholding of promotions, etc. The action by the Company shall not preclude SEBI from taking any action in case of violation of the Regulations.

For and on behalf of ACS Technologies Limited



Prabhakara Rao Alokam

Director

DIN: 02263908



Date: 04/02/2019

Place: Hyderabad

ANNEXURE 1

APPLICATION FOR PRE-TRADING APPROVAL

To,

The Compliance Officer,
ACS Technologies Limited

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code, I seek approval to purchase/ sell/ subscribe _____ Equity Shares of the Company as per details given below:

1.	Name of the Applicant	
2.	Designation	
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 trading in securities	
7.	Estimated number of securities proposed to be purchased/ subscribed/ sold	
8.	Current market price (as on date of application)	
9.	Whether the proposed transaction will be through stock exchange or off-market trade	
10.	Folio No./ DP ID/ Client ID No. where the securities will be credited/ debited	

I enclose herewith the Undertaking signed by me.

Signature:

Name:

Date:



ANNEXURE 2

UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-CLEARANCE

To,

The Compliance Officer,
ACS Technologies Limited

I, _____, _____ of the Company residing at _____, am desirous of trading 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 any unpublished price sensitive information up to the time of signing this Undertaking.

In the event that 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 trading 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.

In the event of this transaction being in violation of the Code or the applicable laws, (a) I will, unconditionally, release, hold harmless and indemnify to the fullest extent, the Company and its directors and officers (the '**indemnified persons**'), for all losses, damages, fines, expenses, suffered by the indemnified persons, (b) I will compensate the indemnified persons for all expenses incurred in any investigation, defense, crisis management or public relations activity in relation to this transaction and (c) I authorize the Company to recover from me, the profits arising from this transaction and remit the same to SEBI for credit of the Investor Protection and Education Fund administered by the SEBI.

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 trade within seven days of the receipt of approval, failing which, I shall seek pre-clearance afresh.



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

Signature:

Name:

Date:

ANNEXURE 3



DISCLOSURE OF TRANSACTIONS

(To be submitted within two days of transaction/ trading in securities of the Company)

To,

The Compliance Officer,
ACS Technologies Limited.

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)

(Strike out whichever is not applicable)

Name of Holder	No. of securities traded	Bought/ Sold/ Subscribed	DP ID/ Client ID/ Folio No.	Price (Rs.)

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 transaction(s).

Signature:

Name:

Date:



ANNEXURE 4

FORM A

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7(1)(a) read with Regulation 6(2) – Initial Disclosure to the Company]

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, CN/DIN & Address with Contact No.	Category of Person (Promoters/ KMP/ Directors/ Immediate Relatives/ Others)	Securities held as on the date of regulation coming into force		% of Shareholding
		Type of security (For eg. – Shares, Warrants, Convertible Debentures, etc.)	Number	

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



Details of Open Interest (OI) in derivatives of the Company held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

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		
Contract Specifications	Number of Units (Contracts * Lot size)	Notional Value in Rupee terms	Contract Specifications	Number of Units (Contracts * Lot size)	Notional Value in Rupee terms

Note: In case of Options, notional value shall be calculated based on premium plus strike price of options.

Name & Signature:

Designation:

Date:

Place:



ANNEXURE 5

FORM B

SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7(1)(b) read with Regulation 6(2) – Disclosure on becoming a
Director/ KMP/ Promoter]

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, CN/DIN & Address with Contact No.	Category of Person (Promoters/ KMP/ Directors/ Immediate Relatives/ Others)	Securities held as on the date of regulation coming into force		% of Shareholding
		Type of security (For eg. – Shares, Warrants, Convertible Debentures, etc.)	Number	

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



Details of Open Interest (OI) in derivatives of the Company 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)

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		
Contract Specifications	Number of Units (Contracts * Lot size)	Notional Value in Rupee terms	Contract Specifications	Number of Units (Contracts * Lot size)	Notional Value in Rupee terms

Note: In case of Options, notional value shall be calculated based on premium plus strike price of options.

Name & Signature:

Designation:

Date:

Place:



ANNEXURE 6

FORM C

SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7(2) read with Regulation 6(2) – Continual Disclosure]

Name of the Company: _____

ISIN of the Company: _____

Sl. No.	Name of Person (Promoters/ KMP/ Directors / Immediate Relatives / Others)	Securities held prior to acquisition/ disposal		Securities acquired/ disposed				Securities held post acquisition/ disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of Intimation to the Company	Mode of acquisition/ disposal
		Type of security (For eg. Shares, Warrants, Convertible Debentures, etc.)	No. & % of shareholding	Type of security (For eg. Shares, Warrants, Convertible Debentures, etc.)	No.	Value	Transaction Type (Buy/Sale/Pledge/Revoke/invoked)	Type of security (For eg. Shares, Warrants, Convertible Debentures, etc.)	No. & % of shareholding	From	To		



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



Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2)

Trading in derivatives (Specify type of contract, Futures or Options, etc.)						Exchange on which trade was executed
Type of Contract	Contract Specifications	Buy		Sell		
		Notional Value	Number of Units (Contract * Lot size)	Notional Value	Number of Units (Contracts * Lot Size)	

Note: In case of Options, notional value shall be calculated based on Premium plus Strike Price of Options.

Name& Signature:

Designation:

Date:

Place:



ANNEXURE 7

FORM D (Indicative Format)

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7(3) – Transactions by Other Connected Persons as identified by the Company]

Details of trading in securities by other connected persons as identified by the Company

Sl. No.	Name, PAN, DIN, CIN, Aadhaar No.	Category of Person (Promoters/ KMP/ Directors / Immediate Relatives / Others)	Securities held prior to acquisition/ disposal		Securities acquired/ disposed				Securities held post acquisition/ disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of Intimation to the Company	Mode of acquisition/ disposal
			Type of security (For eg. Shares, Warrants, Convertible Debentures, etc.)	No. & % of shareholding	Type of security (For eg. Shares, Warrants, Convertible Debentures, etc.)	No.	Value	Transaction Type (Buy/Sale/Pledge/Reverse/invoke)	Type of security (For eg. Shares, Warrants, Convertible Debentures, etc.)	No. & % of shareholding	From	To		

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



Details of trading in derivatives by Other Connected Persons as identified by the Company

Trading in derivatives (Specify type of contract, Futures or Options, etc.)						Exchange on which trade was executed
Type of Contract	Contract Specifications	Buy		Sell		
		Notional Value	Number of Units (Contract * Lot size)	Notional Value	Number of Units (Contracts * Lot Size)	

Note: In case of Options, notional value shall be calculated based on Premium plus Strike Price of Options.

Name& Signature:

Designation:

Date:

Place:

