

26<sup>th</sup> April, 2016

Department of Corporate Services
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalai Street, Fort, Mumbai – 400001
(Scrip ID – SRSLTD, Scrip Code – 533569)

The Listing Department
National Stock Exchange of India Limited
Exchange Plaza,
BandraKurlaComplex,
Bandra (E), Mumbai-400051
(Symbol – SRSLTD, Series – EQ)

Dear Sir/Madam,

## Sub: Representation regarding Trading Plan

We would like to submit herewith that as per the SEBI (Prohibition of Insider Trading Regulations), 2015, a Promoter/Insider are required to formulate a pre-scheduled trading plan for dealing in securities of the Company. Such Trading Plan has to be approved by the Compliance Officer and must be made and disclosed to the public six months before its execution, and is irrevocable.

Sir, we would like to mention here that it becomes practically impossible for Company/ Promoter to predict the Stock Market/Economic conditions six months prior to date of entering into transactions. Further, no deviation is allowed with execution of any trade in securities outside the scope of trading plan.

Trading Plan should not entail trading for period between 20<sup>th</sup> trading day prior to the last day of any financial period and the second trading day after the disclosure of such financial results by the Company. This puts restriction on corporates to pre-decide Board meeting dates, well-in-advance and disclose the same to all insiders; so as to enable them to have proper trading plan in terms of these restrictions. In spite of such advance information for insiders, it is practically not possible for anybody to pre-decide the dates of trading and follow the above restriction, as well.

And, in a case, if the circumstances are not allowing the insider to execute its trading plan, no recourse is available to him.



## **SRS LIMITED**

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Therefore, we request you to please put the matter before SEBI for some relief to the Promoters/Insiders so that a practical trading plan may be made and disclosed.

Thanking You,

Yours faithfully,

For SRS Limited

(Navneet Kwatra)

C.O.O. & Company Secretary

## **SRS LIMITED**