KAMA Holdings

The BSE Limited
BSE's Corporate Relationship Department
1st Floor, New Trading Ring,
Rotunda Building, P.J. Towers,
Dalal Street, Fort,
Mumbai 400 001

KAMA/SEC-A/13 05.02.2016

Sub: Intimations to Stock Exchange- SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015

Dear Sir,

The Board of Directors of the Company in their meeting held on 13th November, 2015 approved amendment of the Code of Conduct to Regulate, Monitor and Report Trading by Insiders.

The aforesaid Code has been published on the website of the Company.

The copy of the Code is attached herewith for your information and record.

Thanking you,

Yours faithfully,

For **KAMA HOLDINGS LIMITED**

RAJAT LAKHANPAL
WHOLE TIME DIRECTOR, CHIEF FINANCIAL OFFICER & COMPANY SECRETARY

Encl : A/a

KAMA Holdings Limited
Block-C, Sector-45
Gurgaon 122 003
Haryana, India
Tel: +91-124-4354400
Fax: +91-124-4354500
Email : info@kamaholdings.com
Website : www.kamaholdings.com

Regd. Office :
C-8, Commercial Complex
Safdarjung Development Area
New Delhi - 110016, India

Corporate Identity No. L92199DL2000PLC104779

This Code has been designed to fulfill the responsibility cast on the Company by the SEBI (Prohibition of Insider Trading) Regulations, 2015 as notified on January 15, 2015 as amended. (hereinafter referred to as "the Regulations").

KAMA Holdings Limited initially implemented a Code of Conduct for Prevention of Insider Trading in June, 2002 which was amended from time to time in line with the amendments in SEBI (Prohibition of Insider Trading) Regulations, 1992.

This Code of Conduct to Regulate, Monitor and Report Trading by Insiders (hereinafter referred to as "the Code") is being introduced to replace the earlier Code of Conduct for Prevention of Insider Trading, **(effective May 30, 2015)** to enhance the standards of corporate governance and to take into account certain changes in the organization structure and regulatory requirements.

The Objectives of this Code are as follows :-

1. Laying down the policy of the Company in relation to insider trading.
2. Setting the policies, procedures and monitoring adherence to the rules for preservation of "Unpublished Price Sensitive Information".
3. Laying down the criteria for identification of 'Designated Employees" as defined in the Regulations.
4. Laying down the procedures for pre-clearing the trades of the Directors Officers and designated employees.
5. Laying down procedure for approval, implementation and monitoring of Trading Plans.
6. System for monitoring compliance of Insider Trading Regulations by the the Board of Directors/Audit Committee.
7. Defining the powers of the compliance officer for discharging his duties under this Code.

1. Definitions

1. **No Trading Period**: The period beginning :-

   a) From the 1st day of the quarter in which the Board meeting for considering quarterly/annual accounts is held and upto the end of the 2nd trading day from the date of the Board meeting; or

   b) From time of notice of Board meeting in which an unpublished price sensitive information is to be considered and upto the end of the 2nd trading day from the date of such a Board meeting.

   In addition to the above, no trading period for approved "Trading Plans" shall be as specified in Para 11 of this Code.

2. The Company means KAMA Holdings Limited.

3. **Trading in securities** means and includes subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell or deal in the securities of the Company and "trade" shall be construed accordingly.

4. **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.

5. **Identified Account** means any security account related or controlled by designated Person including :-

   a) personal accounts of designated Person

b) accounts held by or for the benefit of Immediate Relatives of designated Person.

These requirements do not apply to accounts in which the designated Person have been determined to have only a verifiable arm's length beneficial interest, such as certain trusts, provided that the designated Person do not influence or control investment policy or decisions of such accounts in any way, whether directly or indirectly.

6. **Insiders** means any person who is :
   i) a connected person; or
   ii) in possession of or having access to unpublished price sensitive information;

7. **Compliance Officer**: It means the Whole time Director, Chief Financial Officer and Company Secretary of the Company appointed under the provisions of the Companies Act, 2013 or any amendment thereof, who shall report to the Chairman of the Audit Committee/Chairman of the Board of Directors at such frequency as may be stipulated by the Board of Directors.

8. **Connected Person** means a person defined as connected person under the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 from time to time.

9. **Designated Person** means following employees / officials of the Company:-

   a) All members of the Board of Directors
   b) All Key Managerial Personnel

10. **Officer**: It includes any Director, Manager, or Secretary or any person in accordance with whose directions or instructions the Board of Directors or any one or more of the directors is or are accustomed to act.

11. **Unpublished Price Sensitive Information (UPSI)** 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) other material events defined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

12. **Securities**: It shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 or any modification thereof.

13. **Trading Plan** means a plan formulated by designated person in accordance with the requirements of the Regulations.

14. **Trading Window**: It means the period during which trading in the company's securities is permitted.

Words and expressions not defined in this Policy shall have the same meaning as contained in the SEBI (Prohibition of Insider Trading) Regulation, 2015 or SEBI Act, 1992 or the Companies Act,

2013. The trading window shall be closed when the Compliance Officer determines that designated persons can reasonably be expected to have possession of UPSI. For details please visit SEBI website **www.sebi.gov.in**

2. Interpretation

2.1 Words employed in the masculine gender shall include the feminine also.

2.2 If due to any reason any provision(s)/ clause(s) of this Policy is rendered unlawful or unenforceable, than the Policy shall be read as excluding that clause(s) / provision(s).

2.3 For interpretation of this policy the provisions of the applicable laws would apply.

2.4 Any dispute, discrepancy or disagreement which may arise under or as a result of or pursuant to or in connection with this Policy shall be referred to the Insider Trading Monitoring Committee and the decision / interpretation of the Committee shall be final and binding.

3. Implementation of the Code

i) This Code shall be effective from May 30, 2015.

ii) This Code has been adopted by the Board of Directors of the Company by the resolution passed at its meeting held on May 30, 2015 and as amended vide resolution passed by the Board at its meeting held on November 13, 2015.

iii) Any amendment / modification of this Code shall be effective from date of approval of such amendment / modification by the Board or such other date as may be decided by the Board.

4. Rules for preservation of Unpublished Price Sensitive Information (UPSI)

The general rules for dealing with the price sensitive information are as follows :-

i) The aforesaid information may be shared in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

ii) Copies of the aforesaid documents shall strictly be shared with authorized officials / persons on need to know basis and confidentiality thereof shall be maintained.

iii) The Designated Persons/Directors/insiders shall maintain the confidentiality of all UPSI and shall not pass on such information to any person directly or indirectly by making a recommendation for the purchase or sale of shares.

iv) UPSI should be disclosed only to those within the Company who need the information to discharge their duties and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.

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

vi) Files containing confidential information shall be kept secure. All computers containing UPSI information must have adequate security of login and password protection.

5. Duties of Insider / Designated Person

An Insider shall comply with the following rules:

i) Not to deal, either on their own behalf or on behalf of any other person, in the securities of the Company, while in possession/having knowledge of UPSI or during the no trading period;

ii) The onus of establishing that they were not in possession UPSI shall be on such insider / Designated Persons.

iii) Not to advise any person to deal or not to deal in the securities of the company, on the basis of any UPSI.

iv) Enter into any contract in Future and Options Segment in the Company Securities only if permitted by law for such class of insider;

v) Not to enter into any speculative dealing (e.g. intra-day dealing of shares) with respect to the company securities.

vi) To maintain confidentiality and not to disseminate / disclose the UPSI except strictly as required in performance of the duties or in compliance with any law for the time being in force;

vii) To deal in the securities of the Company only when the trading window is open and after obtaining the requisite pre clearance approval or in accordance with the Trading Plan formulated in accordance with the Regulations and to ensure that the Immediate Relatives do not deal in the Company securities except in compliance with the Code;

viii) To mandatorily implement irrevocable trading plan approved by compliance officer without deviation in accordance with the Regulations.

ix) To designate only one demat and trading account and not use multiple accounts for dealing in the Company securities and also ensure that immediate relatives do not use multiple accounts for dealing in the Company securities;

x) To procure confidentiality undertaking before sharing any UPSI with any third party;

xi) To intimate the Compliance Officer about any change in demat account, contact details pertaining to himself or his relative;

xii) Inform forthwith to the Compliance Officer about any violation / non compliance of the Code;

xiii) Provide such information as may be required by the Board and/or Stakeholders Relationship Committee or Compliance Officer from time to time;

6. Responsibility of Compliance Officer

The Compliance Officer shall be responsible for :-

i) setting the policies and procedures for adherence to this Code.

ii) monitoring the adherence to rules for preservation of the price sensitive information.

iii) Pre-clearing of designated Persons and their immediate relative's trades.

iv) Approval of Trading Plans and its monitoring.

v) Implementation of code of conduct under overall supervision of the Board.

vi) The compliance officer shall maintain records of all the applications / declarations given to him and clearances given by him for dealing in securities for a minimum period of five years from the respective dates.

vii) Assisting all the employees in addressing any clarifications regarding the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and this Code of Conduct.

viii) reporting to the Board of Directors and provide quarterly reports to the Chairman of the Audit Committee and to the Chairman of the Board of Directors or at such other frequency as may be stipulated by the board of directors.

7. Disclosure of shareholding/change etc.

a). Initial Disclosures:

i. Every person on appointment as a key managerial personnel or a Director of the company or upon becoming a promoter shall disclose his and his 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 in Form B of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015(Annexure - I). They shall also provide a disclosure in Annexure II giving the particulars prescribed therein

ii. Initial Disclosure shall also be given by the Designated Persons at the time of their becoming a Designated Person as defined above, in Annexure - II, giving acceptance to the Code and disclosing the total number of shares or voting rights in the company held by him and/or his immediate relatives, details of identified accounts etc.,

b). Continual Disclosures:

i. 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 by him and/or his immediate relatives, 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 ten lakh rupees or such other value as may be specified (in Form C of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015) enclosed herewith as Annexure - V; and

ii. the company shall notify the particulars of such trading to the stock exchanges on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.

Designated Persons shall deal in securities only through identified accounts as disclosed or such other accounts as intimated to the Compliance Officer.

8. Pre-clearing of Trades

All designated Person(s) who intend to deal in securities of the company where 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 ten lakh rupees or such other value as may be specified from time to time under the regulations on their behalf and/or on behalf of their immediate relatives members shall take pre-clearance of the transactions from the compliance officer as per procedure and in the format prescribed (Annexure - III) and they shall be bound to make full disclosure of the information as mentioned in the said format and execute necessary undertaking (Form C (of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015) as prescribed under the Regulations.

The Compliance Officer shall consider and convey his decision in the form as given in Annexure - III within one working day of the receipt of application for pre-clearance. The decision of the Compliance Officer in this regard will be final and binding.

The designated Person(s) shall execute the pre-cleared deal within seven trading days of such approval. If the order is not executed within specified period after the approval is given, the employee/director must pre-clear the transaction again.

The details of the transaction shall be communicated to the Compliance Officer within 2 trading days thereof in Annexure – IV. In the event, the Designated Person decides not to trade the same shall be reported with reasons in the said Annexure IV.

9. Minimum Holding Period

i) All securities, irrespective of the mode of acquisition either from the open market or otherwise must be held for a minimum period of six months (minimum holding period) before dealing in the securities.

ii) No designated person shall engage in the speculative short term trading (including intra day dealings) in the securities of the company.

iii) Minimum time gap between purchase and sale of securities or vice-versa should be six months.

iv). In case the sale of securities is necessitated by personal emergency, the holding period may be waived by the Compliance officer after recording in writing his / her reasons in this regard

10. Trading Plan

(1) Any Designated Person shall be entitled to formulate a trading plan 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.

(2) Such trading plan shall:–

(i) not entail commencement of trading on behalf of the designated person earlier than six months from the public disclosure of the plan;

(ii) not entail trading for the period during window closure;

(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.

(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.

Provided that the implementation of the trading plan shall not be commenced if any unpublished price sensitive information in possession of the designated person at the time of formulation of the plan has not become generally available at the time of the commencement of implementation.

(4) Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

Any designated person interested in formulation of trading plan shall get in touch with Secretarial department for necessary forms and procedure to be complied with.

11. Dealing with/Handling of Price Sensitive Information

All Insiders shall maintain complete confidentiality and shall not make use of any price sensitive information in their possession for other than official purposes or in the ordinary course of business of the Company and shall not pass on such information to any person directly or indirectly by way of making recommendation for the purchase/sale of shares and shall take all necessary precautions to avoid/prevent the same becoming public.

All files containing confidential information shall be kept secured, including computer files with adequate security with login and password etc.

12. Penalty for contravention of code of conduct

i) Any Insider who violates any of the provisions of this Code of Conduct is liable for the disciplinary action as per this Code. Any violation of the Code by an Insider will attract the following penalty:

Nature of Violation	Penalties
Failure to submit disclosures	As may be specified and imposed by SEBI from time to time. (Presently as per SEBI Act penalty imposed may be Rs. 1 Lakh but which may extend to Rs. 1 lakh for each day during which such failure continues subject to a maximum of Rs. 1 crore.)
Trading during No trading period	Disciplinary actions including wage freeze, suspension, ineligibility for participation in employees' stock option plans etc. Any other action that may be taken by SEBI under these regulations.
Execution of contra trade before	The profits from such trade shall be disgorged and paid

expiry of 6 months of trade, inadvertently or otherwise,	to SEBI for credit to the Investor Protection and Education Fund (IEPF A/c) administered by the Board under the Act.

Further, violation of these regulations shall promptly be informed to SEBI for appropriate action.

ii) In case the Compliance Officer identifies that the any insider has dealt in the securities of the Company, in violation of the provisions of this Code, the Compliance Officer shall after completing the enquiry and confirming the default, inform SEBI of the same.

13. Inquiry

i) Where on the basis of the records available or the information received, Compliance Officer finds or has a reason to believe that any employee or officer of the company has violated the provisions of this Code, than such person may be required to furnish documents/evidences to prove the compliance of the Code by him.

ii) If on the receipt of the documents/evidences, Compliance Officer is satisfied that there is no non compliance of the Code then no penal action would taken against him. However, in case of non compliance of the Code, appropriate penal actions as prescribed above would be taken against such person.

iii) In case the proper documents/information is not submitted by the insider, within the time limit as prescribed by the Compliance Officer then the Compliance Officer shall undertake an inquiry.

iv) To undertake the inquiry, the Compliance Officer may appoint one or more competent person (hereinafter referred to as authorized representative). While undertaking the inquiry, the authorized representative may take such actions as may be required including checking the transaction of the insider with the brokerage firm/relevant agencies or authorities. The inquiry should be completed within 15 days. Authorized representative will submit his report to the Compliance Officer within 5 days of the completion of the inquiry.

v) If on the completion of the investigation, insider is found to be the guilty of the violation of the Code, then action as described above would be taken.

14. Miscellaneous

i) The amount collected as penalty shall be immediately paid to SEBI for credit to the Investor Protection and Education Fund (IEPF A/c) administered by the Board under the Act.

ii) Any employee of the Company who becomes aware of any violation by an insider shall immediately intimate the Compliance Officer of such violation or non-compliance. The information provided by such employee shall be treated as confidential and shall not be disclosed.

iii) If any employee has any query/question about this Code or its application to any proposed transaction, the same may be addressed to the Compliance Officer.

iv) The Code shall remain in force until withdrawn by the Board of Directors of the Company.

Annexure I

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, CIN/DIN & Address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relative to/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
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5	6

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 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		
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
7	8	9	10	11	12

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

Name & Signature:
Designation:
Date:
Place:

******

Annexure II

ACCEPTANCE OF CODE AND INITIAL DISCLOSURE OF DETAILS OF SHARES HELD BY INSIDER (SELF)/ IMMEDIATE RELATIVES

The Compliance Officer
KAMA Holdings Limited
C-8, Commercial Complex,
Safdarjung Development Area,
New Delhi – 110 016

Re: Code of Conduct to Regulate, Monitor and Report Trading by Insiders ("Code")

Dear Sir,

This is to confirm that I am in receipt of the Code and have read and familiarized myself with all the terms and conditions therein.

I hereby agree and accept all the terms and conditions of the Policy and shall duly abide by the same.

I also agree that my failure to comply with the terms and conditions of the Policy or any violation thereof by me or my Immediate Relatives shall be taken as the violation of the Code and the Company shall be at liberty to take necessary action as prescribed under the Code or otherwise.

I hereby also declare that that the information as given hereinafter is true and correct and nothing has been concealed including the details of security accounts held by me/ Immediate Relatives.

Self

Name	
Designation	
Residential Address	
Telephone No. & E-mail ID	
Date of becoming insider/date of joining	
No. of shares held	
Date of Acquisition (irrespective of mode)	
Details of identified Accounts	
Name of Depository Participant	
DP ID	
Client ID	

*Immediate Relative (IM)**

Name	
Nature of Relation	
Residential Address	
Telephone No. & E-mail ID	
No. of shares held	
Date of Acquisition (irrespective of mode)	
Details of identified Accounts	
Name of Depository Participant	
DP ID	
Client ID	

I also undertake to furnish the details of any changes in the above information within two working days of change, failure of which would attract penal provisions under the Code.

Signatures:_____

Signatures:_____
(on behalf of Immediate Relatives)

Place :
Date :

Note: **1. To be submitted within 2 days from date of communication of the Code or the date of becoming Insider/joining, whichever is later.**
2. Even NIL declaration is to be submitted with respect to the above.
3. Provide details of all the demat accounts, if more than one. Use separate sheet if required.
4. In case of more than one Immediate Relatives, attach separate sheet.

Annexure III

APPLICATION FOR PRE-CLEARANCE OF TRADING

(To be provided on Rs. 20 Stamp Paper)

The Compliance Officer
KAMA Holdings Limited
C-8, Commercial Complex,
Safdarjung Development Area,
New Delhi – 110 016

Date: _____

1.	Approval seeking for	:	☐ Self ☐ Immediate Relatives (IR)
2.	Nature of proposed transaction	:	Purchase/ Sale
3	Number of securities held in the company as on date	:	_____Equity Shares
4	Number of securities proposed to be transacted	:	
5.	If selling, whether complied with minimum holding period of 6 months		☐ YES ☐ NO, I am seeking waiver (Give reasons) _____ _____ _____

5	Details of Identified Account Name and contact details of the Broker with Account Number		
	Name of Depository Participant	:	
	DP ID	:	
	Client ID/ Folio No.	:	

Undertaking:

a) I am not in possession of or knowledge of any information that could be construed as "Price Sensitive Information" as defined in the Code upto the time of signing this undertaking;

b) In the event that I am in possession/knowledge of 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;

c) I have not contravened the provisions of the Code as notified by the Company from time to time;

d) I have made full and true disclosure in the matter.

e) I hereby undertake that I shall execute my order in respect of the securities of the Company within seven days after the approval of the pre-clearance is given. If the order is not executed within stipulated time, I undertake to obtain pre-clearance for the transaction again.

f) I have not made any opposite transaction with in previous six months from the date of proposed transaction.

Signature:_____

Name:
Designation:

Signature: _____
(On behalf of Immediate Relatives as well, if seeking approval for IR)

PRE-CLEARANCE ORDER (PCO)

PCO No. _____ Date: _____

This is to inform you that your request for dealing in _____(No.) shares of the Company as mentioned in your above application is approved. Please note that the said transaction must be completed within 7 (seven) days from today i.e. on or before _____[date].

Signature: _____
Compliance Officer
Please provide all the information. Incomplete forms will not be accepted.

Annexure IV

CONFIRMATION OF DEAL

To,

The Compliance Officer
KAMA Holdings Limited
New Delhi

I hereby confirm that, I have purchased/sold _____ Equity Shares of KAMA Holdings Limited on _____, through my/my Immediate Relatives identified A/c No., DP ID_____ Client ID_____ , for which approval was granted on _____ vide PCO No. _____.* The details of acquisition/sale in Form C of the Regulations is enclosed

Or

I hereby confirm that, I had not dealt in Securities (Pl. specify the nature of Security) in terms of the preclearance granted on _____ vide PCO No. _____ due to _____ (Pl. specify the reason for not trading).*

Signature:_____ **Signature: _____**

(On behalf of Immediate Relatives)

Name:
Designation:
Department:

Date:

* Please strike off the para which is not applicable.

Instructions:

1. **To be submitted with the 2 days of effecting the transaction**
2. **Intimation given through e-mail, will also be considered valid.**

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: _____

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, CIN/DIN, & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relative to/others etc.)	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 company	Mode of acquisition / disposal (on market/public/ rights/ preferential offer / off market/ Inter-se transfer, ESOPs etc.)
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge / Revoke/ Invoke)	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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 the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
15	16	17	18	19	20	21

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

Name & Signature:

Designation:

Date:

Place:

******