

# SOUTHERN INFOSYS LTD.

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CIN: L67120DL1994PLC059994, Web: www.southerninfosys.com GST NO.: 07AAACD3491K1ZJ

Date: 07.03.2024

To. The Department of Corporate Services Bombay Stock Exchange P J Towers, Dalal Street, Mumbai - 400001

**BSE Code: 540174** 

Sub: Code of Conduct to Regulate, Monitor and Report of Trading by Designated Persons and their Immediate Relatives

Dear Sir,

Pursuant to the Regulation 9(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time, please find enclosed herewith Code of Conduct for Regulating, Monitoring and Reporting of Trading by Designated Persons and their Immediate Relatives.

You are requested to take the same on your record.

Thanking you, Yours faithfully, For Southern Infosys Limited

(Shivani)

Company Secreta Exampliance Officer

M.No.: A65810

# Code of Conduct to regulate, monitor and report trading by Designated Persons

This Code of Conduct for Regulating, Monitoring and Reporting of Trading by Designated Persons and their Immediate Relatives is framed pursuant to Regulation 9(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time. This Code is being framed with an aim that the Designated Persons and their immediate relatives, as defined in the Code, do not derive any benefit or assist others to derive any benefit from the access to and possession of Unpublished Price Sensitive Information (UPSI) about the Company which is not in the public domain and thus constitutes Insider information

#### 1. APPLICABILITY

This Code of Conduct is applicable to all Designated Employees and their immediate relatives, connected persons, Promoter and Promoter Group of the Company.

#### 2. DEFINITIONS

- a) "Act" means the Securities and Exchange Board of India Act, 1992 including any amendment or modification thereto;
- b) "Board" means the Securities and Exchange Board of India;
- c) "Code" or "Code of Conduct" means Conduct for Regulating, Monitoring and Reporting of trading by Designated persons and their immediate relatives.
- d) "Company" means Southern Infosys Limited.
- e) "Compliance Officer" means any senior officer who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations designated so and reporting to the Board of Directors and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board of Directors of the Company.
- f) "Connected person" shall have the meaning given to it under Regulation 2(d) of the regulation and shall also include the promoters, their directors and Key Managerial personnel and persons who would have access to or could access unpublished price sensitive information by virtue of any connection that would put them in possession of unpublished price sensitive information.

## g) "Designated Persons" means:

- (i) All Directors;
- (ii) such Employees of the Company, Employees of material subsidiaries of Company;
- (iii) all promoters of the Company and promoters who are individuals or investment companies for intermediaries and fiduciaries;
- (iv) Chief Executive Officer and employees up to two-level below the Chief Executive Officer of the Company, intermediary, fiduciary and its material subsidiaries irrespective of their functional role in the Company or their ability to have access to Unpublished Price Sensitive Information; and

- (v) Any support staff of the Company, intermediary, fiduciary, who have access to Unpublished Price Sensitive Information
- (vi) and all Connected Persons (including representatives of the auditors, accountancy firms, law firms, analysts, consultants, etc.) as may be identified by the Compliance Officer in consultation with the Board in line with the objectives of the Code.

The term Designated Person/s for the purposes of this Code shall include Immediate Relatives..

- h) "Generally Available Information" means information that is accessible to the Public on a non-discriminatory basis;
- i) "Immediate Relative" means a spouse of the Designated person and includes parent, sibling, and child of Designated person or of the spouse, any of whom is either dependent financially on Designated person, or consults Designated person in taking decisions relating to trading in securities:
- j) "Insider" means any person who is:
  - i) a connected person; or
  - ii) in possession of or having access to unpublished price sensitive information;
- k) "Promoter" shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof;
- l) **"Securities"** shall have the meaning assigned to it under the Securities Contracts Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund;
- m) "**Trading**" means and includes subscribing, buying, selling, dealing or agreeing t0 subscribe, buy, sell, deal in any securities, and 'trade' shall be construed accordingly;
- n) "**Trading Day**" means a day on which the recognized Stock Exchanges are open for trading;
- o) "Trading plan" means a duly formulated Trading Plan which, once approved by the Compliance officer and notified to the Stock Exchanges for public disclosure, will entitle an Insider, to trade in shares or other listed securities of the Company in accordance with Plan;
- p) "**Trading Window**" means a trading period for trading in Company's Securities as specified by the Company from time to time;
- q) "Unpublished Price Sensitive Information" means any information, relating to the 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:
  - financial results;
  - dividends:
  - change in capital structure;
  - mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;

- changes in key managerial personnel; and
- material events in accordance with the Listing Agreement.

#### 3. COMPLIANCE OFFICER – DUTIES AND RESPONSIBILITIES

- 3.1 The Compliance Officer shall report on insider transaction to the Board of Directors of the Company and in particular, shall provide reports to the Chairman of the Audit Committee, if any, or to the Chairman of the Board of Directors at such frequency as may be stipulated by the Board of Directors.
- 3.2 The Compliance Officer shall assist all employees in addressing any clarification regarding the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct.
- 3.3 The Compliance Officer shall be responsible for setting up Codes for adherence to the Rules for prevention of Insider Trading, pre-clearance of Designated Employees' and their dependents' and Connected Person's trades, monitoring of trades and implementation of this Code under the overall supervision of the Board
- 3.4 The Compliance Officer shall change and update the list of Designated Employees from time to time and maintain record of designated Employees and changes thereof.
- 3.5 The Compliance Officer upon approval shall notify Trading Plans to the Stock Exchanges on which shares or other securities of the Company are listed.

#### 4. RESTRICTIONS ON COMMUNICATION AND TRADING BY INSIDERS

- No insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to the Company or securities listed or proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations;
- No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to a Company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations;
- iii. Notwithstanding anything contained in Code of Conduct, an unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction that would:
  - a) entail an obligation to make an open offer under the takeover regulations where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the Company;
  - b) not attract the obligation to make an open offer under the takeover regulations but where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the Company and the information that constitute unpublished price sensitive information is disseminated to be made generally available

at least two trading days prior to the proposed transaction being effected in such form as the Board of Directors may determine;

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

# 5. TRADING WHEN IN POSSESSION OF UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI)

- (1) No insider shall trade in the Securities of the Company's shares that are listed / proposed be listed, when in possession of UPSI:
  - Provided that the insider may prove his innocence by demonstrating extenuating the circumstances including the following:
    - (i) the transaction is/was an off-market inter-se transfer between insiders who were in possession of the same UPSI without being in breach of Clause 4 of the Code of Conduct and both parties had made a conscious and informed trade decision;
    - (ii) in the case of non-individual insiders:
      - (a) individuals who were in possession of such UPSI were different from individuals taking trading decisions and such decision-making individuals were not in possession of such UPSI when they took the decision to trade; and
      - (b) appropriate and adequate arrangements were in place to ensure that the Code of Conduct are not violated and no UPSI was communicated by individuals possessing the information to individuals taking trading decisions and there was no evidence of such arrangements having been breached;
    - (iii) trades were pursuant to a Trading Plan set up in accordance with Clause 6 of Code of Conduct.

#### 6. TRADING PLAN

- 6.1 Any Insider would be entitled to formulate a Trading Plan and present it to the Compliance Officer for approval and public disclosure. A copy of the Application to be submitted to the Company should be in the format given in **Annexure 1**.
- 6.2 Such Trading Plan must
  - 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 Company and the second trading day after 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 or other listed 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 shares or other listed securities for market abuse.
- 6.3 The Compliance Officer shall review such Trading Plan to assess whether the plan would have any potential for violation of the SIL-Code of Conduct and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of such Trading Plan. A copy of the approval letter to be issued should be in the format as per **Annexure 2**.
- 6.4 The Trading Plan once approved shall be irrevocable and the Insider must mandatorily implement the Plan, without being entitled to either deviate from it or to execute any trade in shares or other listed securities outside the scope of the Trading Plan.
- 6.5 The implementation of the Trading Plan must not be commenced if any UPSI in possession of the Insider at the time of formulation of the Plan has not become generally available at the time of the commencement of implementation and, in such event, the Compliance Officer shall confirm that the commencement ought to be deferred until such UPSI becomes generally available information so as to avoid a violation of Clause 5(1) of the Code of Conduct.
- 6.6 Upon approval of the Trading Plan, the Compliance Officer shall notify the plan to the Stock Exchanges in which the Company's shares or other securities are listed.

#### 7. TRADING WHEN NOT IN POSSESSION OF UPSI

- a. all Designated Persons, while not being in possession of UPSI may trade in the Company's listed shares and other Securities only during periods when the Trading Window remains open.
- b. all Designated Persons are required to obtain pre-clearance of trade, in the format stated in **Annexure 3**, from the Company's Compliance Officer should the value of transaction to be executed by them exceeds Rs. 10 lakhs
- c. approval for pre-clearance of Trade shall be given by Compliance Officer in the format specified in **Annexure 4**.
- d. while applying for pre-clearance of trade, Designated Persons must declare that he/she is not in possession of UPSI.
- e. the Compliance Officer shall confidentially maintain a list of its shares or other listed securities as a "restricted list" to be used as a base for approving or rejecting applications for pre-clearance of trades.

- f. the trade, once pre-cleared by the Compliance Officer, will have to be executed by such Designated Persons within a period of Seven (7) trading days and 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 for the trades to be executed. Once the trade is executed, the Designated Persons must inform the Compliance Officer in the format specified in **Annexure 5**.
- g. should the Designated Persons decide not to trade after obtaining preclearance from the Compliance Officer, he/she shall immediately inform the Compliance Officer in the format specified in **Annexure 6**.
- h. once a trade is executed by an Designated Person, he/she must not execute a Contra-trade for a period of six months. However, in case of emergencies, the application (in the format specified in **Annexure 7**) should be made to the Compliance Officer who may grant relaxation from strict application of such restriction for reasons to be recorded in writing. The Compliance Officer must however, ensure that such relaxation does not violate the Code of Conduct.
- i. if a Contra-trade has been executed, inadvertently or otherwise, in violation of clause (h) above, the profits from such trade must be collected from the concerned Designated Persons and must be remitted to the Board for credit to the Investor Protection and Education Fund administered by the Board under the Act.
- j. in the case of ESOPs, exercise of option may be allowed in the period when the Trading Window is closed. However, sale of shares or other listed securities allotted on exercise of ESOPs shall not be allowed when Trading Window remains closed.
- k. in the case of Rights Issue, all Designated Persons may subscribe to their rights entitlement even when Trading Window is closed.
  - However, subscribing to rights renounced in their favour will not be permitted when Trading Window is closed.
- 1. the Trading Window shall remain closed during the period of happening of certain events such as announcement of financial results, declaration of dividends, any other important event, due to any decision taken by the Company or its Board of Directors which may have effect on prices of its shares or other listed securities. The list of such events and the closing period for the window is as follows:
  - i) For Designated Persons

Event	Trading Window remains closed			
	From	To		
Declaration of Dividend	The date on which Notice of	24 hours after the		

	Board Meeting to be held for	Notice is submitted	
	declaration of dividend is	to the Stock	
	submitted to the Stock Exchanges.	Exchanges.	
Issue of Securities by	Do	Do	
way of Public or Right or			
Bonus Issue			
Major Expansion Plans or	Do	Do	
Execution of New Projects			
Amalgamation, Merger,	Do	Do	
Takeovers, Buyback proposals			
for amalgamation of the			
Company with any other			
Company or vice-versa or			
taking over of any other			
Company			

Trading Window shall be opened 48 hours after the information is made public.

However, for the declaration of Financial Results for every quarter, it shall remain closed from the end of every quarter till 48 hours after the declaration of Financial Results of that quarter or such period as may be amended from time to time by the Board.

### 8. DISCLOSURE REQUIREMENTS:

i) .....

Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter or member of the promoter group 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, as per Form A.

### ii) Continual Disclosure:

Every Promoter, employee, Director of the Company and each of their Immediate Relatives shall disclose as per **Form B** 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. 10 lakhs or such other value as may be specified in the format prescribed by SEBI or any other authority from time to time.

The disclosure shall be made within two trading 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.

## iii) Disclosure to the Stock Exchanges:

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

### iv) 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 as per **Form C** at such frequency as he may determine.

#### 9. MAINTENANCE OF RECORDS OF DISCLOSURES

The Compliance Officer shall maintain records of all the above disclosures in an appropriate form for a minimum period of 5 (five) years from the date of the filing thereof.

#### 10. PENALTIES FOR NON-COMPLIANCE

Depending upon the severity of non-compliance with the Code by the Insider/Designated Employees, the Board of Directors of the Company will have complete liberty to impose such sanctions and/or disciplinary action, including wage freeze, suspension, etc. as it may be decide.

#### 11. REPORTING REQUIREMENTS

The Compliance Officer shall place before every meeting of Stakeholders Relationship Committee (SRC) all the details of any trading in the securities by any Designated Employee of the Company and the accompanying documents that such persons had executed under the pre-clearance procedure as envisaged in the "Southern Infosys Limited Code of Conduct".

Further, the Compliance officer shall provide reports to the Chairman of Audit Committee and Chairman of the Board of Directors at regular intervals.

#### 12. AUTHORITY TO MAKE ALTERATIONS

The Board of Directors (including any Committee authorized in this regard), are authorized to make such alterations to this Code as considered appropriate, subject, however, to the condition that such alterations shall not be inconsistent with the provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015

By Order of the Board Sd/-

Place: New Delhi Dated: 07.03.2024

Company Secretary

### Annexure 1

# Application for approval of Proposed Trading Plan

То					
The Compliance	Officer				
Southern Infosys	Limited				
402-A, Arunachal	Building,				
19, Barakhamba I	Road,				
New Delhi – 110	001				
I/We am/are hold	ding Securities (ty	pe of security to b	e specified)	of Rs	s/- each in
my/our capacity	as	hereby submit my/o	our propose	d Trad	ing Plan for trading in
Securities of the C	Company during th	e period when Tradi	ng Window	is open	, for your consideration
and approval:					
Sr no	No of Securities	Plan for Purchase or	Indicative	price	Remark
		Sell month wise	range		
		details			
I/We request you	to kindly give me/	us your approval for	the propose	d Tradi	ng Plan.

Thanking you, Yours faithfully,

#### **Approval of Trading Plan**

То,		
•••••		
•••••		

#### Dear Sir/ Madam

This has reference to your application submitting your proposed Trading Plan for trading in securities (type of security to be specified) of the Company as per the details mentioned therein. I/We have examined the Trading Plan submitted by you and give you the approval for trading in Securities of the Company when trading window is open.

Sr no	No of Securities	Plan for Purchase or Sell month wise details	· ·	Remark

Please note the Trading Plan as approved is required to be implemented by you mandatorily in terms of SEBI (Prohibition of Insider Trading) Regulations, 2015 and you are also required to abide by requirements of disclosure of change in your holding.

Please note that a copy of approved Trading Plan is submitted by us to the Stock Exchanges where Securities of the Company are listed.

Thanking you, Yours faithfully, For Southern Infosys Limited.

Compliance Officer

# Application for pre-clearance of trade

SEBI (PIT) R	egulations, 2015
(When dealing	g in Securities beyond the threshold limit)
To The Complian Southern Info 402-A, Aruna 19, Barakham New Delhi –	sys Limited schal Building, aba Road,
Dear Sir, Sub: Pre-clear	rance of trade
Ref:	DP's name:
Rei.	DP ID:
	CLIENT ID:
	Name of Insider:
	Address:
demat form. I state on sole 1. that I am	mn affirmation:  Director/employee/D.P. of the Company who may reasonably be
	ave an access to UPSI in relation to the Company.
	d to purchase/sale(state No. of Securities) Securities of the Company in at form immediately on receipt of clearance for trade.
3. that I am	aware of the code of conduct for Prohibition of Insider Trading (PIT) and that the applicable to me.
4. that at this	point of time Trading Window is open and I am permitted to trade in Securities.
5. that I do no	at have access to the UPSI and also have not received UPSI till today.
6. that in cas	se I have access to the price sensitive information or receive it after signing this

undertaking, I shall inform the change and refrain from dealing in Securities till the information

becomes public.

7. that I have not contravened the code of conduct for prevention of Insider Trading as notified by the Company.
8. that whatever is stated above is true and correct to the best of knowledge and nothing has been concealed.
Yours truly
Signature:
Name:
Designation:
(You are requested to use the above format for preclearance of trade of your dependents i.e. dependent parents, dependent spouse, and dependent children)

# **Pre-clearance Trade**

To,
Name of employee etc.
Dear Sir/Madam,
This has reference to your application for approval of Trade in the Securities of the Company.
Your application is considered and based on the undertaking given by you, the proposed trade is
approved.
This approval is valid for seven trading days, or till your access to UPSI, whichever earlier.
Thanking you,
Yours faithfully,
For Southern Infosys Limited
Compliance Officer

# **Completion of Trade**

To,	
The Compliance Officer	Date:
Southern Infosys Limited	
402-A, Arunachal Building,	
19, Barakhamba Road,	
New Delhi – 110 001	
Dear Sir,	
Folio No/ D.P.ID. NoC	lient I.D. No
Sub: Preclearance of trade dated	
This is to inform you that the trade for purchase / sale of Co	ompany's Securities cleared by you vide
No. dated has bee	
is my D.P. My D.P.I.D. No. is	_
my folio No. is(state if the Securities a	
I will hold the shares purchased/ not buy the shares for	a period of 6 months from the date of
completion of deal.	
The aliver area	
Thanking you,	
Yours truly	
Signature:	
Name:	
Designation:	

# Intimation about non-execution of Trade after seeking pre-clearance.

То	
The Compliance Officer	Date:
Southern Infosys Limited	
402-A, Arunachal Building,	
19, Barakhamba Road,	
New Delhi – 110 001	
Dear Sir,	
Folio No/ D.P.ID. NoClient I.D. No.	0
Sub: Non-execution of Trade after obtaining Precledated	earance of trade vide letter
·	
	1- 1- 4- 041
This is to inform you that you had approved my application for tra	
Company vide your letter dated I wish to inform you that I con account of	uid not execute the Trade on
(state the reason for non-execution of Trade.)	
(state the reason for non-execution of fraue.)	
Thanking you,	
Yours truly,	
Signature:	
Name:	
Designation:	

# Application for waiver of minimum holding period

То	
The Compliance Officer	Date:
Southern Infosys Limited	
402-A, Arunachal Building,	
19, Barakhamba Road,	
New Delhi – 110 001	
Dear Sir,	
Folio No/ D.P.ID. NoClient I.	D. No.
Sub: Waiver of minimum holding period	.D. No
Suc. Warver of minimum nothing period	
The description of Court court of Court court of the Court court of th	
I/my dependent family member (state name & relation) had vide pre clearance dated, on(date of co	
vide pre clearance dated, on(date of co	impletion of dear).
On account of (state reason for selling) I wish to sell these Sec	curities within the minimum holding period
-	
Vous approval is solicited	
Your approval is solicited.	
Thanking you,	
Yours truly	
Signature:	
Digitatio.	
Name:	
Designation	
Designation:	

# 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: Southern Infosys Limited ISIN of the company: INE298B01010

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

Name,	Category of	Date of	Securities held at the	% of	Open Interest of the		Open Interest of the	
PAN No.,	Person	Appoint-	time of	Share-	Future contracts held at the		Option Contracts held	
CIN/DIN	(Promoter	tment	becoming Promoter /	holding	time		at the time of	
&	s/ KMP /	of	appointment of		of becoming		becoming	
Address	Directors/	Director	Director/KMP		Promoter/app	ointment of	Promoter/appointment	
with	immediate	/KMP			Director/KMI		of Director/KMP	
contact	relatives/	OR						
nos.	others	Date of						
	etc.)	becoming						
		Promoter						
			Type of No.		Number	Notional	Number	Notional
			security		of units	value in	of units	value in
			(For eg. –		(contracts	Rupee terms	(contracts	Rupee terms
			Shares,		* lot size)	•	* lot size)	
			Warrants,		,			
			Convertib					
			le					
			Debenture					
			s etc.)					
			5 5.5.7					
1	2	3	4	5	6		7	<u> </u>
				_				

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

Signature:		
Designation:		
Date:		
Date: Place:		

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

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

Name of the company: Southern Infosys Limited

ISIN of the company:INE298B01010

# Details of change in holding of Securities of Promoter or member of Promoter group, Designated person and director of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN	Category of	Securities held	eld prior Securities			% of		Date of		Date	Mode of	Trading in derivates (Specify		ecify type	Excha	
No.,	Person	to acquired/Disposed			Sharehol	ding	allotment		of	Acquisit	of				nge	
CIN/DIN &	(Promoters/	acquisition/disposal					advice/acquisi		Intima	ion	contract, Futures o		s or Optic	ons etc)	on	
Address of	KMP /							tion of		tion	(Market					which
Promoter/E	Directors/im							shares/sa	le of	to	purchas					the
mployee	mediate							shares sp	ecify	Comp	e/pub					trade
/Director	relatives/othe									any	lic					was
with	rs etc.)										rights/pr					execut
contact nos.											efere					ed
											ntial					
											offer/off					
											market/i					
											nterse					
											transfer					
											etc.					
		Type of	No.	Type of	No.	Pre	Post	From	То			Buy		Sell		
		security		security		Trans	Transa									
		(For eg. –		(For eg. –		a .	ction					Value	Number	Value	Number of	
		Shares,		Shares,		ction							of		units	
		Warrants,		Warrants,									units		(contract	
		Convertible		Convertib									(contract		*	
		Debentures		1									*		lots	
		etc.)		e D.I.									lots Size)		Size)	
				Debenture												
				s etc.)												
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:			

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

[Regulation 7 (3) – Transaction by Other connected persons as identified by the Company

Name of the company: Southern Infosys Limited

ISIN of the company: INE298B01010

Name, PAN	Conn	Securities held prior	rto	Securities		% of		Date of		Date of	Mode ofAcquisit	Tradir	ng in deriv	vates (Sp	ecify type	Excha
No.,	ection	acquisition/disposal		acquired/Dispos		Shareholdi		allotment		Intima	ion (Market	of				nge
CIN/DIN &	with			ed		ng		advice/a	cq	tion to	purchas e/pub lic	contra	ct, Future	s or Opti	ons etc)	on
Address of	comp							uisition (	of	Comp	rights/prefere					which
connected	any							shares/sa	ıl	any	ntial offer/off					the
persons as								e of shar	es		market/interse					trade
identified								specify			transfer etc.					was
by the																execut
Company																ed
with																
contact nos.																
		Type of security	No.	Type of	No	Pre	Post	From	To			Buy		Sell		
		(For eg. –		security (For		Tra	Transa									
		Shares,		eg. – Shares,		nsa	ction					Value	Number	Value	Number of	
		Warrants,		Warrants,		ctio							of		units	
		Convertible		Convertible		n							units		(contract	
		Debenturesetc.)		Debenture s									(contract		÷ .	
				etc.)									*		lots	
													lots Size)		Size)	
													1 1			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
		-		-	0	′	3	,	10	1.1	12	15	1.4	1.5	10	1.7

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

Signature:	
Designation:	
Date:	