

SWARN SARITA GEMS LIMITED
Registered Office: 17/19, GROUND FLOOR, DHANJI STREET, MUMBAI-400003
CIN: L36911MH1992PLC068283
Code of Conduct for Prevention of Insider Trading
(Effective from May 15, 2015)

The Policy and Obligations

The Company endeavors to preserve the confidentiality of un-published price sensitive information and to prevent misuse of such information. The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations.

Every insider (Promoter/Directors/Employees, etc.) of the Company who deals with unpublished price sensitive information has a duty to safeguard the confidentiality of all such information obtained in the course of his or her work at the company. There shall be no selective disclosure of information and the Company and insider shall endeavor to ensure equal accessibility of unpublished price sensitive information to all the stakeholders associated with the Company.

To achieve these objectives, SWARN SARITA GEMS LIMITED (hereinafter referred to as "the Company") hereby notifies that this code of conduct is to be followed by all directors, officers, designated employees, Key Managerial personnel and connected persons.

1. Definitions

- 1.1 "Act" means the Securities and Exchange Board of India Act, 1992.
- 1.2 "Board" means the Board of Directors of SWARN SARITA GEMS LIMITED.
- 1.3 "Code" or "Code of Conduct" shall mean the Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of trading by insiders of SWARN SARITA GEMS LIMITED as amended from time to time.
- 1.4 "Company" means SWARN SARITA GEMS LIMITED.



Mahendra H. Chaudhary

SWARN SARITA GEMS LIMITED

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CIN No.: L36911MH1992PLC068283

1.5 **"Compliance Officer"** means Company Secretary or such other senior officer, designated so and reporting to the Board of Directors and named as compliance officer to regulated bodies, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations and who shall be responsible for the 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.

1.6 **"Connected Person"** means:

- (i) any person who is or has during the six months prior to the concerned act been associated with a company,, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee or the Company or holds any position including a professional or business relationship between himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.
- (ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established,
 - (a) an immediate relative of connected persons specified in clause(i); or
 - (b) a holding company or associate company or subsidiary company; or
 - (c) an intermediary as specified in Section 12 of the Act or an employee or director thereof; or
 - (d) an investment company, trustee company, assets management company or an employee or director thereof; or
 - (e) an official of a stock exchange or of clearing house or corporation; or
 - (f) a member of board or trustees 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; or
 - (g) a member of Board of directors or an employee, of a public financial institution as defined in section 2(72) of the Companies Act, 2013; or
 - (h) an official or an employee of a self-regulatory organization recognized or authorized by the Board; or
 - (i) a banker of the Company; or



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- (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 per cent, of the holding or interest.

- 1.7 **"Dealing in Securities"** means an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in securities of the Company either as principal or agent.
- 1.8 **"Designated Employee"**(s) shall include:
- (i) Every employee in the grade of Assistant General Managers and above;
 - (ii) Every employee in the finance, accounts, secretarial and legal department as may be determined and informed by the Compliance Officer; and
 - (iii) any other employee as may be determined and informed by the Compliance Officer from time to time.
- 1.9 **"Employee"** means every employee of the Company including the Directors in the employment of the Company.
- 1.10 **"Generally available Information"** means information that is accessible to the public on a non-discriminatory basis.
- 1.11 **"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
- 1.12 **"Insider"** means any person who is,
- (i) a connected person; or
 - (ii) in possession of or having access to unpublished price sensitive information.
- 1.13 **"Key Managerial Person"** means person as defined in Section 2(51) of the Companies Act, 2013
- 1.14 **"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;
- 1.15 **"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;
- 1.16 **"SEBI Takeover regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;
- 1.17 **"Trading"** means and includes subscribing, buying, selling. Dealing, or agreeing to subscribe, buy, sell deal in any securities, and "trade" shall be construed accordingly



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- 1.18 **"Trading Day"** means a day on which the recognized stock exchanges are open for trading;
- 1.19 **"Unpublished Price Sensitive Information"** means: 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, delisting, disposals and expansion of business and such other transactions;
 - (v) change in key managerial personnel; and
 - (vi) material events in accordance with the listing agreement
- 1.20 **"Insider Trading Regulations" or "Regulations"** shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.
- 1.21 **"Specified Persons"** means the Directors, connected persons, the insiders, the Designated Employees and promoters and immediate relatives are collectively referred to as Specified Persons.

Words and expression used and not defined in these regulations but defined in the Securities & Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) of the Companies Act, 2013 (18 of 2013) and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation.

2. Role of Compliance Office

- 2.1 He shall maintain record of designated employees and any changes made to the list of Connected Persons
- 2.2 He shall report on insider trading 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.
- 2.3 He shall assist all employees in addressing any clarifications regarding the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct.
- 2.4 Pre-clearing of trades and/or trading plan of Specified person in relation to the Company.



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3. Preservation of "Price Sensitive Information"

- 3.1 All information shall be handled within the Company on a need-to-know basis and no unpublished price sensitive information shall be communicated to any person except in furtherance of the insider's legitimate purposes, performance of duties or discharge of his legal obligations.

Unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction which entails;

- 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 interest of the Company; or
- Not attracting 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

3.2 Need to Know:

- (i) "need to know" basis means that 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 the information.
- (ii) All non-public information directly received by any employee should immediately be reported to the head of the department.

3.3 Limited access to confidential information

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password, etc.

4. Pre-clearance of trades



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All Specified Persons who intends to deal in the securities of the Company when the trading window is open should pre-clear the transaction, by making an application in **Form I** to Compliance Officer where the aggregate of the securities to be acquired/sold/dealt in during a calendar month exceeds 25,000 in number or where the market value of the securities to be acquire/sold/dealt in a calendar month exceeds Rs. 10, 00,000 (Rupees Ten Lakhs) in value, whichever is lower.

While seeking pre-clearance all designated persons shall submit a declaration in **Form II** to the Compliance Officer confirming that he/she does not stand in possession of any unpublished price sensitive information. However, the Compliance Officer shall have the authority to seek further information/clarification to ensure that the subject declaration is accurate.

The Compliance Officer shall give Pre dealing approval letter as per **Form III**. However, no approval for trading in the securities of the company shall be granted when the trading window is closed.

All Specified persons shall execute their transaction which has been pre-cleared; within seven trading days after the approval of such pre-clearance. However, a fresh pre-clearance shall be required in case the transaction which has been pr-cleared earlier was not executed within the prescribed time frame of seven (7) trading days.

The Specified Persons after executing the transaction for which the pre clearance approval was obtained shall submit a report of the trades as executed in **Form IV** within a period of seven (7) working days from the date of execution of subject transaction of the Compliance Officer.

5. Trading Plan

Such person(s) who may perpetually be in possession of unpublished price sensitive information may opt for trading in the securities of the company by way of formulation of "Trading Plan" which shall enable such persons to trade in securities in a compliant manner and plan for trades to be executed in future.

The distinct features of the Trading Plan are detailed herein below:

- (i) An insider may formulate a Trading Plan and present it to the compliance officer in the attached **Form V** for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.
- (ii) Pursuant to the Trading Plan, such an insider:-



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- (a) Shall not commence trading for a period of 6 months from the date of public disclosure of the plan.
- (b) Cannot trade from the twentieth trading day prior to the last day of any financial period for which results are required to be announced by the Company i.e. 20 trading days before June 30, Sept 30, Dec 31 and March 31 and upto 2 trading days after the disclosure of the financial results for such period.
- (c) Shall submit a trading plan for atleast 12 months
- (d) Cannot submit a trading plan for a previous during which another trading plan in existence overlaps.
- (e) Shall not use the trading plan for market manipulation, abuse or any unfair trade practice in the securities market.
- (iii) Such Trading Plan shall 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 which such trades shall be effected;
- (iv) The compliance officer shall review the trading plan to assess whether the plan will have any potential for violation of these regulations 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 the plan. Thus for the said purpose, the Compliance officer shall have the authority to seek such declaration(s) from the insider that the insider is not in possession of Unpublished Price Sensitive Information or that he would ensure that any Unpublished Price Sensitive Information in his possession becomes generally available before the insider commences executing the trades.
- (v) The trading plan once approved shall be irrevocable and the insider 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 any unpublished price sensitive information 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 inform the insider that the commencement ought to be deferred until such unpublished price sensitive information becomes generally available information so as to avoid a violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015.
- (vi) Whenever trading as per the trading plan is executed by such person(s), the details of such executed trade must be submitted to the Compliance Officer in **Form V**.
- (vii) Upon approval, the Compliance Officer shall notify the Trading Plan to the stock exchanges on which the securities of the Company are listed.



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6. Trading Window and Window Closure

- 6.1 (i) The trading period, i.e. the trading period of the stock exchanges, called "trading window", is available for trading in the Company's securities.
- (ii) The trading window shall be, inter alia, closed 7 days prior to and during the time the unpublished price sensitive information is published.
- (iii) When the trading window is closed, the Specified Persons shall not trade in the Company's securities in such period.
- (iv) All Specified Persons shall conduct all their dealings in the securities of the Company only in a valid trading window and shall not deal in any transaction involving the purchase or sale of the Company's securities during the periods when the trading window is closed, as referred to in Point No. (ii) above or during any other period as may be specified by the Company from time to time.
- (v) In case of ESOPs, exercise of option may be allowed in the period when the trading window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when trading is closed.
- 6.2 The trading window shall be, inter alia, closed at the time:
- (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, etc.
 - (iv) Any major expansion plans or execution of new projects
 - (v) Amalgamation, mergers, takeovers and buy-back
 - (vi) Disposal of whole or substantially whole of the undertaking
 - (vii) Any changes in policies, plans or operations of the Company disruption of operations due to natural calamities;
- 6.3 The Compliance Officer shall intimate the closure of trading window to all the designated employees of the Company when he determines that a designated person or class of designated persons can reasonably be expected to have possession of unpublished price sensitive information. Such closure shall be imposed in relation to such securities to which such unpublished price sensitive information relates.
- 6.4 The Compliance Officer after taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, shall decide the timing for re-opening of the trading window, however in any event it shall not be earlier than forty-eight hours after the information becomes generally available.



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- 6.5 The trading window shall also be applicable to any person having contractual or fiduciary relation with the Company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the Company.

7 Other Restrictions

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

8 Reporting Requirements for transactions in securities

Initial Disclosure

- 8.1 Every promoter/ Key Managerial Personnel / Director/ Designated Employees of the Company shall disclose his holding of securities of the Company and that of his/ her immediate relatives as on date of the Insider Trading regulations taking effect i.e. 15th May, 2015, to the Company within thirty days of these regulations taking effect i.e. by 14th June, 2015, in the prescribed **Form VI**.
- 8.2 Every person on appointment as a key managerial personnel or a director of the Company or upon becoming a promoter shall disclose his holding of securities of the Company as on the date of appointment or becoming a promoter, to the Company within seven days of such appointment or becoming a promoter in the prescribed **Form VII**.

Continual Disclosure

- 8.3 Every promoter, employee and director of the Company shall disclose to the Company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. Ten lakhs or such other value as may be specified in the prescribed **Form VIII**.
- 8.4 The Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed within two trading days of receipt of the disclosure or becoming aware of such information in the prescribed **Form VIII**.



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Disclosure by other connected persons

- 8.5 The Compliance Officer may require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the company in the prescribed Form IX and at such frequency as may be determined by the company.

9 Dissemination of Price Sensitive Information

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

The following guidelines shall be followed while dealing with analysts and institutional investors

- Only public information to be provided.
- At least two Company representatives be present at meetings with analysts, media persons and institutional investors.
- Unanticipated questions may be taken on notice and a considered response given later. If the answer includes price sensitive information, a public announcement should be made before responding.
- Simultaneous release of information after every such meet.

10. Penalty for contravention of the code of conduct

- 10.1 Every Specified Person shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her dependents).
- 10.2 Any Specified Person who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalized and appropriate action may be taken by the Company.
- 10.3 Specified Persons who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligibility for future participation in employee stock option plans, etc.
- 10.4 The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

11. Code of Fair Disclosure

A code of practices and procedures for fair disclosure of unpublished price sensitive information for adhering each of the principles is set out below:



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1. Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
3. Designation of a senior officer as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.
7. Developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made. 8. Handling of all unpublished price sensitive information on a need-to-know basis.



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Form I

Form I (Refer Clause 9 of the Code of Conduct for Prohibition of Insider Trading) Application for Pre-clearance

(For use by Directors/Officers/ Key Managerial Personnel in case deal in the securities of Company above minimum of 25,000 shares or Rs.10,00,000 in a calendar month)

To,

The Compliance Officer
SWARNSARITA GEMS LIMITED

Dear Sir,

I / my immediate relative am desirous of dealing in the below-mentioned securities of the Company in my own name or on behalf of my immediate relative_____ (write name of family member and relationship) and seek your approval to acquire/ purchase/ sell them

Type of Securities	No. of Shares	Market Price on date of Application (To give Last trading day's closing price)	Nature of Trade Buy/sell	Date by which trade is proposed to be executed	Folio No. /DP ID No./ Client ID No. Along with the name of depository	Present Holding (No. of Shares)	
Equity Shares						Physical	Demat

My undertaking for the purpose of pre-clearance is attached herewith. I / my immediate relative is aware that if the order is not executed within seven trading days after the approval is given, I would have to pre-clear the transaction again.

I have made full and true disclosure in this application.

Signature:

Name:

Designation:

Department:

Location:



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Form II

FORMAT OF UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-DEALING
UNDERTAKING

Undertaking

In compliance of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the _____ Code for Prohibition of Insider Trading, I, _____
(Name of the Designated Person) hereby undertake/declare that:

1. I do not have any access to or have not received any "Price Sensitive Information" upto the time of signing this undertaking.
2. In case I have access to or receive any "Price Sensitive Information" after the signing of this undertaking but before the execution of the deal, I shall inform the Compliance Office of the change in the position and that I would completely refrain from dealing in Securities till the time such information is made available to public by Company.
3. I have not contravened the Code as notified by the company from time to time. 4. I have made full and true disclosure in the matter.

Signed this _____ day of _____, 20__

Signature:

Name:

Designation:

Department

Location



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Form III

FORMAT FOR PRE-DEALING APPROVAL LETTER Approval No: of _____

Date: _____

To,

Mr. /Mrs.. _____

Emp No. : _____

Designation: _____

PRE-DEALING APPROVAL/DISAPPROVAL -Your application Dtd _____

Dear Mr. /Mrs.

With reference to your above application seeking approval for undertaking certain transactions in Securities of the Company detailed therein, please be informed that you are hereby authorised/not authorised to undertake the transaction(s) as detailed in your said application.

This approval is being issued to you based on the various declarations, representations and warranties made by you in your said application. This approval letter is valid till (i.e. for {7 trading days}). If you do not execute the approved transaction Ideal on or before this date you would have to seek fresh pre-dealing approval before executing any transaction/deal in the Securities of the Company. Further, you are required to file the details of the executed transactions in the attached format within four {4} days from the date of transaction/deal. In case the transaction is not undertaken a "Nil" report shall be necessary.

Yours truly,

Compliance Officer

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Form IV

Format for Confirmation of Trades executed, pursuant to pre clearance

From:
Name:
Designation:

To
The Compliance Officer

Dear Sir,

Pursuant to your pre clearance dated _____ I / my immediate relative have dealt in the below-mentioned securities of the Company in my own name or on behalf of my immediate relative _____ (write name of family member and relationship)

Type of Securities	No. of Shares	Market Price on date of Application (To give Last trading day's closing price)	Nature of Trade Buy/sell	Date by which trade is proposed to be executed	Folio No. /DP ID No./ Client ID No. Along with the name of depository	Present Holding (No. of Shares)	
Equity Shares						Physical	Demat

I hereby confirm that I did not have have any access to or have not received any "Price Sensitive Information" upto the time of execution of this transaction.

4. I have made full and true disclosure in the matter.

Signed this _____ day of _____, 20__

Signature:
Name:
Designation:
Department:
Location



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FORM V
TRADING PLAN

From;
Shri/Smt: _____
Designation _____
Employee No.: _____

To,
The Compliance Officer

Mumbai

Dear Sir,

I would like to submit the following Trading Plan for the period 01.04.____ to 31.03.____ I request you to kindly approve the same:

Date	Number of Shares to be Purchased	Number of Shares to be Sold

I undertake

- a. not to trade for a period of six months from the public disclosure of the plan
- b. not to trade for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced by the issuer of the securities and the second trading day after the disclosure of such financial results;
- c. does not overlap of any period for which another trading plan is already in existence; d. not to use the trading plan for market abuse.

Name:

Signature:

Date:

Place



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Form VI

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (a) read with Regulation 6 (2)]

Name of the company: _____

ISIN of the company: _____

Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

Name, PAN No., CIN/DIN & address with contact nos	Category of Person (Promoter, KMP, Director, etc.)	Securities held as on the date of regulation coming into force		% of Shareholding	Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option Contracts held as on the date of regulation coming into force	
		Type of security (For eg. — Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee	Number of units (contracts * lot size)	Notional value in Rupee
1	2	3		4	5		6	

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

Signature:
 Designation:
 Date:
 Place:



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Form VII
Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (b) read with Regulation 6 (2)]

Name of the company: _____
 ISIN of the company: _____

Name, PAN No., CINIDIN & address with contact nos	Category of Person (Promotes ICMP 1 Directors/ immediate relatives/ others etc)	Securities held as on the date of regulation coming into force		% of Shareholding	Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option Contracts held as on the date of regulation coming into force	
		Type of security (For eg. — Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee	Number of units (contracts * lot size)	Notional value in Rupee
1	2	3		4	5		6	

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

Signature:
 Designation:
 Date:
 Place: .



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FORM IX

**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 Regulation
7(3) -- Transactions by Other connected persons as identified by the company**

Name, PAN No., CIN/DIN , & address of Promot er/ Employ ee i Directo r with contact nos	Connec tion with compa ny	Securiti es held prior to acquisit ion disposal		Securities acquired/Dis posed		% of sharehol ding		Date of allotme nt advice/ acquisit ion of shares/ sale of shares specify		Date of intimati on to compa ny	Mode of acquisitio n (market purchase /pu blic rights/ preferent ial offer / off market/ Inter-se transfer etc.	Trading in derivative's (Specify type of contract, Futures or Options etc)				Exch ange on whic h the trad e was exec uted
												Buy		Sell		
		V al u e	Numb er of units (contr acts * Lot Size)	V al u e	Numb er of units (contr acts * Lot Size)											

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

Name:
Signature:
Date:
Place:

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