

SHALIMAR PAINTS LIMITED

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORTING OF TRADING BY INSIDERS

This Code is framed on the basis of minimum standards set out in Schedule B to the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

(EFFECTIVE FROM 15TH MAY, 2015)

1. This Code may be called the “SPL - Code of Conduct to Regulate, Monitor and Reporting of Trading by Insiders”

2. In this Code, unless the context otherwise provides, the following words, expressions and derivations therefrom shall have the meanings assigned to them as under:–

(a) “Act” means the Securities and Exchange Board of India Act, 1992 (15 of 1992);

(b) “Board” means the Securities and Exchange Board of India;

(c) “Code” or “Code of Conduct” shall mean the Code of Conduct to Regulate, Monitor and Reporting of trading by insiders of Shalimar Paints Limited as amended from time to time.

(d) “SPL” or “Company” means Shalimar Paints Limited

(e) “Compliance officer” means the Company Secretary or such other senior officer, designated so and reporting to the Board of Directors, 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board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” 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 of 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himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.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,

- an immediate relative of connected persons specified in clause (i) or
 - a holding company or associate company or subsidiary company; or
 - an intermediary as specified in Section 12 of the Act or an employee or director thereof; or
 - an investment company, trustee company, asset management company or an employee or director thereof;
- or

- an official of a stock exchange or of clearing house or corporation; or
- a member of board of 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
- a member of the Board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
- an official or an employee of a self-regulatory organization recognised or authorized by the Board; or
- a banker of the Company; or
- 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.

(g) "Dealing in Securities" means an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in the securities of the Company either as principal or agent.

(h) "Designated Employee (s)" shall include:

(i) Directors of the Company, both Executive and Non-Executive;

(ii) Key Managerial Personnel;

(iii) Senior management personnel i.e., all the personnel in the level of General Manager and above and functional heads;

(iv) Every employee in the Finance, Accounts, Secretarial and Legal Departments; and

(v) Executive/Personal Assistants of Executive, Directors and Senior management personnel

The aforesaid definition of 'Designated Employees' shall also include any employee of the Company who is reasonably expected to have access to or could access Unpublished Price Sensitive Information of the Company by virtue of any connection that would put them in position to access the same.

(i) "Generally available Information" means information that is accessible to the public on a non-discriminatory basis.

(j) "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.

(k) "Insider" means any person who is:

(i) a connected person; or

(ii) in possession of or having access to unpublished price sensitive information.

(l) "Insider Trading" shall have the same meaning as mentioned in Explanation (a) to Section 195 of the Companies Act, 2013 and Rules framed there under

(m) "Key Managerial Person" means person as defined in Section 2(51) of the Companies Act, 2013.

(n) "Price Sensitive Information" shall have the same meaning as mentioned in Explanation (b) to Section 195 of the Companies Act, 2013 and Rules framed there under.

(o) "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.

(p) "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;

(q) "Specified" means specified by the Board in writing;

(r) "Takeover regulations" means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;

(s) "Trading" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;

(t) "Trading Day" means a day on which the recognized stock exchanges are open for trading;

(u) "Unpublished Price Sensitive Information" 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) material events in accordance with the listing agreement

(v) "Regulations" shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto;

(w) "Specified Persons" means the Designated Employees, Connected Persons, any other employee who will have access to or possess unpublished price sensitive information.

3. Role of Compliance Officer:

a) The Compliance Officer shall report to the Board of Directors of the Company and in particular, shall provide reports to the Chairman of the Audit Committee. , The Reports shall be submitted to the Chairman of the Audit Committee at every quarterly meeting of the Committee.

b) The Compliance Officer shall provide clarifications sought for under the SEBI (Prohibition of Insider Trading) Regulations, 2015 to all concerned, to the extent possible.

c) The Compliance Officer shall preserve the disclosures received and submitted to the Stock Exchanges concerned for a minimum period of five years.

4. Preservation of “Price Sensitive Information”:

(a) 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 legitimate purposes, performance of duties or discharge of legal obligations.

(b) No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to the Company except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

(c) Notwithstanding anything contained in the regulation, an unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction that would:–

(i) 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;

(ii) 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.

(d) For purposes of clause (c) above, 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 above said purposes and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information.

5. Prevention of misuse of “Unpublished Price Sensitive Information”

(a) To prevent the misuse of confidential information, the Company shall adopt the “Chinese Wall” policy which separates those areas of the functions which routinely have access to confidential information, considered “inside areas” from those areas which deal with sale/marketing/investment advice or other departments providing support services, considered “public areas”.

(b) The employees in the inside area shall not communicate any Price Sensitive Information to anyone in public area. The employees in inside area may be physically segregated from employees in public area.

(c) In exceptional circumstances, employees from the public areas may be brought “over the wall” and given confidential information on the basis of “need to know” criteria, under intimation to the compliance officer.

6. Trading Plan

(a) An insider 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.

(b) Trading Plan shall:

(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 issuer of the securities and the second trading day after the 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 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.

(c) The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of the 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.

(d) The Compliance Officer will endeavor to approve the trading plan within seven working days of receipt of the trading plan together with necessary undertakings and declarations.

(e) 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.

Provided that 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 confirm that the commencement ought to be deferred until such unpublished price sensitive information becomes generally available information.

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

7. Trading Window

(a) Trading Window means a trading period for trading in the securities of Company.

(b) Specified Persons shall not trade in the Company's securities when the trading window is closed.

(c) The trading window shall remain closed during the following period:

- (i) (From the seventh day prior to the date of the Board Meeting to consider financial results of the Company for the quarter / half year / financial year till the second day after the date of said Board Meeting (which shall not be less than 48 hours from the time the results for the respective quarter / half year / financial year are submitted to the stock exchanges);

- (ii) From the seventh day prior to the date of the Board Meeting up to 48 hours after the date of the Board meeting where the proposal on any matter, which has a bearing on the price of the equity shares of the Company, is considered and the same becomes generally available information.

(d) The timing for re-opening of the trading window shall be determined by the Compliance Officer taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, which in any event shall not be earlier than forty-eight hours after the information becomes generally available. 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.

8. Pre-clearance of trades

(a) When the trading window is open, trading by designated persons shall be subject to pre-clearance by the Compliance Officer and in case of the Compliance Officer and/or his designated family members, such pre-clearance shall be obtained from the Executive Director of the Company, if the value of the proposed trade is in excess of Rs. 10.00 lakhs in market value of such shares in one transaction or a series of transactions over any calendar quarter. The application for such pre-clearance be made as per Annexure 1 along with a declaration as per Annexure 2. However, in case the specified person possesses any unpublished price sensitive information, he is prohibited from trading in the Company's securities.

(b) The Compliance Officer shall not approve any proposed trade by the Specified Person if the Compliance Officer determines that such Person is in possession of unpublished price sensitive information even if the trading window is open.

(c) The Compliance Officer may, after being satisfied that the application and declaration are true and accurate, approve trading by a Specified Person.

(d) The trades that have been pre-cleared have to be executed by the specified person within seven trading days following the date of approval, failing which fresh pre-clearance would be needed for the trades to be executed.

(e) The Specified Person shall, within two days of the execution of the trade, submit the details of such trade to the Compliance Officer as per Annexure 3. In case the transaction is not undertaken, a report to that effect shall also be filed.

(f) The Compliance Officer shall confidentially maintain a list of such securities as a "restricted list" which shall be used as the basis for approving or rejecting applications for pre-clearance of trades.

9. Additional trading restrictions on Specified Persons

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

10. Other Restrictions

(a) The disclosures to be made by any person under this Code shall also include those relating to trading by such person's immediate relatives and by any other person for whom such person takes trading decisions.

(b) 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. Provided that trading in derivatives of securities is permitted by any law for the time in force.

(c) The disclosures made under this Code shall be maintained for a period of five years.

11. Reporting Requirements for transactions in securities

(a) Initial Disclosure

(i) Every promoter/ Key Managerial Personnel / Director / Officers / Designated Employees of the Company, within thirty days of these regulations taking effect i.e., by 14th June, 2015, shall forward to the Company the details of all holdings in securities of the Company presently held by them including the statement of holdings of dependent family members as per Annexure 4.

(ii) 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 as per Annexure 5.

(b) Continual Disclosure

(i) Every promoter, employee and director of the Company shall disclose as per Annexure 6 to the Company the number of such securities acquired or disposed of within two trading days of such transaction if the value of 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.

(ii) The disclosure shall be made within 2 working days of:

- the receipt of intimation of allotment of shares, or
- the acquisition or sale of shares or voting rights, as the case may be.

12. Disclosure by the Company to the Stock Exchange(s)

(a) Within 2 days of the receipt of intimation under Clause 11 (b) the Compliance Officer shall disclose to all Stock Exchanges on which the securities of the Company are listed, the information received.

(b) The Compliance officer shall maintain records of all the declarations in the appropriate form given by the directors / officers / designated employees for a minimum period of five years.

13. Disclosures 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 D as per Annexure 7 at such frequency as he may determine.

14. Penalty for contravention of the code of conduct

(a) 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).

(b) Any Specified Person who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalised and appropriate action may be taken by the Company.

(c) 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.

(d) 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.

SHALIMAR PAINTS LIMITED

SPL - Code of Conduct for prevention of Insider Trading

ANNEXURE 1

APPLICATION FOR PRE-CLEARANCE FOR TRADE IN SECURITIES OF THE COMPANY

To,

The Compliance Officer,

Shalimar Paints Limited

Application for Pre-Clearance for trade in Securities of the Company

Dear Sir/Madam,

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct to regulate, monitor and reporting of trading by insiders.

I seek approval to purchase/ sell/ subscribe _____ equity shares of the Company as per details given below:

| | | |
|----|--|---|
| 1 | Name of the applicant | |
| 2 | Designation | |
| 3 | Number of securities held as on date | |
| 4 | Folio No. / DP ID / Client ID No. | |
| 5 | The proposal is for | a) Purchase of securities b) Subscription to securities c) Sale of securities |
| 6 | Proposed date of dealing in securities | |
| 7 | Estimated number of securities proposed to be purchased/subscribed/sold | |
| 8 | Price at which the transaction is proposed | |
| 9 | Current market price (as on date of application) | |
| 10 | Whether the proposed transaction will be through stock exchange or off-market deal | |

I enclose herewith the declaration signed by me.

Signature:

Name:

Date:

SHALIMAR PAINTS LIMITED

SPL - Code of Conduct for prevention of Insider Trading

ANNEXURE 2

FORMAT OF DECLARATION TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-CLEARANCE FOR TRADE IN SECURITIES OF THE COMPANY

DECLARATION

To,

The Compliance Officer,

Shalimar Paints Limited

I, _____, _____ of the Company residing at _____, am desirous of trading in _____ shares of the Company as mentioned in my application dated _____ for pre-clearance of the transaction.

I further declare that I am not in possession of or otherwise privy to any unpublished Price Sensitive Information (as defined in the Company's Code of Conduct to regulate, monitor and reporting of trading by insiders) up to the time of signing this Declaration.

In the event that I have access to or received any information that could be construed as "Price Sensitive Information" as defined in the Code, after the signing of this declaration but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from trading in the securities of the Company until such information becomes public.

I declare that I have not contravened the provisions of the Code as notified by the Company from time to time.

In the event of this transaction being in violation of the Rules or the applicable laws:

(a) I will, unconditionally, release, hold harmless and indemnify to the fullest extent, the Company and its directors and officers, (the 'indemnified persons') for all losses, damages, fines, expenses, suffered by the indemnified persons,

(b) I will compensate the indemnified persons for all expenses incurred in any investigation, defense, crisis management or public relations activity in relation to this transaction and

(c) I authorize the Company to recover from me, the profits arising from this transaction and remit the same to the SEBI for credit of the Investor Protection and Education Fund administered by the SEBI.

I undertake to submit the necessary report within two days of execution of the transaction / a 'Nil' report if the transaction is not undertaken.

If approval is granted, I shall execute the trade within seven days of the receipt of approval failing which I shall seek fresh pre-clearance.

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

Signature:

Name:

Date:

SHALIMAR PAINTS LIMITED

SPL - Code of Conduct for prevention of Insider Trading

ANNEXURE 3

FORMAT FOR DISCLOSURE OF TRANSACTIONS

(To be submitted within 2 days of transaction / trading in securities of the Company)

To,

The Compliance Officer,

Shalimar Paints Limited

I hereby inform that I

- have not bought / sold/ subscribed any securities of the Company
- have bought/sold/subscribed to _____ securities as mentioned below on _____ (date)
(strike out whichever is not applicable)

| Name of holder | No. of securities Traded | Bought / sold / subscribed | DP ID/Client ID/Folio No. | Price (Rs.) |
|-----------------------|---------------------------------|-----------------------------------|----------------------------------|--------------------|
| | | | | |
| | | | | |
| | | | | |

I agree to hold the above securities for a minimum period of six months. In case there is any urgent need to sell these securities within the said period, I shall approach the Compliance Officer for necessary approval. (applicable in case of purchase / subscription).

I declare that the above information is correct and that no provisions of the Company's Code and/or applicable laws/regulations have been contravened for effecting the above said transactions(s).

Signature :

Name:

Date :

ANNEXURE 4

FORM A

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

[Regulation 7 (1) (a) read with Regulation 6 (2)]

| Name, PAN No., CIN/DIN & address with contact nos. | Category of Person (Promoters/ KMP / 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 terms | Number of units (contracts * lot size) | Notional value in Rupee terms |
| 1 | 2 | 3 | 4 | 5 | 6 | | 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:

Place:

ANNEXURE 5

FORM B

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: Shalimar Paints Limited

ISIN of the Company: INE849C01026

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 No., CIN/DIN & Addresses with contact nos. | Category of Person (Promoters / KMP / Directors/ immediate relatives/ 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 | 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 | |
|--|--|---|--|------|-------------------|---|-------------------------------|---|-------------------------------|
| | | | Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.) | No . | | Number of units (contracts * lot size) | Notional value in Rupee terms | Number of units (contracts * lot size) | Notional value in Rupee terms |
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | | 8 | |

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:

ANNEXURE 6

FORM C

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

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

Name of the Company: Shalimar Paints Limited

ISIN of the Company: INE849C01026

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 No., CIN/DIN, & address of Promoter/ Employee / Director with contact nos. | Category of Person (Promoters/ KMP / Directors / immediate relatives/ others etc.) | Securities held prior to acquisition/dissipation | | Securities acquired/Disposed | | % of shareholding | | Date of allotment advice/acquisition of shares/sale of shares specify | | Date of intimation to company | Mode of acquisition (market purchase/public rights/preferential offer / off market/ Inter-se transfer etc) | Trading in derivatives (Specify type of contract, Futures or Options etc) | | | | Exchange on which the trade was executed | |
|--|--|--|-----|--|-----|-------------------|------------------|---|----|-------------------------------|--|---|--|-------|--|--|--|
| | | Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.) | No. | Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.) | No. | Pre transaction | Post transaction | From | To | | | Buy | | Sell | | | |
| | | | | | | | | | | | | Value | Number of units (contracts * lot size) | Value | Number of units (contracts * lot size) | | |
| 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:

ANNEXURE 7

Form D (Indicative format)

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 connected persons, as identified by the company with contact nos. | Connection with company) | Securities held prior to acquisition/disposal | | Securities acquired/Disposed | | % of shareholding | | Date of allotment advice/acquisition of shares/sale of shares specify | | Date of intimation to company | Mode of acquisition (market purchase/public/rights/preferential offer / off market / Inter-se transfer etc.) | Trading in derivatives (Specify type of contract, Futures or Options etc) | | | | Exchange on which the trade was executed | |
|---|--------------------------|--|-----|--|-----|-------------------|------------------|---|----|-------------------------------|--|---|--|-------|--|--|----|
| | | Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.) | No. | Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.) | No. | Pre transaction | Post transaction | From | To | | | Buy | | Sell | | | |
| | | | | | | | | | | | | Value | Number of units (contracts * lot size) | Value | Number of units (contracts * lot size) | | |
| | | | | | | | | | | | | | | | | | 13 |
| 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.

Name:

Designation:

Date:

Place: