



Code of Conduct to Regulate, Monitor and Reporting of Trading by Designated Person of
Gokul Refoils and Solvent Limited

Backgrounds:

The Board of Directors of Gokul Refoils and Solvent Limited (“the Company”) has formulated Code of Conduct to Regulate, Monitor and Reporting of Trading by Designated Person of Gokul Refoils and Solvent Limited (GRSL) (“Code”) has been framed pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015.

SEBI has come up with the amendments to the SEBI (Prohibition of Insider Trading) Regulations, 2015 vide SEBI (Prohibition of Insider Trading) Regulations, 2018

Accordingly company has revised the Code of Conduct to Regulate, Monitor and Reporting of Trading by Designated Person of Gokul Refoils and Solvent Limited (GRSL) (“Code”) has been framed pursuant to the said amendment Regulations which will be effective from 01st April, 2019.

Definitions and Interpretation:

“**Code**” shall mean this Code of Conduct for Listed Companies to Regulate, Monitor and Reporting of Trading by Designated Person of GRSL;

“**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.

“**Board Member**” means all the members of Board of Directors.

“**Key Managerial Personnel**” in relation to a company, means—

- (i) the Chief Executive Officer or the managing director or the manager;
- (ii) the company secretary;
- (iii) the whole-time director;
- (iv) the Chief Financial Officer; and
- (v) such other officer as may be prescribed under Companies Act, 2013;

“**Employee**” means all employees of Gokul Refoils and Solvent Limited .

“**Compliance Officer**” shall be the person holding the position of the Company Secretary of the Company, from time to time or such other senior officer, who is financially literate



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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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board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.;

“Explanation–For the purpose of this regulation, “financially literate” shall mean a person who has the ability to read and understand basic financial statements i.e. balance sheet, profit and loss account, and statement of cash flows.”

"Insider" means any person who is:

- i) a connected person; or
- ii) in possession of or having access to unpublished price sensitive information;

“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 him sell 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, asset 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 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
- (g). 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
- (h). an official or an employee of a sell-regulatory organization recognized or authorized by



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the Board; or

- (i). a banker of the company; or
- (j). a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten per cent of the holding or interest;

"Designated Person" for the purpose of this code the board of directors or such other analogous authority shall in consultation with the compliance officer specify the designated persons to be covered by the code of conduct on the basis of their role and function in the organisation and the access that such role and function would provide to unpublished price sensitive information in addition to seniority and professional designation and shall include:-

- (i) Employees of Company, intermediary or fiduciary designated on the basis of their functional role or access to unpublished price sensitive information in the organization by their board of directors or analogous body;
- (ii) Employees of material subsidiaries of Companies designated on the basis of their functional role or access to unpublished price sensitive information in the organization by their board of directors;
- (iii) All promoters of Companies and promoters who are individuals or investment companies for intermediaries or fiduciaries;
- (iv) Chief Executive Officer and employees upto two levels below Chief Executive Officer of Company, intermediary, fiduciary and its material subsidiaries irrespective of their functional role in the company or ability to have access to unpublished price sensitive information;
- (v) Any support staff of Company, intermediary or fiduciary such as IT staff or secretarial staff who have access to unpublished price sensitive information."

"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.

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

"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;

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



“Trading Day” means a day on which the recognized stock exchanges are open for trading;

"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: –

- 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

“SEBI Insider Trading Regulations” shall mean the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time;

“Trading Window” shall mean the time period during which Dealing in Securities of GRSL shall be permitted and which shall be as specified in paragraph 4.2.1 herein

Words and expressions used and not defined in these regulations but defined in the Securities and 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) or the Companies Act, 2013 (18 of 2013) and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation.

1. Application and Scope :

This Code shall apply to the Designated Persons and their Immediate Relatives. The provisions of this Code shall be applicable irrespective of whether the Securities are held by Designated Persons solely or jointly along with any other Persons(s) or by their immediate relative.

2. Compliance Officer:

2.1 In accordance with the requirement of the SEBI Insider Trading Regulations, GRSL shall always have a Compliance Officer, who shall report to the Board of Directors 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 but not less than once in year. The Compliance Officer shall be responsible for:

- Compliance of policies, procedures, maintenance of records,



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- Monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information as set forth in this Code and applicable laws.
- Pre-clearing of the proposed trading in Securities of GRSL by the Designated Persons and their immediate relatives, and
- Monitoring of Trading in Securities of GRSL and the implementation of this Code under the overall supervision of the Board.
- Determining of closing and reopening of Trading Window
- Approving and Monitoring of trading plan

2.2. The Compliance Officer shall assist the Designated Persons in addressing any clarification and/or issues relating to or arising out of the SEBI Insider Trading Regulations and the Code.

3. Confidentiality of Price Sensitive Information and Chinese Walls.

Confidentiality of Price Sensitive Information.

3.1.1 The Designated Persons and their immediate relatives shall maintain the confidentiality of all Un Published Price Sensitive Information. The Designated Persons and their immediate relatives shall not pass on such information to any person, directly or indirectly.

3.1.2 The Unpublished Price Sensitive Information is to be handled on a “need-to-know” basis, i.e. Unpublished Price Sensitive Information should be communicated only to those Designated Persons and/or to such other persons who need the information in furtherance of their legitimate purpose, performance of duties or discharge of their legal obligation and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.

Chinese Walls:

3.2.1 To prevent the misuse of Unpublished Price Sensitive Information, GRSL shall adopt a “Chinese Wall” policy which separates those areas of GRSL which routinely have access to confidential information and considered to be “inside areas”, from other departments providing support services, considered to be ‘public areas’.

3.2.2 The Designated Persons and their immediate relatives in the inside areas shall not communicate any Unpublished Price Sensitive Information to anyone in the public areas.

3.2.3 In exceptional circumstances, the Designated Persons and their immediate relatives from the public areas may be brought ‘cross the wall’ in furtherance of legitimate purpose, performance of duties or discharge of legal obligations and given the Unpublished Price



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Sensitive Information on a 'need-to-know' basis upon intimation to the Compliance Officer.

4. Restrictions on Trading in Securities of GRSL.

4.1 The Designated Persons shall be subject to the restrictions on Trading in Securities of GRSL as enumerated below.

4.2 Trading Window

4.2.1 The trading period or the Trading Window for Trading in the Securities of GRSL shall be the period excluding the period as specified in paragraph 4.2.3 and 4.2.4. Subject to paragraph 4.2.6, the Designated Persons and their immediate relatives shall Trade in Securities of GRSL only during the time period when the Trading Window is open.

4.2.2 The Designated Persons and their immediate relatives shall not Trade in Securities of GRSL during the period when the Trading Window is closed.

4.2.3 The Trading Window shall be, inter alia, closed 7 days prior to and during the time the unpublished price sensitive information is published. The timing for reopening of the Trading Window shall be determined by the Compliance Officer which in any event shall not be earlier than forty eight hours after the information becomes generally available.

4.2.4 For the purpose of financial results Trading Window shall remain closed from the end of the respective quarter till 48 hours after the declaration of financial results.

The gap between clearance of accounts by audit committee and board meeting should be as narrow as possible and preferably on the same day to avoid leakage of material information.”

4.2.5 Notwithstanding anything to the contrary herein, if a Designated Person or his/her immediate relatives, intends to Trade in the Securities of GRSL for an aggregate value in excess of Rs. 10,00,000/- (Rupees Ten Lakh Only) within calendar quarter then such Designated Person should ensure that he/she shall pre-clear the Trade as per the pre-clearance procedure described in paragraph – 5. For the purpose of computing limit of Rs. 10,00,000/-, the trading by the Designated Person along with the immediate relatives shall be taken into consideration.

5. Pre clearance of Trading in Securities.

5.1 In the event pre-clearance is required for any trading under paragraphs 4.2.4 or 6.1 an application shall be made by the Designated Person in the format, as attached



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“Annexure-I”, to the Compliance Officer indicating the number of Securities that the Designated Persons intends to Trade with the details of the depository account, and such other details as may be required by any rule made by GRSL in this behalf.

5.2 An undertaking shall be executed in the format as attached at “Annexure-I” by such Designated Persons along with the said application. In case of immediate relatives, the undertaking in the specified format shall be given by the concerned Designated Persons.

6. Other Restrictions

6.1 The Designated Persons shall, within seven trading days after the pre-clearance is given, execute the Trade in respect of which the pre-clearance has been accorded. If the Trade is not executed within seven trading days after the pre-clearance is given, the Designated Persons, as the case may be, shall obtain pre-clearance again in accordance with the procedure detailed in paragraph 5.

6.2 In case Designated Persons and their immediate relative who have traded in accordance with the provisions of this code, shall not execute a contra trade within the 6 months of such trade. provided that this shall not be applicable for trades pursuant to exercise of stock options.

6.3 In case the sale of Securities of GRSL is necessitated for reasons to be recorded in writing the minimum holding period as prescribed under paragraph 6.2 may be waived by the Compliance Officer provided that such sale does not violet this code.

6.4 Trading in Securities of GRSL by the Designated Persons shall be exclusively on delivery basis and no short Selling shall be undertaken by them.

6.5 Designated persons shall be required to disclose names and Permanent Account Number or any other identifier authorized by law of the following persons to the company on an annual basis and as and when the information changes:

- (a) immediate relatives
- (b) persons with whom such designated person(s) shares a material financial relationship
- (c) Phone, mobile and cell numbers which are used by them

In addition, the names of educational institutions from which designated persons have graduated and names of their past employers shall also be disclosed on a onetime basis.

Explanation–The term “material financial relationship” shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding twelve months, equivalent to at least 25% of such payer’s annual



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income but shall exclude relationships in which the payment is based on arm's length transactions.”

7. Trading Plans.

7.1 An insider shall have an option 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.

7.2 Such 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.

7.3 The compliance officer shall consider the trading plan made as above and shall approve it forthwith. However, he shall be entitled to take express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per provisions of the SEBI Insider Trading Regulations.

Provided that pre-clearance of trades shall not be required for a trade executed as per an approved trading plan.

Provided further that trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

7.4 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 at the time of formulation of the plan, the insider is in any unpublished price sensitive information and the said information has not become generally available at the time of the commencement of implementation. The commencement of the plan shall be deferred until such unpublished price sensitive information becomes generally available information. Further the insider shall also not be allowed to deal in securities of the Company, if the date of trading in securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.

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

8. Reporting Requirements for Transactions in Securities.

8.1 Initial Disclosure

- Promoter, Key Managerial Personnel and Director shall disclose his holding of securities of the Company within 30 days from 15th May 2015 (Annexure 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 (Annexure III).

8.2 Continual Disclosures

(a). Every Promoter, Designated Person and Director of 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 ten lakh rupees or such other value as may be specified by SEBI Insider Trading Regulations (Annexure IV).

8.3 Disclosures by other Connected Persons.

Any company whose securities are listed on a stock exchange may, at its discretion require any other Connected Person or class of Connected Persons to make disclosures of holdings and trading in securities of the company in such form and at such frequency as may be determined by the company in order to monitor compliance with these regulations (Annexure V).



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8.4 The Compliance Officer shall maintain records of all the declarations given by the Designated Persons for a minimum period of 5 (five) years.

8.5 The Compliance Officer shall place before the Chairman of the Board on quarterly basis all the details of the trading in the Securities of GRSL received from the Designated Persons and their immediate relatives and details of such persons who have submitted trading plans as envisaged in this Code.

9. Penalty for Contravention of Code of Conduct.

9.1 In the event a Designated Persons or his/her immediate relatives, trade in Securities or communicates any information for trading in Securities in contravention of this Code or otherwise violates the provisions of this Code, such Person shall be referred to the Audit Committee of Directors. The Board may, on the recommendations of the Audit Committee, decide on the appropriate disciplinary action (which may include salary freeze, suspension recovery, clawback etc.).

9.2 The action by GRSL shall not preclude SEBI from taking any action under SEBI Insider Trading Regulations.

10. Information to SEBI in case of violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

In case it is observed by Compliance Officer that there has been a violation of SEBI Insider Trading Regulations, GRSL shall inform the SEBI of such violation.

Annexure - I

[PROFORMA OF APPLICATION FORM TO BE SUBMITTED TO COMPLIANCE OFFICER FOR PRE-CLEARANCE OF TRADE]

Mr _____

Compliance Officer

Gokul Refoils and Solvent Limited

Ahmedabad – 380009

.Sub: Approval for pre-clearance of trade

I _____, the undersigned Designated Persons of the Company holding _____ Equity Shares (including Shares held by my immediate relatives) intend to deal in the Equity Shares of the Company exceeding the threshold limit as provided under the Code of Conduct to Regulate, Monitor and Reporting of Trading by Insiders.



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I am having demat account with _____. My client ID No. is _____ and DPID No. is _____. I want to buy /sell_____ Equity Shares of GRSL.

I hereby undertake that,

(a) I do not possess any “unpublished Price Sensitive Information” in relation to the Securities of GRSL.

(b) In the event that I have access to or receive Unpublished Price Sensitive Information after signing of this undertaking but before the execution of the transaction for which I have sought pre-clearance, I shall inform the Compliance Officer of Gokul Refoils and Solvent Limited, about the change in my position and that I would refrain from trading in the Securities so pre-cleared, till the time such information becomes public.

(c) That I have not contravened the Code of Conduct to Regulate, Monitor and Reporting of Trading by Insiders as notified by GRSL from time to time.

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

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

Please approve proposed trading in securities of the Company.

Thanking you,

Yours faithfully,

Signature :

Name :

Designation :

Date

PRE CLEARANCE ORDER

This to inform you that your request for trading in _____ (numbers) of shares of the Company as mentioned in your above mentioned application is approved. Please note that the said transaction must be completed on or before _____ (date), that is within seven trading days from today and Pursuant to clause 6.2 of Insider code, you shall not enter in to the contra trade within the 6 months of such trade.

For Gokul Refoils and Solvent Limited

Compliance Officer

Date:



CONFIRMATION

To
The Compliance Officer
Gokul Refoils and Solvent Limited

I confirm that the share trading for which approval was granted on _____ was completed on _____ to purchasing / Selling _____ (numbers) securities of the Company and I shall not enter in to the contra trade within the 6 months of such trade.

Signature :
Name :
Designation :
Date :

Annexure II
FORM A

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (1) (a) read with Regulation 6 (2) – Initial disclosure to the company]

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, CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/im mediate	Securities held as on the date of regulation coming into force	% of Shareholding



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	relatives/others etc)			
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5

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

Details of Open Interest (OI) in derivatives of the company held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

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		
Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
6	7	8	9	10	11

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

Signature:

Designation:

Date:

Place:

Annexure III

FORM B

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (1) (b) read with Regulation 6(2) – Disclosure on becoming a director/KMP/Promoter]

Name of the company: _____



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 ISIN of the company: _____

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

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

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

Details of Open Interest (OI) in derivatives of the company held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation 6(2).

Open Interest of the Future contracts held at the time of becoming Promoter/appointment of Director/KMP			Open Interest of the Option Contracts held at the time of becoming Promoter/appointment of Director/KMP		
Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
7	8	9	10	11	12



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		Convertible Debentures etc.)	share holding	eg. – Shares, Warrants, Convertible Debentures etc.)			e (Buy/Sale/ Pledge/ Reverse/ Invoicing)	e.g.- Shares, Warrants, Convertible Debentures, etc.)	of share holding				
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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

Details of trading in derivatives of the company by Promoter, Designated Person or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of Contract	Contract Specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
15	16	17	18	19	20	21

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



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		rtible Deben ture s etc.)		ertible Debe nture s etc.)			/Re vok e/In vok e)	War rant s, Cov erti ble Deb ent ures , etc.)					
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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

Details of trading in derivatives by other connected persons as identified by the company

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchang e on which the trade was executed
Type of Contract	Contract Specifica tions	Buy		Sell		
		Notional Value	Number of units (contract s * lot size)	Notional Value	Number of units (contract s * lot size)	
15	16	17	18	19	20	21

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

Signature:

Designation:

Date:

Place:

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