

CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING OF MITCON CONSULTANCY & ENGINEERING SERVICES LIMITED UNDER REGULATION 9 OF THE SECURITIES AND EXCHANGE BOARD OF INDIA (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015

I. PREAMBLE

The Securities and Exchange Board of India (SEBI) on January 15, 2015, notified the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“the Regulations”).

As per Regulation 9, MITCON Consultancy & Engineering Services Limited (the “Company”) has adopted the Code namely “Code of Conduct for Prevention of Insider Trading” (“Insider Trading Code”).

The Company has formulated this Code to ensure that Directors and Designated Persons of the Company and their Relatives do not derive any benefit or assist others to derive any benefit from the access to and possession of Price Sensitive Information about the Company which is not in the public domain and thus constitutes Unpublished Price Sensitive Information (as defined below).

In line with the said Regulations, the following “Code of Conduct for Prevention of Insider Trading” (“Insider Trading Code”) has been prepared and adopted and the same shall come into force with immediate effect.

II. IMPORTANT DEFINITIONS

For the purpose of this Code,

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

“Board” means the Board of Directors of the Company.

“Company” means MITCON Consultancy & Engineering Services Limited.

“Compliance Officer” means the Company Secretary of the Company, who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of UPSI, monitoring of trades and the implementation of the Code under the overall supervision of the Board of Directors of the Company.

The Compliance Officer shall half yearly report to the Board of Directors and Chairman of the Audit Committee.

“Connected Person” includes: (i) A Director of the Company; (ii) A Key Managerial Personnel of the Company; (iii) An Officer of the Company; (iv) Any person who is or has been in a contractual or fiduciary or employment relationship at any time in the six month period prior to the date of determining whether that person, as a result of such relationship, was directly or indirectly allowed access to UPSI or reasonably expected to be allowed access to UPSI; (v) Any person who is or has been in frequent communication with an Officer of the Company at any time in the six month period prior to the date of determining whether that person, as a result of such frequent communication, was directly or indirectly allowed access to UPSI or reasonably expected to be allowed access to UPSI; (vi) An Employee of the Company who has access to UPSI or is reasonably expected to have access to UPSI; (vii) Any person who has a professional or business relationship and that relationship that, directly or indirectly, allows access to UPSI or is reasonably expected to allow access to UPSI;

The persons enumerated below shall be deemed to be Connected Persons if such person has access to UPSI or is reasonably expected to have access to UPSI –

- a) An Immediate Relative of Connected Persons;

MITCON Consultancy & Engineering Services Limited (IS/ISO 9001:2015)

- b) A Holding Company or Associate Company or Subsidiary Company;
- c) An Intermediary as specified in Section 12 of the SEBI Act or an employee or director thereof;
- d) An Investment Company, Trustee Company, Asset Management Company or an employee or director thereof;
- e) An Official of a Stock Exchange or of clearing house or corporation;
- 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;
- 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;
- h) An Official or an Employee of a self-regulatory organization recognized or authorized by the SEBI;
- i) A banker of the Company;
- 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 percent of the holding or interest.

“Designated Persons” shall consist of Connected Persons who are; (i) Promoters of the Company; (ii) Directors of the Company and its subsidiaries; (iii) Key Managerial Person (KMP); (iv) Employees in Finance, Accounting, taxation and Secretarial Functions; (v) Head of all divisions/ departments by whatever designation they may be called; (vi) All employees in the level of Chief Consultants and above; (vii) Such other employees as may be determined by the code from time to time; (viii) Any other Connected Person designated by the Company on the basis of their functional role and (ix) Immediate Relatives of all the above.

“Generally Available Information” means information that is accessible to the public on a non-discriminatory basis.

“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.

“Insider” means any person who is a connected person or in possession of or having access to UPSI.

“Promoter” shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.

“Promoter Group” shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.

“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.

“Specified” means specified by the Board in writing.

“Takeover Regulations” means the Securities and Exchange Board of India (Substantial Acquisition and of Shares and Takeovers) Regulations, 2011 and any amendments thereto.

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

MITCON Consultancy & Engineering Services Limited (IS/ISO 9001:2015)

1st Floor, Kubera Chambers, Shivajinagar, Pune 411 005, Maharashtra (INDIA) | +91-20-25533309, 25534322 | bd@mitconindia.com | CIN: L74140PN1982PLC026933

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

“Unpublished Price Sensitive Information (“UPSI”) means any information, relating to a Company or its securities, directly or indirectly, that is not generally available which, upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily include but not restricted to, information relating to the following:

- i. Declaration of Financial results (half yearly and annual)
- ii. Declaration of dividends
- iii. Change in capital structure i.e. issue of securities by way of public/ rights/ bonus, etc.
- iv. Any major expansion plans or winning of bid or execution of new projects.
- v. Amalgamation, Mergers, de mergers, acquisitions, delisting, disposals, takeovers, buy back and such other transactions.
- vi. Disposal of whole or substantially whole of the undertaking.
- vii. Any changes in policies, plans or operations of the Company.
- viii. Disruption of operations due to natural calamities.
- ix. Litigation/ dispute with a material impact.
- x. Changes in Key Managerial Personnel.
- xi. Any information which, if disclosed, in the opinion of the person disclosing the same is likely to materially affect the prices of the securities of the Company.

The Company will promptly disclose such information on the website of the Company and to the Stock Exchange.

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.

III. COMMUNICATION OR PROCUREMENT OF UPSI:

An Insider shall not

- Communicate, provide or allow access to any UPSI, relating to the Company or its securities, to any person including other insiders, except to the extent allowed by these Rules;
- Procure from or cause the communication by an insider of UPSI, relating to the Company or its securities;

Provided that nothing contained above shall be applicable when an UPSI is communicated, provided, allowed access to or procured:

- In furtherance of legitimate purposes, performance of duties or discharge of legal obligations pursuant to appropriate confidentiality and non-disclosure agreements being executed; or
- In the event the Board of Directors direct or cause the public disclosure of UPSI in the best interest of the Company; or

MITCON Consultancy & Engineering Services Limited (IS/ISO 9001:2015)

1st Floor, Kubera Chambers, Shivajinagar, Pune 411 005, Maharashtra (INDIA) | +91-20-25533309, 25534322 | bd@mitconindia.com | CIN: L74140PN1982PLC026933

- Within a group of persons if such persons have been identified and secluded within a “Chinese Wall” or information barrier by the Compliance Officer from the rest of the Company for a particular purpose or for a specified period of time in furtherance of legitimate purposes, performance of duties or discharge of legal obligations, and are subjected to, among other conditions, additional confidentiality obligations, information barriers designed to prevent exchanges of UPSI outside the “Chinese Wall”, and the execution of an undertaking by such persons to abstain and/ or forego trading during such seclusion or till the UPSI no longer constitutes UPSI.

IV. PROHIBITION ON INSIDER TRADING:

An Insider shall not, directly or indirectly;

- i. Trade in securities that are listed or proposed to be listed when in possession of UPSI;
- ii. Trade in securities of the Company except when the Trading Window is open and the insider is not in possession of UPSI.

Provided the restriction in 4 (i) above shall to apply to:

- a) A transaction that is off market *inter se* transfer between Insiders who were in possession of the same UPSI without being in breach of these Rules and both parties had made a conscious and informed trade decision.

Provided further that such off market trades shall be reported by the insiders to the Company within two working days. Every Company shall notify the particulars of such trades to the Stock Exchange on which the securities are listed within two trading days from receipt of the disclosure or from becoming aware of such information.

- b) The transaction was carried out through the block deal window mechanism between persons who were in possession of the same UPSI without being in breach of these Rules and both parties had made a conscious and informed trade decision.
- c) The transaction in question was carried out pursuant to a statutory or regulatory obligation to carry out a bona fide transaction.
- d) The transaction in question was undertaken pursuant to the exercise of stock options in respect of which the exercise price was pre-determined in compliance with applicable regulations.
- e) Trades pursuant to a Trading Plan set up in accordance with these Rules.

V. TRADING WINDOW:

- The Designated Persons may execute trades subject to compliance with these regulations and a notional trading window shall be used as an instrument of monitoring trading by the designated persons.
- The Designated Persons and their immediate relatives shall not trade in securities when the trading window is closed
- The Designated Persons who trade in the securities of the Company shall not execute a contra trade 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

MITCON Consultancy & Engineering Services Limited (IS/ISO 9001:2015)

1st Floor, Kubera Chambers, Shivajinagar, Pune 411 005, Maharashtra (INDIA) | +91-20-25533309, 25534322 | bd@mitconindia.com | CIN: L74140PN1982PLC026933

to be disgorge for remittance to SEBI for credit to the Investor Protection and Education Fund administered by SEBI.

- With respect to the financial results, the Compliance Officer shall close the trading window for all Insiders on the last day of any financial period viz. quarterly, half yearly or annually for which results are required to be announced by the Company until 48 hours after the declaration of financial results.
- For the cases other than financial results, the trading window shall be closed when the Compliance Officer determines that a designated person or class of designated persons can reasonably be expected to have possession of UPSI and the Compliance Officer shall not re open the trading window earlier than 48 hours after the UPSI in question becomes generally available.

VI. PRE CLEARANCE OF TRADING:

- Trading shall be subject to pre clearance by the Compliance Officer in format as per Annexure I along with an undertaking as per Annexure II.
- The Compliance Officer may, after being satisfied that the application and undertaking are true and accurate, approve Trading by a Designated person, on the condition that the Trade so approved shall be executed within seven trading days following the date of approval failing which fresh pre clearance would be needed for the trades to be executed.
- The Compliance Officer shall not approve any proposed Trade by Designated Person if the Compliance Officer determines that such designated person is in possession of UPSI even though the trading window is open.
- The Designated Person shall, within two days of the execution of the Trade, submit the details of such Trade to the Compliance Officer as per Annexure III. In case the transaction is not undertaken, a report to that effect shall be filled in the said form.
- A Designated Person who trades in securities without complying with the pre clearances procedure as envisaged in these Rules or gives false undertakings and / or makes misrepresentations in the undertakings executed by him /her while complying with the pre clearance procedure shall be subjected to the penalties as envisaged in these Rules.

VII. TRADING PLAN:

- A Designated Person shall be entitled to formulate a Trading Plan that complies with the SEBI Regulations (a “Trading Plan”) and present it to the Compliance Officer for approval and public disclosure pursuant to which Trades may be carried out in his behalf in accordance with such plan.
- The Compliance Officer shall review and approve the Trading Plan if it complies with the SEBI Regulations and shall disclose the Trading Plan to the Stock Exchange.
- The Trading Plan once approved shall be irrevocable and the Designated Person shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the Trading Plan. However, the implementation of the Trading

Plan shall not be commenced, if at the time of formulation of the plan, the Designated Person is in possession of UPSI and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Trading Plan shall be deferred until such UPSI becomes generally available information. Further, the Designated Person shall also not be allowed to Trade 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.

VIII. DISCLOSURE REQUIREMENTS:

1. INITIAL DISCLOSURE:

- a) Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter shall disclose his / her and Immediate Relatives' holding of securities of the Company as on date of appointment or becoming a promoter, to the Company within seven days (7) of such appointment or becoming a promoter, as per Form B set out in Annexure IV.

2. CONTINUAL DISCLOSURE:

- a) Every promoter, member of the promoter group, designated person and director of every 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;
- b) Every Company shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.

IX. PENALTY FOR INSIDER TRADING:

- 1) An Insider who acts in contravention of these Rules shall be liable to have his services or relationship with the Company, as the case may be terminated.
- 2) Directors, Officers and Employees of the Company who violate these rules shall be subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligibility for future participation in the Company's Stock Option Plans or termination.
- 3) The SEBI or any other appropriate regulatory authority would also be informed of the violation of these Rules so that appropriate action may be taken.

X. MISCELLANEOUS:

- 1) The Board of Directors shall be empowered to amend, modify, interpret these Rules and such Rules shall be effective from such date that the Board may notify in this behalf.
- 2) The Compliance Officer shall provide the Audit Committee and the Board, on a quarterly basis, all the details of Trading in securities by the Designated Persons including any violations of the Rules.

- 3) The Compliance Officer shall maintain – (i) Updated List of Designated Persons; (ii) records of disclosures and pre clearance applications and undertakings for a period of five years and (iii) a confidential list of any ‘restricted securities’ to which the Compliance Officer may require Designated Persons to seek pre clearance before Trading in such ‘restricted securities’.
- 4) The Company shall require all Connected Persons to formulate and adhere to a Code of Conduct to achieve compliance with these Rules. In case such persons observe that there has been a violation of these Rules, then they shall inform the Board of Directors of the Company promptly.
- 5) In case it is observed by the Company/ Compliance Officer that there has been a violation of SEBI (Prohibition of Insider Trading) Regulations, 2015, the Company shall inform SEBI about any such violation.

ANNEXURE I

APPLICATION FOR PRE-TRADING APPROVAL

To,

The Compliance Officer,

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Insider Trading Policy, I seek approval to purchase / sell / subscribe _____ nos. of 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 trading in securities
7. Estimated number of securities proposed to be purchased/subscribed/sold
8. Current market price (as on date of application)
9. Whether the proposed transaction will be through stock exchange or off-market trade
10. Folio No. / DP ID / Client ID No. where the securities will be credited / debited

I enclose herewith the Undertaking signed by me.

Signature:

Name:

Date:

ANNEXURE II

**UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE
CLEARANCE**

To,

The Compliance Officer,

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 any unpublished price sensitive information up to the time of signing this Undertaking. In the event that I have access to or receive any unpublished price sensitive information after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from trading in the securities of the Company until such information becomes public.

I declare that I have not contravened the provisions of the Rules 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 pre-clearance afresh.

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

Signature:

Name:

Date:

ANNEXURE III
FORMAT FOR DISCLOSURE OF TRANSACTIONS
(To be submitted within 2 days of transaction/ dealing in securities of the Company)

To,
The Compliance Officer,
MITCON Consultancy & Engineering Services Limited,
Pune

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)

Name of Holder	First or Joint Holder	Number of Securities dealt with	Bought/Sold/ Subscribed	DPID/CLIENT ID (electronic form) or Folio No. for Physical where the securities will be debited or credited	No. of securities held in such a/c	Price (Rs.)

In connection with the aforesaid transaction (s), I hereby undertake to preserve, for a period of 3 (Three) years and produce to the Compliance Officer/SEBI any of the following documents:

1. Broker's Contract note
2. Proof of payment to/from brokers
3. Extract of bank passbook /statement (to be submitted in case of demat transactions).
4. Copy of Delivery instruction slip (applicable in case of sale transaction).

I declare that the above information is correct and that Provisions of the Company's Insider Trading Code and /or applicable laws/regulations have been contravened for effecting the above said transaction (s).

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 Company (Compliance Officer) for necessary approval (applicable in case of purchase/ subscription).

Yours truly,

Signature: _____

Name: _____

Designation: _____

Date: _____

ANNEXURE IV

SEBI (FORM B)

SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (1) (b) read with Regulation 6(2) – Disclosure on becoming a Key Managerial personnel/ Director/ Promoter/ Member of the Promoter Group]

Name of the company: **MITCON Consultancy & Engineering Services Limited**
ISIN of the company: **INE828O01033**

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

Name, PAN, CIN/DIN & Address with contact nos.	Category of Person (KMP /Director or Promoter or member of the Promoter group/ Immediate relative to / others, etc.	Date of appointment of KMP/ Director/ OR Date of becoming Promoter/ member of the Promoter Group	Securities held at the time of appointment of KMP/Director/ or upon becoming Promoter or member of the promoter group		% of Shareholding
			Type of security (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements, 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 on the securities of the company held on appointment of KMP or Director or upon becoming a Promoter or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).

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

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

Name & Signature:

Designation:

Date:

Place:

MITCON Consultancy & Engineering Services Limited (IS/ISO 9001:2015)

1st Floor, Kubera Chambers, Shivajinagar, Pune 411 005, Maharashtra (INDIA) | +91-20-25533309, 25534322 | bd@mitconindia.com | CIN: L74140PN1982PLC026933

ANNEXURE V
FORM C

**SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (2) read with Regulation 6(2) –
Continual disclosure]**

Name of the company: _____

ISIN of the company: _____

Details of change in holding of Securities of Promoter, Member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoter/ member of the promoter group/designated person/Directors / Immediate relative to / others etc.)	Securities held prior to acquisition / disposal		Securities acquired/Disposed				Securities held post acquisition /disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition / disposal (on market/public/rights/preferential offer / off market/ Inter-se transfer, ESOPs etc.)	Exchange on which the trade was executed
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No	Value	Transaction Type (Buy/Sale/Pledge / Revoke / Invoke)	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

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 on the securities of the company by Promoter, member of the promoter group, designated person or Director of a listed company and immediate relatives of such person 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)	
16	17	18	19	20	21	22

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

Name & Signature:
Designation:
Date:
Place:

ANNEXURE VI
FORM D (Indicative format)
SEBI (Prohibition of Insider Trading) Regulations, 2015 Regulation 7(3) – Transactions by Other connected persons as identified by the company

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

Name, PAN, CIN/DIN, & addresses with contact	Connection with company	Securities held prior to acquisition / disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/acquisition of shares/sale of shares specify		Date of intimation to company	Mode of acquisition / disposal (on market/public/rights/preferential offer / off market/ Inter-se transfer, ESOPs etc.)	Exchange on which the trade was executed
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No	Value	Transaction Type (Buy / Sale/ Pledge / Revoke/ Invoice)	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

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

Value of transaction excludes taxes/brokerage/any other charges

Details of trading in derivatives on the securities of the company by other connected persons as identified by the Company.

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)	
16	17	18	19	20	21	22

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

Name:
Signature:
Place: