

CODE OF CONDUCT

FOR

PREVENTION OF INSIDER TRADING

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CHAPTER – 1

INTRODUCTION

This Code shall be known as “**Code of Conduct for Prevention of Insider Trading of RHC Holding Private Limited**” (“Code”) made pursuant to Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Applicability

This code shall apply to Promoters and all insiders of the Company.

1.1 DEFINITIONS

- a) “**Act**” means the Securities and Exchange Board of India Act, 1992
- b) “**Board**” means a Securities and Exchange Board of India.
- c) “**Compliance Officer**” means Company Secretary of the Company and in his absence any senior 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 the Regulations.
- d) “**Connected Persons**” means:
 - i. Any person who is or has during the six months prior to the concerned act been associated with the Company, directly or indirectly, in any capacity including by reasons 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himself and the Company, whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.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:
 - a) An immediate relative of the connected persons specified in clause (i) above; 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 a director thereof
 - d) An investment company, trustee company, asset management company or an employee or director thereof; or
 - e) An official of a stock exchange or clearing house or corporation; or

- f) A member of Board of trustee of a mutual fund or a member of the board of directors of 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 a 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 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 percent of the holding or interest;
- e) **“Dealing in Securities”/ “Trading”** means and includes subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell, deal in any securities and trade shall be construed accordingly;
- f) **“Designated Employees”** shall include all the employees of the Company (including the employee who are seconded/ transferred/ deputed to other group or affiliated companies from the Company):-
- i. Directors of the Company
 - ii. In grade of Vice President and above
 - iii. All Function/Department Heads;
 - iv. of Finance Department in the grade of Manager and above;
 - v. of Compliance, Legal and Secretarial Department;
 - vi. who are executive assistants to employees in grade of Vice President and above as well as Directors.
 - vii. Such other persons as the Compliance Officer may notify from time to time basis seniority and professional designation and role and criticality of function that may entail such person to have availability of UPSI.
- g) **“Director(s)”** mean the member of Board of Directors of the Company as in force from time to time.
- h) **“Generally Available Information”** means information that is accessible to the public on a non-discriminatory basis.
- i) **“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.
- j) **“Insider”** means any person who is:
- i. A connected person; or
 - ii. In possession of or having access to unpublished price sensitive information.

- k) **“Key Managerial Personnel”/“KMP”** means Key Managerial Personnel as defined in the Companies Act 2013 and designated as KMP’s by the Company.
- l) **“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.
- m) **“Regulations”** means SEBI (Prohibition of Insider Trading) Regulations, 2015.
- n) **“Securities”** shall have the meaning assigned to it under the Securities Contract (Regulation) Act, 1956 or any modification thereof except units of a mutual fund;
- o) **“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, demergers, acquisitions, delisting, disposal and expansion of business and such other transactions;
 - v. Changes in KMP; and
 - vi. Material events in accordance with the listing agreement

1.2 Words denoting the singular shall include the plural and vice versa and words denoting masculine gender shall include reference to feminine or neutral gender.

1.3 Words and expressions used and not defined in this Code but defined in the Regulations, Acts, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation.

1.4 Unless the context otherwise requires employee shall mean employee of the Company.

1.5 Compliance Officer

- i. The Compliance Officer shall be responsible for setting forth policies, procedures and monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information, pre-clearing and monitoring of trades and the implementation of this Code under the overall supervision of the Board of Directors of the Company.
- ii. The Compliance Officer shall report to the Board of Directors and shall provide reports to the Chairman of the Audit Committee of the Company, whenever required.
- iii. The Compliance officer shall maintain a record of the Designated Employees and any changes made in the list of Designated Employees.
- iv. The compliance officer shall assist all the persons covered under this Code in addressing any clarification regarding the Regulations and the Company’s Code.

CHAPTER -2

PRESERVATION OF PRICE SENSITIVE INFORMATION

- 2.1 No Director/ KMP/ Designated Employee/ Connected Person shall communicate, provide or allow access to any Unpublished Price Sensitive Information, relating to the Company or Securities listed or proposed to be listed, to any person including other insider except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- 2.2 **Chinese Wall**
- a) Areas of the Company which routinely have access to price sensitive information, shall be considered “restricted areas” and be separated from those areas which deal with sale/ marketing/ investment advice or other departments providing support services, considered “public areas” by a “Chinese Wall”.
 - b) The employees in the restricted area shall not communicate any price sensitive information to anyone in public area.
 - c) In exceptional circumstances employees from the public areas may be brought “over the wall” and given confidential information on “need to know” basis criteria in furtherance of their legitimate purposes, performance of duties or discharge of legal obligations.

CHAPTER-3

PREVENTION OF MISUSE OF PRICE SENSITIVE INFORMATION

3.1 All Directors/ KMP/ Designated Employees/ Connected Persons and their immediate relatives shall be subject to trading restrictions as enumerated below.

3.2 Trading Window

3.2.1 The Company shall specify a trading period, to be called "Trading Window", for trading in the Company's securities. The trading window shall be closed during the time the information referred to in para 3.2.4 is unpublished.

3.2.2 When the trading window is closed, the Director/KMP/ Designated Employees/ Connected Persons and their immediate relatives shall not trade in the Company's securities in such period.

3.2.3 The trading window is also 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.

3.2.4 The trading window shall be, inter alia, closed at the time of:-

- i. Declaration of Financial Result
- ii. Declaration of dividends
- iii. Change in Capital Structure
- iv. Mergers, demergers, acquisitions, delisting, disposal and expansion of business and such other transactions;
- v. Changes in KMP; and
- vi. Material events in accordance with the debt listing agreement, if any prescribed.

3.2.5 The time for commencement of closing of trading window and re- opening of trading window shall be determined by the Compliance Officer taking into account various factors. However, in case of :

- a) Unless communicated otherwise, trading window will close at least 48 hours before the information referred to in para 3.2.4 becomes public;
- b) The re-opening of trading window shall not be earlier than 48 hours after the information referred to in para 3.2.4 becomes public.

Trading window may also be closed by the Compliance Officer during such time in addition to the above period, as it may deem fit from time to time.

3.2.6 All Directors/ KMP/ Designated Employees/ Connected Persons shall conduct all their dealings in the Securities of the Company only in a valid trading window or as per approved trading plan and shall not deal in any transaction involving the purchase or sale of the Company's Securities during

the periods when trading window is closed or where there is no pre-approved trading plan, or during any other period as may be specified by the Company from time to time.

3.3 Trading Plan

3.3.1 Trading Plan is a plan under which an insider can trade in securities even when trading window is closed. It gives an option to Insiders who may be perpetually in possession of unpublished price sensitive information and enabling them to trade in Securities in a compliant manner.

3.3.2 Every insider shall be entitled to formulate a trading plan as per 'Form II' 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.

3.3.3 Such trading plan shall:

- i. Not entail commencement of trading earlier than six months from the public disclosure of the plan

In any case, it should be remembered that this is only a statutory cool-off period and would not grant immunity from action if the Insider was to be in possession of the same unpublished price sensitive information both at the time of formulation of the plan and implementation of the same.

- ii. Not entail trading for trading day prior to the last the period between the 20th day of any financial period for which results are required to be announced by the Company and the 2nd 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.

3.3.4 The Compliance Officer shall review the trading plan made as above to assess whether the plan would have any potential for violations of the Regulations and is also entitled to seek express undertakings as may be necessary to enable such assessment.

3.3.5 Once satisfied, the Compliance Officer shall approve the plan and notify the same to the stock exchanges on which the Securities of the Company are listed

- 3.3.6 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 commences 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.

3.4 Pre- Clearance of Trade

- 3.4.1 All Directors/ KMP/ Designated Employees and their immediate relatives who intends to deal in the Securities of the Company, when the trading window is open, shall pre-clear the intended transactions in the Securities of the Company as per the pre-dealing procedure as described hereunder.
- 3.4.2 Such pre- clearance of trade would be applicable wherever any Key Managerial Personnel / Designated Employees and their immediate relatives intends to deal in the Securities of the Company in excess of the minimum threshold limit of market value exceeding Rs. 5,00,000/-or 5000 shares whichever is less.
- 3.4.3 Directors have to pre- clear their all intended transactions irrespective of value or number of securities involved. Trades of the Compliance Officer which requires pre-clearance in terms of the above shall be approved by the Managing Director or any Whole Time Director of the Company.
- 3.4.4 All application in 'Form I' shall be made to the Compliance Officer, after obtaining the approval of head of department, if any, indicating the estimated number of securities that Director / Key Managerial Personnel / Designated Employees / their immediate relatives intends to deal in and details of depository with which he/she has a depository account and such other details as may be required by any rule made by the Company in this behalf.
- 3.4.5 An undertaking in 'Form I' shall be executed in favour of the Company by such Directors/ KMP/ Designated Employees.

CHAPTER-4

OTHER RESTRICTIONS

- 4.1 Where any transaction has been approved, the Directors/ KMP/ Designated Employees and their immediate relatives shall execute the order within seven trading days of the clearance of the transaction and where any transaction has been approved with any additional restrictions, the same shall be executed within the above time in accordance with the additional restrictions specified. If the order is not executed within seven trading days after the approval is given, the Directors / Key Managerial Personnel / Designated Employees must pre-clear the transaction again.
- 4.2 The Compliance Officer shall have a right to revoke any clearance granted to any transaction or add further additional restrictions to any clearance, before the relevant transaction has been executed.
- 4.3 In case any transaction has been refused, the Director/ KMP/ Designated Employee and their immediate relative shall be free to re-apply for preclearance of the transaction, which was refused, to the next higher authority i.e. to Managing Director/Whole-Time Director, if Compliance Officer has refused the transaction.
- 4.4 All Directors/ KMP/ Designated Employee and their immediate relatives who buy or sell any number of Securities of the Company shall not enter into a contra trade or opposite transaction i.e. sell or buy any number of Securities during the next six months following the prior transaction.
- However, if a contra trade is 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 Board for credit to the Investor Protection and Education Fund administered by the Board under the Act.
- 4.5 No Director / KMP/ Designated Employee/ Connected Persons shall take positions in derivative transactions in the Securities of the Company at any time.
- 4.6 In case the sale of securities is necessitated by personal emergency, the holding period may be waived by the Compliance Officer/ Managing Director/ Whole time Director on recommendation of head of department, if any, after recording in writing his/her reasons in this regard provided such relaxation does not violate the Regulations.

CHAPTER-5

REPORTING REQUIREMENTS

5.1 All Directors/ KMP/ Promoter/Designated Employees are required to forward the following details of their Securities Transaction to the Compliance Officer.

5.1.1 Initial Disclosure

All Directors/ KMP/ Promoter shall be required to forward their details (including details of their immediate relatives) as per Form III of all holdings in securities or voting rights held and positions taken in derivatives by such person to the Compliance Officer at the time of joining of the Company or becoming a Promoter of the Company within 7 days of such joining/ appointment or becoming a Promoter.

5.1.2 Continual Disclosure

All Directors / KMP/ Designated Employees (including details of their immediate relatives) shall be required to forward following details of their securities:-

- i. Half yearly Statement in "Form IV" of all holdings in securities of the Company within 30 days from the end of the half year
- ii. Annual Statement in "Form V" of all holdings in securities within 30 days from the end of the financial year.

5.1.3 Event Based Disclosures

a) Disclosures by Promoters/ Employees/ Directors

Every Promoter, employee, Director of the Company and every Designated Employee (with details of their immediate relatives) shall disclose to the Company in Form C prescribed under SEBI (Prohibition of Insider Trading)Regulations,2015 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 the Board.

b) Disclosure by other Connected Persons

All other Connected Persons (with details of their immediate relatives) who for the time being are in possession of Unpublished price sensitive information shall disclose

to the Company in Form D prescribed under SEBI (Prohibition of Insider Trading) Regulations, 2015 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 one month in excess of the minimum threshold limit of market value exceeding Rs. 5,00,000/- or 5000 shares whichever is less.

Explanation 1 : The disclosures of trading in securities shall also include trading in derivatives of Securities (if permitted by law) and the traded value of the derivatives shall be taken into account.

Explanation 2 : It is clarified for the avoidance of doubts that the disclosure of the incremental transactions after any disclosure under this clause, shall be made when the transactions affected after the prior disclosure cross the threshold specified in clause (a) above.

5.1.4 **Disclosure by the Company to Stock Exchange**

The Company shall notify the particulars of trading, as disclosed to it under clause 5.1.3(a) above, to the stock exchange on which its securities are listed, within two trading days of receipt of the disclosure or from becoming aware of such information.

- 5.2 The Compliance Officer shall maintain records of all declarations given by all Promoters/ Directors / Key Managerial Personnel / Employees / Designated Employees / Connected Persons for a minimum period of 5 years.
- 5.3 The Compliance Officer shall place before the Chairman of Audit Committee or in his absence before the Managing Director / CEO or a Committee notified by the Company, on a quarterly basis all the details of the dealing in the Securities of the Company by the Directors, Key Managerial Personnel, employees, Designated Employees and Connected Persons (along with details of their immediate relatives) received by him and the accompanying documents that such persons had executed under the pre-dealing procedures envisaged in this code.

CHAPTER-6

PENALTY FOR CONTRAVENTION OF THE CODE

- 6.1 Any Director/ KMP/ Designated Employee/ Connected Persons who trade in securities or communicate any information for trading in securities in contravention of this code may be penalized and appropriate action may be taken by the Company.
- 6.2 Director/ KMP/ Designated Employee who violates this code shall also be subject to disciplinary actions by the Company, which may include wage freeze, suspension, render ineligible for future participation in employee stock option plans, etc.
- 6.3 Director/ KMP of the Company, who violate the code or the Regulations shall also be subject to the penalty provided under Section 195 of the Companies Act, 2013 and such penalty will be the personal liability of such Directors/ KMP.
- 6.4 The action by the Company shall not preclude Board from taking any action in case of violation of the Regulations.
- 6.5 In case the Company observes that there has been a violation of the Regulations, the Company shall inform the Board.

CHAPTER-7

FORMS

Form I

To,

The Compliance Officer
RHC Holding Private Limited

From: Name:

Designation:

Department:

Through: Head of Department (if any)

With reference to the Code of Conduct for Prevention of Insider Trading of the Company, I, the undersigned, seek your approval to buy/ sell as a principal/ agent in _____ Securities of the Company, aggregating in value Rs. _____ (Approx)

STATEMENT OF HOLDINGS AT THE TIME OF PRE-CLEARANCE

I. DETAILS OF SECURITIES HOLDING OF DIRECTOR/ KMP/ DESIGNATED EMPLOYEE HELD IN THEIR OWN NAME

Name	designation	Department	No. of Securities held (with Folio No/DP ID/ Client ID)	Nature of Transaction for which Approval is sought [Purchase/Sell/ Others{Pls. Specify}]	No. of Securities to be dealt	Aggregate value of the Transaction (Rs.) (approx.)

II. DETAILS OF SECURITIES HELD BY DEPENDANTS

Name	Relationship	Nature of Transaction for which Approval is sought [Purchase/Sell/ Others{Pls. Specify}]	No. of Securities to be dealt	Aggregate value of the Transaction (Rs.) (approx.)

Please tick the appropriate case:

I/ We hereby declare that I have not purchased any Securities in last 6 months (if approval is sought for selling of shares)	
I/ We hereby declare that I have not sold any Securities in last 6 months (if approval is sought for selling of shares)	

Date: _____

Place: _____

Signature:

Name of Director / KMP/ Designated Employee

Name of the Department Head

Signature

**In case the sale of securities is necessitated by personal emergency, Director/ KMP/ Designated Employees shall specify the reasons.

Reasons:

Enclosure: Undertaking

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PRE CLEARANCE ORDER

This is to inform that your request for dealing in _____ (nos.) _____ Securities of the Company is approved. Please note that the said transaction must be completed within 7 trading days from the date of this order.

Conditions (if any).....

For RHC Holding Private Limited

Date _____

Compliance Officer / Managing Director

UNDERTAKING

I, _____ (Name, Designation and Dept.) residing at _____, desirous of dealing in _____ (nos.) of _____ Securities as mentioned in my application dated _____ for pre- Clearance of the transaction.

As required by the Code, I hereby state that

- a) I have no access to nor do I have any information that could be construed as “Unpublished Price Sensitive Information” as defined in the Code upto the time of signing this undertaking;
- b) I am executing the transaction as per duly approved trading plan. (please delete this Clause if not applicable)
- c) In the event that I have access to or received any information that could be construed as “ Unpublished Price Sensitive Information” as defined in the Code, 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 dealing in the Securities of the Company until such information becomes public;
- d) I have not contravened any provisions of the Code as notified by the Company from time to time;
- e) I have made a full and true disclosure in the matter.

Date:

Place:

Signature:

Name:

FORM II

TRADING PLAN

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 5]

Name:

Designation/ Relationship with the Company:

Period of Plan:

Name, PAN No. & Address of Insider	Details of Depository Participant through whom the trade will be executed (DP ID & Client ID)	No & % of shares/ voting rights held at the time of submitting the Trading Plan	No. of securities to be traded	Aggregate value of trade(s)	Nature of trade(s) (acquisition/ disposal) for which approval is sought	Intervals between trade(s)	Specific dates, if any fixed for trades

Date:

Place:

Signature

Enclosure: Undertaking

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APPROVAL

This is to inform you that your trading plan for dealing in _____ (total nos.) _____ Equity Shares/ other securities of the Company during the period _____ is hereby approved.

Conditions (if any) _____

Date:

For RHC Holding Private Limited

Compliance Officer

UNDERTAKING

I, _____ (Name, Designation and Dept.) residing at _____, desirous of dealing in _____ (nos.) of _____ Equity Shares/ Other Securities (Please Specify) as mentioned in my application dated _____ for approval.

I hereby state that

- a. I will execute the transaction as per duly approved trading plan on the dates as specified in the plan.
- b. In the event that any unpublished price sensitive information at the time of formulation of the trading plan has not become generally available at the time of commencement of implementation of plan, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public;
- c. I have not contravened any provisions of the Code as notified by the Company from time to time;
- d. I have made a full and true disclosure in the matter.

Date:

Place:

Signature

Name

FORM III

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7(1)(b) read with Regulation 6(2)-Disclosure on becoming a director/KMP/Promoter]

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

Name, PAN No. & Address with contact nos.	Category of Person(Promoters/KMP/Directors/immediate relatives etc.)	Date of appointment of Director/KMP or date of becoming Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP		%ge of Shareholding
			Type of Security(For Eg. Shares, Warrants, Convertible Debentures etc.	No.	
1	2	3	4	5	6

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 Future Contracts held at the time of becoming Promoter/appointment of Director/KMP			Open Interest of Option Contracts held at the time of becoming Promoter/appointment of Director/KMP		
Contract Specifications	No. of Units(Contracts*lot Size)	Notional Value in Rupee terms	Contract Specifications	No. 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:

FORM IV*

To,
The Compliance Officer
RHC Holding Private Limited

I. HALF YEARLY STATEMENT OF SECURITY HOLDING OF DIRECTORS/ KMP/ DESIGNATED EMPLOYEES

Name	Designation	Department	No. of securities held on____	No. of securities bought during the Half year	No of securities sold during the Half year	No. of securities held on____	Folio/ DP ID/ Client ID

II. DETAILS OF SECURITIES HELD BY IMMEDIATE RELATIVES

Name	Relationship	No. of securities held on____	No. of securities bought during the Half year	No of securities sold during the Half year	No. of securities held on____	Folio/ DP ID/ Client ID

I/We hereby declare that I/We have complied with the Code and SEBI Regulations with respect of the Securities purchased / sold.

I/ We further declare that the above disclosure is true and correct and is in accordance with the previous disclosure given to the Company.

Date:

Place:

Signature

Name

*This form is required to be submitted within 30days from end of the Half Year

FORM V*

To,
The Compliance Officer
RHC Holding Private Limited

ANNUAL DISCLOSURE

I. STATEMENT OF SECURITY HOLDING OF DIRECTORS/ KMP/ DESIGNATED EMPLOYEES

Name	Designation	Department	No. of securities held on 1 st April 20__	No. of securities bought during the year	No. of securities sold during the year	No. of securities held on 31 st March 20__	Folio/ DP ID/ Client ID

II. DETAILS OF SECURITIES HELD BY IMMEDIATE RELATIVES

Name	Relationship	No. of securities held on 1 st April 20__	No. of securities bought during the year	No. of securities sold during the year	No. of securities held on 31 st March 20__	Folio/ DP ID/ Client ID

I/We hereby declare that I/We have complied with the Code and SEBI Regulations with respect of the Securities purchased / sold.

I/ We further declare that the above disclosure is true and correct and is in accordance with the previous disclosure given to the Company.

Date:

Place:

Signature

Name

*This form is required to be submitted within 30 days from end of the Financial Year.