

OCEANAA BIOTEK INDUSTRIES LIMITED
CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING
AND
CODE OF PRACTICES AND PROCEDURES FOR FAIR
DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

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

**CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING AND CODE OF PRACTICES AND PROCEDURES
FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

OCEANAA BIOTEK INDUSTRIES LIMITED

In compliance with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time, (hereinafter referred to as “the Regulations”) the Board of Directors of the Company have approved and adopted the following Code of Conduct (hereinafter referred to as “the Code”) for prevention of Insider Trading in the securities of the Company.

The Code has been approved and adopted by the Board of Directors of the Company with effect from 15th May, 2015.

Any amendments/modifications to the code shall be intimated to the Stock Exchange.

DEFINITIONS

1. **“Act”** means the Securities and Exchange Board of India Act, 2015.
2. **“Board”** means the Securities and Exchange Board of India.
3. **“Board of Directors”** means the Board of Directors of the Company, Oceanaa Biotek Industries Limited.
4. **“Body Corporate”** means a body corporate as defined under Section 2(11) of the Companies Act, 2013.
5. **“Code”** means this Code of Conduct for Prevention of Insider Trading including modifications made from time to time by the Company, Oceanaa Biotek Industries Limited.
6. **“Company”** means Oceanaa Biotek Industries Limited.
7. **“Compliance officer”** means any senior officer, designated so and reporting to the Board of Directors’ 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board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.
8. **“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) 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 self-regulatory organization recognised 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 per cent. of the holding or interest;

9. **“Dealing in securities”** means an act of subscribing, buying, selling or agreeing to subscribe, buy, sell or deal in any securities by any person either as principal or agent;
10. **“Designated Employee”** shall include
- (i) All the Directors and Key Managerial Personnel;
 - (ii) The employees designated by the Company to whom these trading restrictions shall be applicable, keeping in mind the objectives of this code of conduct.
11. **“Employee”** means every employee of the Company including the Directors in the employment of the Company.
12. **“Generally available information”** means information that is accessible to the public on a non-discriminatory basis
13. **“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
14. **“Insider”** means any person who is:
- i) a connected person; or
 - ii) in possession of or having access to unpublished price sensitive information;
15. **“Key Managerial Personnel”** means the persons as specified under Section 2(51) of the Companies Act, 2013
16. **“Listing Agreement”** means the Agreement as specified by the Board.

17. **"Officer of a Company"** means any person as specified under Section 2(59) Companies Act, 2013
18. **"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
19. **"Relative"** means a person, as defined in Section 2(77) of the Companies Act, 2013;
20. **"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;
21. **"Specified"** means specified by the Board in writing.
22. **"Takeover regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto
23. **"Trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly
24. **"Trading day"** means a day on which the recognized stock exchanges are open for trading.
25. **"Trading Plan"** shall mean a plan for carrying out trades by persons having access to Unpublished price sensitive information
26. **"Trading Window"** shall mean the window available for Trading in the Securities of the Company.
27. **"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;
28. **"Working day"** shall mean the working day when the regular trading is permitted on the concerned stock exchange where the securities of the company are listed.

1. COMPLIANCE OFFICER

1.1 The Company has appointed 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.

1.2 The compliance officer shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of “Price Sensitive Information”, pre-clearing of trades and the implementation of the code of conduct under the overall supervision of the Board of the listed company.

1.3 The compliance officer shall be of assistance in addressing any clarifications regarding the Act and the company’s code of conduct.

2 RESTRICTIONS ON COMMUNICATION AND TRADING BY INSIDERS

2.1 Communication or procurement of unpublished price sensitive information

2.1.1 No insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

2.1.2 No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

2.1.3 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 (2) trading days prior to the proposed transaction being effected in such form as the board of directors may determine.

2.1.4 For purposes of the above mentioned, 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 purpose of sub-regulation 2.1.3, and shall not otherwise trade in securities of the company when in possession of unpublished price sensitive information.

2.2 Need to know

2.2.1 Price Sensitive Information is to be handled on a “need to know” basis, *i.e.*, Price Sensitive Information should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.

2.3 Limited access to confidential information

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

2.4 Chinese Wall

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

2.4.2 The employees in the inside area shall not communicate any Price Sensitive Information to anyone in the public area.

2.4.3 The employees in inside area may be physically segregated from Employees in public area.

2.4.4 Demarcation of the various departments as inside areas shall be decided by the Board of Directors.

2.4.5 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.

3. Trading when in possession of unpublished price sensitive information

3.1 No insider shall trade in securities that are listed or proposed to be listed on a stock exchange when in possession of unpublished price sensitive information:

Provided that the insider may prove his/her innocence by demonstrating the circumstances including the following: –

(i) the transaction is an off-market inter-se transfer between promoters who were in possession of the same unpublished price sensitive information without being in breach of the restrictions on trading, imposed by the Company and both parties had made a conscious and informed trade decision;

(ii) in the case of non-individual insiders: –

(a) the individuals who were in possession of such unpublished price sensitive information were different from the individuals taking trading decisions and such decision-making individuals were not in possession of such unpublished price sensitive information when they took the decision to trade; and

(b) appropriate and adequate arrangements were in place to ensure that these regulations are not violated and no unpublished price sensitive information was communicated by the individuals possessing the information to the individuals taking trading decisions and there is no evidence of such arrangements having been breached;

(iii) the trades were pursuant to a trading plan set up.

3.2 In the case of connected persons the onus of establishing, that they were not in possession of unpublished price sensitive information, shall be on such connected persons and in other cases, the onus would be on the Board.

3.3 The Board may specify such standards and requirements, from time to time, as it may deem necessary for the purpose of these regulations.

4. Trading Plans

4.1 An insider shall 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.

4.2 Such trading plan shall:—

- (i) not entail commencement of trading on behalf of the insider earlier than six (6) months from the public disclosure of the plan;
- (ii) not entail trading for the period between the twentieth (20th) 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.

4.3 The compliance officer shall review the trading plan to assess whether the plan would have any potential for violation of these regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.

4.4 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.

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.

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

5. Pre-clearance of trades

All Key managerial personnel, Promoters, Insider, Designated employees, Immediate relatives as defined by the company who intend to deal in the securities of the company should pre-clear the transaction by application in the Annexure I given below.

An application may be made in Annexures I as given below to the Compliance Officer indicating the estimated number of securities that the Key managerial personnel, Promoters, Insider, Designated employees, Immediate relatives intend to deal in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the company in this behalf.

An undertaking shall be executed in favour of the company as given in Annexure II by such Key managerial personnel, Promoters, Insider, Designated employees, Immediate relatives incorporating, *inter alia*, the following clauses, as may be applicable:

(a) That the Key managerial personnel, Promoters, Insider, Designated employees, Immediate relatives does not have any access or has not received "Price Sensitive Information" upto the time of signing the undertaking.

(b) That in case the Key managerial personnel, Promoters, Insider, Designated employees, Immediate relatives have access to or receives "Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction he/she shall inform the Compliance Officer of the change in his position and that he/she would completely refrain from dealing in the securities of the company till the time such information becomes public.

(c) That he/she has not contravened the code of conduct for prevention of insider trading as notified by the company from time to time.

(d) That he/she has made a full and true disclosure in the matter.

6. Other restrictions

6.1 All Key managerial personnel, Promoters, Insider, Designated employees, Immediate relatives shall execute their order in respect of securities of the company within one week after the Insider approval of pre-clearance is given. If the order is not executed within one week after the approval is given, the above mentioned persons must pre-clear the transaction again.

6.2 All Key managerial personnel, Promoters, Insider, Designated employees, Immediate relatives who buy or sell any number of shares of the company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction. All the above mentioned persons shall also not take positions in derivative transactions in the shares of the company at any time.

In the case of subscription in the primary market (initial public offers), the above mentioned entities shall hold their investments for a minimum period of 30 days. The holding period would commence when the securities are actually allotted.

6.3 In case the sale of securities is necessitated by personal emergency, the holding period may be waived by the compliance officer after recording in writing his/her reasons in this regard.

7. Disclosures of trading by Insiders

7.1 General provisions

7.1.1 Every public disclosure under these provisions shall be made in such form as may be specified.

7.1.2 The disclosures to be made by any person under this Chapter shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.

7.1.3 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 Chapter:

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

8. Disclosures

8.1 Initial Disclosures

(a) Every promoter, key managerial personnel and director of the company shall disclose his/her holding of securities of the company as on the date of these regulations taking effect, i.e. 15th May, 2015 to the company within thirty days in Form A.

(b) Every person on appointment as a key managerial personnel or a director of the company or upon becoming a promoter shall disclose his holding of securities of the company as on the date of appointment or becoming a promoter, to the company within seven days of such appointment or becoming a promoter in Form B.

8.2 Continual Disclosures

(a) Every promoter, employee and director of the Company shall disclose to the company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of ten lakh rupees or such other value as may be specified in Form C.

(b) The Company shall notify the particulars of such trading to the stock exchange within two trading days of receipt of the disclosure or from becoming aware of such information.

8.3 Disclosures by other connected persons

The Company 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 Form D at such frequency as may be determined by the company in order to monitor compliance with the regulations.

9. Codes of Fair Disclosure

9.1. The Company shall ensure prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.

9.2. The Company shall undertake uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.

9.3. The Compliance Officer or any other senior officer appointed by the Company as specified from time to time shall be responsible for dissemination of information and disclosure of unpublished price sensitive information.

9.4. The Company shall ensure prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

9.5. The Company shall make appropriate and fair responses to queries on news reports and requests for verification of market rumors by regulatory authorities.

9.6. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.

9.7. The Company shall develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.

9.8. The Company shall handle all unpublished price sensitive information on a need-to-know basis.

10. Penalty for contravention of Code of Conduct and Codes of Fair Disclosure

10.1 Any Key managerial personnel, Promoters, Insider, Designated employees, Immediate relatives who trades in securities or communicates any information or counsels any person trading in securities, in contravention of the code of conduct may be penalized and appropriate action be taken by the Company.

10.2 Key managerial personnel, Promoters, Insider, Designated employees, Immediate relatives of the organisation/firm who violate the code of conduct may also be subject to disciplinary action by the company, which may include wage freeze, suspension.

10.3 The action by the Company shall not preclude the Board from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

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

11.1 In case it is observed by the compliance officer that there has been a violation of these Regulations, the Board shall be informed by the Company.

ANNEXURE I

APPLICATION FOR PRE-CLEARANCE OF TRADE

To,
The Compliance Officer,
Oceanaa Biotek Industries Limited

Sub: Application for Pre –Dealing approval in Securities of the company

Pursuant to the SEBI (Prohibition of Insider Trading) Regulation 2015 and the Company's Code of Conduct for prevention of Insider Trading , I hereby seek approval for purchase/sale of equity shares of the Company as below:

Name of the applicant	
Designation	
Number of securities held as on date	
Folio No. / DP ID / Client ID No.	
Name of the Depository participant	
The proposal is for	(a) Purchase of securities (b) Sale of securities
Proposed date of trading in securities	
Estimated number of securities proposed to be purchased/subscribed/sold	
Current market price (as on date of application)	
Whether the proposed transaction will be through stock exchange or off-market trade	
Folio No. / DP ID / Client ID No. where the securities will be credited / debited	

I enclose herewith the Undertaking signed by me.

Yours sincerely

Signature:
Name:
Designation:

Date:
Place:

Note: Application shall be sent through mail to info@oceanaabiotek.com followed by hard copy.

ANNEXURE II
FORMAT OF UNDERTAKING

To,
The Compliance Officer,
Oceanaa Biotek Industries Limited

I, _____ (Name), _____ (Designation) of the Company residing at _____, am desirous of dealing in _____ (number of shares) 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 as defined in the Code up to the time of signing this Undertaking;

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 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.

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

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

If approval is granted, I shall execute the deal within 7 days of the receipt of approval failing which I shall seek pre-clearance.

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

Yours sincerely

Signature:

Name:

Designation:

Date:

Place:

Note: The undertaking shall be sent through mail to info@oceanaabiotek.com followed by hard copy.

FORM A

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

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

Name of the company: _____

ISIN of the company: _____

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

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (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:

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: _____

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 No., 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	Open Interest of the Future contracts held at the time of becoming Promoter/appointme nt of Director/KMP		Open Interest of the Option Contracts held at the time of becoming Promoter/appointme nt 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	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:

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: _____

ISIN of the company: _____

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/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)	
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:

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)
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:

Signature:

Date:

Place:
