

**Newel Technologies GROUP - INVESTMENT REQUEST FORM**

Name of Employee: Pankaj

Client Code

Name of Company:

Client Name:

Dept. /Section

Date

Equity					
Sr. No.	Name of Security	Date of earlier opposite transaction (contra trade)	Buy / Sell	Quantity	Price Limit (not including brokerage)
1.	Adhiraj Distributors Ltd (ITP)		SELL	20	MKT

**Note: Pre-clearance is valid for ONE day only****Nature of Trade: Equity****DECLARATION:**

I hereby declare and undertake that;

a) I have read and understood the Compliance Rules set by the Newel Technologies with regard to investments by employees and the above transaction(s) is/are not in contravention of the same.

b) I am not in receipt of any "Unpublished Price Sensitive Information" meaning any information which relates directly or indirectly to the above mentioned security/securities and which if published is likely to materially affect the price of securities of the above mentioned security/securities

c) In case I have access to or receive any "Unpublished Price Sensitive Information" before the execution of the transaction, I shall inform the Compliance Officer of the change in my position and I shall completely refrain from dealing in the Securities of the Client Company till the time such information becomes public.

d) The intended transaction is on my account or dependent family member's account or Concern(s), Firm(s), Company(s), HUF(s), Trust(s) or Association of persons in which the persons to whom this policy is applicable has a stake of more than 10%.

e) The said transaction is not on account of any other third party.

f) I have not availed any finance from any Group Company for subscribing to the IPO/FPO/Rights Issue lead managed by Newel Technologies or where Newel Technologies is Syndicate Member.

g) The securities purchased shall be credited to such DP IDs as registered with the company. The securities sold shall be transferred from such DP IDs as registered with the company.

h) All sell and purchase transactions in securities are for minimum holding / contra trade period, as applicable for securities held by me or my Immediate Relatives and my / their Connected Persons.

i) All F & O contract shall be held by me for minimum period as applicable for securities held by me or my Immediate Relatives and my / their Connected Persons.

j) I undertake to report all such decisions alongwith the reasons to Compliance for not executing or partially executing trades after obtaining the pre-clearance.

k) I understand and acknowledge that should a contra trade be executed by me, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund.

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**Signature of Approver****Approved By :** \_\_\_\_\_**Date of Approval :** \_\_\_\_\_\_\_\_\_\_  
**Signature of Employee****Compliance Control No.:**

