

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

- 1 The Company shall make prompt public disclosure of unpublished price sensitive information that would impact price discovery as soon as credible and concrete information comes into being and will make the same information generally available.
- 2 The Company shall ensure that unpublished price sensitive information is disseminated uniformly and universally and shall avoid selective disclosure.
- 3 The Company has designated Rashmi Kumari (Company Secretary and Compliance Officer) as a Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information. He shall be responsible for ensuring that the company complies with continuous disclosure requirements, overseeing and coordinating disclosure of price sensitive information to stock exchanges, analysts, shareholders and media and educating staff on disclosure policies and procedure.

The information disclosure / dissemination shall normally be approved by the Chief Investor Relations Officer or by such other officer as approved by the Board.

4. If any price sensitive information is disclosed selectively, inadvertently or otherwise without prior approval, the Chief Investor Relations Officer on having knowledge of such partial dissemination shall upload the information on the website of the Company and if required intimate the Stock Exchanges to ensure that the unpublished price sensitive information is generally available
5. The Company shall lay down procedures for responding to any queries on news reports and requests for verification of market rumours by regulatory authorities. The response to these queries shall be appropriate and fair.

The company is not under an obligation to respond to market rumors or speculations. However if the media reports carry such information which is largely accurate, the information underlying the speculation or rumour or press report is based on insider information, which has been leaked. The company would therefore be under obligation to respond to the same and make the insider information generally available.

If the market information or press report is false or inaccurate, the company is not under an obligation to make any announcement / negative disclosures. However if the stock exchange were to make a query to clarify the position, the company must make a formal announcement to the stock exchange and shall not selectively disclose any information / make a negative disclosure.

6. The company shall provide only information that is generally available with the analysts/ research persons / large investors.

The company shall ensure that no inside information is given when answering an analyst's questions or reviewing an analyst's draft report. It is inappropriate for a question to be answered, or draft report corrected, if doing so involves providing inside information. When analysts visit the company, care shall be taken to ensure they do not obtain inside information. No analyst, investor or journalist should receive any selective release of inside information.

7. The company shall strive to 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. In order to avoid misquoting or misrepresentation, at least two company representatives shall be present at meetings with analysts / research personnel / large investors and discussion shall preferably be recorded. The company shall notice of unanticipated questions and give a considered response later. If the answer includes unpublished price sensitive information, the same shall be released to the public as the transcripts shall be uploaded on the website of the Company.
8. The company shall disclose / disseminate information through various media so as to achieve maximum reach and quick dissemination. The Company shall facilitate disclosure through the use of its dedicated Internet website. The Company websites shall provide a means of giving investors a direct access to analyst briefing material, significant background information and questions and answers. The information filed by the Company with the stock exchanges under continuous disclosure requirement shall also be made available on the company website.
9. All unpublished price sensitive information shall be handled only on a "Need-to-Know" basis.

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS

1. This Code of Conduct may be called as "Fervent Synergies Limited Code of Conduct to Regulate, Monitor and Report Trading by Insiders" and is hereinafter referred to as "Code of Conduct for Prevention of Insider Trading".
2. This Code of Conduct has been made pursuant to Regulation 9(1) and (2) of the SEBI (Prohibition of Insider Trading) Regulation, 2015 as amended from time to time.

3. APPLICABILITY:

This Code of Conduct shall be applicable to Directors/ employees / other connected persons of the Company as defined herein from time to time.

4. DEFINITIONS:

In this Code unless the context otherwise requires:

- (a) "Act" means the Securities and Exchange Board of India Act, 1992 (15 of 1992).
- (b) "Board" means the Board of Directors of the Company.
- (c) "Company" means Fervent Synergies Limited.
- (d) "Companies Act" means the Companies Act, 1956(1 of 1956) and Companies Act, 2013.
- (e) "Compliance Officer" means - The officer appointed by the Board for the purpose of compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for preservation of unpublished price sensitive information, monitoring of trades and the implementation of this Code of Conduct as well as the provisions of SEBI (Prohibition of Insider Trading) Regulation, 2015 as amended from time to time, under the overall supervision of the Board.
- (f) "connected person" means 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.
- (g) "Deemed to be connected persons" shall mean the persons falling within the following categories unless the contrary is established, -
 - (i). an immediate relative of connected persons specified in clause (i); or
 - (ii). a holding company or associate company or subsidiary company; or
 - (iii). an intermediary as specified in section 12 of the Act or an employee or director thereof; or
 - (iv). an investment company, trustee company, asset management company or an employee or director thereof; or
 - (v). an official of a stock exchange or of clearing house or corporation; or
 - (vi). 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
 - (vii). 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
 - (viii). an official or an employee of a self-regulatory organization recognised or authorized by the Board; or
 - (ix). a banker of the company; or
 - (x). 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.

(h) "Designated Employee(s)" means: -

- i). Every Employee in the top layer of the management,
- ii). Every Executive Secretary/Executive Assistant to every Employee covered under (i) above,

- iii). Every employee in the corporate finance & accounts department and secretarial , legal & compliance department; and
 - iv). Any other Employee as may be designated by the Compliance Officer in consultation with the Managing Director or Chief Executive Officer or Chief Financial Officer of the Company considering the objectives of the Code.
- (i) "Director" means a member of the Board of Directors of the Company.
 - (j) "Employee" means every employee of the Company (whether working in India or abroad) including the Directors in the employment of the Company.
 - (k) "generally available information" means information that is accessible to the public on a non-discriminatory basis;
 - (l) "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;
 - (m) "Insider" means any person who is
 - i) a connected person; or
 - ii) in possession of or having access to unpublished price sensitive information;
 - (n) "Need to know basis" means the disclosure of Price Sensitive/Confidential Information only to those within the company who need the information in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
 - (o) "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;
 - (p) "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;
 - (q) "Specified Persons" means the Directors, connected persons, the insiders, the Designated Employees and the promoters and immediate relatives are collectively referred to as Specified Persons.
 - (r) "trading" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;
 - (s) "trading day" means a day on which the recognized stock exchanges are open for trading;
 - (t) "unpublished price sensitive information" means any information, relating to the 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.

Words and/or expressions used and not defined in these code 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), SEBI (Prohibition of Insider Trading) Regulations, 2015, the Companies Act, 1956, or the Companies Act, 2013 (18 of 2013) and rules and regulations made there under as amended from time to time shall have the meaning as defined under the said Act and/or Regulations.

5. COMPLIANCE OFFICER

The Company Secretary of the Company shall be the Compliance Officer for setting forth the policies and procedures and to implement and monitor adherence to this 'Code of Conduct' and applicable laws and regulations and policies and procedures. The Compliance Officer shall report to the Board.

The Compliance Officer under this Code shall be responsible for:

- (i) compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for preservation of unpublished price sensitive information;
- (ii) pre-clearing of Designated Employees' trades in Securities of the Company;
- (iii) monitoring of trades in Securities of the Company and the implementation of this Code of Conduct as well as the provisions of SEBI (Prohibition of Insider Trading) Regulation, 2015 as amended from time to time, under the overall supervision of the Board.
- (iv) The Compliance Officer shall maintain a record of the Designated Employees and any changes made in the list of Designated Employees.
- (v) He shall place before the Chairman of the Audit Committee on a quarterly basis, all the details of dealing in securities by the Directors / Designated Employees and the accompanying documents that such persons had executed under the pre-dealing procedure envisaged in this code of conduct.
- (vi) The Compliance Officer shall assist all the employees in addressing any clarifications regarding the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct.

6. NEED TO KNOW

Unpublished price sensitive information is to be handled on a "need to know" basis, Unpublished 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 rise to a conflict of interest or appearance of misuse of the information. He, being in the inside area, shall not communicate any price sensitive information to anyone in public area. All non-public information directly received by him should immediately be reported to the head of the department and the compliance officer.

If, in the performance of duties, it becomes necessary for the Employee to disclose any price sensitive information to any person outside the Company, e.g., Advisors, Auditors, Consultants, Merchant Bankers, Share Transfer agent etc., the Employee shall inform the Compliance Officer of the Price Sensitive Information proposed to be disclosed and shall ensure that the concerned Advisor, Auditor, Consultant, Merchant Banker, Share transfer agent, etc., executes an Agreement with the Company in such format as may be prescribed by the Company.

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

7. PRESERVATION OF PRICE SENSITIVE INFORMATION

No person shall either on his own behalf or on behalf of any other person, deal in Securities of the Company when in possession of any unpublished price sensitive information.

No person shall communicate, counsel or procure directly or indirectly any unpublished price sensitive information to any person who while in possession of such unpublished price sensitive information shall not deal in Securities of the Company.

Designated Employees shall maintain the confidentiality of all Price Sensitive Information. They shall not pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sale of the Securities of the Company.

8. PREVENTION OF MISUSE OF "PRICE SENSITIVE INFORMATION

- i. All directors/designated employees of the Company shall be subject to trading restrictions as enumerated below.
- ii. All directors / Designated Employee shall trade in Securities of the Company only during a specific trading period called "Trading Window" to be specified by the Company. All directors / designated employees of Securities of the Company shall be prohibited to trade in Securities of the Company during the time the information referred to in sub-clause (iii) below is unpublished and during the period the trading window is closed.
- iii. The trading window shall be, *inter alia*, closed at the time of:—

- (a) Declaration of financial results (quarterly, half-yearly and annually).
- (b) Declaration of dividends (interim and final).
- (c) Issue of securities by way of public/rights/bonus etc.
- (d) Any major expansion plans or execution of new projects.
- (e) Amalgamation, mergers, takeovers and buy-back.
- (f) Disposal of whole or substantially whole of the undertaking.
- (g) Any changes in policies, plans or operations of the company.
- (h) Such other information as specified by various law, rules and regulations and ascertained by the Compliance Officer for this purpose.

iv. The Trading Window shall remain closed from the day the intimation of the Board Meeting to be convened for transacting the matters listed in (a) to (h) above is given by the Company to the Stock Exchanges and shall be opened 48 hours after the information referred to in sub-clause (iii) is made public.

v. In case of ESOPs, exercise of option may be allowed in the period when the trading window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when trading window is closed.

9. PRE-CLEARANCE OF TRADES

9.1 All Designated Employees, who intend to deal in the securities of the Company when the trading window is opened and if the value of the proposed trades is above Rs. 10 Lakhs (market value) in one calendar quarter, should pre-clear the transactions. However, no designated person shall be entitled to apply for pre-clearance of any proposed trade if such designated person is in possession of unpublished price sensitive information even if the trading window is not closed and hence he shall not be allowed to trade. The pre-dealing procedure shall be hereunder:

- (i) An application may be made in the prescribed Form (Annexure 1) to the Compliance officer indicating the estimated number of securities that the Specified Employee intends 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.
- (ii) An undertaking (Annexure 2) shall be executed in favour of the Company by such Specified Employee incorporating, *inter alia*, the following clauses, as may be applicable:
 - (a) That the employee/director/officer does not have any access or has not received "Price Sensitive Information" up to the time of signing the undertaking.
 - (b) That in case the Specified Employee has 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.

10. OTHER RESTRICTIONS

- (i) All Specified Persons and their immediate relatives shall execute their order in respect of securities of the Company within one week after the approval of pre-clearance is given. The Specified Person shall file within 2 (two) days of the execution of the deal, the details of such deal with the Compliance Officer in the prescribed form. In case the transaction is not undertaken, a report to that effect shall be filed. (Annexure 4).
- (ii) If the order is not executed within seven days after the approval is given, the Designated Employee/Director must pre-clear the transaction again and the approval granted earlier shall be deemed to have lapsed.
- (iii) All Specified Persons 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 Specified Persons shall also not take positions in derivative transactions in the shares of the Company at any time. 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 to be disgorged for remittance to the Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

In case of subscription in the primary market (initial public offers) of the Company, 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.

- (iv) The Compliance Officer may waive off the holding period in case of sale of securities in personal emergency after recording reasons for the same. However, no such sale will be permitted when the Trading window is closed.

11. REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES

Initial Disclosure

- 11.1 Every promoter/ Key Managerial Personnel / Director / Officers / Designated Employees of the Company, within thirty days of these regulations taking effect, shall forward to the Company the details of all holdings in securities of the Company presently held by them including the statement of holdings of dependent family members in the prescribed Form (Annexure 5).
- 11.2 Every person on appointment as a key managerial personnel or a director of the Company or upon becoming a promoter shall disclose his/her holding of securities of the Company as on the date of appointment or becoming a promoter, to the Company within seven days of such appointment or becoming a promoter (Annexure 6).

Continual Disclosure

- 11.3 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 Rupees Ten lakhs.

The disclosure shall be made within 2 working days of:

- (a) the receipt of intimation of allotment of shares, or
(b) the acquisition or sale of shares or voting rights, as the case may be.

12. DISCLOSURE BY THE COMPANY TO THE STOCK EXCHANGE(S)

- 12.1 Within 2 days of the receipt of intimation under Clause 11.3, the Compliance Officer shall disclose to all Stock Exchanges on which the securities of the Company are listed, the information received.
- 12.2 The Compliance officer shall maintain records of all the declarations in the appropriate form given by the directors / officers / designated employees for a minimum period of five years.

Grey List

The Company Secretary and Compliance Officer shall monitor, maintain and timely update a list of securities, of which certain department or set of employees are privy to have insider information. Such list of securities shall be termed as Grey List, wherein the employees would not be permitted to trade in such securities.

The respective head of departments shall be responsible to timely update the Compliance Officer of such securities to which its department is privy to have insider information.

No buying and selling shall be permitted in respect of a security placed on the Grey List. The Grey List is solely for the internal use of the firm. No one may engage in discussions regarding whether a security is or is not on the Grey List with persons outside the firm without specific clearance by Compliance Officer. The Grey List shall be monitored, maintained and timely updated by the Compliance officer.

13. TRADING PLAN

- (i) An insider may 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.
- (ii) Such Trading Plan shall not entail:-
 - (a) commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
 - (b) trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced by the issuer of the securities and the second trading day after the disclosure of such financial results;
 - (c) trading for a period of less than 12 months;
 - (d) overlap for any period for which another trading plan is already in existence submitted;
 - (e) trading for market abuse.
- (iii) Such Trading Plan shall 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;
- (iv) 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.
- (v) 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.
- (vi) Upon approval, the Compliance Officer shall notify the Trading Plan to the stock exchanges on which the securities of the company are listed.

14. PENALTY FOR CONTRAVENTION

- (i) Every Specified Person shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her dependents).
- (ii) Any Specified Person who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalised and appropriate action may be taken by the Board or any other Authority appointed by the Board after giving reasonable opportunity to show-cause and adherence to the principles of natural justice.
- (iii) Specified Persons who violates the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligibility for future participation in employee stock option plans, etc.
- (iv) The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

15. AMENDMENT TO CODE OF CONDUCT

The Board of Directors of the Company reserves the right to add, amend, modify this Code of Conduct as and when it deems appropriate.

16. SAVINGS CLAUSE

If any rules under the code are in conflict with or inconsistent with the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time, then the SEBI (Prohibition of Insider Trading) Regulations, 2015 as modified/ amended from time to time, shall prevail and shall deemed to have been included in this code.

**ANNEXURE 1
SPECIMEN OF APPLICATION FOR PRE-DEALING APPROVAL**

Date:

To,
The Compliance Officer,
Fervent Synergies Limited
Mumbai

Dear Sir/Madam,

Application for Pre-dealing approval in securities of the Company

Pursuant to the SEBI (prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct for Prevention of Insider Trading, I seek approval to purchase / sale / subscription 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.	Estimated number of securities proposed to be acquired/subscribed/sold		
7.	Whether the proposed transaction will be through stock exchange or off-market deal		

My undertaking for the purpose of pre-clearance is furnished herein above. This is to request you to pre-clear the proposed trade.

I / My dependent family member are aware that I / We have to execute the order in respect of securities of the company within one week after the approval of preclearance is given.

If the order is not executed within one week after the approval is given, I/We would have to pre-clear the transaction again.

Thanking you.

Yours faithfully,

(Signature)

ANNEXURE 2
FORMAT OF UNDERTAKING TO BE ACCOMPANIED WITH
THE APPLICATION FOR PRE-CLEARANCE

UNDERTAKING

To,
Fervent Synergies Limited
Mumbai

I, _____, _____ of the Company residing at _____, am desirous of dealing in _____* shares of the Company as mentioned in my application dated _____ for pre-clearance of the transaction and hereby undertake/declare that:

1. I further declare that I am not in possession of or otherwise privy to any unpublished Price Sensitive Information (as defined in the Company's Code of Conduct for prevention of Insider Trading (the Code) up to the time of signing this Undertaking.
2. 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.
3. I declare that I have not contravened the provisions of the Code as notified by the Company from time to time.
4. I undertake to submit the necessary report within four days of execution of the transaction / a 'Nil' report if the transaction is not undertaken.
5. If approval is granted, I shall execute the deal within 7 days of the receipt of approval failing which I shall seek pre-clearance.
6. I declare that I have made full and true disclosure in the matter.

Date :

Signature : _____

* Indicate number of shares

**ANNEXURE 3
FORMAT FOR PRE- CLEARANCE ORDER**

To,
Name : _____
Designation : _____
Place : _____

PRE-DEALING APPROVAL/DISAPPROVAL -Your application Dtd._____

Dear Mr. /Mrs. _____

With reference to your above application seeking approval for undertaking certain transactions in Securities of the Company detailed therein, please be informed that you are hereby authorised/not authorised to undertake the transaction(s) as detailed in your said application.

This approval is being issued to you based on the various declarations, representations and warranties made by you in your said application.

This approval letter is valid till _____ (i.e. for {1} week). If you do not execute the approved transaction /deal on or before this date you would have to seek fresh pre-dealing approval before executing any transaction/deal in the Securities of the Company. Further, you are required to file the details of the executed transactions in the attached format within four {4} days from the date of transaction/deal. In case the transaction is not undertaken a "Nil" report shall be necessary.

Yours faithfully,

For Fervent Synergies Limited

Compliance Officer

Date : _____

ANNEXURE 4
FORMAT FOR DISCLOSURE OF TRANSACTIONS
(To be submitted within 2 days of transaction / dealing in securities of the Company)

To,
The Compliance Officer,
Fervent Synergies Limited
Mumbai

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	No. of securities dealt with	Bought/sold/subscribed	DP ID/Client ID / Folio No	Price (Rs.)

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 3 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 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 Compliance Officer for necessary approval. *(applicable in case of purchase / subscription).*

I declare that the above information is correct and that no provisions of the Company's Code and/or applicable laws/regulations have been contravened for effecting the above said transactions(s).

Date : _____

Signature : _____

Name :

Designation:

**ANNEXURE 5
FORMAT FOR INITIAL DISCLOSURE OF SECURITIES**

**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:

ANNEXURE 6
FORMAT FOR DISCLOSURE 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 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/ appointment of Director/KMP		Open Interest of the Option Contracts held at the time of becoming Promoter/ appointment 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:

ANNEXURE 7

FORMAT FOR 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)

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)

1	2	3		4		5		6		7		8		9		10		11		12		13		14		15		16		17	
		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	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)		Value	Number of units (contracts * lot size)	Value	Number of units (contracts * lot size)	Exchange on which the trade was executed												
													Buy	Sell																	

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:

ANNEXURE 8 (Indicative format)

FORMAT FOR TRANSACTIONS BY OTHER CONNECTED PERSONS AS IDENTIFIED BY THE COMPANY

FORM D

**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 of the company: _____

ISIN of 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: