SecUR Credentials Limited
Now its safe

20th January, 2018

To,
The Manager,
National Stock Exchange of India Limited,
Exchange Plaza,
Bandra Kurla Complex, Bandra (E),
Mumbai 400 051.

Scrip: SECURCRED

Sub: Outcome of the Board meeting

Pursuant to regulation 30 of the SEBI (Listing Obligations and Disclosure Requirement) Regulations, 2015, we wish to inform you that the Board of Directors in their meeting held on today i.e.20th January, 2018 has:

1) adopted the code of conduct for Prohibition of insider trading & fair disclosure of unpublished price sensitive information (UPSI). (enclosed)

2) authorized Managing Director and Chief Financial Officer of the Company for the purpose of determining materiality of events and information and disclose the same to the stock exchange. Contact details of above authorized persons are as follows:

Mr. Rahul Belwalkar
Managing Director,
SecUR Credentials Limited,
Plot no.G-4, MIDC Cross road A, Andheri (E), Mumbai – 400093.
Email: rahul.belwalkar@secur.co.in

Mr. Mayur Chheda,
Chief Financial Officer,
SecUR Credentials Limited,
Plot no.G-4, MIDC Cross road A, Andheri (E), Mumbai – 400093.
Email: mayur.chheda@secur.co.in

For SecUR Credentials Ltd.

V.V.Bhoy

Vipul Bhoy
Company Secretary

SECUR CREDENTIALS LIMITED MUMBAI

Encl: a/a.

CODE FOR PROHIBITION OF INSIDER TRADING & FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI)

OF

SECUR CREDENTIALS LIMITED

(CIN: L74110MH2001PLC133050)

Preamble

The Securities and Exchange Board of India (SEBI), in its endeavor to protect the interests of investors in general, had formulated the SEBI (Prohibition of Insider Trading) Regulations, 1992. Further, to strengthen these regulations and to create a framework for prevention of insider Trading to facilitate legitimate business transactions, SEBI had introduced the SEBI (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as ("the Regulations") and the same were notified by SEBI on January 15, 2015 which has become effective from May 15, 2015.

This Code of Conduct is known as "Code for Prohibition of Insider Trading & Fair Disclosure of Unpublished Price Sensitive Information (UPSI) of SecUR Credentials Limited". This Code of Conduct has been designed pursuant to the requirement of Regulation 8 & 9 of the SEBI (Prohibition of Insider Trading) Regulation, 2015.

The objective of this Code of Conduct is to enhance the standards of corporate governance and to regulate, monitor and report the Insider trading transactions in compliance with the SEBI (Prohibition of Insider Trading) Regulation, 2015.

Definitions

1. "Act" means the Securities & Exchange Board of India Act, 1992 as may be amended from time to time.

2. "Applicable Laws" means every law relating to Securities Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended, including, without limitation to the Companies Act, 2013 and rules made there under, Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time or any rules made under relevant jurisdiction of any stock exchange on which the Shares are listed or quoted or any changes there into or by whatever name called.

3. "Board" means Board of Directors of the Company.

4. "Code of Conduct" means this Code for Prohibition of Insider Trading & Fair Disclosure of Unpublished Price Sensitive Information (UPSI), including modifications made thereto from time to time.

5. "Company" means 'SecUR Credentials Limited.'

6. "Compliance Officer" shall mean Company Secretary of the Company or such other person as may be nominated as the Compliance Officer by the Chairman and Managing Director from time to time.

7. “Connected Person” 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 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 UPSI 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 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 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 the Company or his Immediate Relative or banker of the Company, has more than 10% of the holding or interest.

8. “Designated Person” means –

(i) Directors and key managerial personnel
(ii) All Departmental Heads
(ii) employees functioning as Personal Assistants/ Secretaries to the persons in category (i) & (ii) above;
(iii) all employees in the accounts, finance, taxation, secretarial and corporate department, whether temporary or permanent; and
(iv) such employees and Connected Persons (including representatives of the auditors, accountancy firms, law firms, analysts, consultants, etc.) as identified by the Compliance Officer in consultation with the board of directors in line with the objectives of the Code of Conduct.

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

10. “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.

11. “Insider” means any person who is;
    (i) a Connected Person; or
    (ii) in possession of or having access to UPSI

12. "Promoter" shall have the meaning assigned to it under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof.

13. “Regulation” means SEBI (Prohibition of Insider Trading), Regulations, 2015 as amended from time to time.

14. "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;

15. "Specified" means specified by the Board in writing;

16. “Takeover Regulations” means the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.

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

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

19. “Trading Window" means the period during which, trading in the Company’s shares by Insiders shall be permissible.

20. "Unpublished Price Sensitive Information (UPSI)" 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.

Interpretation

1. Words and expressions used and not defined in this Regulations but defined in the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation.

2. This Code of Conduct can be modified / amended / altered only by Board of the Company.

3. But in case of any statutory modification or amendment or alteration of the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015, the newly modified / amended / altered provisions of the Regulations shall be deemed to be implemented in the Code of Conduct immediately with effect from the date of the statutory notification for modification or amendment or alteration etc.

4. The amended Code of Conduct shall be placed before the Board of the Company in the board meeting held immediately after the date of statutory notification for modification / amendment / alteration etc of the Regulations for noting.

Applicability

This Code of Conduct shall be applicable to all the Directors / Officers / Designated Persons, present and future.

Responsibilities of the Compliance Officer

1. The Compliance Officer shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of UPSI, monitoring of trades and the implementation of the codes specified in these Regulations under the overall supervision of the Board of the Company.

2. The Compliance Officer shall maintain a record of the Insiders and any changes made in the list of Insiders.

3. The Compliance Officer shall assist all the employees in addressing any clarifications regarding the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time and the Company’s Code of Conduct.

4. The Compliance Officer shall report on details of Insider trading to the board on quarterly basis.

Preservation of Unpublished Price Sensitive Information

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. 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.

3. Price sensitive information is to be handled strictly on a "need to know" basis.

4. Notwithstanding anything contained in this Regulation, an UPSI may be communicated, provided, allowed access to or procured, in connection with a transaction that would:–

    a. 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; and

    b. not attract the obligation to make an open offer under the takeover regulations but where the Board of the Company is of informed opinion that the proposed transaction is in the best interests of the Company and the information that constitute UPSI is disseminated to be made generally available at least two Trading Days prior to the proposed transaction being effected in such form as the Board may determine.

5. The Company shall put in place policies and procedures (hereinafter referred as "Chinese Walls") to manage UPSI and prevent the inadvertent spread and misuse of UPSI.

6. Chinese Walls is to be designed to curb on passing of UPSI. Employees, who are in possession of UPSI, have a responsibility to ensure that UPSI should not be shared or disclosed to any persons except their legal obligations.

7. All non-public information directly / indirectly received by any employee should immediately be reported to the head of the department.

8. This policy should not only address the maintenance of Chinese Walls but also the procedures for crossing the wall.

Trading Plan by Insiders

1. An Insider shall be entitled to formulate a trading plan for dealing in Securities of the Company and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out with such plan.

2. Such trading plan shall:
   (i) not entail commencement of Trading earlier than six months from the public disclosure of the plan;
   (ii) not entail 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;
   (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. The Compliance Officer shall review such 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. The trading plan once approved by the Board of the Company 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.

5. However, the implementation of the trading plan shall not be commenced, if any UPSI in possession of the Insider at the time of formulation of the plan and such UPSI has not become generally available at the time of the commencement of implementation of plan. If it is so, then the Compliance Officer shall confirm that the commencement ought to be deferred until such UPSI becomes generally available information.

6. Upon approval of the trading plan, the Compliance Officer shall notify the plan to the stock exchanges on which the Securities are listed.

7. A notional window shall be used as an instrument of monitoring trading by Designated Person. The Compliance Officer should close Trading Window when he determines that a Designated Person or class of Designated Person can reasonably be expected to have possession of UPSI. Such closure shall be imposed in relation to such Securities to which such UPSI relates. During closure of notional window, Designated Person and their Immediate Relatives shall not trade in Securities when the Trading Window is closed.

Prevention of Misuse of "Price Sensitive Information"

All directors/officers and Designated Person of the Company shall be subject to trading restrictions as enumerated below:

1. The Trading Window shall be closed seven days prior to UPSI pertaining to financial results of the Company is published. However, the Trading Window shall be closed two

trading days prior to UPSI pertaining to any other event is published subject to the compliance with the Applicable Laws.

2. During closure of Trading Window, Designated Person shall not trade in the Securities of the Company.

3. After taking into account various factors including UPSI in question becoming generally available and being capable of assimilation by the market, the Compliance Officer shall determine timing of re-opening of the Trading Window. However, in any event it shall be forty-eight hours after the information becomes generally available.

4. The Trading Window shall also be 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.

All directors/officers/Designated Persons of the Company shall conduct all their dealings in the Securities of the Company only when the Trading Window is open 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 during any other period as may be specified by the Company from time to time.

Pre-Clearance of Trades

When the trading window is open, any Designated Person shall trade in Securities of the Company subject to pre-clearance by the Compliance Officer, if number of shares proposed to be transacted are 1000 or above. However, no Designated Person shall be entitled for pre-clearance of any proposed trade if such Designated Person is in possession of UPSI even if the trading window is not closed.

Designated Person who proposes to execute trade in Securities of the Company shall submit an application duly filled and signed to the Compliance Officer. The format of application is annexed as **Annexure "A"**.

Prior to approving any trades, the Compliance Officer shall seek declarations to the effect that the applicant for pre-clearance is not in possession of any UPSI. He shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.

The Compliance Officer shall confidentially maintain a list of such securities as a "restricted list" which shall be used as the basis for approving or rejecting applications for preclearance of trades.

The Compliance Officer shall approve/ reject pre-clearance application within four working days in a format as prescribed in **Annexure "B"**.

Designated Person shall execute pre-cleared trade within seven trading days from approval and shall report his trade details to Compliance Officer in a format as prescribed in **Annexure "C"** within two trading days from the trade. In case non-trading, Designated Person shall report his decision of non-trading along with the reasons of non-trading in his report.

In case of failure in executing trade within seven trading days, Designated Person shall be required to take fresh pre-clearance for the trades to be executed in a format as prescribed in **Annexure "A"**.

Designated Person who is permitted to trade shall not execute a contra trade within next six months from previous transaction. The Compliance Officer is empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing without violating the Regulations. If 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 Securities and Exchange Board of India for credit to the Investor Protection and Education Fund.

Disclosures Requirements:

Initial Disclosure:

Every Promoter, Key Managerial Personnel and Director of the Company shall disclose his holding of securities of the Company as on the date of these regulations taking effect, within 30 days in format as prescribed in **Annexure "D"**.

Every person on appointment as a Key Managerial Personnel or a Director of the Company or Designated Employee or upon becoming a Promoter shall disclose his holding of securities of the Company and any other person for whom such person takes trading decisions as on the date of appointment or becoming a promoter, to the Company within seven days of such appointment or becoming a Promoter in format as prescribed in **Annexure "E"**.

Continual Disclosure:

Every Promoter, Designated Employee and director of Company and any other person for whom such person takes trading decisions 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 by the Compliance Officer from time to time in format as prescribed in **Annexure "F"**.

Disclosure by the Company to the Stock Exchange(s)

The Company shall within 2 Working days the receipt of disclosures as mentioned as aforesaid, discloses to all Stock Exchanges on which the securities of the Company are listed, the information received as aforesaid.

Code of Fair Disclosure of Unpublished Price Sensitive Information

A code of practices and procedures for fair disclosure of unpublished price sensitive information for adhering each of the principles is set out below:

1. 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.

2. Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.

3. Designation of a senior officer as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.

4. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

5. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.

6. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.

7. Developing 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.

8. Handling of all unpublished price sensitive information on a need-to-know basis.

Penalties

Any Designated Person who contravenes the Code of Conduct shall be penalized and shall also be subject to disciplinary action by the Company.

The Company shall promptly inform SEBI regarding any violation of the Code of Conduct.

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.

General

Employees are advised to pursue the Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time, carefully and acquaint themselves with all the provisions contained therein. The Compliance Officer will be available for clarification / assistance that may be necessary.

Annexure "A"

Application cum Undertaking for Pre-clearance

Date:

To,
The Compliance Officer,
SecUR Credentials Limited,
Mumbai.

Sub: Application for trading in securities of the Company

Dear Sir / Madam,

With reference to Code of Conduct for Insider Trading of the Company, I _____, _____ (designation and department) of the Company, would like to purchase / sale equity shares of the Company as per details given below:

Sr. No.	**Particulars**	
1	No. of Securities held as on application date	
2	DP & Client ID / Folio No.	
3	No./Value of Securities to be purchased / sold	
4	Name of person who proposed to trade	

1. I hereby declare that I am not in possession of any UPSI.
2. In the event that I have access to or received any UPSI, after the signing of this application but before executing trade for which approval is sought, I shall inform the Compliance Officer about the same and shall completely refrain from dealing in the Securities until such UPSI becomes publicly available. Thereafter I will submit fresh application for executing a trade.
3. I also hereby declare that I have not contravened any provision of the Code of Conduct.
4. Further I undertake to submit report on trade within 2 days from date of execution of trade or submit a 'Nil' report if no trade was executed.
5. After approval, I shall execute a trade within 7 trading days from of the receipt of approval trade failing which I shall seek pre-clearance again.

Yours faithfully,

Signature:
(Name of Employee)

Annexure “B”

Approval / Rejection of Pre- Clearance

Date:

To,
Name:
Designation:

Dear Sir / Madam,

With reference to your Application cum Undertaking for Pre-clearance dated, we would like to inform you that your application to purchase / sale equity shares of the Company is hereby approved / rejected. Now, you can execute your trade within 7 trading days i.e. _____. Further, you are required to submit a report of your trade details within two trading days from trade. Or In case, no trade was executed, you are required to submit a ‘Nil’ report.

In case, you do not execute a trade before _____, you shall submit a fresh pre-clearance application before executing any transaction in the Securities of the Company.

Thanking you,

Yours faithfully,

For SecUR Credentials Limited

_____
Compliance Officer

Annexure “C”

Reporting of Trade / Transaction

Date:

To,
The Compliance Officer,
SecUR Credentials Limited,
Mumbai.

Dear Sir / Madam,

According to approval of pre-clearance dated _____ , I have executed a trade / transaction on _____ (date). The details of the transactions are as under;

Name of holder	No. of Securities purchased / sold	Average Gross Price per Securities (in Rs.)	DP ID & Client ID / Folio No.

Further I enclose herewith copy of Contract Note for your ready reference.

I declare that the above information is correct and that no provision of the Code of Conduct has been violated while executing aforesaid trade / transaction.

Or

According to approval of pre-clearance dated _____, I have not executed a trade / transaction due to _____ (Please give reason of non-trading). I will take fresh pre-clearance for trades as and when I propose to trade in Securities of the Company.

Signature _____
Name:
Designation:

Annexure “D”

To,
The Compliance Officer,
Secur Credentials Limited
Mumbai.

Ref: ISIN – INE195Y01010
Sub: Initial Disclosure of Securities

Dear Sir / Madam,

Pursuant to Code of Conduct for Insider Trading of the Company, I _____ (name), _____ (designation and department) of the Company hereby submit the following details of securities held in the Company.

Name of the Director/ Employee/ Promoter	
PAN / CIN / DIN	
Address with contact no.	
Category: Promoter/KMP/Directors/Immediate relative / others etc.)	
Department, if applicable	
Name of the Dependent & relation with the Director/Employee, in case this declaration is made for dependent	

Type & Number of units of Securities held	
Folio No. / DP ID No. & Client ID No.	

Signature: _____
Name:
Designation:

Notes:
1) Separate disclosures should be made in respect of the immediate relatives. Immediate relatives may include the spouse of a person, a parent, sibling, and child of such person or their spouse, any of whom is either dependent financially on them, or consults them in taking decisions relating to trading in securities.

Annexure “E”

To,
The Compliance Officer,
Secur Credentials Limited
Mumbai

Ref: ISIN – INE195Y01010
Sub: Disclosure of Securities held on appointment of Director / KMP / Promoter

Dear Sir / Madam,

Pursuant to Code of Conduct for Insider Trading of the Company, I _____ (name), _____ (designation and department) of the Company hereby submit the following details of securities held in the Company.

Name of the Director/ Employee/ Promoter	
PAN / CIN / DIN	
Address with contact no.	
Category: Promoter/KMP/Directors/Immediate relative / others etc.)	
Date of appointment of Director /KMP Or Date of becoming Promoter	
Name of the Dependent & relation with the Director/Employee, in case this declaration is made for dependent	

Type & Number of units of Securities held	
Folio No. / DP ID No. & Client ID No.	

Signature: _____
Name:
Designation:

Notes:
1) Separate disclosures should be made in respect of the immediate relatives. Immediate relatives may include the spouse of a person, a parent, sibling, and child of such person or their spouse, any of whom is either dependent financially on them, or consults them in taking decisions relating to trading in securities.

Annexure “F”

To,
The Compliance Officer,
Secur Credentials Limited
Mumbai

Ref: ISIN – INE195Y01010
Sub: Disclosure of change in Securities

Dear Sir / Madam,

Pursuant to Code of Conduct for Insider Trading of the Company, I _____ (name), _____ (designation and department) of the Company hereby submit the following details of change in securities held in the Company.

<table>
<tr><td>Name of the Director/ Employee/ Promoter</td><td colspan="4"></td></tr>
<tr><td>PAN / CIN / DIN</td><td colspan="4"></td></tr>
<tr><td>Address with contact no.</td><td colspan="4"></td></tr>
<tr><td>Category: Promoter/KMP/Directors/Immediate relative / others etc.)</td><td colspan="4"></td></tr>
<tr><td>Folio No. / DP ID No. & Client ID No.</td><td colspan="4"></td></tr>
<tr><td rowspan="2">Securities held prior to acquisition / disposal</td><td colspan="2">Type of security (For eg. Shares, Warrants, Convertible Debentures etc.)</td><td colspan="2">No. and percentage of shareholding</td></tr>
<tr><td colspan="2"></td><td colspan="2"></td></tr>
<tr><td rowspan="2">Securities acquired / disposed</td><td>Type of Security</td><td>Number of Securities</td><td>Value</td><td>Transaction type (Buy / Sale / Pledge / Revoke / Invoke)</td></tr>
<tr><td></td><td></td><td></td><td></td></tr>
<tr><td rowspan="2">Securities held post acquisition / disposal</td><td colspan="2">Type of security (For eg. Shares, Warrants, Convertible Debentures etc.)</td><td colspan="2">No. and percentage of shareholding</td></tr>
<tr><td colspan="2"></td><td colspan="2"></td></tr>
<tr><td rowspan="2">Date of allotment advice/ acquisition of shares/ sale of shares specify</td><td colspan="2">From</td><td colspan="2">To</td></tr>
<tr><td colspan="2"></td><td colspan="2"></td></tr>
</table>

Date of intimation to company	
Mode of acquisition / disposal (on market / public / rights / preferential offer / off market/ Inter-se transfer, ESOPs etc.)	

Signature: _____
Name:
Designation:

Notes:

1) Separate disclosures should be made in respect of the immediate relatives. Immediate relatives may include the spouse of a person, a parent, sibling, and child of such person or their spouse, any of whom is either dependent financially on them, or consults them in taking decisions relating to trading in securities.