NIIT

CODE OF CONDUCT

To

REGULATE, MONITOR AND REPORT TRADING BY INSIDERS

NIIT LIMITED

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

Securities and Exchange Board of India (SEBI) has revamped nearly two-decade old regulations on Insider Trading and has put in place a stronger legal and enforcement framework for prevention of Insider Trading. SEBI notified the SEBI (Prohibition of Insider Trading) Regulations, 2015 on January 15, 2015 and these new Regulations will come into effect from May 15, 2015. Pursuant to regulation 9 of the new Regulations, every listed Company is required to formulate a code of conduct to regulate, monitor and report trading by its employees and other connected persons.

It is the policy of the Company to strive to preserve the confidentiality of 'Unpublished Price Sensitive Information' and to prevent misuse of such information. The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations.

Every Director/Employee of the Company has a duty to safeguard the confidentiality of all of 'Unpublished Price Sensitive Information' obtained in the course of his/her duty. No Director/Employee may use his/her position or knowledge of Company to gain personal benefit or to provide benefit to any third party.

The Company had initially implemented Code of Conduct for prevention of Insider Trading in accordance with the SEBI (Prohibition of Insider Trading) Regulations, 1992, as amended from time to time.

This Code of Conduct is being introduced to replace the earlier Code of Conduct for prevention of Insider Trading with effect from May 15, 2015.

1. DEFINITIONS

1.1 "**Act**" means the Securities and Exchange Board of India Act, 1992.

1.2 "**Board**" means the Board of Directors of the Company.

1.3 "**Code**" or "**Code of Conduct**" shall mean the Code of Conduct for Regulating, Monitoring and Reporting of trading by insiders of the Company as amended from time to time.

1.4 "**Company**" means NIIT Limited.

1.5 **"Compliance Officer"** means Company Secretary or such other senior officer, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations designated so and reporting to the Board of Directors 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board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 of the Company.

1.6 "**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) 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 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 the Company or his immediate relative or banker of the Company, has more than ten per cent, of the holding or interest.

1.7 "**Dealing in Securities**" means an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in the securities of the Company either as principal or agent.

1.8 **"Designated Person**(s)" shall include :

a. All IBU and Organizations Heads of the Company and Indian subsidiaries;
b. All Functional / Business Heads directly reporting to IBU Head;
c. All staff members in the office of the Executive Directors;
d. All Employees of the Financial Services Organization (FSO), Legal & Secretarial Organization (LSO) and New Ventures Organization (NV) of the Company, who operates from the NIIT Corporate Office, Gurgaon, irrespective of grade level and includes similar employees of all NIIT group companies;
e. Person directly related to the above people and
f. Connected Persons

1.10 "**Director**" means a member of the Board of Directors of the Company.

1.10 "**Employee**" means every employee of the Company including the Directors in the employment of the Company.

1.11 **"Generally available Information"** means information that is accessible to the public on a non-discriminatory basis.

1.12 **"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

1.13 "**Insider**" means any person who,

(i) a connected person; or

(ii) in possession of or having access to unpublished price sensitive information.

1.14 **"Key Managerial Person"** means person as defined in Section 2(51) of the Companies Act, 2013

1.15 **"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:

1.16 **"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;

1.17 **"Takeover regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;

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

1.19 **"Trading Day"** means a day on which the recognized stock exchanges are open for trading;

1.20 "**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, delisting's, 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

1.21 "**Regulations**" shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.

1.22 "**Specified Persons**" means all Directors, Connected Persons, the Insiders, Employees and the Promoters and their immediate relatives are collectively referred to as Specified Persons.

ROLE OF COMPLIANCE OFFICER:

2. The Compliance Officer shall report to the Board of Directors and shall provide reports to the Chairman of the Audit Committee, if any, or to the Chairman of the Board of Directors on quarterly basis.

3. The Compliance Officer shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of unpublished price sensitive information, pre-clearing the trades of Directors and Designated Persons and their immediate relatives, monitoring of trades and implementation of the Code of Conduct under the overall supervision of the Board of Directors of the Company.

4. The Compliance Officer shall assist all the Employees in providing any clarifications regarding the Regulations and this Code of Conduct.

PRESERVATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION:

5. The Specified Persons shall maintain confidentiality of all `Unpublished Price Sensitive Information'. The Specified Persons shall not pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sale of securities of the Company based on the same.

NEED TO KNOW :

6. The Specified Persons who are privy to 'Unpublished Price Sensitive Information' shall handle the same on a 'need to know' basis. Such 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. No Unpublished Price Sensitive Information shall be communicated to any person except in furtherance of legitimate purposes, performance of duties and discharge of legal obligations.

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

   However, 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 limited purpose and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information

7. All non-public price sensitive information directly received by any Designated Person should be reported to the head of his/her department/Compliance Officer.

LIMITED ACCESS TO CONFIDENTIAL INFORMATION:

8. All physical files containing confidential information shall be kept secure under lock and

key in custody of officials having such information/ documents. Computer files shall have adequate security of login and passwords. Files containing confidential information should be deleted/destroyed after its use.

PREVENTION OF MISUSE OF UNPUBLISHED PRICE SENSITIVE INFORMATION:

CHINESE WALL

9. To prevent the misuse of unpublished price sensitive information, the Company has adopted following norms for 'Chinese Wall' procedures which separates those departments which routinely have access to Unpublished Price Sensitive Information, considered as inside areas from those departments which deal with sale/marketing or other departments providing support services, considered as public areas:

   a. The Employees in the inside areas are not allowed to communicate any unpublished price sensitive information to anyone in the public areas.
   b. The Employees in inside area may be physically separated from the Employees in public area.
   c. The demarcation of various departments as inside area shall be determined by the Compliance Officers in consultation with the Board.
   d. Only in exceptional circumstances, Employees from the public areas are brought over the wall and given unpublished price sensitive information on need to know basis under intimation to the Compliance officer.

TRADING WINDOW

10. All Directors and Designated persons shall be subject to certain trading restrictions as enumerated below :

    a. The Company has designated a 'Trading Window period' being the period during which transactions in the shares of the Company can be done by Directors and Designated Persons (hereinafter referred to as 'Trading Window') for trading in the Company's securities;

    b. The Trading Window shall be closed during any period as may be determined by the Compliance Officer and shall be closed at least seven (7) days prior to the happening of the event giving rise to unpublished price sensitive information and shall be re-opened at such time as may be determined by the Compliance Officer of the Company taking into account various factors, the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, which in any event shall not be earlier than forty-eight hours (48) after the information becomes generally available.

    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.

    The Compliance Officer may communicate to the Directors/Designated Persons about the closure of Trading Window for any other purpose/event, as he may deem fit, by way of e-mail in the Company's email system or otherwise.

c. The Directors/Designated Persons and their immediate relatives shall not trade in the Company's shares during the period when the Trading Window is closed and will have to forego the opportunity to trade in the Company's securities during such period.

d. All Directors and Designated Persons shall conduct all their dealings in the shares of the Company only during the period the Trading Window is open and shall not do any transaction involving the purchase or sale of the Company's shares during the periods when Trading Window is closed or during any other period as may be specified by the Company from time to time.

e. Exercise of Stock Options granted under NIIT Employees Stock Option Plan is allowed in the period when the Trading Window is closed. However, sale of shares allotted on exercise of Stock Options is not allowed when Trading Window is closed.

PRE-CLEARANCE OF TRADES:

11. All Directors/Designated Persons and their immediate relatives who intend to deal (sale/purchase) in the securities of the Company exceeding 25,000 shares in one or more transactions in a financial year shall get the transaction(s) pre-cleared in the manner enumerated below, provided that, 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:

a. an application in the prescribed manner shall be made to the Compliance Officer by the Director/Designated Persons/ immediate relatives indicating the estimated number of securities that such person intends to deal in, details of depository and such other information as may be prescribed by the Company (*Proforma I*);

b. Before the deal is executed, the Director/Designated Person/ immediate relatives shall execute an undertaking *(Proforma II)* in favour of the Company incorporating *inter alia*, the following clauses that:

(i) he/she does not have any access or has not received 'Unpublished Price Sensitive Information' up to the date of signing the undertaking;
(ii) in case he/she has access to or receives 'Unpublished Price Sensitive Information' after the signing of this undertaking but before the execution of the transaction, he/she shall inform the Compliance Officer of the change in his/her position and that he/she shall completely refrain from dealing in the securities of the Company till such time such information becomes generally available ;
(iii) he/she has not contravened the Code of Conduct as notified by the Company from time to time; and
(iv) he/she has made full and true disclosure in the matter.

12. All Directors/Designated Persons/ immediate relatives shall execute their order in respect of the securities of the Company within seven (7) trading days after the pre-clearance approval is received. The date on which the order is executed shall be intimated forthwith to the Compliance Officer in prescribed form within two trading days from the date of executing the order (*Proforma III*). If the order is not executed within seven (7) trading days after the approval is given, the Director/ Designated Person/immediate relatives must pre-clear the transaction again.

TRADING PLAN:

13. An insider may 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 on his behalf in accordance with such plan.

Trading Plan shall:

i. not entail commencement of trading on behalf of the insider 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.

The Compliance Officer shall consider the Trading Plan made as above and shall approve it forthwith. However, he/ she shall be entitled to take express undertakings as may be necessary to enable the assessment of the plan and to approve and monitor the implementation of the plan as per the provisions of the Regulations.

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.

However, the implementation of the trading plan shall not be commenced, if at the time of formulation of the plan, the Insider is in possession of any unpublished price sensitive information and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Plan shall be deferred until such unpublished price sensitive information becomes generally available information.

Further, the Insider shall also not be allowed to deal in securities of the Company, if the date of trading in securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer. However, in such case the Insider can deal in securities of the Company on that trading day on which the trading window is re-opened.

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

OTHER RESTRICTIONS:

14. All Directors/Designated Person 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.

15. All Directors/Designated Persons shall not take any position in derivative transactions in the shares of the Company at any time.

16. In case any 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 Board for credit to the Investor Protection and Education Fund administered by SEBI.

17. In the case of subscription in the primary market (initial public offers), the Directors/Designated Person shall hold their investments for a minimum period of 30 days. The holding period would commence when the securities are actually allotted by the Company.

18. The Compliance Officer may waive the holding period in cases where the sale of shares is necessitated by personal emergency after recording his/her reasons in writing in this regard. An application in this regard shall be made to the Compliance Officer in the prescribed format (*Proforma IV*).

REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES :

19. **General:**

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

b. 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 Code.

c. The disclosures made under this Code shall be maintained for a period of five years.

20. **Initial Disclosure:**

a. Every Promoter, key managerial personnel and Director of the Company shall disclose to the Company in the prescribed form, his holding of securities of the Company, within thirty days of these regulations taking effect i.e. by June 14, 2015. (*Proforma V*);

b. Every person on appointment as a key managerial personnel or a director of the Company or upon becoming a promoter shall disclose to the Company in the prescribed form, his holding of securities of the Company as on the date of appointment or becoming a promoter, within 7 (seven) days of such appointment or becoming a promoter (*Proforma VI*).

21. **Continual Disclosure:**

Every promoter, employee and director of the Company shall disclose to the Company in the prescribed form, 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 Rs.Ten lakhs.(*Proforma VII*)

Disclosure by the Company to the Stock Exchanges:

The Company shall notify the particulars of the trading to the stock exchange(s) on which the securities of the Company are listed within two trading days of receipt of the disclosure or from becoming aware of such information.

22. **Disclosures by Other Connected Persons:**

The Compliance Officer may, at his/her discretion require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the Company in the prescribed form and at such frequency as may be deemed fit, in order to monitor compliance with the Regulations. (*Proforma VIII*)

23. The Compliance Officer shall maintain records of all the declarations in the appropriate forms given by the Directors/Designated Employees for a minimum period of five years.

24. The Compliance Officer shall furnish to the Chairman and Managing Director or a Committee specified by the Company all the details of the dealings in the securities of the Company by Directors/Designated Employees of the Company and the accompanying documents such persons had executed under the pre-dealing procedure.

25. For the purpose of this Code of Conduct, the Compliance Officer deals/intends to deal into the securities of the Company, he should take the prior approval/give intimation, as the case may be, to the Chairman and Managing Director.

PENALTY FOR CONTRAVENTION OF CODE OF CONDUCT :

26. Any Director/Designated Employee who trades in securities of the Company or communicates any information for trading in the securities of the Company, in contravention of the Code of Conduct shall be held guilty and penalized and appropriate action shall be taken by the Company, which may include wage freeze, suspension, etc.

27. The penal action taken by the Company shall not preclude SEBI from taking any action in case of violation of the Regulations.

INFORMATION TO SEBI IN CASE OF VIOLATION :

28. The Company shall inform SEBI cases of any violation of the Regulations so that appropriate action may be taken as per the law.

***** ** **** ** **** ** *****

PROFORMA - I

Application Form for Pre-Clearance of Trades in the Company's Securities

The Compliance Officer
NIIT Limited
New Delhi

Dear Sir,

I intend to deal in the securities of the Company as per the particulars furnished below:

Name of the person for whom the transaction is to be executed	
Relationship with the applicant	
No. of shares covered by the transaction	
Nature of transaction for which approval is Sought	**Purchase / Sale / Both ***
Depository I. D. No.	
Client I. D. No.	
Particulars of the broker through whom the transaction is to be executed	Name : Address : Phone No. :

** - strike out whichever is not applicable*

Pursuant to Clause 11 (b) of the Code of Conduct, I enclose duly executed undertaking executed in favor of the Company, containing the prescribed particulars.

I request you to kindly pre-clear the above transaction at the earliest.

Thanking you,

Yours faithfully,

_____
Name of the Applicant
Employee Code No. :
Department :

Date :

Place :

PROFORMA – II

Undertaking to be accompanied with every Pre-Clearance Application
[Clause 11 (b)]

The Compliance Officer
NIIT Limited
New Delhi

Dear Sir,

I, _____ being a Director/Designated Person of the Company, am desirous of dealing in _____ shares of the Company as mentioned in my application dated _____ for pre-clearance of the transaction.

Pursuant to Clause 11 (b) of the Code of Conduct, I hereby confirm :

a. that I did not have any access or received 'Unpublished Price Sensitive Information' up to the date of signing this undertaking ;

b. that in case I have access to or receive 'Unpublished Price Sensitive Information' after the signing of this undertaking but before the execution of the transaction, I shall inform the Compliance Officer of the change in my position and that I shall completely refrain from dealing in the securities of the Company till such time such information becomes generally available;

c. that I have not contravened the Code of Conduct to Regulate, Monitor and report trading by Insiders as notified by the Company from time to time; and

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

_____
(Signature)

_____
Name of Designated Employee :
Employee Code No.:
Division : Department : Location :

Place :

Date :

PROFORMA – III

Confirmation of date of Completion of Transaction
[Clause 12]

The Compliance Officer
NIIT Limited
New Delhi

Dear Sir,

Sub : **Date of completion of transaction**

I hereby confirm that the transaction for dealing in the shares of the Company for which pre-clearance was granted on _____, was completed on _____ by purchasing * / selling * _____ (nos.) equity shares of the Company.

Thanking you,

Yours faithfully,

_____

(Signature)

_____
Name of Director/Designated Employee :
Employee Code No.:
Division : Department : Location :

Place :

Date :

* - strike out whichever is not applicable

PROFORMA – IV

Application for Waiver of Minimum Holding Period
[Clause 18]

The Compliance Officer
NIIT Limited
New Delhi

Dear Sir,

Sub : **Waiver of minimum holding period**

I request you to grant me waiver of the minimum holding period of six months as required under Clause 18 of the Code of Conduct to Regulate, Monitor and report trading by Insiders with respect to _____ (nos.) equity shares of the Company held by me / _____ (name of dependent), acquired by me on _____ (date). I propose to deal in the said shares on account of

_____

_____

_____

Thanking you,

Yours faithfully,

_____

(Signature)

_____
Name of Designated Employee :
Employee Code No.:
Division : Department : Location :

Place :

Date :

PROFORMA - V

Initial Disclosure
[Clause 20(a)]

Name of the company: _____

ISIN of the company: _____

Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and other such persons

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:

PROFORMA - VI

Initial Disclosure
[Clause 20(b)]

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

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 Option 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**	**6**	**7**		**8**	

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:

PROFORMA - VII

Continual Disclosure
[Clause 21]

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:

PROFORMA VIII

Disclosure by Other Connected Persons
[Clause 22]

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		
												Valuse	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: