Petronet LNG Limited

World Trade Centre, Ist Floor, Babar Road,
Barakhamba Lane, New Delhi – 110 001 (INDIA)
Tel.: 23411411, 23472525 Fax: 23709114
Website: www.petronetlng.com
CIN: L74899DL1998PLC093073

ND/PLL/SECTT/SEBI/2015

4th June, 2015

The Manager Listing
The National Stock Exchange of India Limited
Exchange Plaza,
Bandra-Kurla Complex
Bandra (E)
MUMBAI

Fax No: 022-26598237/38

SUB: - Code of Conduct to Regulate, Monitor and Report Trading by Insiders of the Securities of Petronet LNG Limited

Dear Sir,

In terms of provisions of SEBI (prohibition of insider trading) Regulations, 2015, we enclose herewith Code of Conduct to Regulate, Monitor And Report Trading by Insiders of the Securities of Petronet LNG Limited which is effective from 15th May, 2015.

The same is for your kind reference and record.

Thanking you.

Yours faithfully

(K. C. Sharma)
Company Secretary

Dahej LNG Terminal:
GIDC Industrial Estate, Plot No. 7/A, Dahej
Taluka Vagra, Distt. Bharuch - 392130 (Gujarat)
Tel.: 02641-257249 Fax: 02641-257252

Kochi Site:
Survey No. 347, Puthuvypu
P.O. 682508, Kochi
Tel.: 0484-2502268

PETRONET LNG Limited

1st Floor, World Trade Centre, Barakhamba Lane,
New Delhi.

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS OF THE SECURITIES OF PLL.

CHAPTER- I

1 Preliminary:

a. This code shall be called the Code of Conduct to Regulate, Monitor and Report Trading by Insiders of the securities of PLL.

b. It shall come into force w.e.f. 15th May, 2015.

CHAPTER- II

2 Definitions:

2.1 "Act" means the Securities and Exchange Board of India Act, 1992 (15 of 1992);

2.2 "Board" means the Securities and Exchange Board of India;

2.3 "Compliance Officer" means Company Secretary of the Company.

2.4 "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himself and the company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.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 a company or his immediate relative or banker of the company, has more than ten per cent. of the holding or interest;

2.5 "Designated Persons" means Employees and other Connected Persons as designated on the basis of their functional role.

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

2.7 "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;

2.8 "Insider" means any person who is:

i) a connected person; or

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

2.9 "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;

2.10 "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;

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

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

2.13 "Unpublished Price Sensitive Information" means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: –

(i) financial results;

(ii) dividends;

(iii) change in capital structure;

(iv) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;

(v) changes in key managerial personnel; and

(vi) material events in accordance with the listing agreement

2A Words and expressions used and not defined in these 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.

3 Applicability:

This code shall be applicable to and binding on Designated Persons of the Company.

4 Compliance Officer:

4.1 The Company Secretary or in his absence being on leave or otherwise his Nominated Officer shall be the Compliance Officer.

4.2 The Compliance Officer shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of "Unpublished price sensitive information", monitoring of trades and the implementation of the code as specified in these regulations. The Compliance Officer shall report to the Board of Directors and in particular, shall provide quarterly reports to the Chairman of Audit Committee.

4.3 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 this Code of Conduct.

4.4 Compliance Officer shall perform any other responsibilities as assigned under this code or under SEBI (Prohibition of Insider Trading), Regulations, 2015.

CHAPTER- II

RESTRICTIONS ON COMMUNICATION AND TRADING BY DESIGNATED PERSONS

5 Communication or procurement of unpublished price sensitive information

5.1 No Designated Person shall communicate, provide, or allow access to any unpublished price sensitive information, relating to a company or its 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.

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

5.3 Chinese Wall

To prevent the Misuse of Confidential Information, PLL shall adopt a "Chinese Wall" Policy which separates those Areas of PLL, which routinely have access to "Unpublished Price Sensitive Information", considered "Inside Areas" from those Areas which deal with other Departments having "Generally Available Information" considered "Public Areas"

- The Employees in the Inside Area shall not communicate any Price Sensitive Information to anyone in Public Area.

- Demarcation of the various Departments as Inside Area may be implemented by PLL.

- In Exceptional Circumstances, Employees from the Public Areas may be brought "Over the Wall" and given Confidential Information on the basis of "Need to Know" Criteria, under Intimation to the Compliance Officer

6 Trading when in possession of unpublished price sensitive information.

6.1 No Designated Person shall trade in securities of the Company that are listed or proposed to be listed on a stock exchange when in possession of unpublished price sensitive information.

6.2 The minimum standards adopted by the Company to regulate, monitor and report of trading by insiders are as follows:

A. All information shall be handled within the organisation on a need-to-know basis and no unpublished price sensitive information shall be communicated to any person except in furtherance of the insider's legitimate purposes, performance of duties or discharge of his legal obligations.

B. Designated persons may execute trades subject to compliance of SEBI (Prohibition of Insider Trading) Regulations, 2015. Towards this end, a notional trading window shall be used as an instrument of monitoring trading by the designated persons. The trading window shall be closed when the compliance officer determines that a designated person or class of designated persons can reasonably be expected to have possession of unpublished price sensitive information. Such closure shall be imposed in relation to such securities to which such unpublished price sensitive information relates. Designated persons and their immediate relatives shall not trade in securities when the trading window is closed.

C. The timing for re-opening of the trading window shall be determined by the compliance officer taking into account various factors including 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 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.

D. When the trading window is open, trading by Designated Persons shall be subject to pre-clearance by the compliance officer, if the value of the proposed trades is above Rs. Ten Lakhs. No Designated Person shall 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.

E. Prior to approving any trades, the compliance officer shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any unpublished price sensitive information. He shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.

F. The trades that have been pre-cleared have to be executed by the Designated Person within seven working days, failing which fresh pre-clearance would be needed for the trades to be executed.

G. Designated Person who is permitted to trade shall not execute a contra trade for a period of six months. The compliance officer may be empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate these regulations. Should a 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 SEBI for credit to the Investor Protection and Education Fund administered by the Board under the Act.

7. Pre-clearance of trades

a) Designated Persons who intend to deal in the securities of the Company (in excess of Rs. 10,00,000 i.e. Ten Lakh rupees or such other value as may be specified whether in one transaction or a series of transaction over any calendar quarter) shall obtain pre-clearance of the transaction as per the pre-dealing procedure as described hereunder. Application for pre-clearance shall be made only during valid trading period. Application submitted during closer of trading window shall be invalid.

b) Designated Persons shall make pre-clearance application to the Compliance Officer in the format given in **FORM-I**.

c) An undertaking shall be executed in favour of the Company by such Designated Persons incorporating, inter-alia, the following clauses, as may be applicable:

- THAT he/she does not have any access or has not received "Unpublished Price Sensitive Information" up to the time of signing the undertaking;

- THAT in case he/she has access to or receives " Unpublished 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/her position and that he/she would completely refrain from dealing in the securities of the Company till the time such information becomes public;

- THAT he/she has not contravened the Code of Conduct of Insider Trading in Dealing with the Securities of Company as notified by the company from time to time;

- THAT he/she has made a full and true disclosure in the matter.

A combined proforma application cum undertaking is annexed to this code as **FORM-I**.

d) Immediately on receipt of the pre-clearance application, the date and time of the receipt of the same shall be recorded thereon. The compliance officer shall process the pre-clearance applications and if the pre-clearance application is in accordance and in compliance with the provisions of this code, the Compliance Officer shall communicate the pre-clearance immediately not letter than 48 hours from the time of receiving the application. In the absence compliance officer, the officer authorized by the Compliance Officer shall give the pre-clearance. A proforma letter of intimate of pre-clearance is annexed as **FORM-II.**

8. **Trading Plans.**

8.1 The Designated Persons shall be entitled to 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.

8.2 Such 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.

8.3 The compliance officer shall review the trading plan to assess whether the plan would have any potential for violation of this Code 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.

8.4 The trading plan once approved shall be irrevocable and the Designated Persons 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.

Provided that the implementation of the trading plan shall not be commenced if any unpublished price sensitive information in possession of the Designated Persons at the time of formulation of the plan has not become generally available at the time of the commencement of implementation and in such event the compliance officer shall confirm that the commencement ought to be deferred until such unpublished price sensitive information becomes generally available information so as to avoid a violation of Clause 6.1 above.

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

CHAPTER – III

DISCLOSURES OF TRADING BY DESIGNATED PERSONS

9 General provisions.

9.1 Every public disclosure shall be made in such form as may be specified by SEBI.

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

9.3 The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account:

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

9.4 The disclosures made shall be maintained by the company, for a minimum period of five years.

10. Disclosures by certain persons

10.1 **Initial Disclosures**

(a). Every key managerial personnel and director of PLL shall disclose his holding of securities of the company as on the date of this Code taking effect, to the company within thirty days of Code taking effect in **Form III**;

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

10.2 **Continual Disclosures.**

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

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

Explanation. — It is clarified for the avoidance of doubts that the disclosure of the incremental transactions after any disclosure under this Clause, shall be made when the transactions effected after the prior disclosure cross the threshold specified in sub clause (a) of Clause (10.2).

a) Annual statement of all holdings in securities of the Company as at 31st March by the 7th of next month (proforma disclosure form is given in **FORM-VII**;

10.3 Disclosures by other connected persons

Company may at its discretion require any other connected person or class of connected persons such as relatives of employees, Auditors, Consultants etc. to make disclosures of holdings and trading in securities of the company in order to monitor compliance of the Code.

CHAPTER –IV

MISCELLANEOUS

11. Penalty for contravention of code of conduct

Designated Persons who trade in securities of the Company or communicates any information for trading in securities of the Company in contravention of this code may be penalized and subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligible for further participation in employee stock option plans, etc.

12. Power of SEBI

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.

13. PERIODICAL RETURNS

The Compliance Officer shall place before the Audit Committee on quarterly basis all the details of the dealings, if any, in the securities by Directors/Officer/Designated Persons and the accompanying documents that such persons had executed under the pre-dealing procedure.

---x---

FORM –I

APPLICATION FOR PRE-CLEARANCE OF TRADES IN SECURITIES

To

The Company Secretary
Petronet LNG Limited
1st Floor, World Trade Centre,
Barakhamba Lane, Babar Road,
New Delhi – 110 001

Dear Sir,

I, ...a Designated Person of PLL intend to carry out transaction(s) in the shares of PLL as per the details given below.

Name & Designation of the Director/ Officer/Designated Employees :

Department of Designated Employees :

Date of Joining/ becoming Director/ officer/ Designated employee :

Permanent Account Number (PAN) :

Address with Contact Number :

	No. of shares held (including the Relative(s) as on the date of application	Folio No. / DP ID & Client ID	Nature of new transaction for which approval is sought	Estimated number of securities to be dealt
1	2	3	4	5

Estimated consideration value	Whether proposed transaction is in the self name or in the name of Relative(s)	Name of the Relative(s), if the transaction is in the name(s) of the Relative(s)
6	7	8

Contd.....page 2

UNDERTAKING

In this connection I solemnly confirm and declare:

a) **THAT** I do not have access and/or have not received any "Unpublished Price Sensitive Information" up to the time of signing the undertaking;

b) **THAT** in case I have access to or receive " Unpublished Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction, I shall inform the Compliance Officer of any change in my position and THAT I shall refrain from dealing in the securities of the company till the time such information becomes public;

c) **THAT** I have not contravened the Code of Conduct for Insider Trading in dealing with the Securities of the Company.

d) **THAT** I have made a full and true disclosure in the matter.

Pre-clearance may kindly be accorded in terms of provisions of the Code of Conduct for Insider Trading in dealing with the Securities of the Company.

Signature:.....

Date :

Name:.....

Place :

Designation:.....

OFFICE USE

Serial number of the application received :

Date & time of receipt of the Application :

Date & time of communication of the pre-clearance or otherwise :

Reasons for not giving pre-clearance :

Signature of the Compliance Officer/ Authorised Officer

FORM-II

Letter of intimation of pre-clearance

To

Director/Officer/Designated employees

Dear Sir,

Kindly refer to your application dated ..... for pre-clearance of trading in the shares of the Company, which we have received on ..... at .....hours. We are to inform that your application for trading of .....shares of the Company has been cleared. Kindly note that in terms of the Code of Conduct of Insider Trading in Dealing the Securities of PLL the above mentioned transaction is to be completed within.....i.e. within seven days of the pre-clearance.

Kindly also note that in terms of the Code of Conduct of Insider Trading in Dealing the Securities of PLL, the concerned Director/Officer/Designated Employee 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 and shall also not take positions in derivatives transactions in the shares of the Company.

For & on behalf of,
Petronet LNG Limited.

Compliance Officer/Authorised Officer

Date:

FORM III

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

Name of the company: _____

ISIN of the company: _____

Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director

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

Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Signature:

Designation:

Date:

Place

FORM IV

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

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

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 as on the date of 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

Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Signature:

Designation:

Date:

Place

FORM V

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

Name of the company: _____

ISIN of the company: _____

Details of change in holding of Securities of Promoter, Employee or Director of a listed company

Name, PAN No., CIN/DIN & address 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)	

Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Signature:

Designation:

Date:

Place

FORM VI

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

Name of the company: _____

ISIN of the company: _____

Transactions by Other connected persons as identified by the company

Name, PAN No., CIN/DIN & address with contact nos.	Connecti on 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/pu blic 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)	

Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Signature:

Designation:

Date:

Place

FORM– VII

PROFORMA FOR ANNUAL DISCLOSURE OF SHARE HOLDING TO BE SUBMITTED BY DIRECTORS / OFFICERS /DESIGNATED PERSONS

To

The Company Secretary
Petronet LNG Limited
1st Floor, World Trade Centre,
Barakhamba Lane, Babar Road,
New Delhi – 110 001

Dear Sir,

I .....Director/Officer/Designated Person of PLL, furnish below the details of transaction(s) in the shares of PLL, during the financial year .....as well as shareholding as on 31st March.....

Name & Designation of the Director/Officer/ Designated Persons :

Department of Designated Persons :

Date of Joining/ becoming Director/ officer/ Designated Persons :

Permanent Account Number (PAN) :

Address with Contact Number :

I. **Details of transaction/ shareholding in own name**

No. of shares held as on..... (date of previous disclosure)	Date of transaction	Details of shares Purchased during the year		Details of shares sold during the year		No. of shares held as on..... (date of present disclosure)	Folio No./ DP ID & *Client ID*
		No	Consideration	No	Consideration		

Contd.....page 2

II. Details of transaction/shareholdings of Relative(s)

Name of the Relative(s) if the transaction is in the name of the Relative(s), PAN No. & address with telephone number	Relationship	No. of shares held as on..... (date of previous disclosure)	Date of transaction	Details of shares Purchased		Details of shares sold		No. of shares Held as on..... (date of present disclosure)	Folio No. / DP ID & Client ID
				No	Value	No	Value		

I declare that I have not entered into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction and have also not take positions in derivatives transactions in the shares of the Company.

Signature

Date:

Place: