Aptech Limited
Regd. office: Aptech House
A-65, MIDC, Marol, Andheri (E),
Mumbai - 400 093.
T: 91 22 2827 2300
F: 91 22 2827 2399
www.aptech-worldwide.com

Unleash your potential

May 9, 2016

The Secretary/Listing Department/Corporate Relations
Stock Exchange, Mumbai
P. J. Towers, 25th Floor,
Dalal Street,
Mumbai - 400 001.
Fax No. 022-22723121/3719/2037/2039/2041/2061

The Manager – Listing Department / Corporate Relations
The National Stock Exchange of India Limited
Exchange Plaza, 5th Floor,
Plot no. C/1, G Block,
Bandra-Kurla Complex
Bandra (E),
Mumbai - 400 051.
Fax No.022-26598237/38

Company Scrip Code: 532475 ISIN No. : INE266F01018

Dear Sirs,

Sub: Revised CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY ITS EMPLOYEES AND OTHER CONNECTED PERSONS

The Board of Directors at its meeting held on 6th May 2016, has confirmed amendment of definition of Designated Employee given in the attached revised code of conduct under the Insider Trading Regulations.

This is for your information and record.

Thanking you

Yours faithfully

For Aptech Limited

APTECH LIMITED MUMBAI

Ketan H. Shah
Company Secretary
Encl.: As above.

APTECH LIMITED

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY ITS EMPLOYEES AND OTHER CONNECTED PERSONS

[Under Regulation 9(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015]

Introduction

This document embodies a code to regulate, monitor and report trading by its employees and other connected persons ("**Code of Conduct**") towards achieving compliance with SEBI Act, 1992, SEBI (Prohibition of Insider Trading) Regulations, 2015 and Companies Act, 2013.

The Code is based on the principle that directors and employees of Aptech Ltd ("**Company**") owe a fiduciary duty to, among others, the shareholders of the Company to place the interest of the shareholders above their own and conduct their personal securities transactions in a manner that does not create any conflict of interest situation.

Objective

Aptech Limited, on a continuous basis, endeavors to apply best practices in relation to corporate governance requirements. As a part of its efforts, the Company undertakes to regulate, preserve and manage unpublished price sensitive information. Aptech Limited also aspires to provide equitable treatment of all shareholders, including minority and foreign shareholders by devising this framework to avoid insider trading.

In that pursuit, Company intends to establish an adequate mechanism through this Code of Conduct while achieving compliance with various laws including SEBI Act, 1992, SEBI (Prohibition of Insider Trading) Regulations, 2015 and Companies Act, 2013.

1. Definitions

(a) In this Code, unless the context otherwise requires, the following words, expressions and derivations therefrom shall have the meanings assigned to them as under:–

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

1.2 "**Code**" or "**Code of Conduct**" shall mean the Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of trading by insiders of Aptech Limited, as amended from time to time.

1.3 "**Company**" means Aptech Limited.

1.4 **"Compliance Officer"** means the Company Secretary of the Company, designated so.

1.5 **"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) 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 viz; stockbroker, sub-broker, share transfer agent, banker to an issue, trustee of trust deed, registrar to an issue, merchant banker, underwriter portfolio manager, investment adviser 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 SEBI; 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.

1.6 **Designated Employee**(s) shall mean:

(i) Key Managerial Persons;
(ii) all functional heads;
(iii) every employee in the finance, accounts, secretarial and legal department; and
(iv) any other employee as may be informed by the Compliance Officer from time to time.

1.7 "**Designated Person**" means the directors, Key Managerial Persons, connected persons, the Designated Employees and their immediate relatives.

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

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

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

1.11 **"Immediate Relative"** means:
(i) a spouse of a person, and
(ii) a 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

1.12 **"Insider"** means any person who is,
(i) a connected person; or
(ii) in possession of or having access to unpublished price sensitive information.

1.13 **"Key Managerial Person"** means Chief Executive Officer or the Managing Director, Whole-Time Director, Chief Financial Officer, Company Secretary and such other officer as may be prescribed under section 2(51) of the Companies Act, 2013 from time to time.

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

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

1.2 **"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;

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

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

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

1.6 **"Unpublished Price Sensitive Information"** or **"UPSI"** 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

(b) Words and expressions used and not defined in this Code but defined in the Securities and Exchange Board of India Act, 1992 (15 of 1992) or the Regulations shall have the meanings respectively assigned to them in those legislation.

2. Role and Responsibility of Compliance Officer

2.1 The Compliance Officer shall report to the board of directors or its Committee thereof and in particular, shall provide reports to the Chairman of the Audit Committee, if any, or to the Chairman of the board of directors at such frequency as may be stipulated by the board of directors or its Committee thereof.

2.2 The Compliance Officer 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 or the Committee thereof.

2.3 In the event of the office of the Compliance Officer falling vacant till such time a successor is appointed, the Managing Director or such other senior officer of the Company

designated by the Managing Director shall, in the interim period act as the Compliance Officer.

2.4 The Compliance Officer shall act as the focal point for dealings with the Securities and Exchange Board of India in connection with all matters relating to the compliance and effective implementation of the Regulations and this Code.

2.5 The Compliance Officer shall assist all employees in addressing any clarifications regarding the Regulations and the Code of Conduct.

2.6 The Compliance Officer shall monitor, review and approve all Trading Plans.

2.7 The Compliance Officer may require every person who assists or advises the Company (such as law firms, audit firms, consultants, investment bankers, vendors, customers, bankers etc.) and is required to handle unpublished price sensitive information to disclose trading in securities of the Company in Form D.

2.8 The Compliance Officer shall, based on his/her discretion and occurrence of specific events detailed in this Code of Conduct, regulate and monitor the Trading Window of the securities of the Company.

3. Preservation of "Price Sensitive Information"

3.1 Designated Person shall maintain the confidentiality of all unpublished price sensitive information coming into their possession or control.

3.2 To comply with this confidentiality obligation, the Designated Persons shall not:

(i) communicate, provide or allow access of UPSI to any person directly or indirectly, including by way of making a recommendation for the purchase or sale of Securities of the Company unless such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations;

(ii) discuss UPSI in public places; or

(iii) disclose UPSI to any employee who does not need to know the information for discharging his or her duties; or

(iv) recommend to anyone that they may or may not undertake Trading in Securities of the Company while being in possession, control or knowledge of UPSI.

4. Handling UPSI on a "need to know" basis

4.1 Any information that may be classified as unpublished price sensitive information shall be dealt with by the Designated Persons on a 'need to know' basis only.

4.2 UPSI 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.

4.3 All unpublished price sensitive information shall be disclosed only to those where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations. Incidental access to unpublished price sensitive information needs to be eliminated so far as possible.

4.4 In the event that UPSI is accidentally or inadvertently received by any employee, it should immediately be reported to the Compliance Officer.

4.5 The files and data of the Company containing confidential information shall be kept secure. Computer files must have adequate security of login and password, etc. Hard copies containing confidential information should be destroyed after its use.

5. Chinese Walls

5.1 To prevent the misuse of UPSI, the Company will have 'Chinese Walls' that separate those departments which routinely have access to UPSI, considered "inside areas" from those departments which deal with sale/marketing or other departments providing support services, considered "public areas".

5.2 The employees working within an insider area are prohibited from communicating any confidential or inside information to employees in public areas.

5.3 The employees in inside area may be physically separated from the employees in public area.

5.4 The demarcation of various departments as inside area shall be determined by the Compliance Officers in consultation with the Managing Director.

5.5 Employees within a Chinese Walls have a responsibility to ensure the Chinese Wall is not breached deliberately or inadvertently. Known or suspected breaches of the Chinese Wall must be referred to the Compliance Officer immediately.

5.6 On the basis of "need to know" principle and only in exceptional circumstances, employees from the public areas may be allowed to "cross the wall" and given UPSI. The Compliance

Officer shall make sure that all restrictions are imposed on such employee relating to the protection to unpublished price sensitive information.

6. Trading Plans

6.1 Any Designated Person intending to formulate a Trading Plan shall consult the Compliance Officer to discuss the applicable rules and procedure.

6.2 The Compliance Officer shall only approve a Trading Plan in accordance with the applicable provisions of the Regulations.

7. Trading Window and Window Closure

7.1 Designated Persons and any other persons having contractual or fiduciary relation with the Company may execute trades subject to compliance with the Regulations and this Code.

7.2 The trading window shall be closed 7 (seven) trading days prior to the day the unpublished price sensitive information is published and shall remain closed till forty-eight hours after the information becomes generally available.

7.3 The Compliance Officer shall intimate the closure of trading window to all the Designated Employees of the Company and any person having contractual or fiduciary relation with the Company.

7.4 During the period in which the trading window is closed, the Designated Persons shall not trade in the securities of the Company.

7.5 During the period in which the trading window is closed, 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 shall not trade in the securities of the Company..

7.6 In case of Employee Stock Option Plans (**"ESOP"**), the exercise of option may be allowed in the period when the trading window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when trading is closed.

8. Pre-clearance of trades

8.1 All Designated Persons, who intend to trade in the securities of the Company when the trading window is open and if the value of the proposed trades is above 25,000 shares or exceeds Rs. 5 Lakhs (market value) or 1% of total shareholding, whichever is lower, should pre-clear the transaction.

8.2 No Designated Person shall be entitled to apply for pre-clearance of any proposed trade if such Designated Person is in possession of unpublished price sensitive information even if the trading window is not closed and hence he shall not be allowed to trade.

8.3 An application may be made in the prescribed Form (Annexure 1) to the Compliance Officer indicating the estimated number of securities that the Designated Person intends to deal in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the Company in this behalf.

Provided that the Managing Director of the Company shall be the approving authority for trades to be done by the Compliance Officer or his immediate relatives and may stipulate such procedures as are deemed necessary to ensure compliance with the Regulations.

8.4 An undertaking as per the Annexure 2 shall be executed in favour of the Company by such Designated Person.

8.5 All Designated Persons shall execute their order in respect of securities of the Company within 7 trading days after the approval of pre-clearance is given (Annexure 3).

8.6 If the order is not executed within seven days after the approval is given, the Designated Person must pre-clear the transaction again.

8.7 The Designated Person shall file within 2 (two) days of the execution of the deal, the details of such deal with the Compliance Officer in the prescribed form (Annexure 4).

8.8 In case the transaction is not undertaken, a report to that effect shall be filed. (Annexure 4).

9. Restrictions on Contra Trades

9.1 All Designated Persons who buy or sell any number of shares of the Company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction.

9.2 All Designated Persons shall also not take positions in derivative transactions in the shares of the Company at any time. In case of any contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Securities and Exchange Board of India for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

9.3 The restriction on execution of contra trade in securities is not applicable in case of dealing of securities of the Company through buy back offers, open offers, rights issues, follow-on public offer (FPO) and bonus.

9.4 If a Designated Person has sold/ purchased shares, he can subscribe and exercise ESOPs at any time after such sale/purchase, without attracting contra trade restrictions.

9.5 The Compliance Officer may waive off the holding period in case of sale of securities in cases of personal emergency after recording written reasons for the same. The Designated Person applying for such waiver shall give an undertaking stating that he/she is not in possession of UPSI. The Designated Person shall also, to the extent possible, provide documentary proof of such emergency. However, no such sale will be permitted when the Trading window is closed.

10. Reporting Requirements for Transactions

Initial Disclosure

10.1 Every person on appointment as a Key Managerial Person or a director of the Company or upon becoming a promoter shall disclose his holding of securities of the Company as on the date of appointment or becoming a promoter, to the Company within seven days of such appointment or becoming a promoter in the format of Form B.

Continual Disclosure

10.2 Every promoter, employee and director of the Company shall disclose to the Company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of ten lakh rupees or such other value as may be specified by SEBI. Such disclosure shall be made in the Format of Form C.

11. Disclosure by the Company to the Stock Exchanges

11.1 Within 2 trading days of the receipt of intimation under Clause 10.2, the Compliance Officer shall notify the particulars of such trading to the stock exchange on which the securities are listed.

11.2 The Compliance Officer shall maintain records of all the declarations in the appropriate form given by the directors / officers / designated employees for a minimum period of five years. Such records may be maintained by the Company in physical or electronic form.

12. Additional Guidelines on Disclosures

12.1 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.

12.2 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.

13. Penalty for contravention of the code of conduct

13.1 Every Designated Person shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her immediate relatives).

13.2 Any Designated Person who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalised and appropriate action may be taken by the Company.

13.3 Designated Persons who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligibility for future participation in employee stock option plans, etc.

13.4 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.

13.5 Any violation of the Code of Conduct and the Regulations shall be immediately intimated to the Compliance Officer or the Board of the Company.

13.6 In case it is observed by the Board of Directors that there has been a violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015 in relation to securities of the Company, the same shall be immediately intimated to SEBI.

14. Amendment of the Code

This Code and any subsequent amendment(s) thereto, shall be promptly intimated to the Stock Exchange where the securities of the Company are listed.

ANNEXURE - 1

APPLICATION FOR PRE - DEALING APPROVAL

Date: _____

To,
The Compliance Officer
Aptech Limited
A-65, Aptech House,
M.I.D.C., Marol,
Andheri (East),
Mumbai – 400 093

Internal use
Recd date and time:
Sign :

Dear Sir/Madam,

APPLICATION FOR PRE-DEALING APPROVAL IN SECURITIES OF THE COMPANY

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct for Prevention of Insider Trading, I seek approval for purchase/ sale/subscription of the ___ Securities (give description) of the Company as per the details given below:

NAME_____

State whether

Director	
Officer	
Other Designated / Connected Person	
Director/Designated Employee of the Subsidiary Company	
Immediate Relatives of any of the above	

EMPL NO. : ___ DESIGNATION : ___

DEPARTMENT: ___ LOCATION : ___

Nature of transaction (Buy/ sell/ subscribe)	*Name of Proposed Buyer/ Seller	No. Of Securities	**Date of purchase / allotment	***Previous approval no. and date for purchase/ allotment)	DP/BEN ID of the account / folio no. where the securities will be credited/ debited	No. of Securities held in such Account /Folio No.
		_____ Equity shares of Rs. 10/- each			DP ID Client ID Folio No. -	

* applicable for off market transaction
** applicable only if the application is in respect of sale of Securities
*** applicable only if the application is in respect of sale of Securities for which an earlier purchase sanction was granted by the Compliance Officer

I enclose herewith the form of Undertaking signed by me.

Yours faithfully,

_____
(Signature)

ANNEXURE – 2

FORMAT OF UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-DEALING

UNDERTAKING

To,
Aptech Ltd
A-65, Aptech House,
M.I.D.C., Marol,
Andheri (East),
Mumbai – 400 093

I, _____, resident of _____.

I further declare that I am not in possession of or otherwise privy to any unpublished Price Sensitive Information [as defined in the Company's Code of Conduct for Prevention of Insider Trading (the Code)] upto the time of signing this Undertaking.

In case I have access to or I receive any Price Sensitive Information after signing this Undertaking but before execution of the transaction, I shall inform the Compliance Officer of the change in my position and I would completely refrain from Dealing in the Securities of the Company till the time such Price Sensitive Information becomes public.

I declare that I have not contravened the Code as notified by the Company from time to time.

I undertake to submit the necessary report within four days of execution of the transaction/a 'Nil' report if the transaction is not undertaken.

I am aware that, I shall be liable to face penal consequences as set forth in the Code including disciplinary action under the Code of the Company, in case the above declarations are found to be misleading or incorrect at any time.

I hereby agree to indemnify and keep the Company and its Directors indemnified from and against all and any penalties/fines that may be imposed on them by the Securities and Exchange Board of India and/or any other statutory authorities as a result of violation by me of

the SEBI (Prohibition of Insider Trading) Regulations 2015 and the Code prescribed by the Company.

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

_____

Name : - _____

Date : _____

* strike whichever is not applicable

ANNEXURE - 3

PRE-DEALING APPROVAL LETTER

Date :_____

Approval No: __ of 20__

To,

_____

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

Sir / Madam,

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

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

This approval letter is valid till _____ (i.e. for {7 days). If you do not execute the approved transaction /deal on or before this date, you would have to seek fresh pre-dealing approval before executing any transaction/deal in the Securities of the Company. Further, you are required to file the details of the executed transactions in the attached format within two {2} working days from the date of transaction/deal. In case the transaction is not undertaken a "Nil" report shall be necessary.

Yours truly,

Compliance Officer

ANNEXURE - 4

DISCLOSURE OF PRE-APPROVED TRANSACTIONS

(To be submitted within 2 days of transaction/Dealing in Securities of the Company)

Date: _____

To,
The Compliance Officer
Aptech Limited
A-65, Aptech House,
M.I.D.C., Marol,
Andheri (East)
Mumbai – 400 093

Dear Sir,

DETAILS OF PRE-APPROVED TRANSACTION

Ref: Your Approval letter No. ___ of 20___ dated _____

I hereby inform you that I

- have not bought/sold/subscribed any Securities of the Company

have bought/sold/subscribed ____ Securities (give description) as mentioned below on ____

Name of holder	** First or joint holder	No. of Securities dealt with	Bought / Sold/ Subscribed	DP ID/CLIENT ID (electronic form) or Folio no. for physical where the Sec. will be debited or credited	Price (Rs)

** "F" first holder "J" joint holder

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 3 (Three) years and produce to the Compliance Officer/SEBI any of the following documents:

1. Broker's contract note
2. Proof of payment to/from brokers

3. Extract of bank passbook/statement (to be submitted in case of demat transactions).
4. Copy of Delivery instruction slip (applicable in case of sale transaction)

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

I agree to hold the above Securities for a minimum period of 30 days. In case there is any urgent need to sell these Securities within the said period, I shall approach the Company (Compliance Officer) for necessary approval (applicable in case of purchase / subscription).

Yours truly,

Signature: _____

Name : _____

- Strike out whichever is not applicable.

FORM B

SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (b) read with Regulation 6(2) and Clause 10.1 of this Code– Disclosure on becoming a director/KMP/Promoter]

Name of the company: _____

ISIN of the company: _____

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN & Address with contact nos.	Category of Person (Promoters/ KMP / Directors/im mediate relative to/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
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5	6

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

Details of Open Interest (OI) in derivatives of the company held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation 6(2).

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		
Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
7	8	9	10	11	12

Note: *In case of Options, notional value shall be calculated based on premium plus strike price of options*

Name & Signature:
Designation:
Date:
Place:

******

FORM C

SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (2) read with Regulation 6(2) and Clause 10.2 of this Code– Continual disclosure]

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, CIN/DIN, & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relative to/others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition / disposal (on market/public/ rights/ preferential offer / off market/ Inter-se transfer, ESOPs etc.)
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge / Revoke /Invoke)	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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

Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
15	16	17	18	19	20	21

Note: *In case of Options, notional value shall be calculated based on Premium plus strike price of options.*

Name & Signature:

Designation:

Date:

Place:

FORM D

SEBI (Prohibition of Insider Trading) Regulations, 2015
Regulation 7(3) and Clause 2.7 of this Code– Transactions by Other connected persons as identified by the company

Details of trading in securities by other connected persons as identified by the company

Name, PAN, CIN/DIN, & address with contact nos. of other connected persons as identified by the company	Connection with company	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition/disposal (on market/public/ rights/ Preferential offer / off market/Inter-se transfer, ESOPs etc.)
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge / Revoke/Invoke)	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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

Details of trading in derivatives by other connected persons as identified by the company

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of Contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
15	16	17	18	19	20	21

Note: *In case of Options, notional value shall be calculated based on premium plus strike price of options.*

Name:

Signature:

Place:

****