SHRIRAM City
MONEY WHEN YOU NEED IT MOST

Ref:F1:SE:insidertrading

September 10, 2019

BSE Ltd
Phiroze Jeejeebhoy Tower
Dalal Street
Mumbai – 400 001

National Stock Exchange of India Ltd
Exchange Plaza, Bandra Kurla Complex
Bandra (E)
Mumbai – 400 001

Dear Sir,

Ref: Scrip Code BSE – 532498 & NSE - SHRIRAMCIT

Sub: Code for Fair Disclosure and Conduct

Please find attached Code for Fair Disclosure and Coduct as approved by the Board of Directors w.e.f. August 1, 2019.

Kindly take it on record under Regulation 8 (2) of SEBI (Prohibition of Insider Trading) Regulations 2015 and other applicable regulations.

Thanking you,

Yours faithfully,
For Shriram City Union Finance Limited,

10/9/2019
10/9/2019

C R Dash
Company Secretary

Puveetha

CODE FOR FAIR DISCLOSURE AND CONDUCT

PART-1: FAIR DISCLOSURE CODE

1. OBJECTIVE:

Shriram City Union Finance Limited **("Company")** endeavours to preserve the confidentiality of all Un-published Price Sensitive Information **("UPSI")** and to prevent it's misuse. The Company is committed to transparency and fairness. In compliance with the Regulation and the Act and as a matter of transparency, the Board of Directors of the Company **("Board")** has formulated this **Code for Fair Disclosure and Conduct ("CFDC").**

2. DEFINITIONS:

Unless otherwise specifically provided, any word(s) denoting singular includes plural and vice versa and any word(s) denoting masculine includes feminine and vice versa. Words and expressions used but not defined in the Code, but defined in the Regulation, Act, Depositories Act 1996, Securities Contracts (Regulations) Act 1956 shall have meanings respectively assigned to them.

a. "Audit Committee" : the Audit Committee of the Board by whatever name it is called.

b. "Compliance Officer ("CO") : the Company Secretary ("CS") or the Chief Financial Officer ("CFO") in absence of the CS of the Company.

c. "Connected Person":Any person associated with the Company directly or indirectly, temporary or permanent in any capacity including contractual, fiduciary, employment and by being an employee, officer , director on the date of the trade or 6 months prior to the date of the trade and has/had access to or reasonably expected to have access to UPSI directly or indirectly.

d. "Deemed Connected Person": Persons falling under clause 2(d) (ii) of the Regulation.

e. "Director": Director and a Member of the Board

f. Designated Person : Specified Person, Promoter and heads of Finance, Accounts, Secretarial functions of the Company

g. "Employee" :Officer or employee of the Company

h. "Financial Year": the financial year followed by the Company under the Act.

i. "generally available" : Published on the web site of the Stock Exchanges or published in a national newspaper or displayed on the web site of the Company.

j. "Insider" : (i) connected person (ii) Person in possession of or having access to UPSI (iii) any person in receipt of UPSI for legitimate purpose.

k. Insider Trading : Trading by Insider .

Shriram City Union Finance Limited, CIN: L65191TN1986PLC012840, Regd. office: 123, Angappa Naicken Street, Chennai 600001, Tamil Nadu., Website: www.shriramcity.in : Email: sect@shriramcity.in

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l. "Promoter" : Shriram Capital Ltd ("SCL") or such other person named as Promoter from time to time

m. Promoter Group : As defined under SEBI(Issue of Capital and Disclosure Requirements) Regulations 2018

n. "Published Information": Any information officially published by the Company under any mode, information sent to the Stock Exchanges, information posted on the web site of the Company. Speculative, Advisory or any such reports in print or electronic media shall not be considered as published information.

o. "SEBI Act" : the Securities and Exchange Board of India Act, 1992

p. "Securities": Shares, scrips, stocks, bonds, debentures, debenture stock, rights or interest or derivative of any of these, of the Company.

q. Specified Person : Members of the Board and one level below the Board

r. Stock Exchange: BSE Ltd ("BSE") and National Stock Exchange of India Ltd ("NSE").

s. "Trading" : To or agree to buy, sell, subscribe, pledge, deal in Securities, Derivatives of the Company except for Employees Stock Option scheme or the purpose of Chapter III of the Regulation.

t. Trading Day" : Day on which BSE and NSE are open for Trading

u. Trading period: Period over which trading is proposed in Trading Plan and Pre Clearance of trade.

v. Trading Plan : Plan for trading in securities of the Company

w. "Trading Window Open Period": Trading period other than Trading window Closure Period for trading in the Company's securities.

x. "Trading Window Closure Period" means period from the end of every quarter till 48 hours after the declaration of financial results.

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y. "Unpublished Price Sensitive Information ("UPSI")": Information directly or indirectly relating to the Company or it's Securities, which are generally not available and upon it becoming generally available is likely to materially affect the price of Securities of the Company, which include the followings. (i) Periodical Financial results, (ii) Dividends (both interim and final), (iii) Change in Capital Structure (Rights/Bonus/QIP/Public issues etc), (iv) any major expansion plans or execution of new projects, (v) Amalgamation, mergers, acquisitions, takeovers, (vi) Disposal of whole or substantially whole of the undertaking, (vii) Any significant change in policies plans or operations of the Company, (viii) Change in KMPs.

z. Working Days :Any day the office of the CO functions except Saturday, Sunday and all holidays of the Company

All other words and phrases will have the same meaning as defined under the Act or Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (as amended) from time to time.

3. COMPLIANCE OFFICER ("CO")

3.1 The CO for this purpose shall be appointed by the Board of Directors. In absence of such specific appointment by the Board, the Compliance Officer of the Company shall be the CO.

3.2 In order to discharge his/her functions effectively, the CO shall be adequately empowered and provided with adequate manpower, infrastructure and access to all information and documents relating to the Securities of the Company.

3.3 The CO shall

- Implement and monitor the Code ,
- Approve Trading Plan/ Preclearance of trade
- Inform to the Board, Audit Committee not less than once year the details declaration of Trade/holding in Securities of the Company.
- Maintain and update digital data base of specified details (name, entity, Permanent Account Number, Address and other details) of the Insiders and their immediate relations based on declarations made by Insiders.
- Maintain all declarations and disclosures of the Insiders for a minimum period of 5 years
- Notify the approval of the Trading Plan to the Stock Exchanges
- Notify Window Closure Period
- Intimate the code and any amendment thereto from time to time to Stock Exchanges
- On specific enquiry, clarify employees regarding the Regulations and the Code.

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CODE FOR FAIR DISCLOSURE AND CONDUCT

4. PRESERVATION OF UPSI

4.1 The objective of the Company is to preserve UPSI .The internal control for the purpose shall be compliance with the policy and regulation which covers identification of persons having access to UPSI, confidentiality of UPSI, restrictive access to UPSI, confidentiality agreement with Insiders, implementation of whistle blower policy. The internal Control shall be adequate and effective for the purpose of preventing insider trading, which shall be reviewed at least once by the Audit and Risk Management Committee, for which Insider plays a bigger role.

4.2 The Insider (s) shall

(i) maintain confidentiality of all UPSI coming into their knowledge or possession or control.
(ii) not communicate, provide, allow access to UPSI to any person including other Insiders directly or indirectly relating to the Company or its listed/to be listed Securities except under following circumstances ("Legitimate Purpose")
(iii)under legal obligation, (b) in performance of duties , (c) in discharging obligation to make an open offer under take over regulations with the permission of the Board on execution of contract of confidentiality/non-disclosure and (d) in the best interest of the Company after obtaining confidentiality and non-disclosure agreement, (e) in the ordinary course of business.
(iv) not pass on the UPSI to any employee of the Company, who does not need to know it to discharge his responsibilities (to handle UPSI on "NEED TO KNOW BASIS").
(v) keep secure all files/papers containing UPSI (Computer files must have adequate security of login and password to prevent unauthorised access).
(vi) prevent unauthorised reading, dissemination, distribution or copying of UPSI.

4.3 If any employee or person receives any UPSI not intended for him, shall report the details of such information and source of such information immediately to the CO.

5. RESTRICTIONS IN TRADING

5.1 The Insider(s) is prohibited to trade in the listed or to be listed Securities of the Company during Trading Window Closure Period.

5.2 The Insider (s) can trade in the securities of the Company during Trading window open period.

5.3 When a person in possession of UPSI trades in the shares of the Company shall be presumed to be motivated for trade by the knowledge of UPSI.

CODE FOR FAIR DISCLOSURE AND CONDUCT

The Insider(s) in possession of UPSI shall not, except in the following circumstances, trade in the Securities of the Company even during trading window open period. The restriction on Trading applies to Designated Person/Specified Person

(i) Trade as per approved Trading Plan.
(ii) Off market inter-se transfer between Insiders in possession of same UPSI.
(iii) In case of non-individual Insiders, the individuals trading were not in possession of UPSI and the UPSI was not communicated to such trading individuals by individuals possessing UPSI
(iv) Transaction was undertaken pursuant to exercise of stock options at pre-determined price

6. TRADING THROUGH TRADING PLAN

6.1 An Insider wishing to trade in the securities of the Company, shall have option to formulate only one Trading Plan for a particular period in Form-I and present it duly executed to the CO by email (tradingapproval@shriramcity.com). The Trading Plan shall

(i) not contain trading to commence earlier than six months of the disclosure of the Trading Plan to public.
(ii) not contain 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 and second trading day after the disclosure of such financial results.
(iii) not state trading period less than twelve months.
(iv) state either the number of Securities or value of Securities to be traded in, nature of the trade, intervals or dates of trades.
(v) be mandatorily executed by the Insider after it's approval (No trading shall be executed outside the approved Trading Plan)
(vi) not entail market abuse.

6.2 The CO on receipt and after assessing the duly executed Trading Plan for any potential violation of the Regulation, Act and Code, convey it's approval or rejection by email to the applicant Insider within 2 working days. No reason of rejection shall be mentioned, while rejecting the Trading Plan.

6.3 Every Trading Approval/Rejection shall be dated and shall be issued in the format as appears in Form-I and the same approval shall be irrevocable.

6.4 The CO shall notify the approved Trading Plan within 2 working days of its approval to the stock exchanges.

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7. PRE-CLEARANCE OF TRADE

7.1 An Insider wishing to trade in the Securities of the Company shall have option to trade through Pre clearance of Trade.
7.2 Pre-clearance of trade shall not be required for a trade executed as per Trading Plan
7.3 The Insider shall make an application in Form-I duly executed to the CO by email tradingapproval@shriramcity.com to trade in the securities of the Company.
7.4 The CO on receipt and after assessing the duly executed application for Pre-clearance of Trade for any potential violation of the Regulation, Act and Code, convey it's approval or rejection by email to the applicant Insider within 2 working days. No reason of rejection shall be mentioned, while rejecting the application for pre clearance of Trade.
7.5 The Trading in the securities of the Company shall be completed within 7 trading days of such approval failing which the approval shall lapse.
7.6 Insider transacting in the Securities of the Company shall not enter into an opposite transaction in any number of Securities during the next six months following the prior transaction except acquisition of shares under Employee Stock Option Scheme ("ESOP").

8. PENALTY FOR CONTRAVENTION

8.1 Every Insider shall be individually responsible for compliance with all the clauses of this Code for himself/herself and his/her immediate Relation. Non compliance of any or all the clauses of these Code/Act/Regulations by the Insider shall be deemed to be violation of the Code/Act/Regulations as the case may be by the Insider.

8.2 On information or reason to believe or on suspicion of any violation of this Code by any Insider, it shall be brought to the notice of the Chairman, Audit Committee immediately. The Chairman Audit Committee shall conduct an enquiry by itself or by a competent person.

8.3 The enquiring person shall, on completion of it's enquiry, submit it's report of findings to the Audit Committee within one month of such appointment or such time or extended time as may be given by the Chairman, Audit Committee .The enquiring person may also suggest the penalties to be imposed on the violations found, if any.

8.4. On receipt of the report of such enquiry, Audit Committee shall decide on the penal action or may accept the penal action suggested by the enquiring person .The penal action shall include disciplinary action, salary freeze, suspension, ineligible for future participation in ESOPs, termination of employment and penal action pursuant to any law

8.5 The Company shall inform to SEBI the details of the Insider who has been found guilty of violation of the Code/Regulations/Act

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8.6 The action by the company shall not preclude SEBI from taking any action under Regulations, which may include fine or imprisonment or both.

8.7 The person against whom information has been furnished by the Company to SEBI for violations of the Regulations/Code/Act shall provide all information and render necessary co-operation as may be required by the Company/CO/SEBI.

PART-2: DISCLOSURE AND CONDUCT

1. **GENERAL:**

(i) The Company shall make Fair Disclosure of information and shall preserve UPSI
(ii) The conduct of employees of the Company, Insiders and connected persons shall be directed towards Fair Disclosure and preservation of UPSI.
(iii) UPSI shall be handled on need to know basis by all the employees of the Company
(iv) No person other than MD/CIRO/CO/CFO/CEO or any person authorised by MD shall disclose any information relating to the Securities or performance of the Company to any person.

2. **CHIEF INVESTOR RELATION OFFICER ("CIRO")**

(i) The CIRO shall be appointed by the Board. The CFO shall be CIRO, if no CIRO is appointed by the Board.
(ii) The CIRO shall oversee and deal with dissemination of information and disclosure of UPSI.

3. **DISCLOSURE PROCESS :**

DISCLOSURE AND DESSIMINATION

Every disclosure shall be made in such form as may be specified by the person for himself, immediate relative, for such person for whom such person takes a trading decision.

4. Initial and Continual Disclosure:

4.1 Each Promoter, member of promoter Group, KMP, Director of the Company shall disclose their holding in the Securities of the Company to the CO in Form-B as the case may be duly executed within 7 days of the appointment or becoming the promoter as the case may be.

4.2 Each Promoter, member of promoter Group, KMP, Director of the Company shall disclose their holding in the Securities of the Company to the CO in within 30 days of the regulation taking effect in Form A as the case may be.

4.3 The Promoter, member of Promoter Group ,Designated Person, shall disclose the details of their transactions in the Securities of the Company to the CO within 2 trading days of such transactions in Form C, 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 10,00,000.

4.4 The CO, on receipt of disclosure mentioned in point 4.1 and 4.2 shall notify the same to the Stock Exchanges within 2 trading days of receipt of such disclosure.

4.5 The Company may ask any Insider or Connected Person(s) as identified to disclose their holdings in the securities of the Company to the Company and to disclose their transactions in the securities of the Company in Form D within 2 trading days of such transaction.

5. Dissemention

(i) UPSI shall be disseminated uniformly and universally. Selective disclosure of UPSI (including disclosure to analysts and research personnel) shall be avoided.

(ii) If UPSI gets disclosed selectively (inadvertently or otherwise), the same UPSI shall promptly be made generally available by the CIRO.

(iii) The CIRO shall promptly make UPSI, which will impact price discovery of the Security of the Company, generally available.

(iv)In order to improve Investors' access to the public announcements made by the Company, the CIRO may adopt supplementary ways of communicating the same information in addition to making them generally available.

(v)The CIRO may develop best practice to make transcripts or records of proceedings of the meeting with analysts and other investor conferences on the web site

(i)As far as possible at least two representatives authorised by the CIRO shall be present at meetings with the entities and the discussion shall preferably be recorded

ii) When a meeting is held with any person, a press release shall be made or relevant information shall be posted on its website by the CIRO.

(iii) The CIRO may also consider live webcasting of meeting with such entities.

(iv)If anything other than publically available information are discussed the transcripts or records of such meetings shall be displayed on the web site of the Company by the CIRO.

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CODE FOR FAIR DISCLOSURE AND CONDUCT

The supplementary ways of communication shall be decided on case to case basis by the CIRO in consultation with the Managing Director ("MD") or Chief Executive Officer ("CEO") of the Company.

6. RESPONSE TO MARKET:

Appropriate and fair response to queries on news reports and requests for verification by regulatory authorities shall be made by the CIRO.

The Company shall not respond to market rumours .The Employees/Directors of the Company shall promptly direct any queries or requests for verification of market rumours received (by email or letter) from stock exchanges or from the press or media or from any other source to the CIRO by email ciro@shriramcity.com in writing stating the details and source of such rumours.

The CIRO, shall on receipt of information about rumours as aforesaid, consult the MD/CEO as to the necessity of a public announcement for verifying or denying rumours and shall make appropriate disclosure without any delay. No response to the rumours shall be made by the CIRO without the approval of the MD/CEO.

7. MEDIUM OF DISCLOSURE/DISSEMINATION:

Disclosure/dissemination of UPSI shall be done by one or more methods as decided by CIRO in consultation with MD or CEO of the Company in order to achieve maximum reach and quick dissemination i.e. disclosure to stock exchange ,display on the web site of the Company ,press release or publication in any public media.

8. DISCLOSURE & EFFECT:

8.1 In the event of any amendment to the Regulations/Act or issuance of any clarification such amendment/clarification shall be deemed to be adopted by the Company and in case of any conflict between the provisions of the CCFDC and Regulations/Act, the latter shall prevail.

8.2 This shall come into force with effect from August 1, 2019 and shall remain in force till altered, changed, amended, dropped by the Board of Directors or becomes ineffective by operation of law. The Board can amend all or any of the clauses at any time. This Code and any amendment thereto shall be displayed on the web site of the Company and shall be informed to Stock Exchanges.

CODE FOR FAIR DISCLOSURE AND CONDUCT

Form I

Application for approval of Trading Plan/Pre Clearance of Trade of the Code for Fair Disclosure and Conduct of Shriram City Union Finance Limited ("Code")

To,

The Compliance Officer/ Date:
Shriram City Union Finance Ltd, ("Company")
144, Santhome High Road,Chennai 600 004
Dear Sir,

In accordance with the Code, I seek your approval for the following Trading Plan/ Pre Clearance of Trade in Securities of the Company for self /Immediate Relations ("IR").

S No	Particulars	
1	Date of Trade or time intervals	
2	Buy / Sell/ Subscribe	
3	Name of the Person to trade	
4	Immediate Relation of the person to trade with the applicant	
5	No of Securities held before the trade	
6	No or value of Securities to be traded	
7	DP Id	
8	Client Id/LF No	
9	No of Securities to be held after the Trade	
10	Date of immediate last Approval	
11	Reasons for not trading after securing pre clearance of trade earlier, if any	

I undertake and affirm that

-I am an Insider as per the Code
-I am making this application after going through the Code/Act/Regulation
-I/We have no access to nor do I/we have any information that could be construed as UPSI up to the time of signing this undertaking
-I/We have not/will not contravened the Regulations/Code/Act applicable to me in respect of Prohibition of Insider Trading as notified or may be notified from time to time.
-I/We have made full and true disclosure in the matter.

CODE FOR FAIR DISCLOSURE AND CONDUCT

We shall execute my order in respect of the Securities of the Company as per Pre Clearance of Trade. If the Trading is not executed as per Pre Clearance of Trade, I shall obtain fresh approval of Pre Clearance of Trade.

Thanking you

Yours faithfully,

Signature for self and on behalf of IR, if seeking approval for IR

Name: ---------- Employee Code -Designation ----------

Insider

Note: Please provide all the information. Incomplete forms will not be accepted. Please ensure that you have not made any opposite transaction within previous 6 months

TRADING PLAN **(TP)**/PRE CLEARANCE APPROVAL **(PCA)** ORDER

TP/PCAO No. _____ Date: _____

This is to inform you that your request for approval of Trading Plan/Pre Clearance of Trade as mentioned above is approved/rejected.

For Shriram City Union Finance Limited

Compliance Officer

CODE FOR FAIR DISCLOSURE AND CONDUCT

FORM A

SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (a) read with Regulation 6 (2) – Initial disclosure to the Company]

To,

The Compliance Officer/
Shriram City Union Finance Ltd, ("Company")
144, Stanhope High Road, Chennai 600 004

Date:

Declaration by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2).

Details of Securities held in the Company

Name			
PAN/CIN/DIN			
Address			
Contact No			
E mail ID			
Category of Person (Promoters/KMP/Directors/immediate relative to/others etc)			
Designation			
Securities held as on the date of regulation coming into force	**Type**	**No**	**% of holding**

Details of Open Interest (OI) in derivatives of the Company

Open Interest of the Future contracts held as on the date of regulation coming into force		
Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
Open Interest of the Option contracts held as on the date of regulation coming into force		
Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms

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

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

Signature:

FORM B

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (1) (b) read with Regulation 6 (2) – Disclosure on becoming a director/KMP/Promoter]

To,

The Compliance Officer/ Date:
Shriram City Union Finance Ltd. ("Company")
144, Santhome High Road, Chennai 600 004

Declaration on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of the Company and other such persons as mentioned in Regulation 6(2).

Details of Securities held in the Company

Name			
PAN/CIN/DIN			
Address			
Contact No			
E mail ID			
Category of Person (Promoters/KMP/Directors/immediate relative to/others etc)			
Designation			
Date of appointment of Director/KMP or date of becoming Promoter			
Securities held at the time of becoming Promoter/ appointment of director/KMP	**Type**	**No**	**% of holding**

Details of Open Interest (OI) in derivatives of the Company

Open Interest of the Future 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
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

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

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

Signature:

FORM C

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]

To,

The Compliance Officer/
Shriram City Union Finance Ltd. ("Company")
144, Santhome High Road, Chennai 600 004

Date:

Declaration by Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2)

Details of change in holding of Securities in the Company

Name					
PAN/CIN/DIN					
Address					
Contact No					
E mail ID					
Category of Person (Promoters/KMP/Directors/ immediate relative to/others etc)					
Designation					
Securities held prior to acquisition/ disposal	**Type**	**No**	**% of holding**		
Securities acquired/disposed	**Type**	**No**	**% of holding**	**Value**	**Transaction type (Buy/ Sale/Pledge/Revoke/Invoke**
Securities held post acquisition /disposal	**Type**	**No**	**% of holding**		
Date of allotment advice/acquisition of shares/sale of shares specify	**From**			**To**	
Date of intimation to company					
Mode of acquisition /disposal (market/public/rights/ preferential offer/off market/Interse transfer,ESOPs etc)					
Exchange on which the trade was executed					

Details of trading in derivatives of the Company

Trading in derivatives (specify type of contract. Futures or Options etc)						
Type	Contract specifications	Buy		Sell		Exchange on which the trade was executed
		No of units (contracts * lot size)	Notional value in Rupee terms	No of units (contracts * lot size)	Notional value in Rupee terms	

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

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

Signature:

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Form D

SEBI (Prohibition of Insider Trading) Regulations, 2015

Regulation 7(3) – Transactions by Other connected persons as identified by the company

To,

The Compliance Officer
Shriram City Union Finance Ltd. ("Company")
144, Santhome High Road, Chennai 600 004

Date:

Declaration by other connected persons as identified by the Company

Details of trading in securities in the Company

Name					
PAN/CIN/DIN					
Address					
Contact No					
E mail ID					
Connection with the Company					
Securities held prior to acquisition/ disposal	**Type**	**No**	**% of holding**		
Securities acquired/disposed	**Type**	**No**	**% of holding**	**Value**	**Transaction type (Buy/ Sale/Pledge/Revoke/Invoke**
Securities held post acquisition /disposal	**Type**	**No**	**% of holding**		
Date of allotment advice/acquisition of shares/sale of shares specify	**From**		**To**		
Date of intimation to company					
Mode of acquisition /disposal (market/public/rights/ preferential offer/off market/Interse transfer, ESOPs etc)					
Exchange on which the trade was executed					

Details of trading in derivatives of the Company

Trading in derivatives (specify type of contract. Futures or Options etc)						
Type	Contract specifications	Buy		Sell		Exchange on which the trade was executed
		No of units (contracts * lot size)	Notional value in Rupee terms	No of units(contracts * lot size)	Notional value in Rupee terms	

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

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

Signature:

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