SHREE VASU LOGISTICS LIMITED

Date: March 28, 2019

To,
The Listing Department,
National Stock Exchange of India Ltd.
Exchange Plaza,Plot No. C/1,
G Block, Bandra-Kurla Complex,
Bandra (East), Mumbai- 400051.

Stock Symbol: SVLL

Sub: Outcome of Board Meeting pursuant to Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015

Respected Sir/Madam,

With reference to Regulation 30 of the Securities and Exchange Board of India (Listing Obligation and Disclosure Requirements) Regulations, 2015 (the "Listing Regulations"), we hereby inform you that the Board of Directors at its meeting held on Thursday, March 28, 2019 commenced at 11.30 a.m. inter alia, considered and approved:

1. Pursuant to the Securities and Exchange Board of India (Prohibition of Insider Trading) (Amendment) Regulations, 2018 ('PIT Regulations'), the Board of Directors of the Company has amended the Code of Fair Disclosure under Regulation 8 of the PIT Regulations and Code of Conduct under Regulation 9 of the PIT Regulations. The amended Codes effective from April 01, 2019 are enclosed herewith and shall be made available on the website of the Company i.e.www.shreevasulogistics.com.
2. Pursuant to Regulation 30(5) of the SEBI (Listing Obligation and Disclosure Requirements) Regulations, 2015, authorized below mentioned Key Managerial Personnel of the Company to determine materiality of event/information and make disclosure to stock exchange, in place of Key Managerial Personnel authorized and intimated earlier vide our letter dated July 07, 2018:-

Name :	Mr. Atul Garg	Mr. Rahul Ratch	Ms. Neelam Dahiya
Designation:	Managing Director	CFO	Company Secretary
Address :	A-23, Wallfort City, Bhatagaon, Ring Road No. 1, Raipur – 492013.	B-17, Rajiv Nagar, Near Shiv Mandir Shankar Nagar, Raipur – 492001.	D-28, Near Funfesta Ground, Sector-1, Shailendra Nagar, Raipur - 492001.
Phone No.:	07415040000	06264914640	07000681501
Email:	atulgarg@logisticpark.biz	cfo@logisticpark.biz	cs@logisticpark.biz

The Board Meeting concluded at 12.45 P.M.
You are requested to take the above information on records.

Yours Faithfully
For Shree Vasu Logistics Limited

Neelam Dahiya

SHREE VASU LOGISTICS LTD. RAIPUR (C.G.)

Neelam Dahiya
Company Secretary
Membership No.: A47292

Encl.: As above

SHREE VASU LOGISTICS LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

1. INTRODUCTION

Trading in a company's securities by insiders who enjoy a special status, as compared to the investors, as regard price sensitive information and who as a result thereof are able to use their special status for individual benefit, is commonly referred to as Insider Trading.

With a view to govern the conduct of insiders relating to insider trading, the Securities and Exchange Board of India (SEBI) had formulated SEBI (Prohibition of Insider Trading) Regulations 2015 as amended time to time.

Regulation 8 of the above mentioned Regulations requires inter alia all listed companies to formulate and publish on its official website, a code of practices and procedures for fair disclosure of unpublished price sensitive information that it would follow in order to adhere to each of the principles set out in Schedule A of the said Regulation.

2. OBJECTIVES

In compliance with the above requirements and Regulation, the Company has adopted this code of practices and procedures for fair disclosure of unpublished price sensitive information based on Schedule A of the said Regulations. Shree Vasu Logistics Limited endeavors to ensure timely and adequate disclosure of price sensitive information. The Company is, committed to fairness and transparency in dealing with all stakeholders and in ensuring compliance with applicable laws and regulations.

To achieve these objectives, maintain decency and to observe set procedure in relation to disclosure of price sensitive information of the Company, Shree Vasu Logistics Limited has implemented this code to be followed and observed as mentioned herein.

3. TITLE AND COMMENCEMENT

This Code is called "code of practices and procedures for fair disclosure of unpublished price sensitive information" or Code of Corporate Disclosure Practices.

The Board of Directors of the Company had approved the original Code at its meeting held on February 06, 2018.

The Board of Directors of the Company have, at their Meeting held on March 28, 2019, decided to revise the existing Code to incorporate the requirements of the Act and the PIT regulations. This Code will supersede the provisions of the earlier Code adopted by the Board.

4. DEFINITIONS AND INTERPRETATION

"Act" means the Companies Act, 2013, for the time being in force and as may be clarified, amended, reenacted from time to time.

"Board" means the collective body of the Directors of the Company.

"Company" means the Shree Vasu Logistics Limited or abbreviated as "SVLL".

"Code" means this "code of practices and procedures for fair disclosure of unpublished price sensitive information" or Code of Corporate Disclosure Practices as amended time to time.

"Compliance Officer" means any senior officer, designated so and reporting to the board of directors, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these

regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board of directors of the company**.**

"Designated Persons" means persons covered by the code of conduct, in terms of consultation between Board of Directors and Compliance Officer, on the basis of their role and function in the Company and the access that such role and function would provide to unpublished price sensitive information in addition to seniority and professional designation and includes:-

(a) Employees of the company, intermediary or fiduciary designated on the basis of their functional role or access to unpublished price sensitive information in the organization by the board of directors or analogous body;

(b) All promoters of the Company and promoters who are individuals or investment companies for intermediaries or fiduciaries;

(c) Chief Executive Officer and employees upto two levels below Chief Executive Officer of the Company, intermediary, fiduciary irrespective of their functional role in the company or ability to have access to unpublished price sensitive information;

(d) Any support staff of the Company, intermediary or fiduciary such as IT staff or secretarial staffs who have access to unpublished price sensitive information.

(e) All Employees including trainees working in the accounts, internal audit, MIS, taxation, treasury, finance, legal and secretarial departments of the Company.

(f) Secretaries, personal assistants and persons working closely with the Managing Directors, Directors, Chief Executive Officer, Chief Operating Officer, Chief Financial Officer and Compliance Officer of the Company.

(g) Employees or other persons as may be determined by the Board or as per direction of the Board, from time to time or as may be required as per the Regulations.

"Fiduciary/ Fiduciaries" means professional firms such as auditors, accountancy firms, law firms, analysts, insolvency professional entities, consultants, banks etc., assisting or advising the Company.

"Financially literate" shall mean a person who has the ability to read and understand basic financial statements i.e. balance sheet, profit and loss account, and statement of cash flows.

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

"Insider" means any person who is:

i. a connected person; or
ii. in possession of or having access to unpublished price sensitive information;
iii. Any person in receipt of unpublished price sensitive information pursuant to a legitimate purpose

"Legitimate Purpose" includes sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of PIT regulations.

"PIT Regulation" means the SEBI (Prohibition of Insider Trading) Regulation, 2015 as amended or reenacted time to time.

"Stock Exchanges" means the stock exchanges where Securities of the Company is listed.

"Unpublished price sensitive information" or "UPSI" means any information, relating to the Company or its securities, directly or indirectly, that is not generally available, which upon becoming generally available, is likely to materially affect the price of the Securities of the Company 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, de-listings, disposals and expansion of business and such other transactions;
v. Changes in key managerial personnel.

Words and expressions used and defined and/or used but not defined in this Code shall have the same meaning assigned to them in the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations), Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996or the Companies Act, 2013 and the rules and regulations made thereunder, to the extent relevant in connection with this Code, as the case may be or in any amendment thereto.

5. COMPLIANCE OFFICER

The Board of Directors of the Company shall designate a senior officer as Compliance Officer, to deal with dissemination of information and disclosure of unpublished price sensitive information.

The Company Secretary shall act as Compliance Officer, unless the Board decides otherwise.

The Compliance Officer shall report to the board of directors and in particular, shall provide reports to the Chairman of the Audit Committee at such frequency as may be stipulated by the board of directors, but not less than once in a year.

6. RESTRICTIONS ON COMMUNICATION AND TRADING BY INSIDERS

No insider shall communicate, provide, or allow access to any unpublished price sensitive information, to any other person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

The Board of Directors of the Company has framed a policy for determination of "legitimate purposes" as a part of "Codes of Fair Disclosure and Conduct" attached as **Annexure - A**

No insider shall trade in securities of the Company that are listed or proposed to be listed on Stock Exchange, when in possession of unpublished price sensitive information.

When a person who has traded in securities has been in possession of unpublished price sensitive information, his trades would be presumed to have been motivated by the knowledge and awareness of such information in his possession.

7. PROHIBITION IN DEALING IN SECURITIES OTHER THAN DURING A VALID TRADING WINDOW

All Directors and Designated Persons shall conduct all their dealings in the securities of the Company only in a valid trading window within the threshold limit prescribed and shall not deal in any transactions involving the purchase or sale of the Company's securities during the period when trading window is closed.

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.

Trading restriction period can be made applicable from the end of every quarter till 48 hours after the declaration of financial results. 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.

Trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

8. PROCEDURES FOR DEALING IN SECURITIES OF THE COMPANY

All Directors, Officers and Designated Persons who intend to deal in securities of the Company in their own name or in the name of their relatives, above minimum threshold limit, shall obtain pre-clearance of the transactions by Compliance Officer by making an application in this regard and by giving declarations to the effect that he/she is not in possession of any unpublished price sensitive information. The pre-clearance of trades shall not be required for a trade executed as per an approved trading plan.

The trades which have been pre-cleared by the Compliance Officer shall be executed within seven trading days, failing which fresh pre-clearance would be needed for the trades to be executed.

9. REPORTING AND DISCLOSURES

A. DISCLOSURES BY PROMOTERS, DIRECTORS AND KEY MANAGERIAL PERSONNEL TO COMPANY

(a) Initial Disclosure

On appointment as a key managerial personnel (KMP) or a director of the company or upon becoming a promoter or member of the promoter group, such KMP or Director or Promoter or member of the promoter group, shall disclose his holding of securities of the company as on the date of appointment or becoming a promoter or member of the promoter group, to the company within seven days of such appointment or becoming a promoter or member of the promoter group.

(b) Continual Disclosure

Every promoter, member of the promoter group, designated person and director of 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;

B. DISCLOSURES BY COMPANY TO STOCK EXCHANGES

The Company shall notify the particulars of trading by promoter, member of the promoter group, designated person and director of company 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, 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.

C. DISCLOSURE OF PRICE SENSITIVE INFORMATION

The Company shall disclose promptly the unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
Dissemination of unpublished price sensitive information shall be uniform and universal to avoid selective disclosure.

If there would be any unpublished price sensitive information disclosed selectively to meet the statutory or business requirement or inadvertently or otherwise, such information shall be disseminated promptly to make such information generally available.
The Company shall disclose and disseminate the unpublished price sensitive information to the Stock Exchanges on continuous and immediate basis, as may be appropriate and required.

Wherever necessary to make disclosure to Stock Exchanges about events materially bearing on performance / operation of the Company as well as price sensitive information, as per the PIT Regulations, the CFO and Managing Director will take a view on materiality of event that qualify for disclosure, appropriate time and details for disclosures.

10. RESPONDING TO MARKET RUMOURS

The Designated persons and Directors of the Company shall promptly direct any queries or requests for verification of market rumors received from Stock Exchanges or from the press or media or from any other source, to the Compliance Officer.

The Compliance Officer, on receipt of requests as aforesaid, consults the Managing Director and would respond and address the same appropriately and in fair manner.

11. DEALING WITH ANALYSTS AND RESEARCH PERSONNEL

The Compliance Officer shall ensure that the information shared with analysts and research personnel shall not be unpublished price sensitive information.

The Company shall follow best practice to make a transcripts or records of the proceedings of meeting with analysts and other investor relations conference in relation to announcement of financial results and material updates and to post on website of the Company to ensure confirmation and documentation of disclosures made.

12. HANDLING OF INFORMATION ON NEED TO KNOW BASIS

All information shall be handled within the Company 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.

13. INSTITUTIONAL MECHANISM FOR PREVENTION OF INSIDER TRADING

The Chief Executive Officer, Managing Director of the Company shall put in place adequate and effective system of internal controls to ensure compliance with the requirements given in these regulations to prevent insider trading.

The internal controls shall include the following:

a) all employees who have access to unpublished price sensitive information are identified as designated employee;
b) all the unpublished price sensitive information shall be identified and its confidentiality shall be maintained as per the requirements of these regulations;
c) adequate restrictions shall be placed on communication or procurement of unpublished price sensitive information as required by these regulations;
d) lists of all employees and other persons with whom unpublished price sensitive information is shared shall be maintained and confidentiality agreements shall be signed or notice shall be served to all such employees and persons;
e) all other relevant requirements specified under these regulations shall be complied with;
f) periodic process review to evaluate effectiveness of such internal controls.

The Audit Committee of the Company or shall review compliance with the provisions of PIT Regulations by the Company at least once in a financial year and shall verify that the systems for internal control are adequate and are operating effectively.

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

The Board of Directors of the Company has separately framed Code of conduct to regulate, monitor and report Trading by Insiders to regulate, monitor and report trading in securities of the Company by Insiders.

Every Director, Designated Person and person connected with the Company has a duty to safeguard the confidentiality of all such information obtained in the course of his or her work and association with the Company. Director and Designated Persons should not use his or her position or knowledge of the Company to gain personal benefit or to provide benefit to any third party. Such persons are prohibited from communicating or counseling others with respect to the securities of the Company. Such persons should also refrain from profiteering by misusing the unpublished price sensitive information and thereby enabling the Company to retain investor confidence.

On appointment of Director or designated person, the Company shares such Code of Conduct with the Director or designated person and they are required to adhere to it in their spheres of activities within the Company.

15. CLARIFICATIONS, AMENDMENT ETC

The Board may, subject to applicable laws amend, alter, modify, substitute any of the provision(s) with a new provision(s) or replace this Code entirely with a new code from time to time based on the requirements as prescribed under the PIT Regulations.

In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Code, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Code shall stand amended accordingly from the effective date as laid down under such amendment(s), Clarification, circular(s) etc.

DISCLOSURE

This Policy shall be uploaded on the Company's website for investors and public information and a web link thereto shall be provided in the Board's Report as part of the Annual Report of the Company.

ANNEXURE –A

POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES

1. INTRODUCTION

The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations 2015 as may be amended time to time, provides that no insider shall communicate, provide, or allow access to any unpublished price sensitive information, to any other person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

Regulation 3(2A) of the above mentioned Regulations requires the Board of Directors of every listed companies to frame a policy for determination of "legitimate purposes" as a part of "Codes of Fair Disclosure and Conduct".

The Board of Directors of the Company has framed a policy for determination of "legitimate purposes" as a part of "Codes of Fair Disclosure and Conduct", to list the circumstances or purposes for which an insider can communicate, provide, or allow access to any unpublished price sensitive information, relating to the company or its securities, where such communication, access of unpublished price sensitive information would not be considered illegal by the insider.

2. OBJECTIVES

Shree Vasu Logistics Limited has implemented this policy to fulfill following objectives as outlined in the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations 2015:

a. to cast an obligation on all insiders who are essentially persons in possession of unpublished price sensitive information to handle such information with care and to deal with the information with them when transacting their business strictly on a need-to-know basis.
b. to develop practices in the Company based on need-to-know principles for treatment of information in their possession.
c. to impose a prohibition on unlawfully procuring possession of unpublished price sensitive information.

3. CONSTITUENTS OF LEGITIMATE PURPOSE

The communication, provision, procurement or access to any unpublished price sensitive information, relating to the company or its securities in furtherance of legitimate purposes, will be considered as legitimate purpose, if it qualifies certain grounds. Accordingly, legitimate purposes shall include:

i. Sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of PIT regulations.

ii. Sharing of unpublished price sensitive information in connection with a transaction, where the board of directors of the company is of informed opinion that sharing of such information is in the best interests of the company and the information constituting the unpublished price sensitive information is made generally available at least two trading days prior to the proposed transaction being effected in such form as the board of directors may determine to adequately and fairly cover all relevant and material facts

iii. Sharing of unpublished price sensitive information in connection with a transaction that would entail an obligation to make an open offer under the takeover regulations, where the board of directors of the company is of informed opinion that sharing of such information is in the best interests of the company.

4. CONFIDENTIALITY OF UPSI

Any person in receipt of unpublished price sensitive information pursuant to a legitimate purpose shall be considered an insider. Such persons are under duty to maintain confidentiality of such unpublished price sensitive information.

The parties are required to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties, as may be required by the Board of Directors. Such parties shall keep information so received

confidential and shall not otherwise trade in securities of the company when in possession of unpublished price sensitive information.

5. SAFEGUARDS FOR TRADING WHEN IN POSSESSION OF UPSI

The insider, who has traded in securities of the Company when in possession of unpublished price sensitive information may prove his innocence by demonstrating the circumstances including the following: –

i. the transaction is an off-market inter-se transfer between insiders who were in possession of the same unpublished price sensitive information without being in breach of regulation 3 of PIT regulations and both parties had made a conscious and informed trade decision.
ii. the transaction was carried out through the block deal window mechanism between persons who were in possession of the unpublished price sensitive information without being in breach of regulation 3 of PIT regulations and both parties had made a conscious and informed trade decision;
iii. the transaction in question was carried out pursuant to a statutory or regulatory obligation to carry out a bona fide transaction.
iv. the transaction in question was undertaken pursuant to the exercise of stock options in respect of which the exercise price was pre-determined in compliance with applicable regulations.
v. the trades were pursuant to a trading plan set up
vi. in the case of non-individual insiders: –
   a) the individuals who were in possession of such unpublished price sensitive information were different from the individuals taking trading decisions and such decision-making individuals were not in possession of such unpublished price sensitive information when they took the decision to trade; and

   b) appropriate and adequate arrangements were in place to ensure that PIT Regulations are not violated and no unpublished price sensitive information was communicated by the individuals possessing the information to the individual staking trading decisions and there is no evidence of such arrangements having been breached;

6. CLARIFICATIONS, AMENDMENT ETC

The Board may, subject to applicable laws amend, alter, modify, substitute any of the provision(s) with a new provision(s) or replace this Code entirely with a new code from time to time based on the requirements as prescribed under the PIT Regulations.

In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Code, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Code shall stand amended accordingly from the effective date as laid down under such amendment(s), Clarification, circular(s) etc.

SHREE VASU LOGISTICS LIMITED

Code of Conduct for Regulating, Monitoring and Reporting of Trading by Insiders

SHREE VASU LOGISTICS LIMITED

Code of conduct to regulate, monitor and report Trading by Insiders

Sr.	Content	Page
1	Introduction	3
2	Objectives	3
3	Title, Commencement and Applicability	3
4	Definitions and Interpretation	4
5	Compliance Officer	7
6	Prohibition on Trading	8
7	Confidentiality of Price Sensitive Information	8
8	Close Period / Trading Window	9
9	Restriction on Trading in Securities during Close Period	10
10	Pre-Clearance / Approval for Trading in Securities	11
11	Contra Trade / Minimum Holding Period	11
12	Disclosure regarding Securities under this Code	12
13	Trading Plan	12
14	Leak of Unpublished Price Sensitive Information	13
15	Penalty for Contravention	13
16	Clarifications, Amendment etc.	14
	Forms	

Approved by the Board in its meeting held on March 28, 2019.

The code is authenticated by the following persons:

Name	Signature
Mr. Atul Garg (Managing Director)	Sd/-
Mr. Shri Bhushan Garg (Wholetime Director)	Sd/-

SHREE VASU LOGISTICS LIMITED

Code of conduct to regulate, monitor and report Trading by Insiders Pursuant SEBI (Prohibition of Insider Trading) Regulations, 2015

1. INTRODUCTION

Trading in a Company's securities by insiders who enjoy a special status, as compared to the investors, as regard price sensitive information, and who as a result thereof are able to use their special status for individual benefit, is commonly referred to as Insider Trading.

With a view to govern the conduct of insiders relating to insider trading, the Securities and Exchange Board of India (SEBI) had formulated SEBI (Prohibition of Insider Trading) Regulations 2015, as amended from time to time.

Regulation 9 of the above mentioned Regulations requires *inter alia* that the Chief Executive Officer or Managing Director of all listed companies to set up appropriate mechanism and to frame and implement a code of internal procedures and conduct, as approved by the Board of Directors, based on the Schedule B and other relevant provisions of the said Regulations, to regulate, monitor and report trading by its designated persons and immediate relatives of designated persons.

2. OBJECTIVES

In compliance with the above requirements, the Company has introduced this code to regulate, monitor and report trading in securities of the Company by Insiders. Shree Vasu Logistics Limited endeavors to preserve the confidentiality of unpublished price sensitive information and to prevent misuse of such information. The Company is committed to fairness and transparency in dealing with all stakeholders and in ensuring compliance with applicable laws and regulations.

Every Director, Designated Person and person connected with the Company has a duty to safeguard the confidentiality of all such information obtained in the course of his or her work and association with the Company. Director and Designated Persons should not use his or her position or knowledge of the Company to gain personal benefit or to provide benefit to any third party. Such persons are prohibited from communicating or counseling others with respect to the securities of the Company. Such persons should also refrain from profiteering by misusing the unpublished price sensitive information and thereby enabling the Company to retain investor confidence.

To achieve these objectives and comply with the Regulations, Shree Vasu Logistics Limited implementing this Code to be followed and observed as mentioned herein.

3. TITLE, COMMENCEMENT AND APPLICABILITY

a. This Code is called **"SVLL-Code of conduct to regulate, monitor and report Trading by Insiders"** or **"Insider Trading Code."**

b. The Board of Directors of the Company had approved the original Code at its meeting held on February 6, 2018.
The Board of Directors of the Company, by passing a resolution by circulation on November 27, 2018,

has revised the Code. SEBI on 31st December, 2018 notified the Securities and Exchange Board of India (Prohibition of Insider Trading) (Amendment) Regulations, 2018 applicable w.e.f. April 01, 2019. Accordingly, the Board of Director of the Company at their meeting held on March 28, 2019 have decided to adopt a new code in place of existing code to incorporate the requirement of the Act and the PIT Regulation. This Code will supersede the provisions of the earlier Code adopted by the Board on November 27, 2018.

c. This Code is applicable to all the Designated Persons of the Company, their Immediate Relatives and other persons as mentioned herein.

4. DEFINITIONS AND INTERPRETATION

In this Code, except where the context otherwise requires, the following words and expressions shall have the following meaning.

''Act'' means the Companies Act, 2013, for the time being in force and as may be clarified, amended, reenacted from time to time.

"Board" or **"Board of Directors"** means the collective body of the Directors of the Company.

"Close Period" means the period during which the Trading Window is closed as described in this Code and as may be decided by the Compliance Officer in consultation with the Board or Managing Director time to time.

"Company" means the Shree Vasu Logistics Limited or also referred to as "SVLL".

"Compliance Officer" means any senior officer, designated so and reporting to the board of directors, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board of directors of the company**.**

Unless the Board otherwise decides, Company Secretary of the Company, or in his/her absence, CFO shall be Compliance Officer for the purpose of this Code.

"Code" means this **"SVLL - Code of conduct to regulate, monitor and report Trading by Insiders",** also referred to as **"Insider Trading Code",** in compliance with the Regulations and as amended time to time.

"Connected Person" means; (a) any person who is or has during the six months prior to the concerned act been associated with the Company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the Company or holds any position including a professional or business relationship between himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access, (b) Immediate Relative of any of the aforesaid person, (c) other person as prescribed under the PIT Regulations.

"Director" means person appointed as Director on the Board of the SVLL pursuant to the applicable provisions of

the Companies Act, 2013.

"Designated Persons" means persons covered by the code of conduct, in terms of consultation between Board of Directors and Compliance Officer, on the basis of their role and function in the Company and the access that such role and function would provide to unpublished price sensitive information in addition to seniority and professional designation and includes:-

(a) Employees of the company, intermediary or fiduciary designated on the basis of their functional role or access to unpublished price sensitive information in the organization by the board of directors or analogous body;
(b) All promoters of the Company and promoters who are individuals or investment companies for intermediaries or fiduciaries;
(c) Chief Executive Officer and employees upto two levels below Chief Executive Officer of the Company, intermediary, fiduciary irrespective of their functional role in the company or ability to have access to unpublished price sensitive information;
(d) Any support staff of the Company, intermediary or fiduciary such as IT staff or secretarial staffs who have access to unpublished price sensitive information.
(e) All Employees including trainees working in the accounts, internal audit, MIS, taxation, treasury, finance, legal and secretarial departments of the Company.
(f) Secretaries, personal assistants and persons working closely with the Managing Directors, Directors, Chief Executive Officer, Chief Operating Officer, Chief Financial Officer and Compliance Officer of the Company.
(g) Employees or other persons as may be determined by the Board or as per direction of the Board, from time to time or as may be required as per the Regulations.

The Board shall in consultation with the Compliance Officer, specify the Designated Persons to be covered by such code on the basis of their role and function in the Company.

Designated Persons also includes their respective Immediate Relatives and accordingly this Code is also applicable in relation to the Immediate Relatives of Designated Person.

"Employee" means the person employed by the Company including probationers and trainees for the purpose of this Code.

"Fiduciary/ fiduciaries" means professional firms such as auditors, accountancy firms, law firms, analysts, insolvency professional entities, consultants, banks etc., assisting or advising the Company.

"financially literate" shall mean a person who has the ability to read and understand basic financial statements i.e. balance sheet, profit and loss account, and statement of cash flows.

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

"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.

"Insider" includes (a) connected person or (b) person who is in possession of or having access to unpublished price sensitive information or (c) Any person in receipt of unpublished price sensitive information pursuant to a legitimate purpose

"Key Managerial Personnel" or "KMP" means person as defined in Section 2(51) of the Companies Act, 2013.

"Legitimate purpose" includes sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of PIT regulations.

"Managing Director" or "MD" means the Director of the Company appointed as such or Dy. Managing Director, in his absence, Executive Director or any Director designated by the Board for the purpose of this Code.

"Pre-clearance" or "Pre-clearance approval" means prior approval for Trading in the Securities of the Company.

"Unpublished price sensitive information" or **"UPSI"** means any information, relating to the Company or its securities, directly or indirectly, that is not generally available, which upon becoming generally available, is likely to materially affect the price of the Securities of the Company.

Information relating to the following shall be ordinarily deemed to be UPSI.

(i) Financial results.
(ii) Dividends.
(iii) Change in capital structure.
(iv) Mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions.
(v) Changes in key managerial personnel.

Information relating to the Company or Securities, that is not generally available would be unpublished price sensitive information if it is likely to materially affect the price upon coming into the public domain. The type of matters that would ordinarily give rise to unpublished price sensitive information has been listed above. However, the Board or Managing Director shall determine in this respect from time to time.

"Regulations" or **"PIT Regulations"** means the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended, clarified or re-enacted from time to time.

"Stock Exchange" means stock exchange where securities of the Company are listed.

"Securities" shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 or any modification thereof, which includes, *interalia*, shares, scrips, stocks, bonds, debentures, debenture stock or other marketable securities of a like nature of the Company as may be issued/allotted from time to time and derivative in Securities of the Company.

"SEBI" means Securities and Exchange Board of India constituted under SEBI Act, 1992 or similar authority.

"Trade" or **"Trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell,

deal in any Securities of the Company and "Trade" shall be construed accordingly.

"Trading Window" means period which is not a 'Close Period' for Trading in the Company's Securities or in other words, period during which the Trading Window is not closed and open for Trading in Securities.

Words and expressions used and defined and/or used but not defined in this Code shall have the same meaning assigned to them in the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations), Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and the rules and regulations made thereunder, to the extent relevant in connection with this Code, as the case may be or in any amendment thereto.

The words importing the singular include the plural and vice versa and pronouns importing a gender include each of the masculine, feminine and neuter genders and shall be interpreted in the wide sense in spirit of this Code.

In this Code, there may be used the word 'all', 'and', 'or', in singular or plural for Directors and Designated Persons, however the same shall be read as 'every' or 'individual' Director, Designated Employee and their Immediate Relatives, as may be, this Code is applicable to him or her from time to time.

5. COMPLIANCE OFFICER

The Company has appointed the Company Secretary as the Compliance Officer who shall report to the Board on the matters relating to prevention of Insider trading as specified in the Code as provided below:-

(a) The Compliance Officer shall oversee the compliance and effective implementation of this Code.

(b) The Compliance Officer shall report to the Board and shall provide report to the Chairman of the Audit Committee or Chairman of the Board in such manner and at such frequency as may be stipulated by the Board, but not less than once in a year.

(c) The Compliance Officer shall hold the position so long as he is in the employment of the Company. Till the time the Board appoint successor, the Chief Financial Officer or Head of Finance or any other Employee, as directed by the Managing Director, shall in the interim period act as the Compliance Officer, if necessary.

(d) In order to discharge functions effectively; the Compliance Officer shall be adequately empowered and provided with adequate manpower, infrastructure and support to effectively discharge the function. In the performance of his duties, the Compliance Officer shall have access to all information and documents relating to or affecting to the Securities of the Company.

(e) The Compliance Officer shall act as the focal point for dealings with SEBI and Stock Exchange in connection with all matters relating to the compliance and effective implementation of the Regulations and this Code.

(f) The Compliance Officer is authorized to delegate the functions under this Code to one or more appropriate Employees of the Company, under his overall supervision and control.

b. **DUTIES OF THE COMPLIANCE OFFICER**

The Compliance Officer shall perform the following duties in relation to the Regulations and monitoring of Trading by Insiders, under overall supervision of the Board.

(a) Compliance of policies, procedures and maintenance of records.
(b) Monitoring of trades and the implementation of this Codes.
(c) Prescribing procedures for various activities referred to in the Code.
(d) Advising to the concerned persons / department for adherence to the rules for the preservation of Price Sensitive Information.
(e) Grant of Pre-clearance approvals for dealings in the Company's Securities.
(f) Clarification and guidance as regard policies and procedures with respect to this Code.

6. **PROHIBITION ON TRADING**

No Insider shall trade in the securities of the Company that are listed or proposed to be listed on Stock Exchange when in possession of unpublished price sensitive information, except as provided in the Regulations.

When a person who has traded in securities has been in possession of unpublished price sensitive information, his trades would be presumed to have been motivated by the knowledge and awareness of such information in his possession.

7. **CONFIDENTIALITY OF PRICE SENSITIVE INFORMATION**

a. The Designated Persons shall maintain the confidentiality of all Price Sensitive Information coming in to their possession or control. To comply with this confidentiality obligation, the Designated Persons shall ensure the followings.

a) Designated Persons shall not communicate, provide, or allow access to any unpublished price sensitive information, relating to the Company or Securities listed or proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

b) Designated Persons shall not procure from or cause the communication by any insider of unpublished price sensitive information, relating to the Company or Securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

c) Not to pass on any Price Sensitive Information to any person directly or indirectly by way of making are commendation for the purchase or sale of Securities of the Company.

d) Not to communicate the Price Sensitive Information in situation in which there would be an uncertainty as regards conflict of interest or the possibility of misuse of the information.

e) Not to disclose Price Sensitive Information to their family members, friends, business associates or any other individual.

f) Not to discuss or disclose Price Sensitive Information in public places.

g) Not to disclose Price Sensitive Information to any Employee who does not need to know the information for discharging his or her duties.

Not to recommend to anyone that he/she may undertake Trading in Securities of the Company while being in possession, control or knowledge of Price Sensitive Information.

b. **Need to know**

All information shall be handled within the Company 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.

The Designated Persons, who are privy to Unpublished Price Sensitive Information, shall handle the same strictly on a "Need to Know" basis. This means the Unpublished Price Sensitive Information shall be disclosed only to those Employees within the Company who need to know the same in the course of performance or discharge of their duty and whose possession of Unpublished Price Sensitive Information will not in any manner give rise to a conflict of interest or likelihood of misuse of the information.

c. **Chinese wall procedure**

a) Limited access to confidential information and data security

The Designated Persons privy to confidential information or unpublished price sensitive information shall, in preserving such information and to prevent its wrongful dissemination, adopt among others, the following safeguards.

- Files and documents containing confidential information shall be kept secure.
- Computer files must have adequate security of login through a password.
- Hard files, papers, electronic appliances containing price sensitive information shall be kept under lock in key.
- Ensure confidentiality when printing, emailing, photocopying, scanning etc.

b) Chinese wall Procedure

The Designated Persons shall keep separate and secure all details, files, papers, electronic usages, gadgets etc. containing unpublished price sensitive information or confidential information in appropriate manner and shall not allow other Employees and person for access to the same, except to the extent necessary in discharge of his or her duties towards the Company.

8. **CLOSE PERIOD / TRADING WINDOW**

a. Other than the period for which the Trading Window is closed as prescribed hereunder, the same shall remain open for Trading in the Securities of the Company. The Compliance Officer shall intimate time to time through email or by circular on notice board or by any other appropriate means or intimation to the Stock

Exchange, if requires, about the period during which the Trading Window remain closed **("Close Period").**

Unless otherwise specified by the Compliance Officer, the Trading Window for Trading in Securities of the Company shall be closed for the following purposes:

(a) declaration of financial results (quarterly and annual)
(b) declaration of dividends (interim and final).
(c) issue of Securities by way of public, rights, bonus etc.
(d) any major expansion plans
(e) amalgamation, mergers, takeovers and buy-back.
(f) disposal of whole or substantially whole of the undertaking.
(g) any significant changes in policies, plans or operations of the Company.

The trading window shall also be closed when the Compliance Officer determines that Designated Persons or class of them can reasonably be expected to have possession of unpublished price sensitive information. Such closure may be imposed in relation to such securities to which such unpublished price sensitive information relates.

b. **Close Period for financial results**

In respect of declaration of financial results, the Trading Window shall be closed from 15 days prior to the date on which meeting of the Board is scheduled and shall be re-opened on expiry of 48 hours after the said financial result is made public or furnished to the Stock Exchange.

c. **Close Period for other matters**

As regards declaration of dividend and matters mentioned above (other than financial results), Trading Window shall remain closed from the date of issue of notice or detailed agenda for meeting of the Board of Directors for consideration of the said matters or as may be practicable and ending 48 hours after the outcome of the Board meeting is made public or becomes generally available.

When the specific task / project assigned to team of Designated Persons, which involves or relating to Price Sensitive Information, such team members shall not Trade in the Securities of the Company till the Price Sensitive Information regarding the task or project is made public or abandoned and the Trading Window would be regarded as closed for them accordingly.

d. Notwithstanding provided herein, the Compliance Officer may determine and notify about Closure Period time to time, as may be appropriate or practicable.

9. RESTRICTION ON TRADING IN SECURITIES DURING CLOSE PERIOD

All the Designated Persons including their Immediate Relatives shall strictly conduct all their Trading in the Securities of the Company only when the Trading Window is open and shall not Trade in Securities of the Company during the Closure Period or during the Trading Window is closed or during any other similar period as may be specified by the Compliance Officer from time to time.

Auditors, accounting firms, law firms, analysts and consultants assisting or advising the Company shall not

Trade in the Securities of the Company during the Trading Window is closed.

10. PRE-CLEARANCE / APPROVAL FOR TRADING IN SECURITIES

a. Every Designated Person, who intends to Trade in the Securities of the Company, while Trading Window is open, in excess of 5000 shares/securities in number or such number of securities having market value of Rs. 5,00,000, whichever is lower, in aggregate in a calendar month, shall obtain a Pre-clearance approval as per the procedure prescribed hereunder. The said Pre-clearance approval is also required for Trading in Securities by Immediate Relatives of Designated Person. The Pre-clearance approval is also required when Designated Person or his Immediate Relative is joint holder in Securities.

b. Application for Pre-clearance approval shall be made to the Compliance Officer as per the **Form 1.** In case application by the Compliance Officer, the pre-clearance approval will be addressed to the Managing Director.

c. Such application should be complete and correct in all respects and should be accompanied by such undertakings, declarations, indemnity, bonds and other documents and papers as may be required by the Compliance Officer. Such application for Pre-clearance approval with enclosures should be sent by electronic mail followed by original paper copies of all the documents or as may be directed by the Compliance Officer.

d. The Compliance Officer shall grant the approval or reject the application and communicate the same to applicant. In the absence of the Compliance Officer due to leave, out of office etc., the Employee designated by him from time to time shall discharge the said function.

e. Pre-clearance approval may be withdrawn or asked to apply for fresh or other remedial measure; if it is determined that such Trade would not be permitted under the Regulations.

f. Such Designated Person shall execute the Trade / transaction for which Pre-clearance approval has been granted, within seven days of such approval, failing which fresh pre- clearance will be required.

g. The Compliance Officer may grant such approval subject to instructions and conditions and applicant shall follow the same as may be mentioned in approval or instructed otherwise. 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.

11. CONTRA TRADE / MINIMUM HOLDING PERIOD

Irrespective of the fact that the Trading Window is open, the Designated Persons, who is permitted to Trade, shall not execute contra Trade within six months of Trading in Securities of the Company. The Compliance Officer, in consultation with the Managing Director, may grant relaxation from strict application of the said restriction, in accordance with the provision of the Regulations.

It may however, be noted that in terms of the Regulations, no such sale will be permitted when the Trading Window is closed. Application for the aforesaid relaxation shall be made to the Compliance Officer as per the **Form 2.** The Compliance Officer may ask for further indemnity, bond, confirmation, papers etc. and may decide on the application.

12. DISCLOSURE REGARDING SECURITIES UNDER THIS CODE

The Promoter, member of the promoter group, Key Managerial Personnel, Designated Persons, and Directors of the Company shall be required to submit to the Compliance Officer following disclosures in respect of the Trading and/or holding of the Securities by them and their respective Immediate Relatives.

a. Initial Disclosure

Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a promoter or member of the promoter group shall disclose in the **Form 3**, the number of Securities of the Company held by him/her and his/her Immediate Relatives, **within 7 days** of joining the Company or becoming Designated Employee or promoter or member of the promoter group.

b. Continual Disclosure

Every promoter, member of the promoter group, designated person and director of company shall disclose to the company the number of such securities acquired or disposed of **within 2 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;

c. Disclosure by other Employees /Persons

The Board of the Company may, at its discretion, require any other connected person or class of connected persons to make disclosures of holdings and Trading in securities of the Company in such form and at such frequency as may be determined in order to monitor compliance with the Regulations.

The Board of the Company may, at its discretion, require any Employee or class of Employees or any other person or associates to make disclosures of holdings and Trading in Securities of the Company in such form and at such frequency as may be determined.

d. Disclosures by Company to Stock Exchange

The Company shall notify the particulars of trading by promoter, member of the promoter group, designated person and director of company 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, 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.

13. TRADING PLAN

PIT Regulations entitles the insider to formulate a trading plan. If any Insider / Designated Person wish to formulate trading plan for Trading in securities of the Company, he may do so and present it to the Compliance officer. Trading plan is optional. However, if any Insider opts for Trading Plan, same need to be as per strict provisions of the PIT Regulations and other applicable law. Trading plan need to be approved by Compliance Officer and disclosed to the Stock Exchange. Once Trading plan is approved, it becomes irrevocable.

The compliance officer shall review the trading plan to assess whether the plan would have any potential for violation of these regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.

14. LEAK OF UNPUBLISHED PRICE SENSITIVE INFORMATION

In cases of leak or suspected leak of unpublished price sensitive information, the Compliance Officer or any other analogous body as may be authorized by the Board, shall conduct the inquiry to determine the possible role of every person who had access to information which was leaked. This includes persons/members of committees, those consolidating results, people preparing board notes and presentations, besides the persons involved in disseminating the information. The Company may ask for relevant information or even conduct inquiry upon the relevant intermediaries and fiduciaries, who shall co-operate with the company in connection with such inquiry.

The Compliance Officer shall, accordingly submit a report to the Board of Directors on the inquiry, present systems, processes and controls, the manner in which these would be strengthened besides details of persons manning these systems and the periodicity of monitoring.

The Company shall promptly inform the Securities and exchange Board of India, of such leaks, inquiries and results of such inquiries.

15. PENALTY FOR CONTRAVENTION

Every Designated Person shall be individually responsible for complying with the provisions of this Code (including to the extent the provisions here of are applicable to his/her Immediate Relatives).

The Designated Person who violate this Code shall, in addition to any other penal action that may be taken by the Company pursuant to law, also be subject to disciplinary action including the termination of employment, suspension, wage freeze, recovery, claw back of remuneration paid, non-participation in future employees stock options or any other appropriate action as may be imposed by the Board.

If any non-adherence is observed, the Compliance Officer shall cause an internal enquiry and if non-compliance is established, he shall report the same to the Managing Director and after further inquiry or direction, the Managing Director will decide further course of actions including report to the Board.

In case of any non-observance of this Code by any Director, the same shall be decided by the Board.

Action taken by the Company for violation of this Code against any Designated Person will not preclude the SEBI from taking any action for violation of the Regulations or any other applicable laws, rules, directions etc. Accordingly, in addition to the action taken by the Board, the person violating this Code and the Regulations will also be subject to action by SEBI.

In case the Board of the Company observed and determined that there has been violation of this Code and the Regulations, it is mandatory for the Board to inform the SEBI about such violation, as per the Regulations.

As per the present provision of section 15G of the SEBI Act, any Insider who indulges in insider trading in

contravention of the Regulations is liable to a penalty of Rs. 25 crores or three times the amount of profits made out of insider trading, whichever is higher. As per section 24 of the SEBI Act, anyone who contravenes the Regulations is punishable with imprisonment for a maximum period of ten years or with fine which may extend to Rs. 25 crores or with both.

16. **CLARIFICATIONS, AMENDMENT ETC**

a. This Code is one of the measures to prevent, regulate, monitor and report Trading by Insiders. This has been framed in accordance with the SEBI (Prohibitions of Insider Trading) Regulations 2015. Compliance, restrictions, disclosures etc. under this Code is in addition to the Regulations and/or other applicable law as may be applicable to Designated Persons/ Insiders. In case of any amendment in the Regulations, direction or clarification by SEBI, provision of this Code shall be read and implemented in context of such amended or clarified positions.

b. In case of any technical and practical difficulties in implementing this Code, the Compliance Officer is authorized to issue clarification as may be practicable or necessary to implement this Code.

c. This Code, in part or whole, may be implemented through safe and secure web, by electronically or online transmission system or appropriate digitized manner, as and when it may be decided in consultation with IT department or service provider. In such case the Forms and implementation of this Code may be modified to the extent necessary as may be decided by the Compliance Officer. Head of IT Department and service provider shall ensure about the proper and smooth functioning and regularly monitor the same.

d. Wherever provision of the Regulations are referred or briefed in this Code, the same is for reference and understanding purpose and one should refer the detailed and exact provision in the Regulations as amended from time to time.

e. Whenever there is any decision or power to exercise by the Board under this Code and if there is no Board meeting is expected in near future, the Compliance Officer in consultation with Managing Director may take appropriate steps or decision for intermittent period.

f. The Board or Managing Director may constitute a committee of Directors and / or Employees to discharge the functions of the Compliance Officer.

g. This Code may be modified, amended or substituted by the Board of the Company.

h. Human Resource Department of the Company shall inform to the Compliance Officer about the Employees at such level as may be decided, joined the Company or ceased, time to time, or such other category of Employees as may be determined, to maintain and update details of the Designated Persons.

FORM 1

"SVLL - Code of conduct to regulate, monitor and report Trading by Insiders"

To, Date:_____

The Compliance Officer

Shree Vasu Logistics Limited

Sub.: Application for Pre-clearance approval to Trade in Securities of the Company

I,_____, seek Pre-clearance approval to Trade in the below mentioned Securities of the Company in my own name or Immediate Relative, pursuant to the "SVLL - Code of conduct to regulate, monitor and report Trading by Insiders"

Director	Designated Person	Immediate Relatives	Others

Types of Security	Number of Securities	Mode of Trading i.e. purchase, sale or other	Folio / DP ID & Client ID where Securities will be credited or / debited	Holding of Securities after the Trading	Name of the proposed buyer or seller, for **off market** Trade

UNDERTAKING CUM DECLARATION

In relation to this application for Pre-clearance approval, I hereby declare and undertake that:

(a) I have no access to nor do I have any information that could be construed as Unpublished Price Sensitive Information of the Company as defined in the Code up to the time of signing this undertaking;

(b) In the event that I have access to or received any information that could be construed as Unpublished Price Sensitive Information, after signing of this undertaking but before executing the Trade / transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from Trading in the Securities of the Company until such information becomes public;

(c) I have not contravened the provisions of the above mentioned Code as amended time to time; I undertake to follow instructions received from Compliance Officer or the Board.

(d) I have made full and true disclosure in the matter and I have complied and shall comply with the provision of the Code as may be applicable, time to time.

(e) I shall indemnify the Company, its Directors and Compliance Officer from and against any penalties imposed by the SEBI or other authorities as a result of the violation of the above Code by me.

Full Name		Signature	
Designation		Mobile	
Department		ID Number	

FORM 2

"SVLL - Code of conduct to regulate, monitor and report Trading by Insiders"

To, Date: _____

The Compliance Officer

Shree Vasu Logistics Limited

Application to grant relaxation from strict restriction relating to Contra Trade

Dear Sir,

I held the below mentioned Securities of the Company. I have traded in the Securities latest on_____for buy/sell of_____ Securities / Shares, in respect of which the minimum period of 6 months for Contra Trade in terms of the "SVLL - Code of conduct to regulate, monitor and report Trading by Insiders", has not elapsed.

Types of Security	Folio / DP ID & Client ID	Number of Securities held	Mode of acquisition i.e. purchased or other mode	Date of acquisition	Number of Securities intend to sale / Trade

I desire to sell/Trade the Securities in a manner and because of reason / personal emergency as given below.

In view of the above, I request you to grant me relaxation.

In relation to this request, I hereby declare and undertake that I have made full and true disclosure in the matter and I have complied with the above mentioned Code.

Full Name		Signature	
Designation		Mobile	
Department		ID Number	

ORDER
Relaxation granted / not granted / remark Signature: Date: Name of Compliance Officer: _____

FORM 3

Disclosures of Securities held by Designated Persons and Immediate Relatives

"SVLL - Code of conduct to regulate, monitor and report Trading by Insiders"

To, Date:

The Compliance Officer

Shree Vasu Logistics Limited

Sub.: Initial disclosure of Securities of the Company

Dear Sir,

Pursuant to the "SVLL - Code of conduct to regulate, monitor and report Trading by Insiders", I hereby declare holding of Securities by me and my Immediate Relatives.

Name		Designated Person		Director

Securities held by Director / Designated Person					
*Name of holders	Types of Security	Securities in Demat		Securities in physical	
		DP & Client ID	No. of securities	Folio	No. of securities

* In case of joint holders, first holder needs to be mentioned first and then joint holders.

Securities held by Immediate Relatives				
Name of Immediate Relatives	Relationship	Types of Security	No. of Securities held	Folio No. / DP ID and client ID

I hereby declare that the above details are true, correct and complete.

Full Name : _____ Signature: _____

Designation: _____ Mobile: _____

Department: _____ ID Number: _____

Note: This form duly filed in and signed shall be submitted within 7 days of joining.