Datamatics Global Services Limited

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DATAMATICS®
Next-Generation Solutions

May 27, 2015

To,
Corporate Communication Department
The Bombay Stock Exchange Limited
Phiroze Jeejeeboy Towers
Dalal Street, Mumbai - 400 001

Listing Department
The National Stock Exchange of India Limited
Exchange Plaza, Bandra Kurla Complex,
Bandra (East) Mumbai 400 051

Sub: Code of Fair Disclosure and Conduct for Regulating, Monitoring and Reporting of Trading by Insiders
BSE Scrip Code: 532528 | NSE Code: DATAMATICS

Dear Sir/Madam,

This is to inform you that the Board of Directors of the Company has formulated and adopted the "Code of fair disclosure, internal procedures and conduct for regulating, monitoring and reporting of trading by insiders" as per Regulation 8 and 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015 in its meeting held on May 27, 2015 and the same has been uploaded on the website of the Company. Please find attached "Code of Fair Disclosure, Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading by Insiders."

Kindly take the above on your record.

Thanking you.
For **Datamatics Global Services Limited**

Divya Kumat
Sr. VP - Legal
& Company Secretary

DATAMATICS GLOBAL SERVICES LIMITED ★ MUMBAI

Encl.: - As above

CODE OF FAIR DISCLOSURE, INTERNAL PROCEDURES AND CONDUCT FOR REGULATING, MONITORING AND REPORTING OF TRADING BY INSIDERS

The Policy and Obligations: -

Datamatics Global Services Limited (hereinafter referred to as the Company) is committed to transparency and fairness and strives to preserve the confidentiality of unpublished price sensitive information and prevent misuse of the same. The Company believes that every director, officer including promoter, person who is a part of the promoter group, and designated employee has a duty to safeguard the confidentiality of all such information obtained in the course of his or her work at the company. No promoter, person who is part of the promoter group, director, designated employee may use his or her position or knowledge of the Company to gain personal benefit or to provide benefit to any third party.

To achieve these objectives, the Company hereby notifies that this code of fair disclosure, internal procedures and conduct for regulating, monitoring and reporting of trading by designated employees and connected persons. This code has been framed under the SEBI (Prohibition of Insider Trading) Regulations, 2015 which has also been approved by the Board of Directors in their meeting held on May 27, 2015.

CHAPTER A - Definitions

'Act' means the Securities and Exchange Board of India Act, 1992 including any statutory modifications or re-enactment thereof.

'Board' means the Board of Directors of the Company.

'Company' means Datamatics Global Services Limited.

'Compliance Officer' means the officer as appointed by the board as "Compliance Officer" or the Officer appointed by the Board of Directors of the Company, 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.

'Connected Persons' means

1. any person who is or has been associated with a Company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the Company or holds any position including a professional or business relationship between himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.

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2. Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless contrary is established,

   a) an immediate relative of connected person specified in clause 1;

   b) a holding company or associate company or subsidiary company(ies);

   c) an intermediary as specified in section 12 of the Act or an employee or director thereof;

   d) an investment company, trustee company, asset management company or an employee or director thereof;

   e) an official of a stock exchange or of clearing house or corporation; or

   f) a member of board of trustees of a mutual fund or a member of the Board of Directors of the asset management company of a mutual fund or is an employee thereof; or

   g) a member of the Board of Directors or an employee, of a public financial institution as defined in section 2(72) of the Companies Act, 2013; or

   h) an official or an employee of a self-regulatory organization recognized or authorized by the Board; or

   i) a banker of the Company; or

   j) a concern, firm, trust, Hindu Undivided Family, company or association of persons wherein a director of a Company or his immediate relative or banker of the Company, has more than 10% of the holding or interest.

   Connected Person shall mean any person who is a connected person six months prior to an act of insider trading.

'Dealing in Securities' means subscribing, buying, selling or agreeing to subscribe, buy, sell or deal in any securities either as principal or agent ;

'Designated Employees' shall mean:

(i) All employees directly reporting to the Vice Chairman & CEO irrespective of their grade.
(ii) Officers comprising top three tiers of the Company Management i.e. from Grade M11 and above.
(iii) Senior Employees of the Company's wholly owned subsidiaries worldwide of the rank Vice President and above.
(iv) All Functional Heads.
(v) All employees in Finance, Accounts, Legal and Secretarial Department.
(vi) Executive Secretaries and Personal Secretaries of the Executive Directors and/or of the Employees in Grade M11 and above;
(vii) Company Secretary; and
(viii) Such other employees who are likely to have access to price sensitive information.

'**Designated Person(s)**' means all Designated Employees and other Connected Persons.

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'**Director**' means a member of the Board of Directors of the Company.

'**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 in taking decisions relating to trading in securities;

'**Insider**' means any person who,

(i) is a connected person;
(ii) is in possession of or having access to such unpublished price sensitive information.

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

'**Promoter**' shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof;

'**Securities**' shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any other modification thereof except units of a mutual fund;

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

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

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

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

1. periodical financial results of the company;
2. intended declaration of dividends (both interim and final);
3. change in capital structure;
4. issue of securities or buy-back of securities;
5. mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
6. change in key managerial personnel;
7. disposal of the whole or substantial part of the undertaking;
8. disruption of operations due to natural calamities;
9. material events in accordance with the listing agreement.

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

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'Prohibited Period' means;

1. Period 15 days previous to the day on which the Board of Directors are to consider any price sensitive information or from the date of circulation of agenda papers pertaining to the subject referred above, whichever is longer and ending after 2 hours from the time the Price Sensitive information is made public.
2. Such other period as may be specified by the Compliance Officer from time to time in consultation with the Managing Director/CEO.

'Free Period' means any Period other than the Prohibited Period.

Words and expressions used and not defined in these Regulations but defined in the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956 and the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation.

Words denoting the feminine gender shall include the masculine gender and neuter gender;

CHAPTER B

1. COMPLIANCE OFFICER

The Company has appointed Ms. Divya Kumat as the compliance officer who shall report to the Managing Director/CEO of the Company for the purpose this policy.

1.1 Duties of Compliance Officer

1. She shall maintain a record of designated employees and any changes made thereto.
2. She may in consultation with the Managing Director/CEO and shall as directed by the Board, specify Prohibited Period from time to time and immediately make an announcement thereof.
3. She shall maintain a record of Prohibited Period specified from time to time.
4. She shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of 'Unpublished Price Sensitive Information', 'pre-clearing of Designated Employees' and their immediate relative's trades, monitoring of trades and the implementation of this Code under the overall supervision of the Board of the Company.
5. She shall place before the Managing Director/CEO, on quarterly basis all the details of the dealing in the Securities by Promoters, Person who are part of the promoter group, Designated Employees, Directors of the Company and the accompanying documents that such persons have executed under the pre-dealing procedure as envisaged in these rules.
6. She shall from time to time inform the Stock Exchanges of any price sensitive information on immediate basis.

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7. She shall be responsible for overseeing and co-ordinating disclosure of price sensitive information to Stock Exchanges, analysts, shareholders and media and educating staff on disclosure policies and procedure and report to the Managing Director/CEO.
8. She shall ensure that prohibited period is intimated to all concerned at least 48 hours before the commencement of the said period.
9. She shall report on the compliance and implementation of the regulations and the Code to the Board and in particular, shall provide reports to the Chairman of the Audit Committee, if any, or the Chairman of the Board as and when directed by the Board or Audit Committee.
10. She shall assist all employees in addressing any clarifications regarding the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct.
11. She shall inform SEBI of any violation of SEBI (Prohibition of Insider Trading) Regulations, 2015 within 7 days of knowledge of violation.

2. PRESERVATION OF "UNPUBLISHED PRICE SENSITIVE INFORMATION"

Designated Persons shall maintain the confidentiality of all Unpublished Price Sensitive Information. They shall not pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sale of Securities. Following practices should be followed in this regard.

2.1 Need to Know

Unpublished Price Sensitive Information is to be handled on a "need to know" basis, i.e., price sensitive information should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of information. All non-public information directly received by an employee should immediately be reported to the head of the Department / Compliance Officer.

2.2 Limited access to confidential information

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and pass word, etc. Files containing confidential information should be deleted / destroyed after its use. Shredder should be used for the destruction of physical files.

3. PROHIBITION ON DEALING, COMMUNICATING OR COUNSELING ON MATTERS RELATING TO INSIDER TRADING

No Insider including promoter, person who is a part of promoter group, director, officer designated employee or connected persons shall –

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a) either on his own behalf, or on behalf of any other person, deal in Securities of the Company when in the possession of any Unpublished Price Sensitive Information;

b) communicate, counsel or procure, directly or indirectly any Unpublished Price Sensitive Information to any person. However these restrictions shall not be applicable to any communication required in the ordinary course of business or under any law.

4. TRADING RESTRICTIONS

Designated Persons shall be subject to trading restrictions as enumerated below:-

4.1 Trading Window

The period prior to declaration of price sensitive information is particularly sensitive for transactions in the Company's Securities. This sensitivity is due to the fact that the Designated Persons will during that period often possess Unpublished Price Sensitive Information to the exclusion of others. During such sensitive times, the Designated Persons will have to forego the opportunity of trading in the Company's Securities. The Designated Persons shall not deal in the securities of the Company when the trading window is closed. The Trading Window shall be closed when the Compliance Officer determines that a Designated Person or any class of Designated Persons can reasonably be expected to have possession of Unpublished Price Sensitive Information.

4.2 The trading window shall be, inter alia, closed at the time of:-

1. periodical financial results of the company;
2. intended declaration of dividends (both interim and final);
3. change in capital structure;
4. issue of securities or buy-back of securities;
5. mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
6. change in key managerial personnel;
7. disposal of the whole or substantial part of the undertaking;
8. disruption of operations due to natural calamities;
9. material events in accordance with the listing agreement.

4.3 Period of closure

The period of closure **"Prohibited Period"** shall be effective from 15 days prior to the date on which the meeting of the Board of Directors is proposed to be held or from the date of circulation of agenda papers pertaining to the subject referred above, which is any event shall not be earlier than forty-eight hours after the information is Generally Available Information.

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4.4 The Prohibited Period in case of declaration of financial results shall be as under:

Nature of financial results	Date of declaration	Commencement of Prohibited Period
Unaudited Results for the first quarter	On August 14	30th July
Unaudited Results for the second quarter/Half year	On November 14	30th October
Unaudited Results for the third quarter	On February 14	30th January
Audited Results for the financial year	On May 30	12th May

4.5 The trading window shall be opened 48 hours after the information referred in 4.2 becomes Generally Available Information.

4.6 Designated Persons and any other person having contractual or fiduciary relation with the Company, such as Auditors, accountancy firms, law firms, analysts, consultants, etc. assisting and advising the Company shall conduct their dealings in the securities of the Company only during the free period and shall not deal in any transaction involving the purchase or sale of the Company's securities during the prohibited periods or during any other period as may be specified by the Company from time to time.

4.7 In case of ESOPs, Designated Employees can exercise their options during the period when the trading window is closed. However, they cannot sale those shares during the closure of the trading window.

5. PRE-CLEARANCE OF TRADES AND PRE-DEALING PROCEDURE

5.1 All Designated Persons, who intend to deal in the securities of the Company in excess of 5,000 equity shares in number shall pre-clear the transaction as per the pre-dealing procedure as described hereunder.

5.2 An application for pre-clearance of trade may be made in prescribed form to the Compliance Officer. An undertaking shall be executed in favour of the Company by such Designated Persons incorporating, inter alia, the following clauses, as may be applicable:

5.2.1 That the promoter/person who is a part of promoter group/employee/director/connected person does not have any access or has not received "price sensitive information" up to the time of signing the undertaking.

5.2.2 That in case the Promoter, Person who is a part of the promoter group, Designated Employee, Director, Connected Person has access to or receives "Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction he or she shall inform the Compliance officer of the change in his position and that he or she would completely refrain from

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dealing in the securities of the Company till the time such information becomes public.

5.2.3 That he or she has not contravened the code of conduct for prevention of insider trading as notified by the company from time to time.

5.2.4 That he or she has made a full and true disclosure in the matter.

5.3 The Compliance Officer shall on receiving an application provide the Promoters, Persons who are part of the promoter group, Director, Insider, Connected Person, Designated Employee with an acknowledgement on the duplicate of the application. The Compliance Officer shall grant approval within 2 working days from the date of acknowledgement. The Compliance Officer shall retain copies of all applications and acknowledgements. In exceptional circumstances consent may not be given if the Compliance officer is of the opinion that the proposed deal is on the basis of possession of any Unpublished Price Sensitive Information. There shall be no obligation to give reasons for any withholding of consent. If so requested by the Compliance Officer, Promoter, Persons who are part of the promoter group, Director, Insider, Connected Person, Designated Employees must ensure that his stockbroker is authorised to disclose to the Company all matters relevant to his share dealings.

5.4 Other restrictions

5.4.1 All Designated Persons and Insiders shall execute their order in respect of securities of the Company within one week after the approval of pre-clearance is given. If the order is not executed within one week after the approval is given, the Designated Persons and Insiders must pre clear the transaction again.

5.4.2 All Designated Persons who buy or sell any number of Securities shall not enter into an opposite transaction i.e. sell or buy ay number of Securities during the next six months, following the prior transaction. All Designated Persons shall also not take positions in derivative transactions in the Securities at any time. In case of a contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund administered by the SEBI under the Act.

5.4.3 In case the sale of securities is necessitated by personal emergency, the compliance officer may waive the holding period after recording in writing his or her reasons in this regard. An application for waiver of holding period shall be made to the Compliance Officer in prescribed form. However, no such sale is permitted when the Trading window is closed.

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6. TRADING PLAN

6.1 An Insider shall be entitled to formulate a trading plan for dealing in securities of the Company and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.

6.2 Trading Plan shall:

i) not entail commencement of trading on behalf of the Insider earlier than six months from the public disclosure of the plan;
ii) not entail trading for the period between the twentieth day prior to the last day of financial period for which results are required to be announced by the issuer of the securities and the second trading day after the disclosure of such financial results;
iii) entail trading for a period of not less than twelve months;
iv) not entail overlap of any period for which another trading plan is already in existence;
v) set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
vi) not entail trading in securities for market abuse.

6.3 The Compliance Officer shall review the trading plan made as above and to approve it. He/She shall be entitled to seek express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per the provisions of the Regulations.

6.4 The trading plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in securities outside the scope of trading plan.

However, the implementation of the trading plan shall not be commenced if any Unpublished Price Sensitive Information in possession of the Insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation and in such cases the Compliance officer shall confirm that the commencement of the Plan shall be deferred until such Unpublished Price Sensitive Information becomes generally available information. Moreover, the Insider shall also not be allowed to deal in securities of the Company, if the date of trading in securities of the Company, as per approved Trading Plan, coincides with the date of prohibited period announced by the Compliance Officer.

6.5 Upon approval of the Trading Plan, the Compliance Officer shall notify the plan to the stock exchanges on which the Securities are listed.

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7. REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES

7.1 Initial Disclosures

Existing every Promoter, Person who is a part of the promoter group, Director and Key Managerial personnel of the Company shall disclose to the Company, in **Form A**, the number of shares in the Company presently held by him/her and their immediate relatives within thirty days of these regulations taking effect.

Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter shall disclose to the Company, in **'Form B'**, his/her holding of securities of the Company as on the date of appointment or becoming a Promoter, to the Company within seven days of such appointment or becoming a Promoter.

7.2 Continual Disclosures

Every Promoter, Persons who are part of the promoter group, Directors, Designated Employees of the Company shall disclose to the Compliance Officer the number of such Securities of the Company acquired or disposed of by him/her or his/her Immediate Relatives 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 Rupees Ten Lakhs. The disclosure shall be made in **'Form C'.**

a) the receipt of intimation of allotment of securities, or

b) the acquisition or sale of shares or voting rights, as the case may be.

7.3 Disclosure by the Company to the Stock Exchanges

Within 2 trading days of the receipt of the information under Clause 7.2, the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received.

7.4 Other Disclosures

7.4.1 All designated Employees of the Company shall be required to forward details of their securities transactions including the statement of immediate relatives to the Compliance Officer in **Form 'D'.**

7.4.2 Annual Disclosures

All Promoters, Persons who are part of the promoter group, Directors, Designated Employees dealing in the Securities of the Company shall be required to forward details of their Securities transactions including the holdings of immediate relatives in **Form 'E'** as on March 31 of each year, before April 30 of that year to the Compliance officer.

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7.5 Records of disclosures received by the Company

The Compliance officer shall maintain records of all the disclosures in the appropriate form given by the Promoters, Persons who are part of the promoter group, Directors, Officers, Designated Employees for a minimum period of five years.

8. PENALTY FOR CONTRAVENTION OF CODE OF CONDUCT

Any Promoter, Person who is part of the promoter group, Director, Officer, Designated Employee who trades in securities or communicates any information for trading in securities, in contravention of the code of conduct may be penalised and appropriate action may be taken by the Company. Promoters, Persons who are part of the promoter group, Directors, Officers, Designated Employees of the Company who violate this Code of Conduct shall also be subject to disciplinary action by the Company, which may include wage, salary freeze, suspension, withholding of promotions, ineligible for future participation in employee stock option plan etc.

The action by the Company shall not preclude SEBI from taking any action in case of violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

9. CODE OF FAIR DISCLOSURE

The Company, any Promoter, Person who is part of the promoter group, the members of the Board, Designated employees and connected persons shall adhere to the following principles of fair disclosure of Unpublished Price Sensitive Information:

8.1 Prompt public disclosure of 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.

8.2 Uniform and universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure.

8.3 Designation of a senior officer as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.

8.4 Prompt dissemination of Unpublished Price Sensitive Information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

8.5 Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.

8.6 Ensuring that information shared with analysts and research personnel is not Unpublished Price Sensitive Information.

8.7 Developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the website to ensure official confirmation and documentation of disclosures made.

8.8 Handling of all Unpublished Price Sensitive Information on a need-to-know basis.

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DATAMATICS GLOBAL SERVICES LIMITED MUMBAI

APPLICATION FOR PRE-CLEARANCE OF TRADE
(In terms of Clause 5.2 of the Code)

To,
The Compliance Officer
Datamatics Global Services Limited
Knowledge Centre, Plot No. 58, Street No. 17,
MIDC, Andheri (East), Mumbai – 400 093

1	Name of the applicant	
2	Designation & Department	
3	Number of securities in the Company held as on date	
4	The Proposal is for: (a) Acquisition in the open market (b) Subscription to the securities (c) Sale of securities	
5	Proposed date of dealing in securities	
6	Estimated number of securities proposed to be acquired / subscribed / sold:	

In relation to the above Dealing, I undertake that: -

a. I have no access to nor do I have any information that could be construed as *"Price Sensitive Information"* as defined in the Code upto the time of signing this undertaking;

b. In the event that I have access to or received any information that could be construed as "Price Sensitive Information" as defined in the Code, after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public;

c. I have not contravened the provisions of the code of conduct for prevention of insider trading as notified by the Company from time to time;

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

e. I hereby declare that I shall execute my order in respect of securities of the Company within one week after the approval of pre-clearance is given. If the order is not executed within one week after the approval is given, I undertake to obtain pre-clearance for the transaction again.

Signature _____

Name _____

Date _____

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Datamatics Global Services Limited

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PRE-CLEARANCE ORDER

Mr.

Approval No.
Date

This is to inform you that your request for dealing in _____ (_____) shares of the Company as mentioned in your abovementioned application is approved/not approved.

Please note that the said transaction must be completed on or before _____ that is within one week from today.

For **Datamatics Global Services Limited**

Compliance Officer

CONFIRMATION OF DEAL

To,
The Compliance Officer

I confirm that the share dealing for which approval was granted on _____ was completed on _____to purchasing/selling _____ (numbers) equity shares of the Company.

Signature _____

Name _____

Date _____

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APPLICATION FOR WAIVER OF MINIMUM HOLDING PERIOD
(In terms of Clause 5.4.3 of the Code)

The Compliance Officer

Date: _____

Dear Sir,

I request you to grant me waiver of the minimum holding period of 30 days as required under the Code of Conduct for prevention of insider trading with respect to _____ shares of the Company held by me / _____ (name of relative) singly / jointly acquired by me/us on _____ (Date). I desire to deal in the said shares on account of _____ (give reasons).

Thanking you,

Yours faithfully

Signature
Name
Date

WAIVER OF MINIMUM HOLDING PERIOD ORDER

Approval No. _____
Date _____

This is to inform you that your request for waiver of minimum holding period with respect to _____ shares of the Company held by _____acquired by you on _____ (Date) is accepted / rejected.

For **Datamatics Global Services Limited**

Compliance Officer

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FORM A

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

[Regulation 7 (1) (a) read with Regulation 6 (2)]

Name of the company: _____

ISIN of the company: _____

Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relatives/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding	Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option Contracts held as on the date of regulation coming into force	
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	6		7	

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

Signature:

Designation:

Date:

Place:

DATAMATICS GLOBAL SERVICES LIMITED ★ MUMBAI

FORM B

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

[Regulation 7 (1) (b) read with Regulation 6(2)]

Name of the company: _____

ISIN of the company: _____

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

Name, PAN No., CIN/DIN & Address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relatives/others etc.)	Date of appointment of Director /KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP		% of Shareholding	Open Interest of the Future contracts held at the time of becoming Promoter/appointment of Director/KMP		Open Interest of the Option Contracts held at the time of becoming Promoter/appointment of Director/KMP	
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	5	6		7	

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

Signature:

Designation:

Date:

Place:

DATAMATICS GLOBAL SERVICES LIMITED ★ MUMBAI

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FORM C

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

[Regulation 7 (2) read with Regulation 6(2)]

Name of the company: _____

ISIN of the company: _____

Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN No., CIN/DIN, & address of Promoter/ Employee / Director with contact nos.	Category of Person (Promoters/ KMP / Directors/ immediate relatives/ others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed		% of shareholding		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition (market purchase/public rights/ preferential offer / off market/ Inter-se transfer etc.	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
												Buy		Sell		
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Pre transaction	Post transaction	From	To			Value	Number of units (contracts * lot size)	Value	Number of units (contracts * lot size)	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

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

Signature:

Designation:

Date:

Place:

DATAMATICS GLOBAL SERVICES LIMITED ★ MUMBAI

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Form D (Indicative format)

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

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

Name, PAN No., CIN/DIN & address of connected persons, as identified by the company with contact nos.	Connection with company)	Securities held prior to acquisition/disposal		Securities acquired/Disposed		% of shareholding		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition (market purchase/public/ rights/ preferential offer / off market/ Inter-se transfer etc.)	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Pre transaction	Post transaction	From	To			Buy		Sell		
												Value	Number of units (contracts * lot size)	Value	Number of units (contracts * lot size)	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

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

Name:

Signature:

Date:

Place:

DATAMATICS GLOBAL SERVICES LIMITED ★ MUMBAI

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Datamatics Global Services Limited

DATAMATICS

Form 'E'
ANNUAL DISCLOSURE

To
The Compliance Officer
Disclosure for the year ended 31st March _____

I. **Statement of Shareholdings of Directors, Designated Employees and Key Managerial Personnel:**

1	Name	
2	Designation & Department	
3	No. of Shares held on 1st April _____	
4	No. of Shares Bought during the year	
5	No. of Shares sold during the year	
6	No. of shares held on 31st March _____	

II. **Details of Shares held by Immediate relatives:**

1	Name of Immediate relatives	
2	Relationship	
3	No. of shares held on 1st April _____	
4	No. of shares bought during the year	
5	No. of shares sold during the year	
6	No. of shares held on 31st March ____	

I declare that I have complied with the requirement of the minimum holding period of 30 days with respect to the Shares sold except in respect of _____ shares for which waiver of the minimum holding period was granted to me on _____ (Date).

I/we further declare that the above disclosure is true and correct and is in accordance with the previous disclosures given to the Company.

Signature _____

Name _____

Date _____

DATAMATICS GLOBAL SERVICES LIMITED ★ MUMBAI