



MAXWELL INDUSTRIES LIMITED

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

[Pursuant to Regulation 9(1) of the
SEBI (Prohibition of Insider Trading)
Regulations, 2015 as amended]

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INTRODUCTION

Chapter IV Regulation 9(1) read with Schedule B of SEBI (Prohibition of Insider Trading Regulations, 2015 provides that the board of directors of every listed company shall formulate a code of conduct for regulating, monitoring and reporting of trading by its employees and other connected persons towards achieving compliance with the said Regulations.

To comply with the SEBI (Prohibition of Insider Trading) Regulations, 2015, Maxwell Industries Limited has framed this code of conduct in line of the Companies Act, 2013 and SEBI (Prohibition of Insider Trading) Regulations, 2015, and the same has been adopted by the Board of Directors of the Company at its meeting held on May 30, 2015 and shall come into force with effect from May 15, 2015.

1. DEFINITIONS

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

2.2 **"Board"** means the Securities and Exchange Board of India.

2.3 **"Code "** means this code of conduct to regulate, monitor and report trading by insiders

2.4 **"Company"** means Maxwell Industries Limited.

2.5 **"Compliance Officer"** means the Company Secretary of the Company or such senior officer, designated so and reporting to the Board of directors or head of the organization in case board is not there, 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these Regulations under the overall supervision of the board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 listed company or the head of an organization, as the case may be.

2.6 **"Connected Person"** means

- i. any person who is or has during the six months prior to the concerned act been associated with a company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the company or holds any position including a professional or business relationship between himself and the company

whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.

- ii. Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established, -
- (a) an immediate relative of connected persons specified in clause (i);
 - (b) a holding company or associate company or subsidiary company; or
 - (c) an intermediary as specified in section 12 of the Act or an employee or director thereof; or
 - (d) an investment company, trustee company, asset management company or an employee or director thereof; or
 - (e) an official of a stock exchange or of clearing house or corporation; or
 - (f) a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
 - (g) a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
 - (h) an official or an employee of a self-regulatory organization 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 ten per cent of the holding or interest.

2.7 “Dealing in Securities” means Trading in securities, pledging of securities, counseling about procuring or communicating directly or indirectly any non-public price-sensitive information to any person;

2.8 “Designated Employees” shall include:

- (i) All Directors of the Company and immediate relatives of the Directors;
- (ii) Key Managerial Personnel;
- (iii) all functional heads;
- (iv) Every employee in finance, accounts, secretarial and legal department and immediate relatives of all these employees as may be determined and informed by the Compliance Officer;
- (v) Any other employee as may be determined and informed by the Compliance Officer from time to time.

2.9 “Immediate relative” means a spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities.

- 2.10 **"Generally available information"** means information that is accessible to the public on a non-discriminatory basis;
- 2.11 **"Insider"** means any person who is:
i) a connected person; or
ii) in possession of or having access to unpublished price sensitive information.
- 2.12 **"Regulation"** shall mean Securities and Exchange Board Of India(Prohibition of Insider Trading) Regulations, 2015
- 2.13 **"Securities"** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund.
- 2.14 **"Stock Exchange"** shall mean a stock exchange in which the shares of the Company are listed
- 2.15 **"Takeover Regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto
- 2.16 **"Trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly.
- 2.17 **"Trading day"** means a day on which the recognized stock exchanges are open for trading.
- 2.18 **"Trading Window"** means the period, which is not a 'Close Period' for trading or dealing in the Company's Securities.
- 2.19 **"Unpublished Price Sensitive Information"** 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 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, delisting, disposals and expansion of business and such other transactions;
(v) changes in key managerial personnel; and
(vi) material events in accordance with the listing agreement.

2.20 Words and expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made there under shall have the meanings respectively assigned to them in those legislation.

3 COMPLIANCE OFFICER

The Company Secretary of the Company shall be the Compliance Officer for the purpose of this Code and will report to the Board of Directors of the Company. In the absence of the Company Secretary, any other person as may be designated by the Board of Directors shall act as the Compliance Officer for the purpose of this Code.

Role of the Compliance Officer:

- a. The Compliance Officer shall be responsible for prescribing the policies and procedures for various activities referred to in the Code
- b. Monitoring adherence to the rules for the preservation of Price Sensitive Information, pre-clearing of all Designated Employees proposed Dealings
- c. Addressing any clarifications/difficulties regarding the Regulations and/or the Code and the implementation of the Code, under the overall supervision of the Board of Directors
- d. The compliance officer shall confidentially maintain a list of such securities as a "restricted list" which shall be used as the basis for approving or rejecting applications for preclearance of trades
- e. The Compliance Officer may close the trading window if he determines that a designated person or class of designated persons can reasonably be expected to have possession of unpublished price sensitive information.
- f. 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.

2. RESTRICTIONS ON COMMUNICATION AND TRADING BY INSIDERS

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

- c. All insiders in possession of unpublished price sensitive information shall handle such information with care and shall deal with the information with them when transacting their business strictly on a need-to-know basis.
- d. Designated persons and their immediate relatives shall not trade in securities when the trading window is closed
- e. **EXCEPTIONS**

Notwithstanding anything contained in this Code and Regulation, an unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction that would

 - i. 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 the proposed transaction is in the best interests of the company.
 - ii. not attract the obligation to make an open offer under the takeover regulations but where the board of directors of the company is of informed opinion that the proposed transaction is in the best interests of the company and the information that constitute unpublished price sensitive information is disseminated to be 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.
- f. The Board of Directors shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the purpose stated in Sr. No. 4(e) and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information.

3. PRE-CLEARANCE OF TRADE

- a. Any Designated Person who intends to trade in the Securities of the Company and if the value of the proposed trade is above Rs.10 Lakh of the holder, than a pre-clearance approval for the proposed trade shall be taken from the Compliance Officer by submitting Annexure I
- b. The Compliance Officer shall seek declarations to the effect that the applicant for pre clearance is not in possession of any unpublished price sensitive information in Annexure II.
- c. Trades for which pre-clearance approval have been taken should be executed with-in seven trading days of approval. On failure to execute trade in the stated time frame a fresh pre-clearance approval shall be taken for execution of such trade.

4. CONTRA- TRADE

- a. All Designated Person who buy or sell any number of securities of the Company shall not enter into contra trade i.e. sell or buy any number of securities during the next six months following the prior transaction.

- b. The Compliance Officer may grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate the regulations
- c. Should a contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the act.

5. LIMITED ACCESS TO UNPUBLISHED PRICE SENSITIVE INFORMATION

All files and records whether in physical form or in soft copy, containing records of confidential information and Unpublished Price Sensitive Information shall be kept secure in the manner as stipulated by the Compliance officer in consultation with the Board of Directors of the Company.

6. RESTRICTION IN TRADING WHEN IN POSSESSION OF UNPUBLISHED PRICE SENSITIVE INFORMATION

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

b. Exceptions

If the transaction is an off-market *inter-se* transfer between promoters who were in possession of the same unpublished price sensitive information without being in breach of point 4 of this code and both parties should make a conscious and informed trade decision.

- c. In case of a Company being a non-individual insider, the individuals taking trading decisions for the Company shall be different from the individuals who are in possession of UPSI.

7. CHINESE WALLS

All information shall be handled within the organisation on a need-to-know basis and no unpublished price sensitive information shall be communicated to any person except in furtherance of the insider's legitimate purposes, performance of duties or discharge of his legal obligations. To comply with this confidentiality obligation the Designated Employees shall not:

- a. Disclose UPSI to any employee who does not need to know the information for discharging his or her duties
- b. Pass on the UPSI to any person directly or indirectly by making recommendation for trading in securities
- c. Discuss UPSI in public places or with their immediate relatives or other individuals.

8. TRADING PLANS

SEBI Prohibition of Insider Trading Regulations, 2015 enables insiders who may be perpetually in possession of unpublished price sensitive information to trade in securities in a compliant manner. They may formulate a trading plan and present it to the compliance officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.

Points to be considered while making a Trading Plan are that the Trading Plan shall:

- a. Not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
- b. Not entail trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced by the issuer of the securities and the second trading day after the disclosure of such financial results;
- c. Entail trading for a period of not less than twelve months;
- d. Not entail overlap of any period for which another trading plan is already in existence
- e. 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;
- f. Not entail trading in securities for market abuse.

Any Designated Person intending to formulate a trading plan shall consult the Compliance Officer to discuss any other applicable rules and procedure. On submission of the trading plan the Compliance Officer shall assess whether the plan would have any potential for violation of these regulations and shall seek such express undertakings as may be necessary to enable such assessment and approve the Trading Plan and monitor the implementation of the plan.

9. DISCLOSURES OF TRADING BY INSIDERS

a. Initial Disclosure

Initial Disclosures to be made by the Designated Employees at the time of effectiveness of this Code as per the below requirements.

By whom	To Whom	Particulars to be disclosed	Time of Disclosure	Form
Promoter and Designated Employees	Compliance Officer	Holding of securities of the Company as on the date of this Code taking effect i.e. May 30, 2015	Within 30 days of the Code taking effect i.e. May 30, 2015	<i>Form A</i>

Promoter and Designated Employees	Compliance Officer	Holding of securities of the Company as on the date of appointment or becoming Promoter	Within 7 days of such appointment or of becoming Promoter	Form B
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b. Continual Disclosure

By whom	To Whom	Particulars to be disclosed	Time of Disclosure	Form
Promoter and Designated Employees	Compliance Officer	Number of such shares acquired or disposed	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 Rs. 10 lakhs	Form C
Company	Stock Exchange	Details of above disclosure	Within 2 trading days of receipt of disclosure or becoming aware of such disclosure	Form C

c. Disclosure by other Connected Persons

Every Connected Persons shall make disclosures of holdings and trading in securities of the Company in **Form D** and at such frequency as may be determined by the Company in order to monitor compliances with these regulations.

The Compliance Officer shall maintain records of all the disclosures/declarations/Undertakings /forms as mentioned in this Code, as received from time to time, for a period of five years

10. PENALTY FOR CONTRAVENTION OF THE CODE

- a. All Designated Employees and Connected Persons shall be individually responsible for complying with the provisions of the Regulations and the Code to the extent applicable

- b. Any Designated Employees and Connected Persons who violates the Code shall be subject to disciplinary action, which may include suspension/termination of the service/contract, freezing of emoluments and/or any other action as may be deemed fit by the Board of Directors of the Company.
- c. The action by the Company shall not preclude SEBI from taking any action for violation of the regulation.
- d. In case of violation of the Regulation or the Code is observed, SEBI may be informed of the same by the Company.

Annexure I
SPECIMEN OF APPLICATION FOR PRE-CLEARANCE APPROVAL

Date:
To,
The Compliance Officer,
Maxwell Industries Limited
Mumbai

Dear Sir/Madam,

Sub: Application for seeking Pre-clearance for dealing in securities of the Company

Pursuant to the SEBI (Prohibition of Insider Trading), Regulations, 2015 and the Company's **Code of Conduct to Regulate, Monitor and Report Trading by Insiders**, I seek approval to purchase / sale /subscription of No. of _____ (Type of Security) of the Company as per the details given below:

Sr. No.	Particulars	Details
1.	Name of the applicant and Employee Code	
2.	Designation, Name of the Department	
3.	DP ID and Client ID	
4.	Number and of type of Securities held as on date	
5.	Proposed Nature of Transaction	Purchase/Sale
6.	Proposed Date of dealing in Securities	
7.	Estimated number of securities proposed to be purchased/sold	
8.	Current market price (i.e. closing price on the date of application)	
9.	Whether the proposed transaction will be through stock exchange or off-market deal	

I enclose herewith the form of Undertaking signed by me.

Yours faithfully,

Signature

Annexure II
SPECIMEN OF UNDERTAKING TO BE PROVIDED ALONG WITH APPLICATION
FOR PRE-CLEARANCE APPROVAL

UNDERTAKING

Date:

To,
The compliance Officer,
Maxwell Industries Limited
Mumbai

I, _____, bearing Employee code ___ of the Company residing at _____, am desirous of dealing in _____ no. of securities of the Company as mentioned in my application dated _____ for pre-clearance of the transaction.

As required by the code of conduct to regulate, monitor and report trading by insiders I hereby undertake that:

1. I am not in possession of any Unpublished Price Sensitive Information (UPSI)(as defined in the Company's Code of Conduct for prevention of Insider Trading) (the Code) up to the time of signing this Undertaking.
2. In the event if I receive or get access to any UPSI I shall immediately inform the Compliance Officer about the same and shall completely refrain and prevent myself from trading in securities of the Company.
3. I have not contravened the provisions of the Code as notified by the Company from time to time.
4. I shall submit the trading report within two trading days of execution of the transaction / a 'Nil' report if the transaction is not undertaken.
5. If approval is granted, I shall execute the deal within 7 days of the receipt of approval failing which I shall seek pre-clearance.
6. I am aware that, I shall be liable to face penal consequences as set forth in the disciplinary action under the Code of the Company, in case the above declarations are found to be misleading or incorrect at any time;
7. I declare that I have made full and true disclosure in the matter.

Yours faithfully,

Signature

ANNEXURE III
PRE- CLEARANCE APPROVAL

To,
Name: _____
Employee Code: _____
Designation: _____
Department: _____
Place: _____

With respect to your application dated ___ seeking approval for proposed transaction in ___ no. of securities of the Company as further detailed therein, please be noted that you are hereby authorized/not authorized to undertake the transaction as detailed in your application.

This approval is being issued to you based on the undertaking provided by you as per Annexure II of the code of conduct to regulate, monitor and report trading by insiders. This approval letter is valid till _____ (i.e. for seven trading days from the approval date stated hereof). If the approved transaction is not executed within the aforesaid timeline, fresh pre-clearance would be required for trades to be executed.

Further, you shall file within two trading days of the execution of the trade, the details of such trade, with the Compliance Officer in **Annexure IV**. In case the transaction is not undertaken, a nil report to that effect along with the reasons for the same shall be filed in the said Form within two trading days from the expiry of the pre-clearance order

Yours faithfully,

For Maxwell Industries Limited

Signature
Name of the Compliance Officer:

Date:

ANNEXURE IV
DETAILS OF THE OF PRE- CLEARED TRANSACTION

To,
The Compliance Officer
[.]
Mumbai

Dear Sir/Madam,

Subject: Details of Pre-Cleared Transaction

Ref: Approval letter no. _____ dated _____

I hereby inform you that, I:

- have not bought/sold any Securities (including derivatives) of the Company
- have bought/sold _____ No. of Securities (including derivatives) as mentioned below on _____

Name of Holder	No. of securities dealt with	Bought/sold/subscribed	DP ID/Client ID / Folio No	Price (Rs.)

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

1. Broker's contract note.
2. Proof of payment to/from brokers.
3. Extract of bank passbook/statement (to be submitted in case of demat transactions).
4. Copy of Delivery instruction slip (applicable in case of sale transaction).

I agree to hold the above securities for a minimum period of six months. In case there is any urgent need to sell these securities within the said period, I shall approach the Compliance Officer for necessary approval. (*Applicable in case of purchase / subscription*).

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

Date: _____

Signature: _____

Name: _____

Designation: _____

Employee Code: _____

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		Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option Contracts held as on the date of regulation coming into force	
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms

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

Signature:

Designation:

Date:

Place:

FORM 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 as on the date of regulation coming into force	
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms

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

Signature:

Designation:

Date:

Place:

FORM 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
		Type of security (For eg. – Shares, Warrants, Convertible Debenture s 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.

Signature:
Designation:
Date:
Place:

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.

Signature:
Designation:
Date:
Place: