

CODE OF INTERNAL PROCEDURES AND CONDUCT FOR PREVENTION OF INSIDER TRADING

(w.e.f. 21.02.2018)

PART I

PRELIMINARY

- (1) The Code of Internal Procedure & Conduct for Prevention of Insider Trading (“**the Insider Trading Code**”) is made to regulate, monitor and report the trading by the Insiders.
- (2) The Insider Trading Code has been made pursuant to **Regulation 9** of the Securities and Exchange Board of India (SEBI) (Prohibition of Insider Trading) Regulations, 2015 which would be effective from the date of listing of specified securities i.e. 21st Feb,2018
- (3) **Definitions: For the purpose of this Code –**
 - (a) “**Act**” means the Securities and Exchange Board of India Act, 1992 and any amendments thereto.
 - (b) “**Board**” means the Securities and Exchange Board of India
 - (c) “**Board of Directors**” means the Board of Directors of **TASTY DAIRY SPECIALITIES LIMITED**.
 - (d) “**Code**” or “**Code of Conduct**” shall mean the Code of Internal Procedures & Conduct for Prevention of Insider Trading for Regulating, Monitoring and Reporting of trading by insiders of **TASTY DAIRY SPECIALITIES LIMITED** as amended from time to time.
 - (e) “**Company**” means **TASTY DAIRY SPECIALITIES LIMITED**.
 - (f) “**Companies Act**” means the Companies Act, 2013 & Rules made thereunder and any amendments thereto.
 - (g) “**Compliance Officer**” means any 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision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;

(h) “Connected Person” means:

- i. any person who is or has during 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 any employees of the Company or holds any position including 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 forgoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established,

- an immediate relative of connected persons specified in clause (i) or
- holding company or associate company or subsidiary company; or
- an intermediary as specified in Section 12 of the Act or an employee or directors thereof; or
- an investment company, trustee company, assets management company or an employee or director thereof; or
- an official of a stock exchange or of clearing house or corporation; or
- a member of board of trustees of a mutual fund or a member of the board of directors of the assets management company of a mutual fund or is an employee thereof; or
- 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
- an official or an employee of a self- regulatory organization recognized or authorized by the Board; or
- a banker of the Company; or
- a concern, firm, trust, Hindu undivided Family, company or association of persons wherein a director of the Company or his immediate relative or banker of the Company, has more than ten percent, of the holding or interest;

i) “Designated Employees” shall include:

- a. Every employees in the grade of Assistant General Manager and above;
- b. Every employee in the Finance, Accounts, Marketing, Research, Technical, Human Resource, Secretarial and Legal department as may be determined and informed by the Company Secretary & Compliance Officer; and

- c. Any other employee as may be determined and informed by the Company Secretary &/or Compliance Officer from time to time.
- j) **“Designated Person”** means Directors, Key Managerial Personnel and designated employees and Connected Persons designated on the basis of their Functional Role in the Company.
- k) **“Employees”** means every Employee and Designated employee of the company including the Directors in the Employment of the Company
- l) **“Generally available information”** means information that is accessible to the public on a non-discriminatory basis.
- m) **“Insider”** means any person who is a connected person; or in possession of or having access to unpublished price sensitive information;
- n) **“Immediate relative”** means a spouse of a person, and include parents, 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 of the Company.
- o) **“Promoter”** shall have the meaning assigned to it under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof.
- p) **“Relatives”** means a person, as defined in Section 2(77) of the Companies Act, 2013 and any amendments thereto.
- q) **“Regulations”** means the SEBI (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.
- r) **“Stock Exchange”** means a stock exchange which is recognized of the Central Government or SEBI under Section of Securities Contracts (Regulation) Act, 1956 and any amendments thereto.
- s) **“Securities”** shall have the meaning assigned to it under the Securities Contracts (Regulations) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund.
- t) **“Specified”** means specified by SEBI in writing.

- u) **“Takeover Regulations”** means SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.
 - v) **“Trading”** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and “trade” shall be construed accordingly.
 - w) **“Trading Day”** means a day on which recognized Stock Exchanges are open for trading.
 - x) **“Trading Window”** means a trading period for trading in Company’s Securities as specified by the Company from time to time.
 - y) **“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 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 with the Stock Exchange
 - (y) All other words and phrases not defined in this Insider Trading Code will have the meaning as defined in the SEBI Act, 1992, Securities Contracts (Regulations) Act, 1956, The Depositories Act, 1996 or The Companies Act, 2013 and Rules and Regulations made thereunder and any amendment thereto.
- (4) Applicability of the Code:** This Code will be applicable to the insider as defined in the Clause 3(l) of this Code of Conduct.

5) Role of Compliance Officer

- a. The Compliance Officer shall report on insider trading to the Board of Directors of the Company and in particular, shall provide reports to the Chairman of the Audit Committee, if any, or to the Chairman of the Board of Directors at such frequency as may be stipulated by the Board of Directors.

- b. The Compliance Officer shall assist all employees in addressing any clarifications regarding the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulation 2015 and the Company's Code of Conduct.

PART - II

RESTRICTIONS ON COMMUNICATION AND TRADING BY INSIDERS

6) PRESERVATION OF “PRICE SENSITIVE INFORMATION”

- 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 obligation.

Unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction which entails:

- An obligation to make an open offer under the takeover regulation where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interest of the Company; or
- Not attracting the obligation to make an open offer under the takeover regulation but where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interest 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.

However, the Board of Directors shall require the parties to execute agreement 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 limited purpose and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information.

- Need to Know
 - (i) “Need to know” basis means that Unpublished 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 the information.

(ii) All non-public information directly received by any employee should immediately be reported to the head of the department.

- Limited access to confidential information

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password, etc.

7) Communication or procurement of unpublished price sensitive information:

(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 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) Notwithstanding anything contained in this regulation, unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction pursuant to Regulation 3 of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

8) Trading when in possession of unpublished price sensitive information:

No insider shall trade in the Securities of the Company when in possession of unpublished price sensitive information except as allowed under the Regulation 4(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

9) PREVENTION OF MISUSE OF “UNPUBLISHED PRICE SENSITIVE INFORMATION”

Employee and connected persons designated on the basis of their functional role (“designated persons”) in the Company shall be governed by an internal code of conduct governing dealing in securities.

9.1 Trading Plan :

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. As per Annexure- F

9.2 Trading Plan shall:

- ✓ Not entail commencement of trading on behalf of the insider earlier than 6 months from public disclosure of the plan;
- ✓ Not entail trading for the period between the 20th 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;
- ✓ Entail trading for a period of not less than 12 months;
- ✓ Not entail overlap of any period for which another trading plan is already in existence;
- ✓ Set out either the value of trades to be effected or the number of securities to be traded along with the nature of trade and the intervals at, or dates on which such trades shall be effected; and
- ✓ Not entail trading in securities for market abuse.

9.3 The Compliance officer shall consider the trading Plan made as above and shall approve it forthwith. However, he shall be entitled to take express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per provision of the Regulations.

9.4 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 the securities outside the scope of the trading plan.

However, the implementation of the trading plan shall not be commenced, if at the time of formulation of the plan, the insider is in possession of any unpublished price sensitive information and the said information has not become generally available at the time of commencement of implementation. The commencement of plan shall be deferred until such unpublished price sensitive information becomes generally available information. Further the insider shall not be allowed to deal in securities of the company, if the date of trading in the securities of the company, as per the approved Trading Plan, coincides with the date of closure of trading window announced by the Compliance officer.

9.5 Upon approval of Trading Plan, the Compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

PART- III

DISCLOSURES OF TRADING BY INSIDERS

(10) GENERAL PROVISIONS:

- (1) Every public disclosure under this part shall be made in such form as may be specified.
- (2) The disclosures to be made by any person under this Part shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.
- (3) The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account for purposes of this Part:

Provided that trading in derivatives of securities is permitted by any law for the time being in force.

- (4) The disclosures made under this Part shall be maintained by the company, **for a minimum period of five years**, in such form as may be specified.

11) Disclosures by certain persons:

(1) Initial Disclosures:

- (a) Every Promoter, Key Managerial Personnel, Director and Designated Employee of the Company shall disclose his equity shareholding in the Company as on date of this code taking effect to the Company within 30 days of this code taking effect in **Form No. A**
- (b) Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter shall disclose his equity shareholding in the Company as on the date of the appointment or becoming a Promoter, to the Compliance Officer within 7 days of such appointment or becoming a Promoter in **Form No. B**

(2) Continual Disclosures:

- (a) Every Promoter, Employee and Director of the Company shall disclose to the Compliance Officer in **Form No.C** the number of equity shares acquired or disposed of within two trading days of such transaction, if the value of the equity shares traded, whether in one transaction or a series of transactions over any

calendar quarter, aggregates to a traded value in **excess of Rs. Ten Lacs or such other value as may be specified;**

- (b) The Company shall notify the particulars of such Trading to BSE Ltd. within two trading days of receipt of the disclosure or from becoming aware of such information.

(3) Disclosures by other connected persons:

The other connected persons to whom this Code is applicable is holding equity shares of the Company, shall disclose their shareholding within 30 days from the date of this code taking effect in **Form No. D** and Trading made by them within 7 days in **Form No E** if the value of the equity shares traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in **excess of Rs. Ten Lacs or such other value as may be specified.**

12) Compliance of the Trading Restrictions: Every Promoter, Key Managerial Personnel, Director and Designated Employee of the Company shall be subject to Trading restrictions in the following manner:-

- (a) The Trading window:** The Trading Window will be closed before 7 days of the happening of the following events and shall remain closed 48 hours after the publication of the price sensitivity information i.e.

- (i) Declaration of Financial Results (Quarterly, Half Yearly & Annual)
- (ii) Declaration of Dividends (Interim & Final)
- (iii) Issue of securities by way of Public/ Rights /Bonus etc.
- (iv) Any major expansion plan or execution of new project
- (v) Amalgamation, Mergers, takeovers or any buy back.
- (vi) Disposal of the whole or substantially the whole of the undertaking.
- (vii) Any major change in policies, plans or operation of the Company

(b) Restriction on Trading during the Closure of Trading Window:

Every promoter, key managerial personnel, director and designated employee and connected persons of the company shall not deal in the securities of the Company during the Closure of the Trading Window.

(c) Pre-clearance of Trading Plans:

- i. Every Promoter, Key Managerial Personnel, Director and Designated Employee of the Company and the Persons deemed to be connected persons as per this Code intending to buy/sell equity shares of the Company will have to

submit the trading plan(s) in the **Form No. F** at least 6 months prior to the start of the trading to the Compliance Officer of the Company for the prior approval.

- ii. Only after receiving the prior approval, the transaction should be carried out strictly as per the Trading plan(s) approved by the Compliance Officer of the Company.
- iii. The Compliance Officer will disclose the Trading plan(s) approved by him to the BSE Limited immediately.
- iv. The Trading plan(s) once approved by the Compliance Officer of the Company shall be irrevocable and the concern person shall have to mandatorily carry out the Trades within the time limit as approved by the Compliance Officer of the Company. No Trade(s) shall be executed during the closure of the Trading window.

13) Violation of the Code:

- (a) Every Promoter, Key Managerial Personnel, Director and Designated Employee of the Company and the persons deemed to be connected persons as per this Code who violates any of the provisions of this Code will be penalized and appropriate action will be taken against them by the Company after giving reasonable opportunity to them to show cause. They shall also be subject to disciplinary action including wage freeze, Suspension, in-eligibility for future participation in E.S.O.P. etc.
- (b) If the Insider deals in the equity shares of the Company, violating the Code, the Compliance Officer will confidentially maintain the list of the same.
- (c) In addition to the action which may be taken by the Company, the persons violating this Code will also be subject to any penal action by SEBI as per SEBI Act and the Company shall inform the same to the SEBI promptly.

- 14)** The Compliance Officer of the Company shall report to the Board of Directors and the Chairman of the Audit Committee of the Company about the compliance of the Code on quarterly basis.

FORM “A”

SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (a) read with Regulation 6 (2) – Initial disclosure to the company]
Pursuant to clause no. 11(1) (a) of the code

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, CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate Relative to/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5

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

Details of Open Interest (OI) in derivatives of the company held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6 (2)

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		
Contract Specification	Number of units (contracts *lot size)	Notional value in Rupees terms	Contract Specification	Number of units (contracts *lot size)	Notional value in Rupees terms
6	7	8	9	10	11

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

Name & Signature: _____

Designation: _____

Date: _____

Place: _____

FORM “B”

**SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (b) read with Regulation 6(2) – Disclosure on becoming
Director/KMP/Promoter]
Pursuant to clause no. 11(1)(b) of the code**

Name of the company: _____

ISIN of the company: _____

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

Name, PAN, CIN/DIN & Address with contact nos.	Category of Person (Promoters/ KMP / Directors/ immediate relative to/others etc.)	Date of appointment of Director /KMP OR Date of Becoming Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP		% of Shareholding
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5	6

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

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

Open Interest of the Future contracts held at the time of becoming Promoter/appointment of Director/KMP			Open Interest of the Option contracts held at the time of becoming Promoter/appointment of Director/KMP		
Contract Specification	Number of units (contracts *lot size)	Notional value in Rupees terms	Contract Specification	Number of units (contracts *lot size)	Notional value in Rupees terms
7	8	9	10	11	12

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

Name & Signature: _____

Designation: _____

Date: _____

Place: _____



Tasty Dairy
SPECIALITIES LTD.

FORM C

SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (2) read with Regulation 6(2)& – Continual disclosure] director/KMP/Promoter Pursuant to clause no. 11(2) of the code

Name of the company: _____

ISIN of the company: _____

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

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

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

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

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

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

Name & Signature:

Designation:

Date:

Place:

FORM D (Indicative format)

**SEBI (Prohibition of Insider Trading) Regulations, 2015
Regulation 7(3) – Transactions by Other connected persons as identified by the company**

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

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

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



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

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

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

Name & Signature:

Designation:

Date:

Place:



FORM "E"

FORM FOR THE CONTINUAL DISCLOSURE BY OTHER CONNECTED PERSONS PURSUANT TO CLAUSE NO. 11(3) OF THE CODE

To,

Date _____

The Compliance Officer,
TASTY DIARY SPECIALITIES LIMITED,
Regd. Off. : D-3 UPSIDC, Industrial Area,
Jainpur, Kanpur Dehat
209311

Dear Sir,

Sub: Dealing in the equity shares of the Company

I _____ hereby inform that, I have acquired or disposed off on ____ day of _____ 201____, _____ equity shares of the Company of the market value of Rs. _____ during the period from _____ to _____ which is in excess of the monetary limit prescribed Clause 9(3) of the Code of Conduct for prevention of Insider Trading.

Further, I am connected with your Company in the capacity of _____ or related with Mr. _____ Promoter / Director / Key Managerial Personnel / Designated Employee of your Company.

This is for your information and necessary actions.

Thanking you.

Signature:
Name:

FORM "F"

APPLICATION BY PROMTER/ DIRECTOR/ KEY MANAGERIAL PERSONNEL / DESIGNATED EMPLOYEE / OTHE CONNECTED PERSONS PURSUANT TO CLAUSE NO. 9.1 & 12(c) OF THE CODE FOR PRE-APPROVAL OF TRADING PLAN

To,
The Compliance Officer,
TASTY DIARY SPECIALITIES LIMITED,
D-3 UPSIDC,
Industrial Area Jainpur,
Kanpur Dehat
209311

From:
Name:
Designation:

Dear Sir,

Date: _____

Sub: Application for Pre-approval of Trading Plan

I _____ hereby inform that, I have gone through the Code of Conduct for prevention of Insider Trading and I seek you pre approval of the trading plan which I will execute as per the details given hereunder within twelve months after expiry of six months from the date of this application, if pre-approved by you.

Name of Promoter / Director / KMP / Designated Employee / Company / Connected person	Nature of Relationship	No. of Shares held as on Date of this application	No. of Shares to be purchased or disposed off.	Probable period for purchase or disposal.	Folio No./ DP ID, if any

I also declare that, I am not in possession of unpublished price sensitive information as defined in the Code. I further declare that, I will not deal in the equity shares of the Company during the closure of Trading Window as per the requirements of the Code.

I further confirm that, the violation of any of the provisions of the Code would subject me the penal provisions as per the Code.

I request you to approve my above referred Trading Plan at the earliest.

Signature _____