

**Oracle Financial Services Software Limited**

**CODE OF INTERNAL PROCEDURES & CONDUCT  
FOR PREVENTION OF INSIDER TRADING**

[Under Regulation 12(1) of SEBI (Prohibition of Insider Trading) Regulations, 1992  
as amended from time to time]

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**INTRODUCTION**

Pursuant to the requirements of Regulation 12 of the Securities and Exchange Board of India (Prohibition of Insider Trading Regulations), 1992 (**“the Regulations”**), **Oracle Financial Services Software Limited**, (**“the Company”**) has framed this Code of Internal Procedures and Conduct for regulating and prevention of Insider Trading (**“the Code”**) for its directors, employees and such other persons as designated by the Company.

This code was approved by Board of the Company on August 25, 2015 and supersedes earlier version of the Code:

**DEFINITIONS:**

Unless repugnant to the context, in this Code:

- i. **“Act”** shall mean SEBI Act.
- ii. **“Board”** means the Board of Directors of the Company.
- iii. **“Chief Investor Relations Officer”** - The Chief Financial Officer shall be the Chief Investor Relations Officer.
- iv. **“Code”** means this code of Conduct for Prevention of Insider Trading as applicable, including modifications made thereto from time to time.
- v. **“Compliance Officer”** means any senior officer, designated so and reporting to the board of directors, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board of directors of the company;
- vi. **“Chief Investor Relations Officer”** Chief Financial Officer of the Company shall be the Chief Investor Relations Officer of the Company to deal with dissemination of information and disclosure of Unpublished Price Sensitive Information.

vii. **“Confidential Information”** means any information which relates to Company’s business, trade secrets and includes other information which, if parted with, may cause financial and other loss to the Company and includes unpublished price sensitive information.

viii. **“Connected Person”** means,

- a. 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.

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, -

- i. an immediate relative of connected persons specified in clause xiii; or
- ii. holding company or associate company or subsidiary company; or
- iii. an intermediary as specified in section 12 of the Act or an employee or director thereof; or
- iv. an investment company, trustee company, asset management company or an employee or director thereof;
- v. an official of a stock exchange or of clearing house or corporation; or
- vi. 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
- vii. a member of the board of directors or an employee, of a public institution as defined in section 2 (72) of the Companies Act, 2013; or
- viii. an official or an employee of a self-regulatory organization recognized or authorized by the Board; or
- ix. a banker of the company; or
- x. 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 immediate relative or banker of the company has more than ten percent of the holding or interest;

- ix. **“Employee”** means any person who:
- (a) Is a director of the Company or of a subsidiary of the Company;  
or
  - (b) Is an employee of the Company or of a subsidiary of the Company;
- x. **“Designated Employee”** means and includes the Directors of the Company, and the employees of the Company in the grade or designation of Chief Executive Officer, Managing Director, Chief Financial Officer, Chief Accounting Officer, Company Secretary and/or employees reporting directly to the Chief Executive Officer, General Counsel and their financially dependent family members. The Compliance Officer has the authority to change or amend the definition of Designated Employees so as to include or exclude certain employees or grade or designation of employees, as may be required and deemed fit from time to time.
- xi. **“ESOP”** means an Employee Stock Option Plan or an Employee Stock Purchase Plan formulated by the Company.
- xii. **“Generally available Information”** means information that is accessible to the public on a non-discriminatory basis.
- xiii. **“Immediate Relative”** means a spouse of a designated 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;
- xiv. **“Insider”** means any person who is:
- i) a connected person; or
  - ii) in possession of or having access to unpublished price sensitive information;
- xv. **“Insider Trading Regulations”** means the Securities and Exchange Board of India (Prohibition of Insider Trading Regulations), 1992.
- xvi. **“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 modifications thereof.
- xvii. **“Relative”** means a person defined in section 1(77) of the Companies Act, 2013 and who is financially dependent on the employee / Director in whole or in part.
- xviii. **“SEBI”** means the Securities and Exchange Board of India.
- xix. **“Securities”** shall have the same meaning as is assigned thereto under Section 2(h) of the Securities Contract (Regulation) Act, 1956 and includes shares, debentures, bonds and other securities now or hereafter issued by the Company.

- xx. **“Trading day”** means a day on which the recognized stock exchanges are open for trading;
- xxi. **“Trading in Securities”** means and includes an act of subscribing to buying, selling, dealing or agreeing to subscribe to buy, sell or deal in any Securities of the Company and “trade” shall be construed accordingly. However, exercise of ESOPs shall not be considered to be trading except for the purposes of Chapter III of the SEBI (Prohibition of Insider Trading) Regulations, 2015.
- xxii. **“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: –
- (i) financial results;
  - (ii) dividends;
  - (iii) change in capital structure;
  - (iv) mergers, de-mergers, acquisitions, delistings, 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.

**Capitalised terms used but not defined in this Code shall have the meaning assigned thereto in the Insider Trading Regulations.**

## **CODE**

### **1. Appointment and Role of Compliance Officer**

- 1.1 “Compliance Officer” shall be such person as may be designated by the Board of Directors as the Compliance Officer from time to time.
- 1.2 The Compliance Officer has the authority to, and shall be responsible for:-
- (a) Compliance of policies and procedures for prohibition of Insider Trading,
  - (b) Monitoring of adherence to the rules for the preservation of Unpublished Price Sensitive Information,
  - (c) Pre-clearing of Designated Employees and Connected Persons’ trades in the Securities
  - (d) Monitoring of trades and implementation of this Code under the overall supervision of the Board of Directors of the Company.
  - (e) grant of pre-clearance approvals to the Designated Persons for trading in the Company’s Securities by them / their immediate relatives and monitoring such trading.
- 1.3 The Compliance Officer shall maintain a record of Designated Employees.
- 1.4 The Compliance Officer shall assist Employees in addressing any questions regarding the Insider Trading Regulations, 2015 and this Code.
- 1.5 The Board of Directors of the Company shall be approving authority for trades done by the Compliance Officer or his immediate relatives as insider.

### **2. Preservation of “Unpublished Price Sensitive Information”**

- 2.1. Employees shall maintain the confidentiality of all Unpublished Price Sensitive Information. Employees shall not pass on any Unpublished Price Sensitive Information to any person, directly or indirectly, including by way of making a recommendation for the purchase or sale of Securities.
- 2.2. **Need to know**
- 2.2.1 Unpublished Price Sensitive Information is to be handled on a “need to know” basis: Unpublished Price Sensitive Information should be disclosed only to those within the Company who need such information to discharge their duty and whose possession of such information shall not give rise to a conflict of interest or appearance of misuse of the information. All non-public information directly received by an Employee, where such Employee does not need to know such information to discharge their duties to the Company, should immediately be reported to the Compliance Officer.

### **2.3. Limited access to Confidential Information**

2.3.1 Files containing Confidential Information shall be kept secured. Computer files must have adequate security in accordance with the relevant policies of the Company.

#### **2.3.2 Chinese Wall**

To prevent misuse of Unpublished Price Sensitive Information (UPSI), the Company has adopted a 'Chinese Wall' system which separates those departments which routinely have access to UPSI, considered "inside areas" from those departments which deal with sale/marketing or other departments providing support services, considered 'public areas'.

As per the said system:

- The Employees in the inside areas are not allowed to communicate any UPSI to anyone in the public areas.
- The Employees in inside area may be physically separated from the Employees in public area.
- The demarcation of various departments as inside area shall be determined by the Compliance Officer in consultation with the Board.
- Only in exceptional circumstances, Employees from the public areas are brought 'over the wall' and given UPSI on the basis of 'need to know' criteria under 'intimation' to the Compliance Officer.

### **3. Prevention of misuse of "Unpublished Price Sensitive Information"**

3.1 Notwithstanding anything contained elsewhere in this Code, no Employee shall, either on his own behalf or on behalf of any other person, deal in any Securities when in possession of any Unpublished Price Sensitive Information.

All Employees are subject to trading restrictions as enumerated below.

#### **3.2 Non Transaction Period**

3.2.1 The Company may specify a period, to be called "Non Transaction Period", for trading in the Company's Securities. Any other period shall be Transaction Period for the purposes of this Code.

3.2.2 Employees shall not trade in Company's Securities during Non-Transaction Period.

3.2.3 A Non Transaction Period shall be declared by the Compliance Officer during, inter alia:-

- (a) Declaration of Financial results (quarterly, half-yearly and annual)
- (b) Declaration of dividends (interim and final)
- (c) Issue of Company's securities by way of public, rights, bonus, etc.
- (d) Any major expansion plans or execution of new projects.

- (e) Amalgamations, mergers, de-mergers, acquisitions, delisting's, takeovers and buy-backs.
- (f) Disposal of the whole or substantially the whole of the undertaking.
- (g) Any significant changes in policies, plans or operations of the Company.
- (h) Changes in Key Managerial Personnel.
- (i) Material events in accordance with the Listing Agreement.

The time for commencement of the Non transaction Period shall be decided by the Company.

3.2.4 The Transaction Period shall be opened 48 hours after the Unpublished Price Sensitive Information is made public.

3.2.5 All Employees of the Company must conduct all their dealings in Securities only during a Transaction Period and must not deal in any transaction involving the purchase or sale of Securities during a Non Transaction Period, as referred to in para 3.2.3 or during any other period as may be specified by the Company from time to time.

3.2.6 In case of ESOPs, the exercise of an option is permitted during a Non Transaction Period. However, the sale of Securities allotted on exercise of ESOPs is not be allowed during a Non Transaction Period.

### 3.3 Pre-clearance of trades

3.3.1 All Employees of the Company including Immediate Relative and Connected Persons who intend to deal in Securities must obtain pre-clearance of the proposed transaction from the Compliance Officer by sending the request for approval through the Company's Intranet system or in such other form and manner as may be communicated by the Company or the Compliance Officer from time to time.

3.3.2 The Compliance Officer shall have the authority to ask for further information if deemed necessary and it is obligatory for the relevant Employee to immediately furnish the information sought for by the Compliance Officer. If the request for pre-clearance is granted, the Compliance Officer will inform the concerned Employee and the Connected Person of the period during which the pre-clearance will remain valid, and the proposed transaction must be effected during that period ("Pre-Cleared Period"). The Pre-Cleared Period shall not exceed one week.

3.3.3 An undertaking shall be executed in favour of the Company by such Employee and Connected Person incorporating, *inter alia*, the following clauses, as may be applicable:

- (a) That the employee & Immediate Relative /director/officer/ Connected Person does not have any access or has not received "Unpublished Price Sensitive Information" up to the time of signing the undertaking.

- (b) That in case the employee & Immediate Relative /director/officer Connected Person has access to or receives “Unpublished Price Sensitive Information” after the signing of the undertaking but before the execution of the transaction he/she shall inform the Compliance Officer of the change in his/her position and that the employee/director/officer Connected Person would completely refrain from dealing in the securities of the company till the time such information becomes public.
- (c) That the employee & Immediate Relative /director/officer Connected Person has not contravened the code of conduct for prevention of insider trading as notified by the company from time to time.
- (d) That the employee & Immediate Relative /director/officer Connected Person has made a full and true disclosure in the matter.

#### **4 Other restrictions**

- 4.1. All Designated Employees shall execute their order in respect of the Securities within the Pre-Cleared Period.
- 4.2. All Employees who trade in Securities of the Company shall not execute a contra trade during the next **six months** following the prior transaction. All Employees shall also not take positions in derivatives transactions in the Securities of the Company at any time. In case of subscription in the primary market (initial public offers), the Employees shall hold their investments for a minimum period of 30 days. The holding period to commence from the date when the Securities are actually allotted.
- 4.3. In the event that the sale of Securities in contravention of section 4.2 is necessitated by personal emergency, the holding period may be waived by the Compliance Officer after recording in writing his/her reasons in this regard. The decision of Compliance Officer shall be final and binding on Employees.

#### **5 Reporting Requirements for transactions in Securities**

##### **5.1 Initial Disclosure**

Every Promoter/ Key Managerial Personnel / Director / Designated Employee & their Immediate Relative, shall within thirty days of these regulations taking effect, forward to the Company the details of all holdings in securities of the Company presently held by them in **Form A**.

Every person on appointment as a Key Managerial Personnel / Designed Employees or a Director of the Company or upon becoming a promoter shall disclose his holding of securities of the company including the holdings by Immediate Relative as on the date of appointment or becoming a promoter, to the company within seven days of such appointment or becoming a promoter in **Form B**.



## **5.2 Continual Disclosure**

The Promoter, Employee and their Immediate Relative, Director, Key Managerial Personnel of the Company shall disclose to the company in **Form C**, the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of ten lakh rupees;

The Company shall notify the particulars of such trading to the stock exchanges on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.

Explanation — It is clarified for the avoidance of doubts that the disclosure of the incremental transactions after any disclosure under this sub-regulation, shall be made when the transactions effected after the prior disclosure cross the threshold limit.

## **5.3 Disclosures by other Connected Persons**

The Company may, at its discretion require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the company in **Form D** and at such frequency as may be determined by the company in order to monitor compliance with these regulations.

## **6 Penalty for contravention of code of conduct**

- 6.1 Any Employee who trades in Securities or communicates any information for trading in Securities in contravention of this Code may be penalised and appropriate action may be taken by the Company.
- 6.2 Employees of the Company who violate this Code shall also be subject to disciplinary action by the Company, which may include inter alia monetary fines, wage freeze, suspension, ineligibility for future participation in ESOP, at the sole discretion of the Company.
- 6.3 The penalty provisions for violation or noncompliance of the Code are given in Annexure A. Any action taken by the Company will not preclude SEBI or other regulatory authorities from taking any action against an Employee.

## **7 Information to SEBI in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015**

If Company or the Compliance Officer observes that there has been a violation of the Insider Trading Regulations by any Employee, SEBI shall be informed by the Company.

## **8 Code of fair Disclosure**

The Company shall adopt the code of Fair Disclosure as specified in Annexure B.

## **9 Amendment**

The Code shall stand modified in pursuant to the notifications/ amendments as may be issued by SEBI from time to time.

## Annexure A

### Oracle Financial Services Software Limited

#### Penalty for contravention of Code of Internal Procedures & Conduct for Prevention of Insider Trading of the Company

In terms of the Securities and Exchange Board of India (Prohibition of Insider Trading Regulations), 2015 (**“the Regulations”**), Oracle Financial Services Software Limited (**“the Company”**) has framed this Code of Internal Procedures and Conduct regulating and prevention of Insider Trading (**“the Code”**) in the year 2002. The Code was amended in September 2014, May 2015 and in August 25, 2015.

### Penal provisions

In terms of the Code, the Company will take appropriate disciplinary action against the defaulters for not complying with the Code. Please note that the following action shall be taken for any non compliance with the code in addition to the actions that may be taken by SEBI or other authorities.

1.	<p><b>Not obtaining pre-clearance for trading (buying/selling) in the Securities*</b></p> <p>First instance: Warning</p> <p>Second instance: A fine of upto 5% of the gross value of the transaction</p> <p>Third instance: A fine of upto 10% of the gross value of the transaction</p> <p>Fourth instance: Action as may be decided by the Compliance Committee</p> <p><i>(* this includes trading in Securities above the approved limits)</i></p>
2.	<p><b>Delay in reporting / declaring transactions (buy/sell) in the Securities within the stipulated time (including a ‘nil’ report):</b></p> <p>First instance: Warning</p> <p>Second instance: A fine of Rs. 1,000/- per day of default upto the first 10 days of default</p> <p>Third instance: A fine of Rs. 2,000/- per day of default upto the first 10 days of default</p> <p>Fourth instance: Action as may be decided by the Compliance Committee</p> <p><i>Note: The amount of fine payable for any delay under this category beyond the first 10 days of default would be decided by the Compliance Committee.</i></p>

3.	<b>Trading during non trading period (when the trading window is closed)</b>  First instance:       Warning Second instance:    A fine of 10% of the gross value of transaction Third instance:      A fine of 20% of the gross value of transaction Fourth instance:     Action as may be decided by the Compliance Committee
4.	<b>Any other non-compliance with the Code:</b>  Appropriate action as may be decided by the Compliance Committee.

The fine is payable to the Company and the modalities for paying the fine would be separately communicated by the Compliance Officer to the concerned employee.

In case of any doubt or dispute with regard to the interpretation or applicability or otherwise of the provisions of the Code or related provisions, the decision of the Compliance Officer shall be final.

## Annexure B

### **Oracle Financial Services Software Limited**

#### **Code of Fair Disclosure**

In terms of the Securities and Exchange Board of India (Prohibition of Insider Trading Regulations), 2015 (**“the Regulations”**), Oracle Financial Services Software Limited (**“the Company”**) has prepared a code of practices and procedures for fair disclosure of unpublished price sensitive information as enumerated below:

- 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.
- 2) Uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- 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.
- 4) Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- 5) Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- 6) Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.
- 7) Developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
- 8) Handling of all unpublished price sensitive information on a need-to-know basis.

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## FORM A

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

Name of the Company: **Oracle Financial Services Software Limited**

ISIN of the company: **INE881D01027**

### 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 Sharehol ding
		Type of security (For e.g. – 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 such other 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 Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee 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 a director/KMP/Promoter]

Name of the Company: **Oracle Financial Services Software Limited**

ISIN of the company: **INE881D01027**

#### 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 e.g. – 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 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 Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee 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:

## FORM C

### SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]

Name of the Company: **Oracle Financial Services Software Limited**

ISIN of the company: **INE881D01027**

#### 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 with contact nos.	Category of Person (Promoters / KMP / Directors/ immediate relatives/ others etc.)	Securities held prior to acquisition/ disposal		Securities acquired/ Disposed				Securities held post acquisition/ 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 Debentures etc.)	No. and % of share holding	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge/ Revoke/ Invoke)	Type of Security (For eg. Shares, Warrants, Convertible Debentures etc.)	No. and % of share holding	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
Type of Contract	Contract Specifications	Buy		Sell		
		Notional value	Number of units (contracts* lot size)	Notional value	Number of units (contracts* 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

### 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. of other connected persons as identified by the company	Connection with company	Securities held prior to acquisition/ disposal		Securities acquired/ disposed				Securities held post acquisition/ 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 Debentures etc.)	No. and % of Share holding	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge/ Revoke/ Invoke)	Type of Security (For eg. Shares, Warrants, Convertible Debentures etc.)	No. and % of share holding	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
Type of Contract	Contract Specifications	Buy		Sell		
		Notional value	Number of units (contracts* lot size)	Notional value	Number of units (contracts* 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:

Date:

Place: