

CIN NO.: L45200GJ2015PLC083577





Date: 04th June, 2019

To,

Deptt. Of Corporate Service, BSE Limited, 1st Floor, Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai-400001

REF: Script Code 540061

Listing Department,
National Stock Exchange of India Limited,
Exchange Plaza, c-1 Block G
Bandra- Kurla Complex, Bandra (E)

Mumbai- 400050

REF: Script Code BIGBLOC

Sub: Revised Code of Conduct for Prevention of Insider Trading

Ref: Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015

We are enclosing herewith revised "Code of Conduct for Prevention of Insider Trading" in compliance with SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018. The Code shall be effective from 01st April, 2019.

The Revised Code shall be available on the website of the Company at www.bigblocconstruction.com/www.nxtbloc.in.

Kindly take the above on record.

Thanking you.

FOR BIGBLOC CONSTRUCTION LIMITED

SUMIT NIRMAL DAS COMPANY SECRETARY

REVISED CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

BIGBLOC CONSTRUCTION LIMITED



CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

1. INTRODUCTION

This code is framed pursuant to the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations 2015 as amended, and supersedes the earlier code. It shall come into force from 1st day of April, 2019.

2. APPLICABILITY

This Code shall apply to all Directors, Designated Employees and other Connected Persons as mentioned in this Code.

3. **DEFINITIONS**

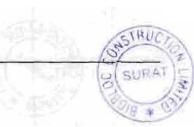
- a) "Act" means the Securities and Exchange Board of India Act, 1992, as amended from time to
- b) "Board of Directors" means the Board of Directors of Bigbloc Construction Limited;
- c) "Company" means Bigbloc Construction Limited.
- d) "Code" means this Bigbloc Code of Conduct for regulating & reporting trading by insiders as modified from time to time;
- e) "Compliance Officer" means the Chief Financial Officer of the Company, appointed in terms of Section 203 of the Companies Act 2013 is appointed as the Compliance Officer, 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of this code under the overall supervision of the Board of Directors of the Company.;
- f) "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); or
 - 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;
- 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 recognised 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;
- g) "Designated Employees" means as decided by the Board of Directors in consultation with the Compliance Officer of the Company; means a person occupying any of the following position in the company:
 - (a) All Directors
 - (b) Key Managerial Personnel
 - (c) All Executive Directors including Chief Vigilance Officer
 - (d) All General Managers
 - (e) All Heads of Finance of Units/Divisions/Regions
 - (f) All Employees working in Books, Budget, Financial Service and Direct Taxation Sections of Corporate Finance;
 - (g) All employees working in Company Secretariat & Legal Deptt.
 - (i) Any other key person, who in the opinion of Compliance Officer be covered in the "designated employee";
- h) Generally Available Information" means information that is accessible to the public on a non-discriminatory basis; (Information published on the website of a stock exchange, would ordinarily be considered generally available.)
- i) "Key Managerial Personnel" or "KMP", in relation to a company means:-
 - (a) the Chairman & Managing Director;
 - (b) all Whole-time Functional Directors;
 - (c) Company Secretary; and
 - (d) such other officer as may be prescribed under the Companies Act, 2013;
- j) Director" means a member of the Board of Directors of the Company;
- k) "Immediate relative" means 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'
- I) Insider" means any person who is: i) a connected person; or ii) in possession of or having access to unpublished price sensitive information;



- m) "Securities" shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except unit of a mutual fund;
- n) "Stock Exchange" means:
 - (a) Bombay Stock Exchange Limited; and
 - (b) National Stock Exchange of India Limited;
- o) Takeover Regulations" means Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;
- p) "Trading" means an act of subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;
- q) "Trading Day" means a day on which the recognized stock exchanges are open for trading where securities of the Company are listed;
- r) "Trading Window" means trading period for trading in the Company's Securities. All days shall be the trading periods except when trading window is closed;
- s) 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:-
 - (a) Financial results
 - (b) Dividends
 - (c) Change in capital structure
 - (d) Mergers, de-mergers, acquisitions, delisting, disposals and expansions of business and such other transactions;
 - (e) Changes in key managerial personnel; and
 - (f) Material events in accordance with the listing agreement
 - (g) Compliance Officer may decide any other matter also as Price Sensitive Information;

All other words and phrases will have the same meaning as defined under the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time. 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, the Depositories Act, 1996 or the Companies Act, 2013 and rules & Regulations made thereunder shall have the meanings respectively assigned to them in that legislation.

4. COMPLIANCE OFFICER

1. The company has appointed Shri Mohit Narayan Saboo (Director & Chief Financial officer) as a Compliance Officer, under the said regulations. The Compliance Officer 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.



- 2. The Compliance Officer shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of "Price Sensitive Information", pre-clearing of designated employees' and their Immediate relatives trades monitoring of trades and the implementation of the code of conduct under the overall supervision of the Board of the listed Company.
- 3. The Compliance Officer shall assist all the employees in addressing any clarifications regarding the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the Company's code of conduct.
- 4. The Compliance Officer shall designate a Senior Official or the Company Secretary of the Company to act as Compliance officer in his absence.

5. PRESERVATION OF "PRICE SENSITIVE INFORMATION"

- All Designated Employees and Connected Persons shall maintain the confidentiality of price sensitive information. 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.
- No insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to a 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.
- Notwithstanding anything contained in the Code, 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 atleast two trading days prior to the proposed transaction being effected in such form as the board of directors may determine.
 - 4. For the purpose of the above clause, the parties shall be required 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 of Clause 5 (5) and shall not otherwise trade in securities of the company when in possession of unpublished price sensitive information.



5. For the purpose of prompt public disclosure of UPSI, the Company also adopts the Code regarding practice & procedure for Fair Disclosure set out at Annexure-I.

6. PREVENTION OF MISUSE OF "PRICE SENSITIVE INFORMATION

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.

All Directors/Designated Employees and their dependant family members / Immediate relatives, of the Company will be subject to trading restrictions as enumerated below:-

Trading window

1. The Company will <u>specify a trading period</u>, to be called "Trading Window", for trading in the Company's Equity Shares. The trading window shall be closed on and 7 days before the happening of the following events and shall remain close up to forty-eight hours after the publication of the price Sensitive Information. Trading Window may be further closed by the Company during such time in addition to the above period as it may deem fit from time to time.

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

- (a) Declaration of Financial results (quarterly, half-yearly &annual);
- (b) Declaration of dividends (interim and final); •
- (c) Issue of securities by way of public/ rights/bonus etc.
- (d) Any major expansion plans or execution of new projects;
- (e) Amalgamation, mergers, takeovers and buy-back;
- (f) Disposal of whole or substantially whole of the undertaking;
- (g) Any changes in policies, plans or operations of the Company.

In respect of declaration of financial results, the "Trading Window" shall remain closed from the end of every quarter till 48 hours from the time the results are communicated to the Stock Exchanges.

When the trading window is closed, the Directors/Designated Employees and their dependant family members will not trade in the Company's Equity Shares in such period.

All Directors/Designated Employees of the Company and their dependent family members / Immediate relatives, will conduct all their dealings in the Equity Shares of the Company only in a valid trading window and will not deal in any transaction involving the purchase or sale of the Company's Equity Shares during the periods when trading window is closed, or during any other period as may be specified by the Company from time to time.

7. PRE CLEARANCE OF TRADES:

 All Directors/Designated Employees and their immediate relatives who intend to trade in the securities of the company above a minimum of 8,000 shares of the company per transaction should pre-clear the transactions as per the pre-trading procedure as described hereunder.



- 2. An application shall be made in Form 'I' to the Compliance Officer indicating the estimated number of securities that the Designated Employees or their immediate relatives intends to trade in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the company in this behalf.
- All Directors/Designated Employees and their immediate relatives shall execute their order in respect of securities of the company within seven trading days after the approval of pre-clearance is given. If the order is not executed within the aforementioned specified period, the Designated Employee must pre-clear the transaction again.
- 4. In case the Designated Employee or his/ her immediate relative decides not to execute the trade after securing pre-clearance, he/ she shall inform the Compliance Officer of such decision along with reasons thereof immediately.
- No Designated Employee or his/ her immediate relative shall apply for pre-clearance of any
 proposed trade when the trading window is closed or if he/ she is in possession of unpublished
 price sensitive information.
- 6. Prior to approving any trades, the compliance officer shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any unpublished price sensitive information. He shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.
- It shall be the responsibility of Designated Employees to ensure compliance of clauses 1 to 4 above in case of their immediate relatives also.
- All Directors/Designated Employees who buy or sell any number of shares of the company shall not execute a contra trade i.e. sell or buy any number of shares during the next six months following the prior transaction.
- 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.
- 10. 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.

8. TRADING PLANS:

 Any insider as defined in the said regulations can formulate trading plans and submit it to the compliance officer for approval and public disclosure, pursuant to which trade may be carried out on his behalf in accordance with such plan as per conditions and restrictions mentioned in the said Regulation.

Such 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 trading day prior to the last day of any financial period for which results are required to be announced by the Company 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.
- The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of the Regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.
- 3. 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 the securities outside the scope of the trading plan.

Provided that 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 event the Compliance Officer shall confirm that the commencement ought to be deferred until such unpublished price sensitive information becomes generally available information.

4. Upon approval of the trading plan, the Compliance Officer shall notify the plan to the stock exchanges on which the securities are listed.

9. REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES

A. Initial Disclosure

- Every promoter/ Key Managerial Personnel / Director / Officers / Designated Employees of the Company, within thirty days of these regulations taking effect, shall forward to the Company the details of all holdings in securities of the Company presently held by them including the statement of holdings of dependent family members in the prescribed Form A.
- II. Every person on appointment as a key managerial personnel or a director of the Company or upon becoming a promoter shall disclose his 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 in the prescribed Form B.

B. Continual Disclosure

I. Every promoter, employee and director of the Company shall disclose to the Company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. Ten lacs In the prescribed Form C

The disclosure shall be made within 2 working days of:

- (a) the receipt of intimation of allotment of shares, or
- (b) the acquisition or sale of shares or voting rights, as the case may be.

The Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, within 2 trading days of the receipt of disclosures under Clause 9 (B) I.

The Compliance officer shall maintain records of all the declarations in the appropriate form given by the directors / officers / designated employees for a minimum period of five years.

C. Disclosure by other connected persons

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

10. PENALTY FOR CONTRAVENTION OF CODE OF CONDUCT

- Any Director/Designated Employee who trades in Equity Shares or communicates any information for trading in Equity Shares, in contravention of the code of conduct will be penalised and appropriate action will be taken by the Company.
- Any Director/Designated Employee of the Company who violates the code of conduct will also be subject to disciplinary action by the Company, which may include wage freeze, suspension, etc.
- 3. The action by the Company will not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading), Regulations, 2015.

11. <u>INFORMATION TO SEBI IN CASE OF VIOLATION OF SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015</u>

In case it is observed by the Company/Compliance Officer that there has been a violation of SEBI (Prohibition of Insider Trading) Regulations, 2015, SEBI will be informed by the Company.



Trading Plan

(Under the code of conduct of the company read with SEBI Insider Trading Regulation, 2015)

То,	
The Compliance officer	
Bigbloc Construction Limited	
Ref	
DP's Name:	
DP ID:	-
Client ID	_
Name of Insider	
Address	
Your approval is sought for proposed Trading pla	an for Purchase/ sale of Securities of the company in

Your approval is sought for proposed Trading plan for Purchase/ sale of Securities of the company in the physical / Demat form, I am furnishing details of trade to be made in six months after the approval of the proposed trading plan.

Sr No.	Nature of Trade	Number of Securities to be traded	Time interval between two trades	Date of Proposed Trade

I confirm that:

- 1. I do not have access to the unpublished price Sensitive information and also have not received unpublished price sensitive information till today.
- 2. in case I have access to the unpublished price Sensitive information or receive it after approving the trading plan, I shall inform the change and refrain from dealing in securities till the information become public.
- 3. I have not contravened the code of conduct for prevention of Insider trading as notified by the company.
- 4. whatever is stated above is true and correct to the best of my knowledge and nothing has been concealed.

Yours truly, Signature Name: Designation Place: Date:



Form 'I'

(Application for Pre-clearance of trade)

(For Directors, Designated employees and their immediate relatives in case of trading in the Securities of the company above minimum of 8000 shares of the company)

To,
The Compliance officer
Bigbloc Construction Limited

Dear Sir,

Pursuant to SEBI (Prohibition of Insider Trading) regulation, 2015 and the company's code of Conduct for Prevention of Insider trading, I seek approval to Purchase / Sale /Subscription of _______ Equity Shares of the company as per details given below

1.	Name of the applicant	
2.	Designation	The second secon
3.	Number of securities held as on date	
4.	Folio No. / DP ID / Client ID No.)	
5.	The proposal is for	(a) Purchase of securities (b) Subscription to securities (c) Sale of securities
6.	Proposed date of dealing in securities	
7.	Estimated number of securities proposed to be acquired/subscribed/sold	्राचित्र स्थापना वर्षात्र वर्षात्र । वर्षात्र स्थापना वर्षात्र स्थापना स्था
8.	Price at which the transaction is proposed	
9.	Current market price (as on date of application)	THE PARTY OF THE P
10.	Whether the proposed transaction will be through stock exchange or off-market deal	
11.	Folio No. / DP ID / Client ID No. where the securities will be credited / debited	

I enclose herewith the form of Undertaking signed by me.

Yours faithfully	
	RUCTION
(Signature of Employee)	SURAT
	Signia *

UNDERTAKING
To, The Compliance officer Bigbloc Construction Limited
Dear Sir,
I, of the Company residing
at, am desirous of dealing in
* shares of the Company as mentioned in my application dated for pre-clearance of the transaction.
I further declare that I am not in possession of any unpublished Price Sensitive Information (as defined in the Company's Code of Conduct for prevention of Insider Trading (the Code) at the time of signing this Undertaking.
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.
I declare that I have not contravened the provisions of the Code as notified by the Company from time to time.
I undertake to submit the necessary report within 2 days of execution of the transaction / a 'Nil' report if the transaction is not undertaken.
If approval is granted, I shall execute the deal within 7 days of the receipt of approval failing which I shall seek pre-clearance.
I state that after buying / selling of the shares, I shall not enter into an opposite transaction i.e. sell / buy during the next six months following the prior transaction. However, in case of personal emergency, I will approach for waiving the requirement with reasons, which shall be stated.
The transaction as referred herein is estimated to have a market value of Equity Shares of Rs.10 Lakhs and above. I shall inform within 2 working days, the fact of the transaction having been completed.
I declare that I have made full and true disclosure in the matter.
Date:
Signature:
* Indicate number of shares

PRE-CLEARANCE ORDER

To,	
Name:	
Designation:	
Place:	
This is to inform you that your request for dealing in is approved.	_ (nos) shares of the Company as
Please note that the said transaction must be completed on or before 7 days from today.	ore (date) that is within
In case you do not execute the approved transaction /deal on or be have to seek fresh pre-clearance before executing any transaction. Company.	
Further, you are required to file the details of the executed transaction days from the date of transaction/deal. In case the transaction is no necessary.	
Yours faithfully	
For Bigbloc Construction Limited	
Compliance officer	
Date:	
	STRUCTION

Encl: Format for submission of details of transaction

FORM A

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

Name of the com	pany:									
ISIN of the comp	ISIN of the company:									
Details of Securi			anagerial Person	anel (KMP), Di	rector and othe					
Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoters/ k	COMING IN	Securities held as on the date of regulation coming into force							
	Directors/imr ate relative to/others etc)	Shares W	ecurity (For eg. – farrants, Convertibes etc.)	No.						
1	. 2		3	4	5					
Details of Open Managerial Pers 6(2) Open Interest of the date of regula	the Future contr	Director and o		ns as mentioned	racts held as on					
Contract Specifications	Notional value in Rupee terms									
6	7	8	9	10	11					
Note: In case of coptions Name & Signatur Designation: Date: Place:		l value shall be d	calculated based o	on premium plus	Strike price of					

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]

	g a Promoter of		ey Managerial Per any and other su		
Name, PAN, CIN/DIN & Address with contact nos.	Category of Person (Promoters/ KMP / Directors/imm	Date of appointment of Director /KMP OR Date of becoming	Securities held at becoming Promoter/appoints Director/KMP	S	% of Shareholding
į,	ediate relative to/others etc.)	Promoter	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	The State of the S
			Debeniules etc.)		
of Insider Trad	ing) Regulations, .	2015.	4 ned under regulat		
of Insider Trad Details of Op Managerial Pe	ies" shall have the ing) Regulations, . en Interest (OI)	meaning as defi 2015. in derivatives or Director or u	ned under regulate of the company pon becoming a	ion 2(1)(i) of Si	EBI (Prohibition
of Insider Trad Details of Op Managerial Pe and other such Open Interest of	ies" shall have the ing) Regulations, . en Interest (OI) ersonnel (KMP) o	in derivatives or Director or utioned in Regular	ned under regulate of the company pon becoming a	held on appoi Promoter of a	EBI (Prohibition ntment of Key listed company
of Insider Trad Details of Op Managerial Pe and other such Open Interest of time of becomi	en Interest (OI) ersonnel (KMP) of persons as ment of the Future contrang Promoter/appo	in derivatives or Director or utioned in Regular	of the company pon becoming a lition 6(2). Open Interest of t time of becoming Director/KMP	held on appoi Promoter of a he Option Cont Promoter/appo	EBI (Prohibition ntment of Key listed company
Details of Op- Managerial Period other such Open Interest of time of becomin Director/KMP Contract specifications	res" shall have the sing) Regulations, are Interest (OI) ersonnel (KMP) of persons as ment of the Future contrarg Promoter/appo Number of units (contracts * lot size) 8	in derivatives or Director or un tioned in Regular racts held at the intment of Notional value in Rupee terms	of the company pon becoming a lition 6(2). Open Interest of t time of becoming Director/KMP	held on appoi Promoter of a he Option Cont Promoter/appo Number of units (contracts * lot size)	ntment of Key listed company racts held at the intment of Notional value in Rupee terms

Place:

SURAT E

FORM C

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

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,	Categor	Securities	held	Securities acquired/Disposed				Securities	held post	Date of a	llotment	Date of	Mode of
PAN,	y of	prior to						acquisitio	sition/disposal advice/		intimation	acquisition /	
CIN/DIN,	Person	acquisitio	n/dispo								to	disposal (on	
& address	(Promot	sal								shares/ company		company	market/public/
with	ers/									sale of sl	nares		rights/
contact	KMP/									specify			preferential
nos.	Director	Type of	No.	Type of	No.	Valu	Transact	Type of	No. and %	From	То		offer / off
	s/immed	security	and %	security		e	ion	security	of				market/ Inter-se
	iate	(For eg.	of	(For eg.			Type	(For eg.	shareholdi			1	transfer, ESOPs
	relative	- Shares,	shareh	_			(Buy/	- Shares,	ng				etc.)
	to/other	Warrants	olding	Shares,			Sale/	Warrants					
	s etc.)	,		Warran	1		Pledge /	,					
		Converti	l	ts,			Revoke/	Converti				1	\
		ble		Convert			Invoke)	ble					
		Debentur		ible				Debentur					
		es etc.)		Debent				es etc.)		l			
				ures									
				etc.)									
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).

	Exchange on which the trade was executed						
Type of contract	Contract specifications	l mil mil					
	Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)			
15	15 16 17 18 19 20						

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,	Connect	Securities	held	Securitie	es acqu	aired/D	•	Securities he	•	Date of a	llotment	Date of	Mode of
PAN,	ion with	prior to					1	acquisition/d	lisposal	advice/		intimation	acquisition/dispos
CIN/DIN,	compan	acquisitio	n/dispo							acquisiti	on of	to	al (on
& address	y	sal								shares/		company	market/public/
with										sale of s	nares		rights/
contact										specify			Preferential offer /
nos. of		Type of	No.	Type of	No.	Valu	Transa	Type of	No. and % of	From	То		off market/Inter-
other		security	and %	security		e	ction	security	shareholding				se transfer, ESOPs
connected		(For eg.	of	(For eg.			Туре	(For eg					etc.)
persons		- Shares,	shareh	_			(Buy/	Shares,					1
as .		Warrants	olding	Shares,			Sale/	Warrants,					İ
identified		,		Warran			Pledge	Convertible					
by the		Converti		ts,			/	Debentures					
company		ble		Convert			Revoke	etc.)					
		Debentur		ible			/Invoke						
		es etc.)		Debent)						
				ures									
				etc.)									
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

	Exchange on which the trade was executed					
Type of	Contract	E	Buy		Sell	
Contract	specifications	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:

Place:

