

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

1. INTRODUCTION

In order to protect the interests of investors in general and to put in place a framework for prohibition of insider trading in securities and to strengthen the legal framework thereof, the Securities and Exchange Board of India (“**SEBI**”) in exercise of the powers conferred on it under Section 30 read with clause (g) of sub-section (2) of section 11 and clause (d) and clause (e) of section 12A of the Securities and Exchange Board of India Act, 1992 (“**SEBI Act**”) has issued the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“**the PIT Regulations**”) which came into effect from May 15, 2015.

The clause 2A of regulation 3 read with regulation 8 of the PIT Regulations requires every listed company to frame (a) policy for determination of legitimate purpose as a part of Code of Practices and Procedures for fair disclosure of Unpublished Price Sensitive Information (“**UPSI**”); and (b) Code of Practices and Procedures for fair disclosure of UPSI.

Airox Technologies Limited (“**Company**”) endeavors to preserve the confidentiality and prevent the misuse of UPSI. The Company is committed to ensure transparency and fairness in dealing with all stakeholders and in ensuring adherence to all the applicable laws and regulations.

Accordingly, Company has framed this code as a code of Practices and Procedure for fair disclosure of UPSI covering policy for determination of legitimate purpose of the Company by its designated persons and immediate relatives of designated persons (collectively referred to as the “**PIT Fair Disclosure Code**”) which is in line with the PIT Regulations and is effective from 20th May, 2022 as notified by the board of directors of the Company.

2. APPLICABILITY:

The Code is applicable to the following persons:

- Promoters including member(s) of Promoter group
- Directors
- Designated Persons
- Concerned Advisers/Consultants/Retainers of the Company
- Connected Persons

3. DEFINITIONS:

In this Code unless the context otherwise requires, the following words, expression and derivations there from shall have the meanings assigned to them as under:

3.1 ‘Act’ means Securities and Exchange Board of India Act, 1992.

3.2 ‘Board’ means the Board of Directors of the Company.

3.3 ‘Company’ means Airox Technologies Limited.

3.4 ‘Compliance Officer’ means Company Secretary of the Company or in absence of Company Secretary, any senior officer, designated so or in absence of both, the Executive Director or such other senior officer, who is financially literate and is capable of appreciating requirements of legal and regulatory compliance under the PIT Regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring and adherence to the rules for preservation of UPSI, monitoring of trades and the implementation of this Code of Conduct and Compliance officer shall function and carry out his responsibilities under the overall supervision of the Board.

Explanation – for the purpose of this Code of Conduct “financially literate” shall mean a person, who has ability to read and understand basic financial statement like balance sheet, statement of profit and loss,

cash flow statement etc.

3.5 ‘Concerned Adviser / Consultants / Retainers’ of the Company means such advisers or consultants or retainers or professionals who in the opinion of the Company may have access to UPSI.

3.6 ‘Connected Person’ means:

3.6.1 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 UPSI or is reasonably expected to allow such access.

3.6.2 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,

3.6.3 an immediate relative of connected persons specified in clause (i); or

3.6.4 a holding company or associate company or subsidiary company; or

3.6.5 an intermediary as specified in Section 12 of the Act or an employee or director thereof; or

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

3.6.7 an official of a Stock Exchange or of clearing house or corporation; or

3.6.8 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

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

3.6.10 an official or an employee of a self-regulatory organization recognized or authorized by the SEBI; or

3.6.11 a banker of the Company; or

3.6.12 a concern, firm, trust, Hindu undivided family, company or association of persons where in a director of the Company or his immediate relative or banker of the Company, has more than ten percent, of the holding or interest.

3.7 ‘Designated Person(s)’ shall mean and include:

3.7.1 All Directors of the Company and their secretaries;

3.7.2 Officers in the Senior Management of the company i.e., Leadership Team; Key Managerial Personnel,

3.7.3 Company Secretary Department, Central Finance Department including Financial/ Business Counsels, Tax Department-Direct and Indirect, Information Technology Department, Sourcing Department, Marketing Department and as such other employees or Departments as may be notified from time to time.

3.7.4 All Promoters and Promoter Group of the Company.

3.7.5 Employees of the Company designated based on their functional role or access to UPSI.

3.7.6 Employees of the Material Subsidiary, if any, designated based on their role or access to unpublished price sensitive information.

3.7.7 Employees up to two levels below Managing Director.

3.7.8 Employees up to two levels below the Managing Director of the Material Subsidiary.

3.7.9 Any other person as may be determined and informed by the Compliance Officer from time to time.

3.8 **‘Director’** means a Member of the Board of Directors of the Company.

3.9 **‘Employee’** means every employee of the Company including the Directors in the employment of the Company.

3.10 **‘Immediate Relative’** means a spouse of a person, and includes parent, sibling and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading insecurities

3.11 **‘Insider’** means any person who is a Connected Person; or is in possession of or having access to UPSI;

Any person in receipt of unpublished price sensitive information pursuant to a “legitimate purpose” and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with these regulations.

It is clarified that any person in receipt of UPSI pursuant to a “legitimate purpose” shall be considered an “Insider” for the purpose of this Code and due notice shall be given to such persons to maintain confidentiality of such UPSI in compliance with the PIT Regulations.

3.12 **‘Key Managerial Person (KMP)’** means the person as defined in Section 2(51) of the Companies Act, 2013 including any amendment or modification thereto and such other officer(s) named in the offer documents to be filed or filed with the SEBI and other persons as may be designated by the Board from time to time.

3.13 **‘Legitimate purpose’** shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partner(s), collaborator(s), lender(s), customer(s), supplier(s), merchant banker(s), bankers, legal adviser(s), auditors, staff members of the audit firm conducting the audit, insolvency professional(s) or other adviser(s) or consultant(s), and such other person as may be decided by the Audit Committee, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the PIT Regulations.

The Legitimate Purpose shall also inter alia include sharing of the UPSI in relation to the following: a) Sharing the information upon an action, subpoena or order of a court of competent jurisdiction; b) Sharing the information for any requirement of legal process, regulation or governmental order, decree or as per applicable laws, rules and regulations; c) Sharing of information for the purposes of obtaining regulatory licenses and approvals etc.; d) Sharing of such information as may be determined by the Audit Committee from time to time.

3.14 **‘Listing Regulations’** means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (SEBI (LODR) Regulations, 2015) as amended from time to time.

3.15 **‘Material Facts’** means the materiality of a fact depends upon the circumstances. A fact is considered “material”, if it is likely to affect the market price of the securities; upon coming into public domain. Material information can be positive or negative and can relate to virtually any aspect of the business of a Company or its holding company, subsidiary company or affiliates or to any type of security, debt or equity. Examples of material information include (but are not limited to) facts concerning:

3.15.1 Dividends;

- 3.15.2 Corporate earnings or earnings forecasts;
 - 3.15.3 Business performance developments, such as number of customers; mergers or acquisitions; major litigation; significant borrowings or financing; defaults on borrowings; and bankruptcies,
 - 3.15.4 Issues of securities or buyback of securities;
 - 3.15.5 Any major expansion plans or execution of new projects;
 - 3.15.6 Amalgamation, mergers or takeovers;
 - 3.15.7 Disposal of whole or substantial part of the undertaking; and
 - 3.15.8 Any significant changes in policies, plans or operations of the Company.
- 3.16 **‘Material Subsidiary’** means a subsidiary, whose income or net worth exceeds 10% of the consolidated income or net worth respectively, of the Company and its subsidiaries in the immediately preceding accounting year.

Explanation - The Company shall formulate a policy for determining ‘material’ subsidiary.

- 3.17 **‘Need to know’** means the UPSI shall be disclosed only to those who need the information to discharge their duty and/ or legal obligations by virtue of their respective role and function, whose possession of such UPSI will not give rise to a conflict of interest or appearance of misuse of the information.
- 3.18 **‘Non-public Information’** Information is “non-public” if it is not available to the general public. In order for information to be considered public, it must be widely disseminated in a manner making it generally available to investors by distribution to Stock Exchanges where Company’s shares are listed or through such media as press and television, journals or similar broad distribution channels or the press media in India and abroad. The circulation of rumors, even if accurate and reported in the media, does not constitute effective public dissemination.
- 3.19 **‘Promoter’** and/ or **‘Promoter Group’** shall have same meaning assigned to it under Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any amendment thereof.
- 3.20 **‘Securities’** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund.
- 3.21 **‘SEBI’** means Securities and Exchange Board of India constituted under Securities and Exchange Board of India Act, 1992.
- 3.22 **‘PIT Fair Disclosure Code’** shall mean this document covering (a) policy for determination of legitimate purpose and (b) code of Practices and Procedure for fair disclosure of UPSI.
- 3.23 **‘PIT Regulations’** means Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time including any statutory modification hereof.
- 3.24 **‘Stock Exchange’** shall mean any recognized stock exchange(s) on which Company’s securities are listed.
- 3.25 **‘Specified’** means specified by the SEBI in writing.
- 3.26 **‘Takeover Regulations’** means Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.
- 3.27 **‘Trading’** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities of the Company whether directly or through any Portfolio Management Scheme or otherwise and ‘trade’ shall be construed accordingly.
- 3.28 **‘Trading Day’** means a day on which the recognized Stock Exchanges are open for trading;
- 3.29 **‘Unpublished Price Sensitive Information’** or **‘UPSI’** means any information, relating to the

Company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following:

- 3.29.1** financial results;
- 3.29.2** dividends;
- 3.29.3** change in capital structure;
- 3.29.4** mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions; and
- 3.29.5** changes in key managerial personnel(KMP)

Words and expressions used and not defined in this Code but defined in SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, SEBI Act, 1992 (15 of 1992), Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made there under (including any statutory modifications or re-enactment thereof) shall have the meanings respectively assigned to them in those legislation.

3.30 In this Code unless there is anything repugnant in the subject or context words importing the masculine gender shall be taken to include females and vice versa. In addition, words in the singular shall include the plural and vice versa.

4. COMMUNICATION OR PROCUREMENT OF UPSI:

4.1. Notwithstanding anything contained in this Code, an UPSI may be communicated, provided, allowed access to or procured, in connection with a transaction that would –

4.1.1. 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 sharing of such information is in the best interests of the Company;

4.1.2. 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 sharing of such information is in the best interests of the Company and the information that constitute UPSI 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 to be adequate and fair to cover all relevant and material facts.

4.1.2.1. For the purpose of clause a. above, the Board of Directors shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the purpose of a. above, and shall not otherwise trade in securities of the Company when in possession of UPSI.

5. CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

5.1. Directors and employees shall maintain strict confidentiality of business information and all Unpublished Price Sensitive Information of the Company.

5.2. The business information and all Unpublished Price Sensitive information should not be communicated to any person except in the course of performance of duties or discharge of legal obligations.

5.3. The Unpublished Price Sensitive Information shall be handled on a “need to know” basis i.e., price sensitive information shall 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.

- 5.4. Files containing confidential information shall be kept secure. Computer files shall have adequate security of login and password as per the Company's IT Policy.
- 5.5. All employees must consult the Marketing Department of the Company and/or the Compliance Officer and /or Legal Department before communicating with the media or public. The Company's communication policy with the public will have to be adhered to at all times.
- 5.6. The Company,
 - 5.6.1. shall make 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.
 - 5.6.2. shall ensure uniform and universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure.
 - 5.6.3. appoints Compliance Officer to deal with dissemination of information and disclosure of Unpublished Price Sensitive Information.
 - 5.6.4. shall make prompt dissemination of Unpublished Price Sensitive Information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
 - 5.6.5. shall give appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
 - 5.6.6. shall ensure that information shared with analysts and research personnel is not Unpublished Price Sensitive Information.
 - 5.6.7. shall develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the website of the Company, to ensure official confirmation and documentation of disclosures made.
 - 5.6.8. shall ensure that all the Unpublished Price Sensitive Information are handled on a need-to-know basis.

Policy for determination of "Legitimate Purposes"

In line with clause 2A of regulation 3 of the PIT Regulations, Policy for determination of legitimate purposes is provided under **Annexure 1** of this Code.

ANNEXURE 1

POLICY FOR DETERMINATION FOR LEGITIMATE PURPOSES FOR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

Under clause 2A of regulation 3 read with regulation 8 of the PIT Regulations

No insider shall communicate, provide, or allow access to any UPSI, relating to securities of the Company or securities proposed to be listed by the Company, to any person including other insiders except where such communication is in furtherance of Legitimate Purposes, performance of duties or discharge of legal obligations.

No person shall procure from or cause the communication by any insider of UPSI, relating to securities of the Company or securities proposed to be listed by the Company, except in furtherance of Legitimate Purposes, performance of duties or discharge of legal obligations

Any person in receipt of UPSI pursuant to Legitimate Purpose shall be considered an insider for the purpose of this Code and due notice shall be given to such persons to maintain confidentiality of UPSI in compliance with the PIT Regulations. Such person is also required to ensure the confidentiality of UPSI shared with him, in compliance with the PIT Regulations.

The Company believes in timely and adequate disclosure of price sensitive information legitimate purposes.

The following norms shall be followed for disclosure of UPSI.

- a. The Compliance Officer entrusted to administer the code of conduct and other requirements under the PIT Regulations.
- b. The Compliance Officer shall after clearance by the Managing Director furnish UPSI to the Stock Exchanges.
- c. The quarterly financial information of the Company shall be hosted in the web site of the Company after the information is furnished to the Stock Exchanges.
- d. The Managing Director responsible for Investor Relations shall oversee and carry out disclosure of price sensitive information to Stock Exchanges, Analysts, Shareholders and media. He shall be responsible for ensuring that the Company complies with continuous disclosure requirements.
- e. Disclosure/dissemination of information may be approved in advance by the Managing Director or the Compliance Officer as the case may be.
- f. If information is accidentally disclosed without prior approval, the person making such disclosure shall immediately inform the Managing Director, even if the information is not considered price sensitive.
- g. The Compliance Officer in consultation with the Managing Director shall respond to queries or requests from Stock Exchanges concerning market rumors.
- h. The Managing Director shall be responsible for deciding whether a public announcement is necessary for verifying or denying rumors and then making the disclosure.
- i. The Compliance Officer shall make disclosure of shareholdings / ownership by major shareholders and also make disclosure of changes in ownership as required under the Stock Exchange listing agreement and / or under any rule / regulation made under the Act.
- j. All Directors, Officers and Employees of the Company shall comply with the following guidelines while dealing with analysts and institutional investors:
 - i. Only public information shall be provided to the analyst / research persons / large investors like institutions. Alternatively, the information so given should be simultaneously made public at the

earliest.

- ii. In order to avoid misquoting or misrepresentation, the Compliance Officer and one other representative of the Company shall be present at Meetings with Analysts, Brokers or Institutional Investors and discussion shall be recorded.
- iii. Analysts' questions that raise issues outside the intended scope of discussion should be handled with care. Unanticipated questions may be taken on notice and a considered response given later. If the answer includes price sensitive information, a public announcement should be made before responding.
- iv. When any Meeting is organized with analysts, a press release shall be made, or relevant information hosted on website after every such meet. The Company may consider live web casting of analyst meets.
- v. Disclosure / dissemination of information may be made through various media so as to achieve good reach and quick dissemination. Disclosure to Stock Exchange shall be made promptly. Disclosures may also be made through the use of dedicated Internet website. Company website may be used to give investors a direct access to analyst briefing material, significant background information, questions and answers.

FORMATS PRESCRIBED BY SEBI UNDER SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015 (INDICATIVE)

Please note that the following forms are indicative, and the latest format prescribed by the Securities Exchange and Board of India for making the requisite disclosures are to be used, as and when required, in accordance with applicable laws.

FORM A

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

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

Name of the company: _____

ISIN of the company: _____

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

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relatives/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding	Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option Contracts held as on the date of regulation coming into force	
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	6	7	8	9

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

Signature:

Designation:

Date:

Place:

FORM B

FORM B

**SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (b) read with Regulation 6(2) – Disclosure on
becoming a Key Managerial Personnel/Director/Promoter/Member of
the promoter group]**

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 or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN & Address with contact nos.	Category of Person (KMP / Director or Promoter or member of the promoter group/ Immediate relative to others, etc.)	Date of appointment of KMP/Director OR Date of becoming Promoter/ member of the promoter group	Securities held at the time of appointment of KMP/Director or upon becoming Promoter or member of the promoter group		% Shareholding of
			Type of securities	No. (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements, etc.)	
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 on the securities of the company held on appointment of KMP or Director or upon becoming a Promoter or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).

Open Interest of the Future contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group			Open Interest of the Option Contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group		
Contract specifications	Number units (contracts * lot size)	Notional value in Rupee terms	Contract specifications	Number 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

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, Member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoter/member of the promoter group/designated person/Director s/immediate relative to/others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment/ acquisition of shares/ disposal 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.)	Exchange on which the trade was executed
		Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements etc.)	No. and % of share holding	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No.	Value	Transaction Type (Purchase/sale/Pledge / Revocation/ Invocation/ Others-please specify)	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of shareholding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

Note: (i) "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.
(ii) Value of transaction excludes taxes/brokerage/any other charges

Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or Director of a listed company and immediate relatives of such persons 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)	
16	17	18	19	20	21	22

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

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. 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/ acquisition of shares/ disposal 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.)	Exchange on which the trade was executed
		Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of shareholding	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No.	Value	Transaction Type (Purchase/Sale/ Pledge/ Revocation / Invocation/ Others-please specify)	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of share holding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

Note: (i) "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.
(ii) Value of transaction excludes taxes/brokerage/any other charges

Details of trading in derivatives on the securities of the company 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)	
16	17	18	19	20	21	22

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

Name:

Signature:

Place: