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## Document Change History

Version	Author	Date	Comments
<b>V 1.0</b>	A Sivaram Nair	31 July 2006	
<b>V 1.1</b>	A Sivaram Nair	24 November 2006	Change of name
<b>V 1.2</b>	A Sivaram Nair	28 February 2008	Executive Names removed
<b>V 1.3</b>	Sudha Sridhar	28 May 2009	Updating of contact details
<b>V 2.0</b>	Sudha Sridhar	19 August 2009 (w.e.f. 1 September 2009)	Amendments to Policy to align to amendments in SEBI Guidelines and improvements based on HP Policy.
<b>V 3.0</b>	Subramanian Narayan	24 August 2011 (w.e.f 1 September 2011)	Amendments to the policy to provide that for the applicability of the code only to the designated persons as against all the employees of Mphasis Group
<b>V 4.0</b>	Subramanian Narayan	30 July 2014 (w.e.f 1 August 2014)	Amendment to the policy to align to the provisions of the Companies Act, 2013 and Rules made thereunder,
<b>V 5.0</b>	Subramanian Narayan	22 May 2015 ( w.e.f 15 May 2015)	Amendment to the code to align to the SEBI ( Prohibition of Insider Trading ) Regulations 2015
<b>V 6.0</b>	Subramanian Narayan	1 November 2017 (w.e.f 1 November 2017)	Updation of Compliance Officer details

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## Introduction



"Insider trading" is a term that most investors have heard and usually associate with illegal conduct. When corporate insiders— i.e. officers, directors and employees, appointed counsels, auditors — trade stock in their own companies, while in possession of material, non-public information about the Company / or its shares, they are indulging in "Insider Trading". For example, if you, as an employee, are aware that Mphasis is about to win a big contract from a prestigious client (You may also know that the news of this contract could significantly improve your Company's stock price.) and buy the Company's shares or advise anybody to buy shares of your Company, you would be indulging in Insider Trading, as you are acting while in possession of confidential information not available to the general public that would affect the Company's stock price.

Insider trading violations may also include "tipping" which is the act of passing on inside information to others (relatives and friends) who may benefit by trading based on this information. **Insider Trading is a breach of the trust and confidence placed by the Company and Investors in the employees and is illegal.**

Examples of insider trading include:

- Company officers, directors and employees, appointed counsels and auditors who trade in the Company's shares while in possession of knowledge / information of significant, confidential corporate developments (such as takeover, merger etc.);
- Friends, business associates, immediate relatives and other "tippees" of such officers, directors, and employees, who trade in the Company's shares after receiving inside information;
- Employees of audit, law, banking, brokerage, printing firms and other professional / vendor firms who are given such information to provide services to the Company, but who misuse the information to trade in shares of the Company;
- Other persons who misuse or take advantage of confidential information received from their employers.

Insider trading is unfair to investors outside a Company and undermines investor confidence in the fairness and integrity of the Securities markets.

In India, the Securities Exchange Board of India (SEBI) vide its SEBI (Prohibition of Insider Trading) Regulations, 2015 ( Insider Trading Regulations) and the Ministry of Corporate Affairs through the Companies Act, 2013, has laid down provisions to prevent Insider Trading. Employees, including Directors and KMP, should be aware that if they possess inside information regarding the Company they work for, they must completely refrain from trading or advising anybody to trade in the Securities of that Company during the time such information remains unpublished, as this is classified as 'Insider Trading' and is a punishable offence. The penalty for violating this requirement includes ban from trading in the stock market, payment of market price of Securities which have been traded in violation of these requirements and criminal prosecution (i.e. imprisonment up to 10 years and/or fine up to Rs.25 crores). (Ref: SEBI (Prohibition of Insider Trading) Guidelines, 2015, as amended up to date and Companies Act, 2013).

## About this Code of Conduct

One of the rules prescribed by SEBI for preventing Insider Trading is that the Board of Directors of every listed company should formulate and adopt a Code of Conduct to regulate, monitor and report trading by its Covered Persons. The Code adopted by the Company should adhere as closely as possible to the Model Code specified in Schedule B of the Insider Trading Regulations without diluting it in any manner and companies must ensure compliance of the same. The Code of Conduct contained herein is framed in compliance with the aforesaid requirement of SEBI (Prohibition of Insider Trading) Regulations, 2015 and provisions of the Companies Act, 2013. This Code of Conduct supersedes and replaces any previous Codes of Conduct on Prevention of Insider Trading, whether express or implied, in full. This Code of Conduct pertains solely to Prevention of Insider Trading and does not purport to be a general Code of Conduct for employees in respect of other matters.

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*Note 1 – SEBI is the Regulator of the Securities Market in India, just like the Securities and Exchange Commission (SEC) in USA.*

## Mphasis Code of Conduct for Prevention of Insider Trading

## 1. Introduction and applicability

- a. This Code may be called the “Mphasis Code of Conduct for Prevention of Insider Trading”.
- b. This Code is framed pursuant to the provisions of Regulation 9(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and provisions of the Companies Act, 2013.
- c. The Code was initially adopted on 10 January 2006 and was lastly amended on 30 July 2014. This amended version of the Code shall come into force with effect from 15 May 2015.
- d. The Code shall be applicable to **Covered Persons** i.e
  - i. Designated Persons of Mphasis Group; and
  - ii. Employees of statutory and internal audit firms that are part of the audit team for Mphasis’ audit;
  - iii. Directors, partners, proprietors, employees and other persons of legal, accountancy, banking, brokerage, printing firms and other professional / consultants/ vendors, Analysts, Merchant bankers having access to Unpublished Price Sensitive information.
  - iv. Persons Deemed as Covered Persons.

## 2. Definitions

- a. “Act” means the Securities and Exchange Board of India Act, 1992.
- b. “Board” means the Board of Directors of Mphasis Limited.
- c. “Code” means the Mphasis Code of Conduct for Prevention of Insider Trading.
- d. “Company” means Mphasis Limited.
- e. “Compliance Officer” means the Company Secretary or such senior officer who may be appointed by the Board of Directors as the Compliance Officer. The Compliance Officer shall report directly to the Audit Committee on the matters in relation to the Insider Trading.
- f. ‘Covered Person’ includes
  - i. Designated Persons of Mphasis Group; and
  - ii. Employees of statutory and internal audit firms that are part of the audit team for Mphasis’ audit;
  - iii. Directors, partners, proprietors employees and other persons of legal, accountancy, banking, brokerage, printing firms and other professional / consultants/ vendors firms , Analysts, Merchant bankers having access to Unpublished Price Sensitive information.
  - iv. Deemed to be Covered Persons.

*Explanation 1:* for the purpose of this code, the following shall be deemed to be covered persons under the code unless it is established that the covered person is not connected with the deemed covered person:

- a. An immediate relative of the Covered Persons;
- b. A holding company or associate company or subsidiary company of non-individual covered persons ;
- c. A banker of the company.
- d. 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 10 % of the holding or interest.

*Explanation II:* whenever there is an event triggering compliance to the provisions of the Code by the deemed covered persons, the responsibility of ensuring compliance with this Code is on such covered person to whom the deemed covered person is associated.

Explanation II: Any person who is or has during the six months prior to trading in securities of the Company has 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, will also be deemed to be covered person with respect to such trading in securities.

- g. “Designated Persons” means
  - i. Directors of the Company
  - ii. Key Managerial Personnel
  - iii. Executive Management of the Group (i.e. Presidents, Group Chief Financial Officer and Group Chief Human Resource Officer and persons directly reporting to the Chief Executive Officer of the Company)
  - iv. All employees of the Finance, Audit, Strategy, Corporate Communications, Legal and Secretarial Departments across the Group having access to UPSI.
- h. “Immediate Relative” means the 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. “Trading ” means and includes subscribing, buying , selling , trading or agreeing to subscribe , buy , sell , deal in any Securities , and “trade” shall be construed accordingly. Trading includes trading in Securities.  
  
Trading in Securities shall also include Forward Trading in the Securities of the Company, Holding Company and its Subsidiaries.
- j. “Trading Day” means a day on which the recognized stock exchanges are open for trading.
- k. “Forward Trading in Securities” means
  - (a) a right to call for delivery or a right to make delivery at a specified price and within a specified time, of a specified number of relevant Securities ; or
  - (b) a right, as he may elect, to call for delivery or to make delivery at a specified price and within a specified time, of a specified number of relevant-Securities.
- l. “Group” means the Mphasis Group and includes all direct and indirect subsidiaries of the Company and other entities treated as part of the Mphasis Group from time to time.
- m. ‘Insider’ means any covered person or any person, who is reasonably expected to have access to unpublished price sensitive information of the Company, or who has received or has had access to unpublished price sensitive information of the Company including the unpublished price sensitive information about the Securities of the Company.
- n. “Insider Trading “means trade in Securities by any Insider;
- o. “Key Managerial Personnel (KMP)“ shall be as defined under the provisions of the Companies Act, 2013 and the Rules made thereunder.

- p. "Trading Plan" shall mean the Trading Plan as allowed under the SEBI (Prohibition of Insider Trading) Regulations, 2015.
- q. "Unpublished Price Sensitive Information or UPSI" means any information, relating to the Company or its Securities, listed or proposed to be listed 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 include, but not restricted to, information relating to the following: –
  - (i) Financial results;
  - (ii) Dividends;
  - (iii) Change in capital structure;
  - (iv) Mergers, de-mergers, acquisitions, de-listing , disposals and expansion of business and such other transactions;
  - (v) Changes in key managerial personnel; and
  - (vi) Material events in accordance with the Listing Agreement with Stock Exchanges as covered under the Policy for Fair Disclosure of Unpublished Price Sensitive Information of Mphasis.
- r. "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 as generally available.
- s. "Securities" includes the equity shares of the Company or such other Securities as may be issued by the Company and listed on the Stock Exchanges in India.
- t. "Trading Window" means a period to be specified by the Company in which trading of Securities can be done by the Covered Persons.
- u. All other expressions unless defined herein shall have the same meaning as have been assigned to them under the Act or the SEBI (Prohibition of Insider Trading) Regulations, 2015 or the Companies Act, 2013, or any statutory modification or re-enactment thereto, as the case may be.

### 3. Protocol and Trading Restrictions applicable to Covered Persons

- a. Covered Persons shall maintain the confidentiality of all Unpublished Price Sensitive Information and shall not pass on the information to any person directly or indirectly by way of making a recommendation for the purchase or sale of Securities.
- b. Unpublished Price Sensitive Information (UPSI) shall be handled on a 'need to know' basis, which means that it shall be disclosed only to those persons who need the information to discharge their duty or of legal obligations. Files containing UPSI shall be kept secure.
- c. Covered Persons shall not trade in the Securities of the Company or counsel any person to trade in the Securities of the Company while in possession of UPSI.
- d. Restriction on communication of UPSI is not applicable in case of open offer under SEBI ( Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto and in case of any other transaction where the Board of Directors of the Company is of the opinion such proposed transaction is in the best interest of the Company. Such information should be made public at least two trading days before the proposed transaction.
- e. Covered Persons may trade in the Securities of the Company only when the Trading Window is open and if they do not possess UPSI at the time of trading. This, however, does not prevent employees from exercising their stock options during the time the Trading Window is closed, although, the shares obtained on exercise of options cannot be

traded in any manner during the time the Trading Window is closed or when the employee is in possession of Unpublished Price Sensitive Information.

- f. Covered Persons, perpetually in possession of UPSI, may formulate a Trading Plan for a minimum period of 12 months period in advance, specifying the value of Securities or number of Securities to be invested or divested with specific dates or specific time intervals. Such Trading Plan needs to be approved by the Compliance Officer in the format specified in **Annexure III** and the approved plan needs to be notified to the Stock Exchanges on which the Securities of the Company are listed. Trading Plan once approved shall be considered irrevocable and to be implemented mandatorily. Such approved Trading Plan should be reported to the Board at its next meeting. Trading under the approved Trading Plan shall not be commenced earlier than 6 months from the public disclosure of Plan by the Compliance officer.
- g. As regards such covered persons who have opted for Trading Plan, the trading window shall be closed from the 1st day of the last month of the financial quarter for which the financial results are required to be announced till the 2nd trading day after the announcement of the such financial results.
- h. As regards the other Covered Persons, the Trading Window shall be closed, inter-alia, from the 23rd day of the last month in the financial quarter and shall open 48 hours after the announcement of financial results for that quarter.
- i. The Trading Window may also be closed at other times when the Price Sensitive Information remains unpublished.
- j. Covered Persons who wish to trade in the Company's Securities, when the trading window is open, where the value of the proposed trade(s), taken together with the value of trade(s) executed over a calendar quarter, is likely to exceed Rs.1 million in that calendar quarter or where the shares proposed to be traded exceed 25000 shares, whichever is lower shall intimate the intention to trade in the Company's Securities **in the format specified in Annexure I** and shall pre-clear the trade from the Compliance Officer, prior to undertaking the transaction. The transaction so pre-cleared shall be completed within 7 days of its pre-clearance by the Compliance Officer and shall be reported to the Compliance Officer on completion. Covered Persons who do not complete the transaction within 7 days of pre-clearance shall seek fresh pre-clearance for the transaction. Transactions pre-cleared by Covered Persons shall be reported by the Compliance Officer to the Audit Committee designated by the Board of Directors in this behalf.
- k. Covered persons shall also report any decision of not undertaking any transaction for which pre- clearance had been procured along with reasons for such decision in the format specified in Annexure I.
- l. Covered Persons in possession of UPSI are not eligible to apply for pre-clearance of any proposed trade even if trading window is open.
- m. Covered Persons shall strictly follow practices and physical arrangements as implemented within the Company to prevent the inadvertent spread and misuse of UPSI. However, Covered persons can be exempted from such compliances only with the prior approval of the Compliance Officer. Inadvertent breach need to be reported to Compliance Officer immediately.

#### 4. Additional Trading restrictions applicable to Covered Persons

- a. Covered Persons who trade in any number of Securities of the Company shall not enter into an opposite transaction (i.e. sell or buy etc.) for any number of Securities for the six months period following the prior transaction. The

Compliance Officer may, on application from the Covered Persons, grant relaxation with regard to the minimum holding period after recording reasons for the same in writing. Instances of waiver of minimum holding period shall be reported by the Compliance Officer to the Audit Committee.

The above provision is not applicable for exercise of stock options.

- b. In case of any violation of the above requirement, whether inadvertently or otherwise, profits from such trade shall be liable to be forfeited for remittance to Investor Protection and Education Fund administered by SEBI in addition to being liable for other penal consequences.
- c. No Covered Person shall take positions in derivative transactions in the Company' Securities.

## 5. Reporting Requirements applicable to Covered Persons

- a. Directors of Mphasis Limited, Key Managerial Personnel of the Company and the Executive Management of the Mphasis Group shall, within 7 days of joining the Company or becoming a promoter of the Company, disclose their shareholding, if any, as on the date of appointment in the Company or becoming a promoter in the format specified in **Annexure IV**. Other covered persons shall disclose their shareholding in the Company in **Annexure IV** within 15 days from the date of appointment or engagement.
- b. Covered Persons shall, on an annual basis, within 30 days from the end of the year, furnish the details of the Securities held by them and their immediate relatives or by any other person for whom such persons takes trading decisions, in the format prescribed in **Annexure II**.
- c. Where the Covered Person does not hold any Securities in the Company either in his/her name or in the names of his/her immediate relatives, he/she shall furnish the report in the format prescribed in Annexure II, stating the shareholding as NIL.
- d. Where it is subsequently found that the Covered Person was holding Securities of the Company (either directly or in the name of his/her immediate relatives) and the same was not duly reported, the Covered Person shall be treated as violating the Code of Conduct and the Company may forthwith proceed to take penal action prescribed in para 6 of this Code.

## 6. Penalty for Contravention of the Code

- a. Any instance of violation of this Code shall be reported to the Audit Committee or any other Committee of the Board designated for this purpose by the Board of Directors of the Company.
- b. Any Covered Person who violates this Code may be penalized and appropriate action may be taken against him/her, which may extend to wage freeze, suspension, elimination from Employee Stock Options Plan and / or removal from services of the Group. The Audit Committee shall have the authority to take appropriate action against insiders for violation of this Code. The Committee may refer serious instances of violation to the Board for information and / or decision on penal action to be taken.
- c. Any instance of violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015 shall be placed before the Board of Directors of the Company and if deemed fit by the Board such instances of violation shall be reported to the Securities Exchange Board of India. The action taken by Mphasis in such cases shall not preclude Securities Exchange Board of India from taking any action under the SEBI (Prohibition of Insider Trading) Regulations, 2015 or the Act.



- d. In addition to the above, the person violating the code shall also be liable for consequences as per the provisions of the Companies Act, 2013.

## 8. Compliance Officer

- a. The Company Secretary of the Company is the Compliance Officer responsible for setting forth procedures and monitoring adherence to the rules for the preservation of unpublished price sensitive information, approving Trading Plans, pre-clearing trades of Covered Persons, monitoring trades and the overall implementation of this Code.
- b. The Compliance Officer shall provide annual report to the Board of Directors and shall provide quarterly reports to the Chairman of the Audit Committee.
- c. The Compliance Officer may be contacted at the following address for any clarifications and approvals in respect of this Code:

**COMPANY SECRETARY**  
**LEGAL & SECRETARIAL DEPARTMENT**  
**Mphasis Limited**  
**Bagmane World Technology Center,**  
**Marathalli Outer Ring Road, Doddanakhundi Village,**  
**Mahadevapura, BANGALORE – 560 048**  
**Ph: +91 80 33524613 (D) Fax +91-80-66959943**  
**Email - [subramanian.narayan@mphasis.com](mailto:subramanian.narayan@mphasis.com)**

**FORM FOR PRE-CLEARANCE OF TRADES BY COVERED PERSONS**  
In terms of Para 3(j) of the Code.

To  
**The Compliance Officer**  
**Mphasis Limited**

**ANNEXURE I**

Date		
Name of the Covered Person		
Employee Number, if any		
Company on whose Rolls placed		
Email ID		
Connection with the Covered Persons or Company, as applicable		
DP ID and Client ID from which trade is proposed to be executed		
PRE-CLEARANCE (Required to be obtained by Covered Persons where the value of the proposed trade(s), taken together with the value of trade(s) executed over a calendar quarter, is likely to exceed Rs.1 million in that calendar quarter or where the shares proposed to be traded exceed 25000 shares, whichever is lower)		
Number of for proposed to be traded	No. of Securities: Purchase or Sale : Market / Off-Market :	
Whether trade undertaken in own name or that of immediate relatives or any other person for whom I take trading decision (Please give name of your relative or such other person )		
In case the trade is not undertaken after securing pre-clearance , reasons for such decision		

In terms of Para 3 of the Mphasis Code of Conduct for Prevention of Insider Trading, I wish to pre-clear the aforesaid transaction proposed to be undertaken by me / my immediate relatives/ any other person for whom I take trading decisions, as the value of the Securities proposed to be traded (taken together with the value of shares traded during the calendar quarter) exceeds Rs.1 million per calendar quarter or the number of shares proposed to be traded exceeds 25000 shares (strike off whichever is not applicable). I confirm that:

- (i) I am not in possession of any unpublished price sensitive information while seeking pre-clearance.
- (ii) In case I have access to or receive unpublished price sensitive information after this date but before execution of the transaction I shall inform the Compliance Officer of the change in position and shall completely refrain from trading in the Company's Securities till such time the unpublished price sensitive information is made public/ becomes irrelevant and not price sensitive;
- (iii) I am not otherwise precluded or disqualified from entering into the above transaction;
- (iv) All information given above is true to the best of my knowledge and belief.

Signature

Date:

**FORM FOR ANNUAL DISCLOSURE OF SHAREHOLDING BY COVERED PERSONS**  
 In terms of Para 5(b) of the Code.

**ANNEXURE II**

<b>Disclosure for the year ended</b>	
<b>Name of the Covered Person</b>	
<b>PAN Number</b>	
<b>DIN/CIN Number</b>	
<b>Employee Number , if applicable</b>	
<b>Company on whose Rolls placed</b>	
<b>Contact address with contact details and Email ID</b>	
<b>Connection with the covered person or Company , as applicable</b>	
<b>DP ID and Client ID (Self)</b>	
<b>DP ID and Client ID (Immediate Relatives)</b>	
<b>Name of Spouse</b>	
<b>Name/s of Dependent Child / Children</b>	
<b>Name /s of the Parents</b>	
<b>Name/s of the Siblings</b>	
<b>Name/s of persons for whom covered persons take trading decisions, if any.</b>	
<b>Details of the deemed to be covered persons , if any</b>	

**A. Details of Securities Held by Employee and Immediate Relative in Mphasis Limited**

<b>Immediate Relatives</b>	<b>Type of Securities</b>	<b>DP ID or Client ID</b>	<b>Securities held as at beginning of the year</b>	<b>Securities purchased during the year</b>	<b>Securities sold during the year</b>	<b>Mode of Acquisition *</b>	<b>Securities held as at end of the year</b>
Self							
Spouse							
Dependent Children							
Parents*							
Siblings*							

\* Who is either dependent financially on such person, or consults such person in taking decisions relating to trading in Securities

\* market purchase/public/rights/preferential offer/off market/inter-se transfer etc.

**B. Details of Securities held by any other person for whom trading decision is taken by the Covered Persons including deemed covered persons ( other than above)**

<b>Name of the persons</b>	<b>Kind of Securities</b>	<b>DP ID or Client ID</b>	<b>Securities held as at beginning of the year</b>	<b>Securities purchased during the year</b>	<b>Securities sold during the year</b>	<b>Securities held as at end of the year</b>

**Details of Securities held for less than 6 months.**

No. of Securities	Date of Purchase	Date of Sale	Details of pledge created, if any	Date of approval from the Compliance Officer, in case applicable (Refer Para 4(a) of the Code)

I confirm that:

- (i) I was not in possession of unpublished price sensitive information at the time of trading in Securities of the Company ;
- (ii) The aforesaid trades were executed when the Trading Window was open and disclosures wherever required has been made by me to the Company from time to time;
- (iii) I have duly pre-cleared trades from the Compliance Officer;
- (iv) I have held Securities purchased by me, directly or indirectly through my immediate relatives, for more than 6 months. If the Securities were not held for 6 months, I have taken due approval from the Compliance Officer for the same;
- (v) I undertake to fully adhere to the standards and requirements specified by SEBI, from time to time, in relation to SEBI (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto; and
- (vi) All information given above is true to the best of my knowledge and belief.

\_\_\_\_\_  
Signature  
Date:

## FORM FOR APPROVAL OF TRADING PLAN FOR COVERED PERSONS

In terms of Para 3(f) of the Code.

ANNEXURE III

<b>Name of the Covered Person</b>	
<b>Email ID</b>	
<b>PAN Number</b>	
<b>DIN/CIN</b>	
<b>DP ID and Client ID (Self)</b>	
<b>DP ID and Client ID (Immediate Relatives)</b>	

### Details of Securities currently held by the Covered Person

No. of Securities	Date of Purchase	Details of pledge created, if any

### Details of Proposed Trading Plan

Time period ( Exact dates or time range)	Type of Securities to be traded	No/Value of Securities proposed to be purchased	No/ proposed to be sold

I declare the following that:

- (i) If the Trading Plan is approved, I hereby authorize and consent to Compliance officer to disclose the trading plan to the stock exchanges as required by SEBI Regulations.
- (ii) I shall not implement the Trading Plan if any Unpublished Price Sensitive Information in my possession at the time of formulation of trading plan is not public at the time of implementation of Trading Plan;
- (iv) I shall not implement the trading plan when the trading window is closed.
- (v) I shall mandatorily adhere to the aforesaid Trading Plan once approved by the Compliance Officer.
- (vi) All information given above is true to the best of my knowledge and belief.

\_\_\_\_\_  
Signature

Date:

**FORM FOR DISCLOSURE OF SHAREHOLDING BY THE DIRECTOR /KMPs/ EXECUTIVE MANAGEMENT GROUP /COVERED PERSONS**

**FORM B**

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

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

Name of the company: -----

ISIN of the company: -----

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

Name, PAN No., CIN/DIN & Address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate Relatives/others etc.)	Date of appointment of Director /KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP		% of Shareholding	Open Interest of the Future contracts held at the time of becoming Promoter/appointment of Director/KMP		Open Interest of the Option Contracts held at the time of becoming Promoter/appointment of Director/KMP	
			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	

**Note:**

1. "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.
2. Other such persons includes immediate relatives and any other person for whom reporting person takes trading decision.
3. "Immediate Relatives" means the 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.

Signature: \_\_\_\_\_

Designation: \_\_\_\_\_

Date: \_\_\_\_\_

Place: \_\_\_\_\_