

CODE OF CONDUCT FOR PROHIBITION OF INSIDER TRADING (“CODE”)

Introduction

Insider Trading is the act of trading, directly or indirectly, in the securities of a listed entity by any person, who may or may not be managing the affairs of such company, based on certain information, not available to the public at large, that can influence the market price of the securities of such entity. An insider, who has access to critical price sensitive information with respect to a given entity, may tend to use such information to his economic advantage, severely impairing the interests of a public shareholder who is not privy to such information.

As discussed above, permitting few people to take advantage of Unpublished Price Sensitive Information (“UPSI”) before it is disclosed to the others is a grave compromise on fairness and equity and this affects the integrity of the financial market. In view of the same, this Code is framed to ensure that confidentiality of UPSI is maintained and to elucidate all Designated Persons that they have a responsibility and duty to preserve the confidentiality of UPSI and not to take advantage of any such information for personal gains in any manner whatsoever.

Necessity of the Code:

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, including amendments thereto, (“Regulations”) provides for a framework for prohibition of insider trading in securities and aims at strengthening the legal framework thereof. The Regulations requires the board of directors of listed company, intermediaries and fiduciaries to formulate a code of conduct to regulate, monitor and report trading by its designated persons including their immediate relative(s) towards achieving compliance with the provisions of Regulations.

In the above context, “A.K. Group” comprising of the following entities, has formulated this Code:

Name of the Entity	Nature of Registration and Registration No.	Capacity
A.K. Stockmart Private Limited (AKSPL)	SEBI Registered Stockbroker: INZ000240830 Depository Participants (CDSL & NSDL) - IN-DP-481-2020 In-house Registrar and Share Transfer Agent: CDSL (RTA): 372	Intermediary
A. K. Wealth Management Private Limited (AKWMPL)	SEBI Registered Portfolio Manager: INP000003674	Intermediary
A. K. Capital Finance Limited (AKCFL)	RBI Registered Systematically Important Non-Banking Financial Company: N-13.01991	Listed Entity and Fiduciary

Family Home Finance Private Limited (FHFPL)	NHB registered Housing Finance Company (without accepting public deposit): 04.0167.18	Fiduciary
A K Capital Services Limited (AKCSL)	SEBI Registered Merchant Banker: INM000010411 SEBI Registered Investment Adviser: INA000007669	Listed Entity and Intermediary

All the entities shall be collectively referred as “A.K. Group”/ “A.K/Company.”

AKSPL, AKWMPL, AKCFL and FHFPL are subsidiaries of AKCSL.

Objectives and Applicability of this Code:

A.K. Group is financial conglomerate and has various SEBI and RBI Licenses. The nature of activities/business involves stock broking, depository participant, merchant banking, investment banking, distribution of financial products, investment advisory, Housing Finance business, Non-Banking Financial services and Portfolio Management Services. All the aforesaid activities are highly regulated by the regulators and authorities like Securities and Exchange Board of India, Reserve Bank of India, Stock Exchange(s), Depositories etc.

Given the diversity of the business operations, applicability of various regulations that A.K. Group’s activities are subject to and given the impact of non-compliance, it is important that the Designated Persons (defined hereinafter) of A.K. Group, understand and comply strictly with the applicable regulatory requirements in letter and spirit of the law.

Designated Persons of A.K. Group may have access to UPSI about A.K. Group, Securities issued by it, and may also acquire UPSI relating to client (including potential client) companies, listed issuers/ securities (including securities proposed to be listed) having business/ commercial or operational nexus with A.K. Group. UPSI may be acquired while working on assignments/ projects / transactions / mandate for Clients of A.K. Group. In view of the same, this Code regulates the trading by Insiders and aims to protect the confidentiality of UPSI.

This Code shall be applicable to all Designated Persons and their immediate relatives.

1. Definitions

- 1.1 **“Act”** means the Securities and Exchange Board of India Act, 1992 and any amendments, circulars, notifications issued thereto.
- 1.2 **“Board”** means the Securities and Exchange Board of India.

- 1.3 **"Code" or "Code of Conduct"** shall mean this Code of Conduct for Prohibition of Insider Trading, as amended from time to time.
- 1.4 **"Compliance Officer"** means the Compliance Officer person who has been designated by the Board of Directors to ensure compliance of the SEBI (Prohibition of Insider Trading) Regulations, 2015 including amendments thereto.
- 1.5 **"Designated Compliance Officer"** means the Compliance Officer appointed by the Board of Directors for the purpose of compliance of policies, procedures, maintenance of records, monitoring adherence to the Regulation, 2015 as amended from time to time, under the overall supervision of the SEBI.
- 1.6 **"Designated Employees"** includes all Promoters, Directors and employees of A.K. Group across all levels/grades including their immediate relatives.
- 1.7 **"Designated Person"** shall include:
- (i) Employees and Directors of the A.K. Group.
 - (ii) Representatives of Fiduciaries viz. Professional Firms directly dealing with the Company such as auditors, accountancy firms, law firms, analysts, consultants, banks, lenders etc., assisting or advising the Company or such other entities having a business relation/ commercial arrangement with the Company by virtue of which have access to Unpublished Price Sensitive Information.
 - (iii) Promoter and Promoter Group and their person acting in concert;
 - (iv) Such other persons as may be determined by the Compliance Officer from time to time.
- 1.8 **"Generally available Information"** means information that is accessible to the public on a non-discriminatory basis.
- Note: It is intended to define what constitutes generally available information so that it is easier to crystallize and appreciate what unpublished price sensitive information is. Information published on the website of a stock exchange, would ordinarily be considered generally available.
- 1.9 **"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 in securities.
- 1.10 **"Insider"** means any person who is,
- (i) a connected person;
 - (ii) Designated Person
 - (iii) in possession of or having access to unpublished price sensitive information.

(iv) Any person in receipt of unpublished price sensitive information pursuant to a “legitimate purpose” shall be considered an “insider” for purposes of these regulations

- 1.11 **“Key Managerial Person or KMP”** means person as defined in the Companies Act, 2013 and rules made thereunder.
- 1.12 **“Legitimate Purpose”** shall have the same meaning as defined in Code of Practices & Procedures for Fair Disclosure of Unpublished Price Sensitive Information and shall include sharing of unpublished price sensitive information in the ordinary course of business by an Insider with partners, collaborators, lenders, customers, suppliers, bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of this Code. Any person in receipt of unpublished price sensitive information pursuant to a “legitimate purpose” shall be considered an “insider” for purposes of these regulations and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with these regulations.
- 1.13 **“Material financial relationship”** means a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding twelve months, equivalent to at least 25% of such payer’s annual income but shall exclude relationships in which the payment is based on arm’s length transactions.
- 1.14 **“Portal”** shall mean portal deployed for ensuring compliances under the Regulations, viz. <https://pit.akgroup.co.in/>
- 1.15 **“Promoter”** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof.
- 1.16 **“Regulations”** shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments, circulars, notifications issued thereto.
- 1.17 **“Restricted List”** – means list of listed securities maintained by Compliance Officer for monitoring compliance with SEBI (Prohibition of Insider Trading) Regulations, 2015.
- 1.18 **“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.
- 1.19 **“Takeover Regulations”** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;
- 1.20 **“Trading”** means and includes an act of subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any Securities, and "trade" shall be construed accordingly.

NOTE: Under the parliamentary mandate, since the Section 12A (e) and Section 15G of the Act employs the term 'dealing in securities', it is intended to widely define the term

“trading” to include dealing. Such a construction is intended to curb the activities based on unpublished price sensitive information which are strictly not buying, selling or subscribing, such as pledging etc. when in possession of unpublished price sensitive information.

1.21 **“Trading Day”** means a day on which the recognized stock exchanges are open for trading.

1.22 **“Trading Plan”** is a plan formulated by an Insider who are in possession of unpublished price sensitive information (UPSI) perpetually and presented to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on behalf of the Insider in accordance with such plan as per Regulation 5(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

NOTE: Trading Plan intends to give an option to persons who may be perpetually in possession of unpublished price sensitive information and enabling them to trade in securities in a compliant manner. This provision would enable the formulation of a trading plan by an insider to enable him to plan for trades to be executed in future.

1.23 **“Unpublished Price Sensitive Information (UPSI)”** means any information, relating to a Company or its Securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the Securities and shall, ordinarily including but not restricted to, information relating to the following:

- i. financial results;
- ii. dividends;
- iii. change in capital structure;
- iv. mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
- v. changes in key managerial personnel;
- vi. material events in accordance with the listing agreement; and
- vii. such other information as may be specified by the Compliance Officer for this purpose.

NOTE: It is intended that information relating to a company or securities, that is not generally available would-be unpublished price sensitive information if it is likely to materially affect the price upon coming into the public domain. The types of matters that would ordinarily give rise to unpublished price sensitive information have been listed above to give illustrative guidance of unpublished price sensitive information.

Words and expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992 (15 of 1992), the 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 thereunder shall have the meanings respectively assigned to them in those legislation.

2. Role of Compliance Officer

Under the Code, there shall be a Group Compliance Officer who shall administer and oversee the implementation of this Code at the Group level.

Every group/associated entity shall have a Designated Compliance Officer who shall report to their respective Board of Director and shall administer and oversee the implementation of this Code at the entity/business unit level.

The Designated Compliance Officer under the overall supervision of the Board of Directors shall be responsible for:

- I. Compliance of SEBI (Prohibition of Insider Trading) Regulations, 2015, compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for preservation of UPSI;
- II. Implementation of this Code as per the provisions of Insider Trading Regulations, as amended from time to time;
- III. Place adequate restrictions on communication or procurement of UPSI;
- IV. Maintain lists of all employees and other persons with whom UPSI is shared and ensure that confidentiality agreements are signed or notice is served to all such employees and persons;
- V. Pre-clearing of trades and/or trading plan of an employee and other connected persons, further upon approval of the trading plan the Compliance Officer shall notify the plan to the stock exchange where the securities are listed
- VI. Monitoring of trades in the securities of the A.K. Group as per this Code and the Regulations;
- VII. The Compliance Officer shall assist all the Designated Employees and the Connected Persons in addressing any clarifications regarding this Code and the Insider Trading Regulations;
- VIII. To inform the Board in case of any material breach/ violation of this Code and/or Regulations.

3. Restrictions on Communication and Trading by Insiders

- 3.1 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. All information shall be shared on "need to know" basis.
- 3.2 No person shall procure from or cause the communication by any Insider of UPSI, relating to a company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

- 3.3 The Code also provides for Policy on determination of Legitimate Purposes as provided in “Schedule A” which forms part of “Codes of Fair Disclosure” formulated under Regulation 8 of the Regulations.
- 3.4 Since all the Employees, irrespective of departments/ divisions/ designations are considered as Designated Employees, this Code does not provide bifurcation of Public Area *vis a vis* Inside Area. However, this does not mean that information can flow without any restriction from one department to another or within the same department. Principles as enumerated in Clause 3 of this Code shall require to be adhered to while communicating any UPSI.
- 3.5 The Board of Directors of Listed Entities of A.K. Group, viz. AKCSL and AKCFL may share/ provide/ make available, UPSI information relating to listed entity in connection with the transaction that would: -
- a. entail an obligation to make an open offer under the Takeover Regulations where the board of directors believes that sharing of such information is in the best interests of the company;
 - b. not attract the obligation to make an open offer under the Takeover Regulations but where the board of directors believes that sharing of such information is in the best interests of the company and the information that constitute unpublished price sensitive information is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the board of directors may determine to be adequate and fair to cover all relevant and material facts

Designated Person shall ensure that Non-Disclosure Agreement / Confidentiality Agreement(s) or similar arrangement is in place before UPSI is shared/made available by the Insider to any person including for Legitimate Business Purposes.

4. Structured Digital Database

The Board of Directors/Compliance Officer shall maintain a structured digital database containing the names of such persons or entities as the case may be with whom information is shared under this regulation along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such databases shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.

The board of directors or head(s) of the organisation of every person required to handle unpublished price sensitive information shall ensure that the structured digital database is preserved for a period of not less than eight years after completion of the relevant transactions and in the event of receipt of any information from the Board regarding any investigation or enforcement proceedings, the

relevant information in the structured digital database shall be preserved till the completion of such proceedings.

5. Trading when in Possession of Unpublished Price Sensitive Information

5.1 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:

When a person who has traded in securities has been in possession of unpublished price sensitive information, his trades would be presumed to have been motivated by the knowledge and awareness of such information in his possession.

5.2 Provided that the Insider may prove his innocence by demonstrating the circumstances including the following:

5.2.1 The transaction is an off-market inter-se transfer between Insiders who were in possession of the same unpublished price sensitive information without being in breach of regulation 3 and both parties had made a conscious and informed trade decision.

Provided that such unpublished price sensitive information was not obtained under sub-regulation (3) of regulation 3 of the Regulations.

Provided further that such off-market trades shall be reported by the Insiders to the Company within two working days. Every Company shall notify the particulars of such trades to the stock exchange on which the securities are listed within two trading days from receipt of the disclosure or from becoming aware of such information

5.2.2 The transaction was carried out through the block deal window mechanism between persons who were in possession of the Unpublished Price Sensitive Information without being in breach of regulation 3 of Regulations and both parties had made a conscious and informed trade decision;

Provided that such unpublished price sensitive information was not obtained by either person under sub-regulation (3) of regulation 3 of the Regulations.

5.2.3 The transaction in question was carried out pursuant to a statutory or regulatory obligation to carry out a bona-fide transaction.

5.2.4 The transaction in question was undertaken pursuant to the exercise of stock options in respect of which the exercise price was pre-determined in compliance with applicable regulations.

5.2.4.1 in the case of non-individual insiders: –

5.2.4.2 the individuals who were in possession of such unpublished price sensitive information were different from the individuals taking trading decisions and such decision-making individuals were not in possession of such unpublished price sensitive information when they took the decision to trade; and

5.2.4.3 appropriate and adequate arrangements were in place to ensure that these regulations are not violated, and no unpublished price sensitive information was communicated by the individuals possessing the information to the individuals taking trading decisions and there is no evidence of such arrangements having been breached.

5.3 The trades were pursuant to a trading plan set up in accordance with regulation 5 of the Regulation.

6. Trading Plans

Applicable provisions of the Regulations relating to Trading Plan intends to give an option to persons who may be perpetually in possession of unpublished price sensitive information and enabling them to trade in securities in a compliant manner.

In view of same, Trading Plan may be framed and adopted by such Insiders (in perpetual possession of UPSI) for dealing in the listed securities of AKCSL and/or AKCFL by formulating the Trading Plan and in compliance with the provisions of the Regulations.

7. Disclosures of Trading by Insiders

7.1 The disclosures to be made by any person under this Code and/ applicable Regulation shall include those relating to trading by such person's Immediate Relatives, and by any other person for whom such person takes trading decisions.

7.2 The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be considered for the purpose of disclosure under this Code. Provided that trading in derivatives of securities is permitted by any law for the time being in force.

8. Initial Disclosures and Continuous Disclosures

8.1 Every Employee as on the date of joining shall disclose his and his Immediate Relatives holding of Securities as on the date of appointment, in the manner provided in the "Annexure I" & "Annexure II"

Every Employee shall update the list of Securities held by him and his Immediate Relatives in the manner provided in the "Annexure I" of this Code on a quarterly basis or at such interval as may be required by Compliance Officer.

At the time of cessation of Employment, the Employee shall provide details of securities held in the manner provided in the "Annexure III"

Every Promoter, Member of the promoter group, Designated Person and Director of AKCSL and/or AKCFL shall disclose, the number of securities (issued by AKCSL and/or AKCFL) acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of ten lakh rupees, in the manner provided in "Annexure IV" of this Code.

On receipt of disclosure as provided hereinabove, AKCSL/ AKCFL shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.

9. Code of Fair Disclosure

Regulation 8 of the Regulations provides that, the board of directors of every company, whose securities are listed on a stock exchange, shall formulate and publish on its official website, a code of practices and procedures for fair disclosure of unpublished price sensitive information.

In view of the same, Board of Directors of AKCSL and AKCFL have adopted Schedule A of the Regulations as provided in "Annexure A" forming part of this Code.

The code is adopted to provide for framework and policy for fair disclosure of events and occurrences that could impact price discovery in the market for its securities.

10. Policy on Process of Inquiry in case of Leak of UPSI or Suspected Leak of UPSI

Regulation 9A(5) of the Regulations provide that, every listed company shall formulate written policies and procedures for inquiry in case of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information, which shall be approved by board of directors and accordingly initiate appropriate inquiries on becoming aware of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information and inform the Board promptly of such leaks, inquiries and results of such inquiries.

In view of the same, the Board of Directors of AKCSL and AKCFL have adopted the Policy on process on inquiry in case of leak of UPSI or suspected leak of UPSI as provided in "Annexure B" forming part of this Code.

11. Trading Window and Window Closure

The provisions relating to the Trading Window shall be applicable only for the Securities of AKCSL and AKCFL.

- 11.1 The trading window shall be closed during the time when the Compliance Officer and/ Board of Directors determines that Insiders can reasonably be expected to have Unpublished Price Sensitive Information.

However, trading restriction period shall be made applicable from the end of every quarter till 48 hours after the dissemination of the financial results

The Board of Directors of AKCSL and AKCFL shall endeavour to conduct meeting of Audit Committee and the Meeting of Board of Directors on the same day for approval of accounts so as to avoid leakage of material information.

- 11.2 The communication related to closure and opening of the trading window shall be sent to all the Insiders and all Employees by means of intimation to the stock exchanges where securities of the listed entity of A.K. Group are listed. Irrespective of whether such communication has been read or received or not, persons governed by this Code shall mandatorily verify with the Compliance Officer on the status of the trading window before undertaking any trades in the listed securities of the A.K. Group.

- 11.3 Subject to aforesaid clause, all Insiders and their Immediate Relatives are prohibited to trade in securities, when the trading window is closed except in case of insiders who have submitted their Trading Plans to the Compliance Officer.
- 11.4 Insiders shall conduct all their dealings in the Securities of the Company only in a valid trading window and shall not deal in any transaction involving the purchase or sale of the Company's Securities during the periods when the trading window is closed, as referred above or during any other period as may be specified by the Company from time to time.
- 11.5 The Compliance Officer after considering various factors including the Unpublished Price Sensitive Information in question becoming generally available and being capable of assimilation by the market, shall decide the timing for re-opening of the trading window, however in any event it shall not be earlier than forty-eight hours after the information becomes generally available. The trading window shall be applicable to all Insiders.

12. Compliance of Code by the Employees (Including Director, Promoters and Member of Promoter Group)

- 12.1 Pursuant to the Regulation 9 of the Regulations, the board of directors of every listed company and every intermediary shall ensure that the chief executive officer or managing director shall formulate a code of conduct with their approval to regulate, monitor and report trading by its designated persons and immediate relatives of designated persons towards achieving compliance with these regulations, adopting the minimum standards set out in Schedule B in case of a listed company and Schedule C in case of an intermediary/ fiduciaries of the Regulations, without diluting the provisions of these regulations in any manner.
- 12.2 Employees/ Insiders of holding/ subsidiaries/ associates/ joint ventures/ fellow subsidiaries/ group companies, may have access to UPSI relating to AKCSL and/ AKCFL and/or their Securities. in view of same, the standards adopted for dealing in the securities of listed arm of A.K. Group, viz. AKCSL and/AKCFL shall apply to all the Insiders of A.K. Group. The Board of Directors of AKCSL and AKCFL have adopted the Schedule B of the Regulations to regulate, monitor and report trading by its designated persons and immediate relatives of designated persons in the listed securities of A.K. Group (own securities) which shall form the integral part of the Group.
- 12.3 Similarly, A.K. Group holds various SEBI and/RBI licenses/ registration certificates to carry on its various activities/ businesses. Accordingly, entities of A.K. Group are also identified/ considered as an Intermediary / Fiduciaries for the purpose of this Regulation. Accordingly, the Board of Directors of all the entities of A.K. Group have also adopted Schedule C to regulate, monitor and report trading by its designated persons and immediate relatives of



designated persons with respect to trading in other securities. Schedule C shall also form part of this Code.

13. Updating of database by Insiders

13.1 Pursuant to the Clause 14 of the Schedule B and Clause 12 Schedule C of the Regulations, the Designated Persons (Employees) shall be required to disclose names and Permanent Account Number or any other identifier authorized by law of the following persons to the company on an annual basis and as and when the information changes in Annexure II:

- a. immediate relatives;
- b. persons with whom such designated person(s) shares a Material Financial Relationship;
- c. Phone, mobile and cell numbers which are used by them in addition, the names of educational institutions from which designated persons have graduated and names of their past employers shall also be disclosed on a one-time basis.

13.2 Restricted List

Compliance Officer shall be required to update and maintain the restricted list with the help of Business Heads. Business Heads and Compliance Officer shall have reasonable discretion while deciding the list of securities and/companies to be added in the restricted list.

It is proposed to make Restricted List at group level due to following reasons:

- (i) Sharing of common premises by entities of A.K. Group
- (ii) Involvement of one or more entities of A.K. Group in a mandate/ assignment in different capacities.
- (iii) Common sharing of resources

The Restricted List shall be maintained confidentially by the Compliance Officer with limited access to business head(s).

13.3 Process for Pre-Clearance of Trades

It is mandatory for all the Employees (excluding Non-executive Independent Directors) to seek pre-clearance of trade before trading in any Securities either for self or their Immediate Relatives.

Any Designated Employees or his/her Immediate Relatives who carries on any transaction or series of transaction to circumvent this clause shall be in violation of this Code.

Explanation: It is clarified that pre-clearance is not required for

- I. Trades executed in accordance with a Trading Plan which is approved under Clause 6 of this Code;
- II. Exercise of employee stock options, if any.

In case of doubt, Designated Employees and their Immediate Relatives shall be responsible to check with the Compliance Officer from time to time, whether the provisions of pertaining to pre-clearance of trade are applicable to any particular proposed transaction in the Securities.

(i) **Process of pre-clearance for dealing in the Securities**

- a) Designated Employee(s) shall apply for pre-clearance of trade by making on-line request for the trade approval through Portal.
- b) While applying for pre-clearance of Trade, Designated Employee shall affirm that he/ she does not have any UPSI relating to securities in which he/she proposes to trade.
- c) To ensure the compliance of the Regulations with proper internal controls and checks, the following procedure is adopted for granting an approval when trade request is placed:
 - i. All the Securities proposed to be traded, the same shall be approved/ rejected by Group Compliance Officer.
 - ii. Once the trade is approved by the Compliance Officer, the same shall be intimated to the Applicant which shall be valid for a period of 3 trading days unless the said Security is transferred in restricted list. If the trade is not executed within the validity period, fresh approval shall be required.
 - iii. In case the request for trading in a Security is approved and subsequently put into Restricted List, the validity of the same shall stand changed accordingly and the same will be updated.
 - iv. Designated Employees shall file the details of the transactions / reason for non-execution of trade (as the case maybe), within 2 (two) days from the date of such trade or within 2 (two) days after the expiration of approval date whichever is earlier made by the Designated Employee either for himself or on behalf of his Immediate Relative.
 - v. No Contra Trade shall be allowed for a period of six months in the listed Securities of A.K. Group. However, the Compliance Officer may grant relaxation of such restriction for reasons to be recorded in writing provided

that such relaxation does not violate these Regulations. 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 the Board for credit to the Investor Protection and Education Fund administered by the Board under the Act.

- d) The Applicant shall adhere to the terms and conditions as enumerated in the system or communicated by way of an e-mail while approving the securities from time to time.

(ii) **Process for Pre-Clearance in Physical Mode**

The Portal for the purpose of trading in the securities shall be available/ accessible to the Employees of the Company.

However, there can be instances wherein Portal is down/ under maintenance/ not live or account of the concerned employee is blocked or not accessible for reasons beyond control, in such case, the concerned Employee may also seek the approval by following the process enumerated herein below:

Designated Employee(s) shall take a pre-clearance approval regarding the proposed transaction by making request in physical mode in "Annexure V" of this Code. Such application should be complete and correct in all respects and should be accompanied by such undertakings, declarations, and other documents/papers as may be prescribed by the Compliance Officer from time to time.

All the Designated Employee(s) who have taken approval in physical/ offline mode, shall submit signed report within 2 (two) days of the execution of the trade or on expiry of approval period, whichever is earlier, the details in "Annexure VI" of this Code for trade request made by the Designated Employee either for himself or on behalf of his Immediate Relative.

If a transaction is not executed within the approval period, the Designated Employee or his Immediate Relative must apply to the Compliance Officer for pre-clearance of the transaction, if they intend to transact again.

(iii) **Factors considered (including but without limitation) before approving / rejecting the trade request**

- i. If the security forms the part of restricted list;
- ii. Liquidity, turnover/ volume in the scrips;
- iii. Nature of the scrip;
- iv. Compliance track record of the Employee;
- v. Rumours circulating in the market about the scrip, if any;

- vi. Possibility of possession of UPSI with an Insider in the scrip for which approval is sought;
- vii. Any other factors may deem fit from time to time.

14. Retaliation for reporting suspected violations is strictly prohibited under this Code

Employee who reports any alleged violations of insider trading laws in accordance with the Informant mechanism introduced vide SEBI (Prohibition of Insider Trading) (Third Amendment) Regulations, 2019 dated September 17, 2019, will be protected against any discharge, termination, demotion, suspension, threats, harassment, directly or indirectly or discrimination.

15. Others

- 15.1 Any two Directors and the Compliance Officer are authorized to make minor modifications to this Code which would remove ambiguities, enhance clarity on the provisions of the Code etc. Any major modification to the Code will require authorization by the Board.
- 15.2 Where the Company engages a service provider who is/ becomes/ may become a Connected Person/ Insider, the head of the department for a particular function which engages such Connected Person is responsible for communicating the requirements of this Code to such Connected Person and verify whether such Connected Person has a similar code of conduct applicable to its employee(s)/ representatives to prevent such persons from misusing Unpublished Price Sensitive Information relating to A.K. Group and/ or its clients/ potentials clients and other Securities, as well as the efficacy of implementation of such code by those Connected Persons.
- 15.3 In pursuance of Clause 13.2 above, a provision substantially in the form set forth below shall be included in agreements entered by the A.K. Group with service providers, consultants and all other third parties who are Connected Persons/ shall become:

“In accordance with the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“Insider Trading Regulations”), A.K. Group has formulated its code of conduct for prevention of insider trading (“Code of Conduct”) for preventing the misuse of Unpublished Price Sensitive Information (as defined in the Insider Trading Regulations). In accordance with the Insider Trading Regulations, the Code of Conduct would be applicable to <Insert Name of Third Party>. Accordingly, <Insert Name of Third Party> hereby convent and undertakes that it shall comply with the provisions of the Code of Conduct and the Insider Trading Regulations.

<Insert Name of Third Party> also consents and undertakes that it shall take such measures (including but not limited to formulating its own internal code of conduct) to ensure compliance with the Code of Conduct and the Insider Trading Regulations”.

16. Penalty for Contravention of the Code of Conduct

- 16.1 Every Designated Employee/ Insider shall be individually responsible for complying with the provisions of the Code and Regulations (including to the extent the provisions hereof are applicable to his/her Immediate Relatives).
- 16.2 Any Designated Employee/ Insider who trades in Securities or communicates any information for trading in Securities, in contravention of this Code and/Regulations will be penalized and appropriate action may be taken by A.K. Group. Designated Employee(s) who contravenes any of the provisions of this Code and/ Regulation shall indemnify and hold harmless the A.K. Group, its directors, officers for any consequences resulting from such violation, whether monetary or not.
- 16.3 Designated Employees/ Insiders who violate the Code and/ Regulation, (whether the violation was intentional or unintentional) shall also be subject to disciplinary action, which may include action such as wage freeze, issue of warning letters, termination from employment/ business or other legal, commercial relation, filing a suit and such other remedy as may be available under the law for the time being in force at the sole discretion of the A.K. Group.
- 16.4 The action taken by the Company shall not preclude SEBI or any other competent authority from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.
- 16.5 The Company shall intimate SEBI regarding the material violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.
- 16.6 The Insider agrees to read, abide and comply with the provisions of this Code and Regulations in its true spirit. Further, Insider confirms and understands that the Company, its subsidiaries, group companies, associate companies or its other employees, officers, representatives, directors and promoters shall not be responsible/ liable for any acts of omission and/or commission of the Insider or any other person resulting in violation of Code and/Regulations in any manner whatsoever.

17. Reporting of violations

In terms of clause 13 of Schedule B (in case of listed companies) and clause 11 of Schedule C (in case of intermediaries and fiduciaries) read with Regulation 9 of the PIT Regulations, the listed companies, intermediaries and fiduciaries shall promptly inform the Stock Exchange(s) where the concerned



securities are traded, regarding violations relating to Code of Conduct under PIT Regulations in such form and manner as may be prescribed by the Board from time to time. (Refer Annexure A of SEBI Circular dated July 23, 2020).

18. Disclaimer

The Code is the internal policy of the Company to regulate the Insider/ Employees and Connected Persons who are considered by the Company and/ A. K. Group to be Insiders for the purposes of the Regulations, from Trading. It is however the responsibility of each of the Insider, Employee and Connected Person to ensure compliance with the provisions of the Regulations and other related laws. The Company shall not be responsible or liable in any way for any violation or contravention by any of them in any manner whatsoever, of the Regulations or other related laws.

ANNEXURE A **CODE OF FAIR DISCLOSURE**

I. Introduction:

Pursuant to Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015, the Board of Directors of listed entities is required to formulate and publish on company's website, a code of practices and procedures for fair disclosure of unpublished price sensitive information. Accordingly, the Company has adopted this "Code of Fair Disclosure"

The objective of this Code of Fair Disclosure is to ensure timely and adequate public disclosure of Unpublished Price Sensitive Information no sooner than credible and concrete information comes into being in order to make such information generally available. The term 'Unpublished Price Sensitive Information', shall have the meaning as provided under the Company's policy on Code of Conduct for Prevention of Insider Trading.

II. Designation of Chief Investor Relations Officer

Chief Financial Officer of the Company shall be the Chief Investor Relations Officer ("CIRO") for the purpose of this Code.

The CIRO shall be responsible for dissemination of information and disclosure of Unpublished Price Sensitive Information.

III. The CIRO/ Company shall adhere to the following principles to ensure timely and fair disclosure of Unpublished Price Sensitive Information:

1. To 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.
2. To make, uniform and universal dissemination of Unpublished Price Sensitive Information, with intent to avoid selective disclosures.
3. To ensure, prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently, or otherwise to make such information generally available.
4. To provide appropriate and fair response to queries on news reports and requests for verification on market rumours by regulatory authorities.
5. The CIRO/ Company will ensure that, information if any, shared with analysts and research personnel is not Unpublished Price Sensitive Information.
6. The Company will constantly endeavour to develop best practices to make transcripts and records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
7. Unpublished Price Sensitive Information is to be handled on a “need to know” basis, i.e., Unpublished Price Sensitive Information should be disclosed only to those within and outside the Company who need to know such Unpublished Price Sensitive Information to discharge their duty.

IV. Legitimate Purpose

The UPSI can be shared as an exception for Legitimate Purpose as per the Policy of Determination of Legitimate Purpose, provided it is not shared to avoid prohibition under Code of Fair Disclosure.

POLICY OF DETERMINATION OF LEGITIMATE PURPOSE

[Pursuant to Regulation 3 (2A) of SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018]

1. PREFACE

This Policy, as a part of " Codes of Fair Disclosure and Conduct"" formulated under Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations 2015, will be known as "Policy for Determination of Legitimate Purposes" hereinafter referred to as the "Policy". This Policy is prepared in accordance with Regulation 3(2A) of SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018.

2. OBJECTIVE

The objective of this policy is to identify 'Legitimate Purposes' for performance of duties or discharge of legal obligations, which will be considered as exception for the purpose of procuring unpublished price sensitive information (UPSI).

3. LEGITIMATE PURPOSES

Legitimate Purposes shall mean sharing of UPSI in the ordinary course of business by an Insider with the following on "Need to Know Basis":

- a. Promoters
- b. Insider's inter-se
- c. Auditors (Statutory, Internal, Management, Secretarial, GST and any other Auditor as applicable)
- d. Staff Members of the Audit firm/team conducting the Audit
- e. Collaborators
- f. Lenders
- g. Clients
- h. Vendors and Suppliers
- i. Bankers
- j. SEBI Registered Intermediaries, RBI Registered NBFCs, Financial Institutions and Regulators
- k. Judiciary and Quasi Judiciary bodies.

- I. Legal Advisors & Professionals rendering Services
- m. Consultant(s)
- n. Employee(s), apprentice working with group, subsidiary, associate companies
- o. Any other person with whom UPSI is shared.

Insiders shall share the UPSI with the external agencies only in the interest of the employer and/or in compliance with the requirements of the law.

The agreements entered into involve sharing of UPSI should have a “confidentiality clause” or else a separate Non-Disclosure Agreement shall be executed with parties to safeguard the disclosure of UPSI.

4. RESTRICTIONS ON COMMUNICATION AND TRADING BY INSIDERS

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 and shall not otherwise trade in securities when in possession of unpublished price sensitive information.

5. AMENDMENT

The Board of Directors, subject to applicable laws, rules & Regulations, may amend / substitute any provision(s) with a new provision(s) or replace this entire Policy with a new Policy. In any circumstance where the terms of this Policy differ from any law, rule, regulation etc. for the time being in force, the law, rule, regulation etc. shall take precedence over this Policy. This Policy and any subsequent amendment(s) thereto, shall be promptly intimated to the Stock Exchanges, if required under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and/or SEBI (Prohibition of Insider Trading) Regulations, 2015 and any amendment, re-amendment or re-enactment thereto.

6. APPROVED AND ADOPTED

This Policy has been approved and adopted by the Board on May 29, 2021 and effective w.e.f. May 29, 2021.

ANNEXURE B

POLICY ON PROCESS OF INQUIRY IN CASE OF LEAK OF UPSI OR SUSPECTED LEAK OF UPSI

BACKGROUND:

In terms of Regulation 9A (5) of the Regulations, the Board requires to formulate policies and procedures for inquiry in case of leak/suspected leak of UPSI, this policy sets out the broad principles that the Board will follow while inquiring into cases of actual or suspected leak of UPSI:

1. Inquiry under this policy shall commence based on a written complaint received from any employee, Registrar and Share Transfer Agent, Designated Person, Depository, Stock Exchange, Regional Director or any official thereof, Registrar of Companies or any official thereof, regulatory / statutory authority or any other department of Central or State Government or other appropriate entity.
2. The complaint shall inter-alia state particulars of the complainer and details of the complaint. The Complainant has the option of annexing such documentary evidence, as deemed reasonable for the purpose of substantiating the complaint lodged.
3. The Complaint shall be addressed to the Board of Directors or Audit Committee or Chairman or Managing Director or Compliance Officer. All such complaints received shall be forwarded promptly to Managing Director (MD) by the recipient.
4. Within 5 (five) working days of receipt of the complaint, MD shall write to the complainer intimating the details of the complaint received and requesting him to give a written representation within 7 (seven) working days of receipt of letter. If MD feels that the complaint has been lodged to secure needless publicity for defamatory matter which is detrimental to the interest of the Company, then he will discard the complaint with reasons recorded in writing.
5. Within 7 (seven) working days of receipt of representation, MD shall proceed to investigate in the matter and for such purpose may consult such persons, whether internal or otherwise or obtain such external assistance or opinion, as he may deem expedient in this regard. During such investigation, MD may call for such additional documents, representations, etc. as he may deem fit.
6. If no representation is received within the aforesaid stipulated time, MD shall issue notice to the

complainer asking him about the status of complaint to which the complainer shall respond within 2 working days from the date of receipt of such notice. Failing to respond within the stipulated timelines, MD may issue show cause notice to the complainer as to why the Company should not initiate disciplinary proceedings, as applicable, against him.

7. On completion of the preliminary investigation under point 5, receipt of reply to the show-cause notice issued under point 6 or on non-receipt thereof, MD shall refer the matter to the Chairman of the Audit Committee, along with his opinion, for his consideration.
8. Chairman of the Audit Committee on receipt of such opinion shall proceed to convene a meeting of the Audit Committee and shall convene the concerned meeting within a period of 45 days of receipt of opinion of MD.
9. The Audit Committee shall consider the matter and put forward its recommendation to the Board of Directors. The Members of the board on receipt of such recommendation and after due review, if forms an opinion that the complainer is guilty of leak of UPSI or suspected leak of UPSI, then it will order for necessary disciplinary proceedings, which will be in addition to the penal provisions stated under SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 and any other statutory enactments, as applicable.
10. The company/ A.K. Group, *Suo-moto* reserves the right of initiating an inquiry under this policy against any designated person if it has reasons to believe that such person has leaked UPSI or suspected to leak UPSI.
11. This policy shall not in any way preclude any referrals, complaints, measures, actions etc. which can be instituted, or which are available under the existing Vigil Mechanism Policy of the Company.
12. Any words used in this Policy but not defined herein shall have the same meaning as described to it in the Companies Act, 2013 or Rules made thereunder, Securities & Exchange Board of India Act or Rules and Regulations made thereunder, SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, SEBI (Prohibition of Insider Trading) Regulations, 2015, including amendment thereto, or any other relevant legislation/law applicable to the Company, as amended from time to time.

To,
The Compliance Officer
Mumbai

Subject: **Declaration for Adherence to the Code of Conduct for Prohibition of Insider Trading ("Code") and SEBI (Prohibition of Insider Trading), Regulations, 2015, including amendments thereto ("Regulations")**

I, _____, (holding PAN: _____), Designated Person as per the provisions of the Code understand that the provisions of the Regulations and Code are applicable to me from the date of joining and shall continue to apply till the expiry of 6 months after cessation of employment or possession of unpublished price sensitive information, whichever is later. The Copy of Code was furnished to me at the time of joining and the same is also available on the website of the Company, viz. www.akgroup.co.in and portal used by the Company for compliance of Regulations and Code, viz. www.pit.akgroup.co.in

I have read the applicable Regulations and Code and the relevant provisions thereof were also explained to me in person.

After reading and understanding, the provisions of the Regulations & Code, I understand my duties and responsibilities and agree to abide by the same. I shall also keep the track of amendments/ re-enactments and modification thereof.

In addition to above, the requisite information(s)/ disclosures as required pursuant to the provisions of the Code and Regulations are marked in the **Annexure I & II** of this Letter. The information submitted by me are correct and complete in all respect and I shall agree to update the same, in case of any change(s).

Name and Signature of the Employee

Annexure I

Initial/Continuous Disclosure by Insider/ Employee/ Connected Person of the Company

Pursuant to the applicable provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 read with Code of Conduct of the Company to Regulate the trading by Insiders

Date of Declaration:

Name of the Employee:

Employee Code:

Sr no	Name of the Employee/Immediate Relative*	PAN of the Employee/Immediate Relative	ISIN	Company Name	Type of Security#	DPID ^	Description #	No of Security held	As on Date

Notes:

Please mention NIL/NA in the table given above, in case you/Immediate Relatives holds NIL security

* Immediate relative(s): of a person means a spouse, or the parent, sibling or child of that person or his or her spouse, if they are either dependent financially on such person or consult such person in taking decisions relating to Trading in securities.

Type of Security/Description: Equity/Debentures

^ DPID: Enter your 16 digit DP ID and Client ID

Signature

Annexure II

Details as required from Designated Person under Clause 14 of the Schedule B and Clause 12 Schedule C of SEBI (Prohibition of Insider Trading) Regulations, 2015

1	Employee Name (as per PAN)	
2	PAN	
3	HR Code	
4	Present Residential Address	
5	Permanent Residential Address	
6	Date of appointment/ joining	
7	Designation	
8	E-mail ID (Official)	
9	E-mail ID (Personal)	
10	DP ID and Client ID (16 Digit Nos.)	
11	Physical Folio No	
12	Mobile No.	
13	Landline No.	
14	Degree & Educational Institute & (Year)- 1 Name	
15	Degree & Educational Institute & Year- 2	
16	Past Employer - 1 Name and Period	
17	Past Employer - 2 Name and Period	
18	Marital Status	

Details of Immediate Relatives and persons with whom Employee shares Material Financial Relationship*

SN	Name of Immediate Relative#	PAN	Relation with Insider	Mobile No.	Landline No.	Physical Folio	DP ID/ Client ID

Notes:

"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 in securities. It is presumed that spouse of Designated Person shall be deemed to be Immediate Relative in all cases.

* "Material Financial Relationship" shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding twelve months, equivalent to at least 25% of such payer's annual income but shall exclude relationships in which the payment is based on arm's length transactions.

Updating PAN of the persons mentioned shall be mandatory only if the person(s) falls within the ambit of Immediate Relative and/or having material financial relationship.

In case you have attained professional degree and post graduations from different educational institutions, please mention the names of all such educational institutions.

Update all the contact details (Phone Nos.) used by you (landline and mobile)

You may add additional column, if required.

Date:		Place:		Signature:	
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Annexure III

STATEMENTS OF HOLDINGS BY DESIGNATED PERSON AND UNDERTAKING

Pursuant to the applicable provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation] read with Code for Prohibition of Insider Trading [Code]

Date of Declaration:

Name of the Employee:

Employee Code:

Mobile (i):

Mobile (ii)

Alternate Contact No.:

Personal Email:

Present/ Correspondence Address:

Permanent Address:

I, hereby declare the details of securities held by me and/or my Immediate Relatives in the following manner:

Securities held on the date of this declaration

Name of Employee/Immediate Relative	Name of the Company/ ISIN	Type of Security Equity/Pref/ Debentures etc.	No. of Securities held

Declaration/ Undertaking:

1. I have complied with the provisions of the Regulations and Code from time to time and shall continue to comply with the same, to the extent applicable. I undertake to update any changes in the Contact details for a period of one year from the date of cessation.

2. All the details mentioned hereinabove are true, fair, accurate and complete in all respects as per my knowledge and belief and I understand that giving wrong declaration may lead to adverse repercussions and consequences as provided under the Regulations and Code.

3. I further confirm that I and my Immediate Relatives shall not deal in the security of A. K. Capital Services Limited and A. K. Capital Finance Limited (A.K. Group) for 6 months from the date of cessation, failing which I would be solely responsible for the consequences, to the complete exclusion of the Company, its Directors and officers and the Compliance officer, as they would not have any recourse post my termination of employment to communicate with me to pursue compliances hereunder.

4. I hereby further confirm that I will not enter into any transaction pertaining to the securities, on the basis of unpublished price sensitive information, which I am privy to, if any and will not communicate, provide, or allow access to any Unpublished Price Sensitive Information, relating to listed company and/or security (including securities proposed to be listed) in any manner whatsoever.

5. I shall be solely and absolutely responsible for complying with the provisions of the Regulation & Code, and I agree to indemnify and hold harmless A.K. Group and its representatives for any consequences resulting from violation, (whether monetary or not) for any contravention in the provisions of this Regulation and/ Code and my dealings in Securities/Capital Market.

Signature

Note: Terms not defined hereinabove shall have the same meaning as defined in Regulation &/or Code

Annexure IV

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-advice/ acquisition of shares/ sale-of-shares-specify		Date of intimation to company	Mode of acquisition/ disposal (on market/public/rights/ preferential offer/ off market/ Inter-se transfer, ESOPs, etc.)	Exchange on which trade was executed
		Type of securities (For e.g.- Shares, Warrants, Convertible Debentures, Rights entitlements etc.	No and % of shareholding	Type of securities (For e.g.- Shares, Warrants, Convertible Debentures, Rights entitlements etc.	No.	Value (in INR)*	Transaction type (Purchase/sale Pledge / Revocation / Invocation / Others-please specify)	Type of securities (For e.g.- Shares, Warrants, Convertible Debentures, Rights entitlements 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

* Amount rounded off at the nearest rupee

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

No. of contract	Contract specifications	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which trade was executed
		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
DesignationDate:
Place:

Annexure V

APPLICATION FOR PRE-DEALING APPROVAL		
Date:		
SN	Particulars	Inputs
1	Company Name	
2	Security Type (Equity / Debenture)	
3	ISIN	
4	Insider / Sub Insider Name	
5	DPID_ClientId	
6	Number of Share	
7	Mode of Trade (Market/Pledge/Buy Back/Offer for Sale/Right Issues/Bonus Shares/Spilt of Shares/Gift)	
8	Nature of trade (Acquisition/Disposal)	
<p>Applicant/Requestor hereby confirms, undertake and declare that:</p> <ol style="list-style-type: none"> Is not in possession of or otherwise privy to any Unpublished Price Sensitive Information as defined in the Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading by Insiders (hereinafter referred to as "the Code") In the event of having access to or received any information that could be construed as "Price Sensitive Information" as defined in the Code, after giving undertaking but before executing the trade for which approval is sought, I shall inform to the Compliance Officer of the same and shall completely refrain from dealing in the Securities till forty-eight hours until such information becomes public. Has not contravened the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as "Regulation") and the Code as notified from time to time To submit the necessary report/document within two trading days of such transaction / a 'Nil' report if the transaction is not undertaken along with reasons for the same. In case approval lapses, the Applicant shall seek pre-clearance again. Notwithstanding anything contained in any part of the Regulation/Code, for the purpose of dealing in the Securities by the Immediate Relatives, it is the sole responsibility of the Employee for reporting the trade and other compliances applicable under the Regulation/Code. It is the responsibility of each of the Insider, Employee and Connected Person to ensure compliance with the provisions of the Regulation, Code and other related laws. <p>I hereby agree to the undertaking and declaration stated above.</p> <p>Yours faithfully,</p> <p>Name: Designation: Signature:</p> <p>Date: Place:</p>		

Annexure VI

REPORTING OF TRADES		
Sr No	Particulars	Inputs
1	Name of the Company	
2	Security Type (Equity / Debenture)	
3	ISIN	
4	Exchange on which trade is executed (BSE/NSE/NA/MCX-SX)	
5	Trade Date	
6	Mode of Acquisition/Disposal (Market/Pledge/Buy Back/Offer for Sale/Right Issues/Bonus Shares/Spilt of Shares/Gift)	
7	Transaction Type (Acquisition/Disposal)	
8	DPID/CLID	
9	Number of Securities	
10	Rate	
11	Amount	

In connection with the aforesaid transaction(s), I hereby undertake to preserve for a period of 3 years and produce to the Compliance officer / SEBI any of the following documents:

1. Broker's contract note.
2. Proof of payment to/from brokers.
3. Extract of bank passbook/statement (to be submitted in case of demat transactions).
4. Copy of Delivery instruction slip (applicable in case of sale transaction).

I declare that the above information is correct and that no provisions of the Company's Code and/or applicable laws/regulations have been contravened for effecting the above said transactions(s).

Name:

Designation:

Signature:

Date:

Place: