

Datamatics Global Services Limited

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November 11, 2016

To,

Corporate Communication Department
BSE Limited
Phiroze Jeejeeboy Towers
Dalal Street, Mumbai - 400 001
BSE Scrip Code: 532528

Listing Department
The National Stock Exchange of India Limited
Exchange Plaza, Bandra Kurla Complex,
Bandra (East) Mumbai 400 051
NSE Code: DATAMATICS

Sub: Board Meeting Proceedings

Dear Sir/Madam,

This is to inform you that, at the meeting of the Board of Directors of the Company, held today, i.e., Friday, November 11, 2016, at Mumbai, the following matters were considered and approved -

- **Appointment of Mr. Sandeep Mantri as the Chief Financial Officer(CFO) of the Company -**

Pursuant to Section 203 of the Companies Act, 2013, and Rule 8 of the Companies (Appointment and Remuneration of Managerial Personnel) Rules, 2014 and other applicable provisions, if any, thereunder, and in view of office of the CFO of the Company remaining vacant with effect from May 31, 2016, the Company was required to appoint CFO as one of the whole-time Key Managerial Personnel, within six months from the date of vacancy.

Mr. Sandeep Mantri is appointed as the Chief Financial Officer of the Company with effect from November 11, 2016. Mr. Sandeep Mantri is a Certified Public Accountant (CPA) from the American Institute of Certified Public Accountants, Fellow Chartered Accountant (FCA) from the Institute of Chartered Accountants of India (ICAI), a holder of Certificate Course on Valuation by ICAI, Cost Accountant from the Institute of Cost and Works Accountants of India (ICWAI). He has more than 16 years of professional experience.



- **Insider Trading Policy -**

In order to incorporate new forms notified by SEBI *inter alia* few other revisions in consonance with the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Insider Trading Policy was revised. The revised Policy is enclosed herewith as "**Annexure - A**".

The Meeting of Board of Directors commenced at 12.00 noon and concluded at 2.55 P.M.

Kindly take the above on your record.

For **Datamatics Global Services Limited**



Divya Kumat
Sr. VP. - Legal & Company Secretary

Encl: As Above

Annexure – A

“INSIDER TRADING POLICY”

The Policy and Obligations: -

Datamatics Global Services Limited (hereinafter referred to as the Company) is committed to transparency and fairness and strives to preserve the confidentiality of unpublished price sensitive information and prevent misuse of the same. The Company believes that every Director, Promoter, person who is a part of the Promoter group, and Designated Employee has a duty to safeguard the confidentiality of all such information obtained in the course of his or her work at the Company. No Promoter, person who is part of the Promoter group, Director, Designated Employee may use his or her position or knowledge of the Company to gain personal benefit or to provide benefit to any third party.

To achieve these objectives, the Company hereby notifies that this revised Insider Trading Policy (hereinafter referred to as “Policy”) has been framed under the SEBI (Prohibition of Insider Trading) Regulations, 2015, which has also been approved and adopted by the Board of Directors at their meeting held on November 11, 2016.

CHAPTER I

Definitions

‘**Act**’ means the Securities and Exchange Board of India Act, 1992 including any statutory modifications or re-enactment thereof.

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

‘**Company**’ means Datamatics Global Services Limited.

‘**Compliance Officer**’ means any senior officer as appointed by the Board and reporting to the Board as “Compliance Officer” , who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these Regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the Policy specified in these Regulations under the overall supervision of the Board of the Company.

‘**Connected Persons**’ means



contractual, fiduciary or employment relationship or by being a Director, officer or an employee of the Company or holds any position including 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.

2. Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be Connected Persons unless contrary is established, -

- a) an Immediate Relative of connected person specified in clause 1;
- b) a holding company or associate company or subsidiary company(ies);
- c) an intermediary as specified in section 12 of the Act or an employee or Director thereof;
- d) an investment company, trustee company, asset management company or an employee or Director thereof;
- e) an official of a stock exchange or of clearing house or corporation; or
- f) a member of Board of trustees of a mutual fund or a member of the Board of Directors of the asset management company of a mutual fund or is an employee thereof; or
- g) a member of the Board of Directors or an employee, of a public financial institution as defined in section 2(72) of the Companies Act, 2013; or
- h) an official or an employee of a self-regulatory organization recognized or authorized by the Board; or
- i) a banker of the Company; or
- j) a concern, firm, trust, Hindu Undivided Family, company or association of persons wherein a Director of a Company or his Immediate Relative or banker of the Company, has more than 10% of the holding or interest;

Connected Person shall mean any person who is a connected person six months prior to an act of Insider trading.

'Dealing in Securities' means subscribing, buying, selling or agreeing to subscribe, buy, sell or deal in any securities either as principal or agent;

'Designated Employees' shall mean:

- (i) All Directors;
- (ii) Key Managerial Personnel;
- (iii) All employees directly reporting to the Vice Chairman & CEO irrespective of their grade;
- (iv) Officers comprising top three tiers of the Company Management i.e. from Grade M11 and above;
- (v) Senior Employees of the Company's wholly owned subsidiaries worldwide of the rank Vice President and above;



- (vi) All Functional Heads;
- (vii) All employees in Finance, Accounts, Legal and Secretarial Department and;
- (viii) Such other employees who are likely to have access to price sensitive information.

'Designated Person(s)' means all Designated Employees and other Connected Persons.

'Director' means a member of the Board of Directors of the Company.

'Generally Available Information' means information that is accessible to the public on a non-discriminatory basis.

'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 in taking decisions relating to trading in securities;

'Insider' means any person who,

- (i) is a connected person;
- (ii) is in possession of or having access to such unpublished price sensitive information.

'Key Managerial Person' means person as defined in Section 2(51) of the Companies Act, 2013;

'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;

'Securities' shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any other modification thereof except units of a mutual fund;

'Takeover Regulations' means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;

'Trading' means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and 'trade' shall be construed accordingly;

'Trading Day' means a day on which the recognized stock exchanges are open for trading;

'Unpublished Price Sensitive Information' ('UPS') 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:-

1. financial results of the Company;



2. dividends ;
3. change in capital structure;
4. mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
5. change in Key Managerial Personnel;
6. material events in accordance with the listing agreement.

'Regulations' shall mean the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto;

Words and expressions used and not defined in these Regulations but defined in the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956 and the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation.

Words denoting the feminine gender shall include the masculine gender and neuter gender;

CHAPTER II

1. COMPLIANCE OFFICER

The Company has appointed Ms. Divya Kumat as the Compliance Officer who shall report to the Managing Director/CEO of the Company for the purpose of this Policy.

1.1 Duties of Compliance Officer

- 1.1.1. She shall maintain a record of Designated Employees and any changes made thereto.
- 1.1.2. She shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of 'UPSI', 'pre-clearing of Designated Employees' and their Immediate Relative's trades, monitoring of trades and the implementation of this Policy under the overall supervision of the Board of the Company.
- 1.1.3. She shall place before the Managing Director/CEO, on quarterly basis all the details of the dealing in the Securities by Promoters, Person who are part of the promoter group, Designated Employees, Directors of the Company and the accompanying documents that such persons have executed under the pre-dealing procedure as envisaged in these rules.
- 1.1.4. She shall be responsible for overseeing and co-ordinating disclosure of UPSI to Stock Exchanges, analysts, shareholders and media and educating staff on disclosure policies and procedure and report to the Managing Director/CEO.
- 1.1.5. She shall ensure that trading window closure is intimated to all concerned at least 24 hours before the commencement of the said period.



- 1.1.6. She shall report on the compliance and implementation of the Regulations and the Policy to the Board and in particular, shall provide reports to the Chairman of the Audit Committee, if any, or the Chairman of the Board as and when directed by the Board or Audit Committee.
- 1.1.7. She shall assist all employees in addressing any clarifications regarding the SEBI Insider Trading Regulations and these Rules.
- 1.1.8. She shall confidentially maintain a list of such securities as a "restricted list" which shall be used as the basis for approving or rejecting applications for pre-clearance trades.
- 1.1.9. She shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any unpublished price sensitive information. She shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.

RESTRICTIONS ON COMMUNICATION AND TRADING BY INSIDERS

2. PRESERVATION OF "UNPUBLISHED PRICE SENSITIVE INFORMATION"

Designated Persons shall maintain the confidentiality of all UPSI. They shall not pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sale of Securities. Following practices should be followed in this regard.

2.1 *Need to Know*

UPSI is to be handled on a "need to know" basis, i.e., UPSI should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of information. All non-public information directly received by an employee should immediately be reported to the head of the Department / Compliance Officer.

2.2 *Limited access to confidential information*

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and pass word, etc. Files containing confidential information should be deleted / destroyed after its use. Shredder should be used for the destruction of physical files.

3. PROHIBITION ON DEALING, COMMUNICATING OR COUNSELING ON MATTERS RELATING TO INSIDER TRADING

- a) No Insider shall communicate, provide or allow access to any UPSI, relating to the Company or securities listed or proposed to be listed by the Company, to any person



including other Insiders except where such communication is in furtherance of any legitimate purposes, performance of duties or discharge of legal obligations.

b) No person shall procure from or cause the communication by any Insider of UPSI, relating to the Company or securities listed or proposed to be listed by the Company, except in furtherance of any legitimate purposes, performance of duties or discharge of legal obligations.

4. TRADING RESTRICTIONS

Designated Persons shall be subject to trading restrictions as enumerated below:-

4.1 Trading Window

The Trading Window shall be closed when the Compliance Officer determines that a Designated Person or any class of Designated Persons can reasonably be expected to have possession of UPSI. The Designated Persons shall not deal in the securities of the Company when the trading window is closed.

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

1. financial results of the Company;
2. dividends;
3. change in capital structure like issue of securities by way of public/right/bonus/buy-back of securities;
4. mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
5. change in Key Managerial Personnel;
6. material events in accordance with the Listing Agreement.

4.3 Period of closure of trading window

The trading window shall be closed 7 days prior to the Board Meeting for items referred to in Clause 4.2.

4.4 The trading window shall be opened 48 hours after the information referred in 4.2 becomes Generally Available Information.

4.5 Designated Persons and any other person having contractual or fiduciary relation with the Company, such as Auditors, accountancy firms, law firms, analysts, consultants, etc. assisting and advising the Company shall conduct their dealings in the securities of the Company only when the trading window is open and shall not deal in any transaction involving the purchase or sale of the Company's securities during the periods when trading window is closed.



5. PRE-CLEARANCE OF TRADES AND PRE-DEALING PROCEDURE

- 5.1 All Designated Persons, who intend to deal in the securities of the Company and if the value of the securities to be 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, shall pre-clear the transaction as per the pre-dealing procedure as described hereunder.
- 5.2 An application for pre-clearance of trade may be made in prescribed form to the Compliance Officer and such application form should contain the following undertakings(s):
- 5.2.1 That the promoter/person who is a part of Promoter Group/Designated Employee/Director/Connected Person does not have any access or has not received UPSI up to the time of signing the undertaking.
 - 5.2.2 That in case the Promoter, Person who is a part of the promoter group, Designated Employee, Director, Connected Person has access to or receives UPSI after the signing of the undertaking but before the execution of the transaction he or she shall inform the Compliance Officer of the change in his position & that he or she would completely refrain from dealing in the securities of the Company till the time such information becomes public.
 - 5.2.3 That he or she has not contravened the Policy for prevention of Insider trading as notified by the Company from time to time.
 - 5.2.4 That he or she has made a full and true disclosure in the matter.
- 5.3 The Compliance Officer shall on receiving an application provide the Promoters, Persons who are part of the promoter group, Director, Insider, Connected Person, Designated Employee of the Company with an acknowledgement on the duplicate of the application. The Compliance Officer shall grant approval within 2 working days from the date of acknowledgement. The Compliance Officer shall retain copies of all applications and acknowledgements. In exceptional circumstances consent may not be given if the Compliance Officer is of the opinion that the proposed deal is on the basis of possession of any UPSI. There shall be no obligation to give reasons for any withholding of consent. If so requested by the Compliance Officer, Promoter, Director, Employee must ensure that his stockbroker is authorised to disclose to the Company all matters relevant to his share dealings.
- 5.4 Other restrictions
- 5.4.1 All Designated Persons shall execute their order in respect of securities of the Company within Seven trading days after the approval of pre-clearance is



given. If the order is not executed within seven trading days after the approval is given, the Designated Persons must pre clear the transaction again.

- 5.4.2 In case the sale of securities is necessitated by personal emergency, the Compliance Officer may waive the holding period after recording in writing his or her reasons in this regard. An application for waiver of holding period shall be made to the Compliance Officer in prescribed form. However, no such sale is permitted when the Trading window is closed.

6. TRADING PLAN

- 6.1 An Insider shall be entitled to formulate a trading plan for dealing in securities of the Company and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.
- 6.2 Trading Plan shall:
- i) not entail commencement of trading on behalf of the Insider earlier than six months from the public disclosure of the plan;
 - ii) not entail trading for the period between the twentieth day prior to the last day of financial period for which results are required to be announced by the issuer of the securities and the second trading day after the disclosure of such financial results;
 - iii) entail trading for a period of not less than twelve months;
 - iv) not entail overlap of any period for which another trading plan is already in existence;
 - v) set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
 - vi) not entail trading in securities for market abuse.
- 6.3 The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of these Regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per the provisions of the Regulations.
- 6.4 The trading plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in securities outside the scope of trading plan.

However, the implementation of the trading plan shall not be commenced if any UPSI is in possession of the Insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation and in such



cases the Compliance Officer shall confirm that the commencement of the Plan ought to be deferred until such UPSI becomes generally available information.

- 6.5 Upon approval of the Trading Plan, the Compliance Officer shall notify the plan to the stock exchanges on which the Securities are listed.

CHAPTER III DISCLOSURES OF TRADING BY INSIDERS

7. REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES

7.1 Initial Disclosures

Every Promoter, Key Managerial personnel and Director and of the Company shall disclose his/her holding of securities of the Company in 'Form A', within thirty days of these Regulations taking effect.

Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter shall disclose his/her holding of securities of the Company, in 'Form B', as on the date of appointment or becoming a Promoter, to the Company within seven days of such appointment or becoming a Promoter.

7.2 Continual Disclosures

Every Promoter, Director and Employee of the Company shall disclose to the Compliance Officer the number of such Securities of the Company 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 Rupees Ten Lakhs or such other value as may be specified. The disclosure shall be made in 'Form C'.

7.3 Disclosure by the Company to the Stock Exchanges

The Compliance Officer shall inform the Stock Exchanges on which the Company is listed, within 2 trading days of the receipt of the information under Clause 7.2.

7.4 Other Disclosures

- 7.4.1 The Company may, at its discretion require any other connected person or class of Connected Persons to make disclosure of holdings and trading in securities of the Company in 'Form D' and at such frequency as may be



determined by the Company in order to monitor compliances with this Policy and the Regulations.

7.5 Records of disclosures received by the Company

The Compliance Officer shall maintain records of all the disclosures in the appropriate form given by the Designated Persons for a minimum period of five years.

8. AMENDMENT OF THIS POLICY

The Board of Directors is authorised to change/amend this Policy from time to time at its sole discretion and/or in pursuance of any amendments made in the SEBI (Prohibition of Insider Trading) Regulations, 2015.

9. PENALTY FOR CONTRAVENTION OF POLICY

Any Designated Person who trades in securities or communicates any information for trading in securities, in contravention of the Policy may be penalised and appropriate action may be taken by the Company. Any Designated Person who violates this Policy shall also be subject to disciplinary action by the Company, which may include wage, salary freeze, suspension, withholding of promotions, ineligible for future participation in employee stock option plan etc.

The action by the Company shall not preclude SEBI from taking any action in case of violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

CHAPTER IV CODE OF FAIR DISCLOSURE

10. PRINCIPLES FOR FAIR DISCLOSURE

The Company and any Designated Person shall adhere to the following principles of fair disclosure of UPSI:

- 10.1 Prompt public disclosure of UPSI that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
- 10.2 Uniform and universal dissemination of UPSI to avoid selective disclosure.
- 10.3 Designation of a senior officer as a chief investor relations officer to deal with dissemination of information and disclosure of UPSI.
- 10.4 Prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.



- 10.4 Prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- 10.5 Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- 10.6 Ensuring that information shared with analysts and research personnel is not UPSI.
- 10.7 Developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the website to ensure official confirmation and documentation of disclosures made.
- 10.8 Handling of all UPSI on a need-to-know basis.

Divya




APPLICATION FOR PRE-CLEARANCE OF TRADE
 (In terms of Clause 5.2 of the Policy)

To,
 The Compliance Officer
 Datamatics Global Services Limited
 Knowledge Centre, Plot No. 58, Street No. 17,
 MIDC, Andheri (East), Mumbai – 400 093

1	Name of the applicant	
2	Designation & Department	
3	Number of securities in the Company held as on date	
4	The Proposal is for: (a) Acquisition in the open market (b) Subscription to the securities (c) Sale of securities	
5	Proposed date of dealing in securities	
6	Estimated number of securities proposed to be acquired / subscribed / sold:	

In relation to the above Dealing, I undertake that: -

- a. I have no access to nor do I have any information that could be construed as "Price Sensitive Information" as defined in the Policy upto the time of signing this undertaking;
- b. In the event that I have access to or received any information that could be construed as "Price Sensitive Information" as defined in the Policy, after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public;
- c. I have not contravened the provisions of the Policy for prevention of Insider trading as notified by the Company from time to time;
- d. I have made full and true disclosure in the matter.
- e. I hereby declare that I shall execute my order in respect of securities of the Company within one week after the approval of pre-clearance is given. If the order is not executed within one week after the approval is given, I undertake to obtain pre-clearance for the transaction again.

Signature _____
 Name _____
 Date _____



PRE-CLEARANCE ORDER

To,
Name: [•]
Designation: [•]

Approval No.

This is to inform you that your request for dealing in _____ (_____) shares of the Company as mentioned in your abovementioned application is approved/not approved.

Please note that the said transaction must be completed on or before _____ that is within one week from today.

For **Datamatics Global Services Limited**

Compliance Officer

CONFIRMATION OF DEAL

To,
The Compliance Officer

I confirm that the share dealing for which approval was granted on _____ was completed on _____ to purchasing/selling _____ (numbers) equity shares of the Company.

Signature _____
Name _____
Date _____



APPLICATION FOR WAIVER OF MINIMUM HOLDING PERIOD

(In terms of Clause 5.4.3 of the Policy)

To,
The Compliance Officer

Dear Madam,

I request you to grant me waiver of the minimum holding period of 30 days as required under the Policy for prevention of Insider trading with respect to _____ shares of the Company held by me / _____ (name of relative) singly / jointly acquired by me/us on _____ (Date). I desire to deal in the said shares on account of _____ (give reasons).

Thanking you,

Yours faithfully

Signature :
Name :
Date :

WAIVER OF MINIMUM HOLDING PERIOD ORDER

Approval No. _____
Date _____

This is to inform you that your request for waiver of minimum holding period with respect to _____ shares of the Company held by _____ acquired by you on _____ (Date) is accepted / rejected.

For Datamatics Global Services Limited



FORM A

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

Name of the company: _____

ISIN of the company: _____

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

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relative to/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5

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

Details of Open Interest (OI) in derivatives of the company held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

Open Interest of the Future contracts held as on the date of regulation coming into force			Open Interest of the Option Contracts held as on the date of regulation coming into force		
Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
6	7	8	9	10	11

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

Name & Signature:
Designation:
Date:
Place:



FORM B

**SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (b) read with Regulation 6(2) – Disclosure on becoming a
director/KMP/Promoter]**

Name of the company: _____

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, CIN/DIN & Address with contact nos.	Category of Person (Promoters/ KMP / Directors/ immediate relative to/others etc.)	Date of appointment of Director /KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP		% of Shareholding
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5	6

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

Details of Open Interest (OI) in derivatives of the company held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation 6(2).

Open Interest of the Future contracts held at the time of becoming Promoter/appointment of Director/KMP			Open Interest of the Option Contracts held at the time of becoming Promoter/appointment of Director/KMP		
Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
7	8	9	10	11	12

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

Name & Signature:

Designation:

Date:

Place:



FORM C

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

Name of the company: _____
ISIN of the company: _____

Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

1	2	3	4	5		6	7	8	9		10	11		12	13	14
				Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of holding				Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	Value		Transaction Type (Buy/Sale/Pledge/Revoke/Invoke)	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)			

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



Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc)							Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		Number of units (contracts * lot size)	
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)		
15	.16	17	18	19	20		21

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

Name & Signature:

Designation:

Date:

Place:



Details of trading in derivatives by other connected persons as identified by the company

Type of Contract	Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
	Contract specifications	Buy		Sell		Number of units (contracts * lot size)	
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)		
15	16	17	18	19	20	21	

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

Name:

Signature:

Place:

