



## Code of Conduct to regulate, monitor and report trading by Insiders

### I. Introduction and objective:

Commercial Engineers & Body Builders Co Limited has formulated this code " **CEBBCO Code of Conduct for Insiders**" putting in place requisite mechanism for regulating, monitoring and reporting trading in securities by all Insiders, in accordance with the provisions of Securities And Exchange Board Of India (Prohibition Of Insider Trading) Regulations, 2015 ("Regulations").

The Code is intended to serve as a guiding charter for all Insiders including but not limited to Promoters, Directors, Officers, Employees and other connected persons associated with the functioning of the Company and their dealings in its Securities while they are in possession of any Unpublished Price Sensitive Information (UPSI) relating to Company or its securities.

The Code is based on the principle that the Insider shall neither disclose nor communicate UPSI to any person nor trade in securities of the Company whilst in possession of UPSI. This is in order to ensure that dealing in securities by insiders is not in any manner detrimental to the interest of other shareholders.

### II. Code of Conduct

- (a) This Code of Conduct shall be called "**CEBBCO Code of Conduct for Insiders**" (hereinafter referred to as "the CEBBCO Insider Code").
- (b) This Code shall come into force with effect from 15<sup>th</sup> May, 2015 and is in supersession to the existing code.
- (c) This Code shall be applicable to all the Insiders as defined herein.

### III. Definitions

- (a) "**Act**" means the Securities and Exchange Board of India Act, 1992 and any statutory amendment or reenactment thereof.
- (b) "**Compliance Officer**" means any senior officer, designated so and reporting to the Board of Directors of the Company, 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of this Code under the overall supervision of the Board of Directors of the company.
- (c) "**Connected Person**" means,-
  - (i) any person who is or has during the six months prior to the concerned event, been associated with the company, directly or indirectly, in any capacity including by reason of frequent communication with Company's officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the company or holds any position including a professional or business relationship with the company whether temporary or permanent, that



allows such person, directly or indirectly, access to UPSI or is reasonably expected to allow such access.

- (ii) Persons falling within the following categories shall be deemed to be connected persons unless the contrary is established:-
  - 1) persons identified as connected persons by the company;
  - 2) an immediate relative of connected persons specified in clause (i) or (1) above; or
  - 3) a holding company or associate company or subsidiary company of the company; or
  - 4) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his/her immediate relative, has more than ten per cent of the holding or interest.
  
- (d) **“Designated Persons”** means and includes the following:
  - (i) All Promoters of the Company and promoter group entities;
  - (ii) All the Directors on the Board of the Company ;
  - (iii) All management staff of the Grade – M1 and above of all the Departments of CEBSCO;
  - (iv) All the Employees of the Chairman’s Office, Managing Director/Joint Managing Director’s office, Finance, Accounts, Taxation, Internal Audit and Secretarial & Legal department of CEBSCO;
  - (v) Other employees notified or advised of his/her categorization as an “Insider” by the Compliance Officer in consultation with the Board of Directors on the basis of their role and function in the organisation.
  
- (e) **“Generally available information”** means information that is accessible to the public on a non-discriminatory basis;
  
- (f) **“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;
  
- (g) **“Insider”** means any person who is:
  - (i) a Connected person; or
  - (ii) a Designated person; or
  - (iii) person in possession of or having access to unpublished price sensitive information;
  
- (h) **“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;
  
- (i) **“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;
  
- (j) **“Takeover regulations”** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;
  
- (k) **“Trading”** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and “trade” shall be construed accordingly ;



- (l) **“Unpublished Price Sensitive Information”** means any information, relating to the company or its securities, directly or indirectly, that is not generally available, which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: –
- (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; and
  - (vi) material events in accordance with the Listing Agreement.

#### **IV. Compliance Officer**

- (a) The Company Secretary of the Company shall be the Compliance Officer, under the Code.
- (b) The Compliance Officer shall report to the Board of Directors and in particular, shall provide reports to the Chairman of the Audit Committee, on annual basis or at such other frequency as may be stipulated by the Board of Directors.
- (c) The Compliance Officer shall set forth policies, procedures and monitor adherence to the Regulations or any modifications thereof, for ensuring preservation of “Unpublished Price Sensitive Information” (UPSI), pre-clearing of trades of Directors, Insiders and their immediate relatives in accordance with the requirements of this Code, monitor trades and implement this Code under the overall supervision of the Board of Directors of the Company.
- (d) The Compliance Officer shall place status report before the Managing Director, detailing dealings in the Securities by the Directors and the Insiders along with the documents that such persons had executed in accordance with the pre-dealing procedure prescribed under the Code on a quarterly basis.
- (e) The Compliance Officer shall maintain a record of the Directors and the Insiders and any changes therein.
- (f) The Compliance Officer shall assist all the Directors and the Insiders in addressing any clarifications regarding the Regulations and this Code.
- (g) The Compliance Officer shall act as the focal point for dealings with SEBI in connection with all matters relating to the compliance and effective implementation of the Regulations and CEBSCO Insider Code.

#### **V. Communication or Procurement of Unpublished Price Sensitive Information**

- (a) No insider shall communicate, provide, or allow access to any UPSI, relating to the company or its 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.



- (b) No person shall procure from or cause the communication by any insider of unpublished price sensitive information, 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.

## **VI. Trading when in possession of UPSI**

No insider shall trade in securities that are listed or proposed to be listed on a stock exchange when in possession of UPSI.

Provided that the insider may prove his/her innocence by demonstrating the circumstances, including the transaction is an off-market inter-se transfer between promoters who were in possession of the same unpublished price sensitive information without being in breach of clause V above (Communication or procurement of UPSI) and both parties had made a conscious and informed trade decision;

## **VII. Trading Window**

All the Insiders shall be subject to certain trading restrictions, as enumerated below;

- (a) The Company has designated a "Trading Window" being the period during which transactions in the shares of the Company can be effected by the Insiders (hereinafter referred to as 'Trading Window') for trading in the Company's securities;
- (b) The Trading Window shall remain Closed for 10 days prior to any of the events referred below or such other dates as may be intimated by the Compliance Officer from time to time -
  - (i) Declaration of Financial results (quarterly, half-yearly and annual);
  - (ii) Declaration of dividends (interim and final);
  - (iii) Changes in capital structure;
  - (iv) mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
  - (v) Material events in accordance with the listing agreement
  - (vi) Any other events as may be decided by the Board/management.
- (c) The Trading Windows shall be opened 48 hours after the information referred to in Clause (b) is made public.
- (d) The Insiders shall not trade in the Company's securities during the period when the Trading Window is closed and will have to forego the opportunity to trade in the Company's securities during such period.
- (e) All the 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 Trading Window is closed or during any other period as may be specified by the Company from time to time.
- (f) In case of ESOPs or such other Share Based Benefits given to the Insiders, exercise of option may be allowed in the period when the trading window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when trading window is closed.



#### VIII. Pre-Clearance of Trades:

When the trading window is open, all the Insiders of the company and their immediate relatives who intend to deal in the securities of the company above 25,000 equity shares shall get the transactions pre-cleared in the manner enumerated below:

- a. an application in the prescribed form shall be made to the Compliance Officer by the Insiders indicating the estimated number of securities that such person intends to deal in, details of depository and such other information as may be prescribed by the Company (**Proforma I**) and should obtain the pre-clearance of the Compliance Officer (**Proforma II**);
- b. before the deal is executed, the Insiders shall execute an undertaking (**Proforma III**) in favour of the Company incorporating inter-alia, the following clauses, as may be applicable that:
  - (i) the Insiders does not have any access or has not received 'UPSI' upto the date of signing the undertaking;
  - (ii) in case the Insiders has access to or receives 'UPSI' after the signing of this undertaking but before the execution of the transaction, he/she shall inform the Compliance Officer of the change in his/her position and that he/she shall completely refrain from dealing in the securities of the Company till such time such information becomes public ;
  - (iii) he/she has not contravened this Code; and
  - (iv) he/she has made full and true disclosure in the matter.
- c. Prior to approving any trades, the compliance officer shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any UPSI. He shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.

#### IX. Period for completing the transaction

All the Insiders of the company and their immediate relatives shall execute their order in respect of the securities of the Company within one week after pre-clearance approval is received. The date on which the order is executed shall be intimated forthwith to the Compliance Officer in the prescribed format (**Proforma IV**). If the order is not executed within one week after the approval is given, the Insider or their immediate relative must pre-clear the transaction again and inform the Compliance Officer in writing within 2 days thereof.

#### X. Holding Period

All Insiders of the company and their immediate relatives who buy or sell any number of shares of the company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction. 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.

Compliance Officer shall not pre-clear any trade that would cause short term profit.

### **Waiver of Holding Period**

The Compliance Officer may waive the holding period in cases where the sale is necessitated by personal emergency after recording his/her reasons in writing in this regard. An application in this regard shall be made to the Compliance Officer in the prescribed format (*Proforma V*).

## **XI. Trading plans**

- (a) An insider may formulate a trading plan 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, subject to following restrictions:
  - (i) Trading plan cannot be commenced by an insider earlier than six months from the public disclosure of the plan;
  - (ii) Trading plan does not entail trading for the period between the 20th trading day prior to the last day of any financial period for which results are required to be announced by the issuer of the securities and the 2nd trading day after the disclosure of such financial results;
  - (iii) Trading plan entails trading for a period of not less than twelve months;
  - (iv) Trading plan does not entail overlap of any period for which another trading plan is already in existence;
  - (v) Trading plan sets 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;
  - (vi) not entail trading in securities for market abuse.
- (b) The compliance officer shall review the trading plan to assess whether the plan would have any potential for violation of Regulations. Compliance Officer may seek such express undertakings as may be necessary to enable assessment and to approve and monitor the implementation of the plan.
- (c) The trading plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan

Provided that the implementation of the trading plan shall not be commenced if any UPSI in possession of the insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation and in such event the compliance officer shall confirm that the



commencement ought to be deferred until such unpublished price sensitive information becomes generally available information so as to avoid a violation of sub-regulation (1) of regulation 4

- (d) Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

## **XII. Disclosure & reporting requirements for transactions in securities:**

### *a. Initial Disclosures:*

- i. Every Promoter, Director and Key Managerial Personnel shall disclose his/her holding of securities of the company as on 15<sup>th</sup> May, 2015 to the company within thirty days of this code coming into effect. **(Proforma VI).**
- ii. 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 as on the date of appointment or becoming promoter, to the company within seven days of such appointment or becoming a promoter. **(Proforma VII).**

### *b. Continual Disclosures:*

Every Promoter, Director and Designated Employees shall disclose to the company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of **ten lakh rupees** or such other value as may be specified **(Proforma VIII).**

- c. In addition to complying with the reporting requirements as prescribed above, all the Insiders shall file with the Compliance Officer, annual statements of all holdings in Company's Securities as on 31<sup>st</sup> March every year - latest by 21<sup>st</sup> April **(Proforma IX).**
- d. The disclosures to be made by any Insider shall include those relating to trading by such person's immediate relatives and by any other person who consults such insider in trading decision relating to trading in securities. The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account.
- e. Disclosure of the incremental transactions after any disclosure under above, shall be made when the transactions effected after the prior disclosure cross the threshold specified above.
- f. Company 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.
- g. **Disclosures by Connected persons**
  - i. Every Connected persons or class of connected persons shall disclose his holding of securities of the company as on 15<sup>th</sup> May, 2015 to the company within thirty days of this Code coming into effect. **(Proforma X)**



- ii. Every Connected persons or class of connected persons shall disclose to the company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of **ten lakh rupees** or such other value as may be specified. **(Proforma XI)**

### **XIII. Maintenance of records of disclosure**

The Company shall maintain records for a minimum period of five years.

### **XIV. Amendment**

Any amendments to this Code shall be approved by the Board of Directors and shall be promptly intimated to the Stock Exchanges where the securities are listed.

### **XV. Penalty**

In case it is observed by the Compliance Officer that there has been a violation of the Regulations by any Insider, he/she shall forthwith inform the Managing Director. The Compliance Officer shall simultaneously inform SEBI about such violation.

Insiders of the Company who violate the CEBSCO Insider Code shall also be subject to disciplinary action by the company, which may include but not limited to wage freeze, suspension, ineligibility or future participation in employee stock option plans, criminal proceedings, etc.

The Insider, against whom information has been furnished by the Company/Compliance Officer to SEBI for violations of the Regulations/ CEBSCO Insider Code, shall provide all information and render necessary co-operation as may be required by the Company/Compliance Officer or SEBI in this connection.

### **XVI. Clarifications**

For all queries concerning this Code, the Directors, Employees and Insiders may please contact the Compliance Officer.

### **XVII. Disclosure of the CEBSCO Insider Code on Public domain**

This Code shall be published on the official website of the Company. Further, this Code and every subsequent amendment thereto, shall be promptly intimated to the Stock Exchange where the securities of the Company are listed.





PROFORMA - I

Serial No.....

**APPLICATION FORM FOR PRE-CLEARANCE OF TRADES IN COMPANY'S SECURITIES**

***The Compliance Officer***  
**Commercial Engineers & Body Builders Co Limited**  
**124, Napier Town, Jabalpur**

Dear Sir,

I intend to deal in the securities of the Company as per the particulars furnished below:	
Name of the person for whom the transaction is to be executed	
Relationship with the applicant	
No. of shares covered by the transaction	
Nature of transaction for which approval is sought	<b>Purchase / Sale / Both *</b>
Depository I. D. No.	
Client I. D. No.	
Particulars of the broker through whom the transaction is to be executed	Name : Address :  Phone No. :

\* - *strike out whichever is not applicable*

Pursuant to the CEBSCO Insider Code, I enclose duly stamped and executed undertaking executed in favour of the Company, containing the prescribed particulars.

I request you to kindly pre-clear the above transaction at the earliest.

Thanking you,

Yours faithfully,

\_\_\_\_\_  
Name of the Applicant  
Person Code No.:  
Department:

Date:  
Place:



**PROFORMA - II**

(Draft letter of approval from Compliance Officer)

Date:

To :

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Dear Sir,

Sub: Pre-clearance of transaction in Company's Securities

Ref: **Your application dated \_\_\_\_\_, for pre-clearance of transaction for \_\_\_\_\_ shares of the Company in your name / in the name of \_\_\_\_\_.**

With reference to your above application pursuant to Clause VIII(a) of CEBBCO Insider Code, seeking pre-clearance of your transaction in shares of the Company, we hereby accord our approval to the proposed transaction.

You may kindly note that pursuant to provisions of Clause IX of CEBBCO Insider Code, the aforesaid transaction shall be executed **within 1 week** from the date of receipt of this approval letter, failing which, an application seeking pre-clearance to the proposed transaction together with undertaking in the prescribed format, shall be made afresh. As stipulated in Clause X of CEBBCO Insider Code, you cannot enter into opposite transaction during the minimum period of six months from the date of sale/purchase of transactions affected.

Thanking you,

Yours faithfully,

For **Commercial Engineers & Body Builders Co Limited**

**COMPLIANCE OFFICER**



**PROFORMA – III**

(Draft undertaking to be accompanied with every pre-clearance application)

**The Compliance Officer  
Commercial Engineers & Body Builders Co Limited  
124, Napier Town, Jabalpur**

Dear Sir,

I, \_\_\_\_\_ being a Director/ Insider of the Company, am desirous of dealing in \_\_\_\_\_ shares of the Company as mentioned in my application dated \_\_\_\_\_ for pre-clearance of the transaction.

Pursuant to Clause VIII(b) of the CEBSCO Insider Code, I hereby confirm:

- a. to maintain confidentiality of all 'Unpublished Price Sensitive Information' that may come into my possession in the discharge of my duties with the Company;
- b. not to pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sale of securities of the Company based on the same;
- c. to report to the Compliance Officer, any non-public information that may be directly received by me;
- d. that I did not have any access or received '**Unpublished Price Sensitive Information**' upto the date of signing this undertaking;
- e. that in case I have access to or receive '**Unpublished Price Sensitive Information**' after the signing of this undertaking but before the execution of the transaction, I shall inform the Compliance Officer of the change in my position and that I shall completely refrain from dealing in the securities of the Company till such time such information becomes public;
- f. that I have not contravened the CEBSCO Insider Code as amended by the Company from time to time; and
- g. that I have made full and true disclosure in the matter..

\_\_\_\_\_  
(Signature)

\_\_\_\_\_  
Name of Director/Insider:

Person Code No.:

Division:

Department:

Location:

Place:

Date:



**PROFORMA – IV**

(Confirmation of date of completion of transaction)

**The Compliance Officer  
Commercial Engineers & Body Builders Co Limited  
124, Napier Town, Jabalpur**

Dear Sir,

Sub: **Date of completion of transaction**

I hereby confirm that the transaction for dealing in the shares of the Company for which, pre-clearance was granted on \_\_\_\_\_, was completed on \_\_\_\_\_ by purchasing \* / selling \* \_\_\_\_\_ (nos.) equity shares of the Company.

Thanking you,

Yours faithfully,

\_\_\_\_\_

(Signature)

\_\_\_\_\_  
Name of the Director / Insider:

Person Code No.:

Division:

Department:

Location:

Place:

Date:

\* - strike out whichever is not applicable



**PROFORMA – V**

**The Compliance Officer  
Commercial Engineers & Body Builders Co Limited  
124, Napier Town, Jabalpur**

Dear Sir,

Sub: **Waiver of minimum holding period**

I request you to grant me waiver of the minimum holding period of **six months** as required under Clause X of the CEBSCO Insider Code with respect to \_\_\_\_\_ (nos.) equity shares of the Company held by me / \_\_\_\_\_ (name of relative) singly / jointly, acquired by me on \_\_\_\_\_ (date). I propose to deal in the said shares on account of

\_\_\_\_\_  
\_\_\_\_\_  
(give reasons)

Thanking you,

Yours faithfully,

\_\_\_\_\_

(Signature)

\_\_\_\_\_  
Name of the Director /Insider:

Person Code No.:

Division:

Department:

Location:

Place:

Date:



**PROFORMA – VI**

Name of the company: **Commercial Engineers & Body Builders Co Limited**

ISIN of the company: \_\_\_\_\_

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

Name, PAN No. CIN/DIN & Address with Contact Numbers	Category of person (Promoters/KMP/Directors/Immediate Relative/others etc)	Securities held as on the date of regulation coming into force		%age of shareholding	Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option Contracts held as on the date of regulation coming into force	
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms

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

**Name:**

**Signature:**

**Place:**

**Date:**



**PROFORMA – VII**

Name of the company: **Commercial Engineers & Body Builders Co Limited**

ISIN of the company: \_\_\_\_\_

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

Name, PAN No. CIN/DIN & Address with Contact Numbers	Category of person (Promoters/KMP/ Directors/ Immediate Relative/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		%age of shareholding	Open Interest of the Future contracts held at the time of becoming Promoter/appointment of Director/KMP		Open Interest of the Option Contracts held at the time of becoming Promoter/appointment of Director/KMP	
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms

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

**Name:**

**Signature:**

**Place:**

**Date:**







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

**Name:**

**Signature:**

**Place:**

**Date:**



**PROFORMA - IX**

**SERIAL NO:**

**ANNUAL DISCLOSURE OF SHARES HELD IN THE COMPANY BY A DIRECTOR/INSIDER & THEIR RELATIVES AS ON 31<sup>st</sup> MARCH \_\_\_\_\_ [Clause XII(c)]**

**Name of Director/ Insider& Relatives:**

Particulars	No. of shares held on 01.04.....	No. of shares bought during the year	No. of shares sold during the year	No. of shares held on 31.03.....	Pan No.	Client I.D. No.

I/We declare that I/we have complied with the requirement of the minimum holding period of **6 months** with respect to the shares.

I further declare that the above disclosure is true and correct and is in accordance with the previous disclosures given to the Company.

**Place:**

**Date:**

\_\_\_\_\_  
(Signature)



**PROFORMA -X**

**SERIAL NO:**

**INITIAL DISCLOSURE OF HOLDING BY CONNECTED PERSON OR HIS RELATIVE [Clause XII(g)(i)]**

Name, PAN No. & Address of Connected Person/Relative	No. of shares held

**Place:**

\_\_\_\_\_ (Signature)

**Date:**





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

**Name:**

**Signature:**

**Place:**

**Date:**