

Star Ferro and Cement Limited

CODE OF CONDUCT

FOR

PREVENTION OF INSIDER TRADING

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Star Ferro and Cement LIMITED

CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

CHAPTER – I

INTRODUCTION

Insider trading means dealing in securities of a company listed/traded on any stock exchange in India based on, or when in possession of, unpublished price sensitive information.

With a view to govern the conduct of insiders on matters relating to insider trading, the Securities and Exchange Board of India (SEBI) had formulated Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992 (hereinafter referred to as 'The Regulations').

Chapter IV of the Regulations require, inter alia, all listed companies to frame a Code of Internal Procedures and Conduct as near thereto to the Model Code specified in Part A of Schedule I to the Regulations.

Star Ferro and Cement Limited ("**the Company**") has formulated this Code of Conduct called Star Ferro Code of Conduct for Prevention of Insider Trading ("**Code**"). All the Directors and Designated Employees of the Company are governed by the Code.

The Code shall come into with immediate effect.

All the Directors and Designated Employees and connected persons of the Company and its Subsidiaries are advised to carefully go through and familiarise themselves with and adhere to the Regulations and the Code.

1. THE POLICY AND OBLIGATIONS

The Company endeavors to preserve the confidentiality of un-published price sensitive information and to prevent misuse of such information. The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations.

Every director, officer, designated employee of the Company has a duty to safeguard the confidentiality of all such information obtained in the course of his or her work at the company. No director, officer, 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 code of conduct is to be followed by all directors, officers, designated employees and connected persons.

2. APPLICABILITY

This Code shall apply to all Directors/Executive Directors/General Managers and other designated employees of Star Ferro and Cement Limited

DEFINITIONS

- (i) **“Act”** means the Securities and Exchange Board of India Act, 1992 (15 of 1992);
- (ii) **“body corporate”** means a body corporate as defined in section 2 of the Companies Act, 1956 (1 of 1956)
- (iii) **“Company or the Company”** means Star Ferro and Cement Limited
- (iv) **'Compliance Officer'** means the Company Secretary of the Company
- (v) **“Connected Person”** means any person who—
(i) is a director, as defined in clause (13) of section 2 of the Companies Act, 1956 (1 of 1956), of a company, or is deemed to be a director of that company by virtue of sub-clause (10) of section 307 of that Act or
(ii) occupies the position as an officer or an employee of the company or holds a position involving a professional or business relationship between himself and the company whether temporary or permanent and who may reasonably be expected to have an access to unpublished price sensitive information in relation to that company:
Explanation :—For the purpose of clause (c), the words “connected person” shall mean any person who is a connected person six months prior to an act of insider trading;
- (vi) **“Dealing in Securities”** means an act of subscribing, buying, selling or agreeing to subscribe, buy, sell or deal in any securities by any person either as principal or agent;
- (vii) **Designated Employee'** shall mean:
1. Managing Director, Whole-time Directors, Chief Executive Officer, Chief Financial Officer ;
 2. All officers in grades of Vice Presidents (and equivalent level) and above;
 3. Permanent invitees to the meetings of the Board of Directors of the Company and such other Committees as may be constituted from time to time and specified for the purposes of this Code;
 4. Employees designated by the Board of Directors from time to time to whom the trading restrictions shall be applicable.
- (viii) **'Dependent Family Members'** shall mean the employee's spouse, dependent parents and dependent children and any other person(s) dependant on the Designated Employee as may be notified by him/her.
- (ix) **'Free Period'** means any Period other than the Prohibited Period.
- (x) **'Insider Trading'** means when insiders use unpublished price sensitive information to arrive at securities trading (including buying as well as selling) decisions, the action is referred to as insider trading.
- (xi) **“Insider”** means any person who,
(i) is or was connected with the company or is deemed to have been connected

- with the company and is reasonably expected to have access to unpublished price sensitive information in respect of securities of company, or
- (ii) has received or has had access to such unpublished price sensitive information.

- (xii) “Officer of a Company”** means any person as defined in clause (59) of section 2 of the Companies Act, 2013 including an auditor of the company;
- (xiii) “Person is Deemed to be a Connected Person”**, if such person—
- (i) is a company under the same management or group, or any subsidiary company thereof within the meaning of the Companies Act, 2013 or sub-clause (g) of section 2 of the Monopolies and Restrictive Trade Practices Act, 1969 (54 of 1969) as the case may be; or 12 [(ii) is an intermediary as specified in section 12 of the Act, Investment company, Trustee Company, Asset Management Company or an employee or director thereof or an official of a stock exchange or of clearing house or corporation;
 - (iii) is a merchant banker, share transfer agent, registrar to an issue, debenture trustee, broker, portfolio manager, Investment Advisor, sub-broker, Investment Company or an employee thereof, or is member of the 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 who have a fiduciary relationship with the company;
 - (iv) is a Member of the Board of Directors or an employee of a public financial institution as defined in section 4A of the Companies Act, 1956; or
 - (v) is an official or an employee of a Self-regulatory Organisation recognised or authorised by the Board of a regulatory body; or
 - (vi) is a relative of any of the aforementioned persons;
 - (vii) is a banker of the company.
 - (viii) is a relatives of the connected person; or
 - (ix) is a concern, firm, trust, Hindu undivided family, company or association of persons wherein any of the connected persons mentioned in sub-clause (i) of clause (c), of this regulation or any of the persons mentioned in sub-clause (vi), (vii) or (viii) of this clause have more than 10 per cent of the holding or interest
- (xiv) “Price Sensitive Information”** means any information which relates directly or indirectly to a company and which if published is likely to materially affect the price of securities of company.
- Explanation.—The following shall be deemed to be price sensitive information :—
- (i) periodical financial results of the company;
 - (ii) intended declaration of dividends (both interim and final);
 - (iii) issue of securities or buy-back of securities;
 - (iv) any major expansion plans or execution of new projects.
 - (v) amalgamation, mergers or takeovers;
 - (vi) disposal of the whole or substantial part of the undertaking;
 - (vii) and significant changes in policies, plans or operations of the company;
- (xv) “Relative”** means a person, as defined under the Companies Act, 2013
- (xvi) 'Prohibited Period' means;**
1. Period as defined in clause 8.3 of this code i.e. 10 days prior to consider any price sensitive information ending after 24 hours from the time the Price Sensitive information is made public.

2. Such other period as may be specified by the Compliance Officer from time to time in consultation with the Chairman & Managing Director

(xvii) “Stock Exchange” means a stock exchange which is recognised by the Central Government or Securities and Exchange Board of India under section 4 of Securities Contracts (Regulation) Act, 1956 (42 of 1956)

(xviii) “Subsidiaries” shall have the meaning as ascribed in the Companies Act, 1956.

(xix) “Trading Window” shall have the meaning ascribed thereto in clause 7 of the Code

(xx) “Unpublished” means information which is not published by the company or its agents and is not specific in nature.

Explanation.—Speculative reports in print or electronic media shall not be considered as published information.

(xxi) “Working day” shall mean the working day when the regular trading is permitted on the concerned stock exchange where the securities of the company are listed

Words and expressions not defined in these Regulations shall have the same meaning as contained in SEBI (Prohibition of Insider Trading) Regulations, 1992 or the Securities and Exchange Board of India Act, 1992.

4 Compliance Officer

The Company has appointed the Company Secretary as Compliance Officer who shall report to the Chairman, Managing Director or Chief Executive Officer of the Company. In the absence of the designated/appointed Compliance Officer the Chairman shall be authorised to appoint a person to act as the Compliance Officer in the period of absence.

4.1 Duties of Compliance Officer:

1. He shall maintain a record of designated employees and any changes made to the list of Connected Persons.
2. He may in consultation with the Chairman & Managing Director and shall as directed by the Board, specify Prohibited Period from time to time and immediately make an announcement thereof
3. He shall maintain a record of Prohibited Period specified from time to time.
4. He shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of 'Price-Sensitive Information', 'pre-clearing of Designated Employees' and their dependents' trades, monitoring of trades and the implementation of the Code of Conduct under the overall supervision of the Board of the Company.
5. He shall maintain records of all the declarations submitted in the appropriate form given by the Directors, Officers and Designated Employees for a minimum period of three years. The declarations may be taken and preserved in either physical form or electronic form

5 Preservation of "Price Sensitive Information

Directors, Designated Employees, Officers shall maintain the confidentiality of all Price Sensitive Information. Employees/ directors 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.

5.1 Need to Know

Unpublished Price Sensitive Information is to be handled on a "need to know" basis, i.e., Price Sensitive Information 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.

5.2 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.

6 Prohibition on Dealing, Communicating or Counseling On Matters Relating To Insider Trading:

No insider shall

- 6.1 either on his own behalf, or on behalf of any other person, deal in securities of the company when in the possession of any unpublished price sensitive information;
- 6.2 Communicate, counsel or procure, directly or indirectly any unpublished price sensitive information to any person. However these restrictions shall not be applicable to any communication required in the ordinary course of business or under any law.
- 6.3 The period of closure shall be effective from two days prior to the issue of notice of Board/Committee meeting in which the meeting of the Board/Committee decides upon any matter referred above, and the same shall continue upto 24 hours after the information is submitted to the Stock Exchange.

CHAPTER – III

TRADING RESTRICTION

All Directors/ Officers and designated employees of the Company shall be subject to trading restriction as enumerated below:

7 Trading Window

- 7.1 The period prior to declaration of price sensitive information is particularly sensitive for transaction in the Company's securities. This sensitivity is due to the fact that the Directors and Designated Employees will, during that period, often possess unpublished price sensitive information

The Directors and Designated Employees of the Company shall not trade in the company's securities when the trading window is closed. The period during which the trading window is closed shall be termed as Prohibited Period.

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

1. Declaration of Financial results (quarterly, half-yearly and annual)
2. Declaration of dividends (interim and final)
3. Issue of securities by way of public/ rights/bonus, etc.
4. Any major expansion plans or execution of new projects
5. Amalgamation, mergers, takeovers and buy-back
6. Disposal of whole or substantially whole of the undertaking
7. Any changes in policies, plans or operations of the Company disruption of operations due to natural calamities;

7.3

- 7.4 The trading window shall be opened 24 hours after the information referred in 7.2 is made public.

- 7.5 All Directors, Officers, Designated Employees of the company shall conduct all their dealings in the securities of the Company only during the free period and shall not deal in any transaction involving the purchase or sale of the Company's securities during the prohibited periods or during any other period as may be specified by the Company from time to time.

7.6 In case of ESOPs, 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.

8 Pre-clearance of trades

8.1 All Directors, Officers, Designated Employees of the Company and their dependent family members who intend to deal in the securities of the company in excess of 1500000 equity shares in number or Rs. 150000000 in market value, whichever is lower, in one or more tranches in any financial year, shall require prior clearance from the Compliance Officer.

8.2 The Clearance shall be obtained as per the procedure prescribed below:

8.2.1 An application is to be made to the compliance officer as per the enclosed format **(Form -I)** indicating the estimate number of securities that the director/designated employee intends to deal in, the details of securities held in physical form as to folio no., the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the Company in this behalf.

8.2.2 Each Director and Designated Employee shall execute in favour of the Company an undertaking in the enclosed pro-forma **(Form -I)** for getting the trades cleared.

The Compliance Officer shall on receiving an application provide the Director, Officer, Designated Employee 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 unpublished Price Sensitive Information. There shall be no obligation to give reasons for any withholding of consent.

If so requested by the Compliance Officer, Director, Officer, Designated Employee must ensure that his stockbroker is authorised to disclose to the Company all matters relevant to his share dealings.

9 Minimum Period for holding of Securities

a. The directors/designated employees shall execute their transactions within thirty days after the pre-clearance failing which they have to pre-clear the transactions again.

All Directors/Officers/Designated employees 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. All Directors/Officers/Designated employees shall also not take positions in derivative

transactions in the shares of the Company at any time.

- b. All directors/designated employees shall hold their investments for a minimum period of 30 days in order to be considered as being held for investment purposes. This shall also apply to purchases in the primary market (IPOs) where the holding period shall commence when the securities are actually allotted.
- c. In case the sale of securities is necessitated by a personal emergency, the compliance officer may waive the holding period after considering the written request made in **Form 'I'** (as attached to this code).

CHAPTER – IV

REPORTING AND DISCLOSURE REQUIREMENTS FOR TRANSACTIONS IN SECURITIES

10. Reporting Requirements for transaction in securities

- 10.1 All Directors/designated employees shall forward to the Compliance Officer following details of their securities transactions including the statement of dependent family members:
 - (a) All holdings in securities of the company, at the time of joining the company in **Form -II**;
 - (b) Annual statement of all holdings in securities of the Company in **Form -III**.
- 10.2. Any person who holds more than 5% securities/ voting rights in the Company shall disclose to the Company the number of securities or voting rights held by such person on becoming such holder in the form specified in **Form - A** within 2 working days of:
 - a) the receipt of the information of allotment of the securities. Or
 - b) the acquisition of securities or voting rights as the case may be
- 10.3 Any Director or Designated Employees of the Company shall disclose to the company, the number or voting rights held and positions taken in derivatives by such person and his dependent, within 2 working days of becoming a Director or Designated Employees in the Company in the form specified in **Form -B**.
- 10.4 Any person who holds more than 5% securities or voting rights in the Company shall disclose to the Company the number of securities and voting rights held and change in shareholding or voting rights, even if such change results in shareholding falling below 5% if there has been a change in the holdings from the last disclosure made, and such change exceeds 2% of the total shareholding or voting rights in the form specified in **Form –C**.
- 10.5 Any person who is a Director or Designated Employees of the Company shall disclose to the company and the stock exchange the total number of securities or voting rights held and change in shareholding or voting rights if there has been a change in such holdings from the last disclosure made, and the change exceeds Rs.5.00 lacs in

value or 25,000 securities or 1% of the total shareholding or voting rights, whichever is lower, in the form specified in **Form - D**.

- 10.6 All Directors/officer/Designated Employees 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. All Directors/officer/Designated Employees shall also not take positions in derivate transactions in the derivate transactions in the shares of the Company at any time.
- 10.7 The Compliance Officer shall maintain records of all the declarations/undertakings/forms as mentioned in this Code, as received from time to time, for a period of three years.
- 10.8 The Compliance Officer shall place before Chairman & Managing Director\Committee specified by the Company, on a monthly basis, all the details of the dealing in the securities by designated employees/director of the company and the accompanying documents that such persons had executed under the pre-dealing procedure as envisaged in this Code.

11. Disclosure by Company to Stock Exchange

Pursuant to Regulation 13 (6), within 2 working days of the receipt of the information under Clause 10.2, 10.3, 10.4 and 10.5, the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received.

The company is required to frame a corporate disclosure policy for code of conduct under the Prevention of Insider Trading Regulations which is enclosed herewith.

CHAPTER – V

12. Penalty for breach of code of conduct

The directors/partners/designated employees who violate the code of conduct shall be subject to disciplinary action by the Company that may include wage freeze, suspension etc. and shall be ineligible for future participation in Employees Stock Option Plan (ESOP).

The action by the organization/firm shall not preclude SEBI from taking any action against those who are found guilty of Insider trading.

13. Information to SEBI in case of violation of the SEBI (Prohibition of Insider Trading) Regulations, 1992

In case it is observed by the Company and / or Compliance Officer that there has been a violation of the SEBI (Prohibition of Insider Trading) Regulations, 1992, SEBI must be informed.

THIS POLICY IS ONLY INTERNAL CODE OF CONDUCT AND ONE OF THE MEASURES TO AVOID INSIDER TRADING. IT WILL BE THE RESPONSIBILITY OF EACH EMPLOYEE TO ENSURE COMPLIANCE OF SEBI GUIDELINES AND OTHER RELATED STATUTES FULLY.

FORM I**LIMITED**

(Under _____ Code of Conduct for Prevention of Insider Trading)

The Compliance Officer_____
Limited

[Address]

Internal use

Recd date and time:

Sign:

SUB: APPLICATION FOR TRADING IN SHARES OF THE COMPANY AND UNDERTAKING

Dear Sir,

I, _____, an Employee/ Director of _____ (Name of the Company), propose to trade in the Shares of the _____ (Name of the Company) as per details hereunder:

Name of person proposing to trade in:

Shares of the Company and relationship with employee/Director:

No. of Shares of the Company held by the person as on date of the application:

Sr. No.	Physical Form	Demat Form		No. of shares Presently held
	Folio No.	DPID	Client ID	

Particulars of proposed transaction in Shares of the Company:

Number of Shares held in the Company (A)	Number of Shares of the Company proposed to be Sold (B)	Number of Shares of the Company proposed to be acquired (C)	Balance holding (A) +(C)/ (A) -(B)

Name of Depository:

DP ID No.:

Client ID No.:

Number of Shares of the Company would be held by the person after this application (if approval granted):

I confirm that:

i) I and my relatives do not have access to any price sensitive information and have complied with the code of conduct for prevention of insider trading as specified by the Company from time to time.

ii) We shall execute the trade of Shares within 30 days of your approval failing which we shall apply again to you for your approval.

iii) We shall hold Shares of the Company for a minimum period of 30 days from the date of acquisition.

I have held the securities being sold by me for a period of less than 30 days and as the sale of securities is necessitated by the following personal emergency, the minimum holding period may kindly be waived: (please clearly state the reasons for requesting waiver of minimum holding period):

I hereby undertake and confirm that,

1) I do not have any access or have not received "Price Sensitive Information" up to the time of signing this undertaking

2) In case I have access to or have received "Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction I will inform the Compliance officer of the change in my position and that I would completely refrain from dealing in the securities of the Company till the time such information becomes public.

3) I have not contravened the prevailing Code of Conduct for Prevention of Insider Trading.

4) I have made a full and true disclosure in this matter.

We further confirm that the aforesaid facts are true and correct and shall be fully responsible for any wrongful acts done by me or my relatives including such penalties as may be imposed by the Company.

You are requested to provide the pre-clearance of trade for the above transaction.

Thanking you,

Yours sincerely,

Place:

Signature:

Date:

Name :
Designation :
& Department

E-Mail ID for Communication of Approval :

Note: This application has to be necessarily submitted through electronic mail at the dedicated e-mail id *** and followed by a hard copy.

FORM – II

Statement in Holding of Securities at the time of joining the company by Director/ Designated Employee

(Under _____ Code of Conduct for Prevention of Insider Trading)

The Compliance Officer

_____ Limited

[Address]

Reg. : Initial Disclosure of Shareholding

Following are the details of shares held by me----- or (dependent family member as on

Name	Relationship	No. of Shares held in the Company	Other Details such as Folio / DP Id / Client Id
Dependent:	Self:		
1			
2			
3			
4			

I undertake to furnish the Annual Statement regarding the complete details of all shares held by us within 15 days from the end of each year.

Signature :

Name :

Designation :

Department :

Date :

E-Mail ID for Communication :

Note: Please do not submit through electronic mail at the dedicated e-mail id **** and followed by a hard copy.

FORM III

ANNUAL STATEMENT OF HOLDING

(Under _____ Code of Conduct for Prevention of Insider Trading)

The Compliance Officer

_____ Limited

[address]

Reg. : Annual Disclosure of Shareholding

Following are the details of shares held by me and my dependent family members as on 31st March, 20,,,,,.

Name	Relationship	No. of Shares held in the Company as on 31st March_____	Other Details such as Folio / DP Id / Client Id
Dependent;	Self		
1.			
2.			
3.			

I/ We declare that the shares sold have been held by me / us for 30 days.

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

Signature :

Name :

Designation :

Department :

Date :

E-Mail ID for communication :

FORM A

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992

[Regulation 13 (1) and (6)]

Regulation 13(1) – Details of acquisition of 5% or more shares in a listed company

Name, PAN No. & address of shareholder with telephone number	Shareholding prior to acquisition	No. and percentage of shares /voting rights acquired	Date of receipt of allotment /advice. Date of acquisition(specify)	Date of intimation to Company	Mode of acquisition (market purchase/public/rights/preferential offer etc.)	Shareholding subsequent to acquisition	Trading Member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value
1	2	3	4	5	6	7	8	9	10	11

FORM B

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992

[Regulation 13 (2) and (6)]

Regulation 13(2) – Details of shares held or positions taken in derivatives by Director or officer of a listed company and his dependents

Name, PAN No. & Address of Director/Officer	Date of assuming office of Director / Officer	No. & % of shares/voting rights held at the time of becoming Director / Officer	Date of intimation to company	Mode of acquisition (market purchase / public rights / preferential offer etc.)	Trading Member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value
1	2	3	4	5	6	7	8	9

Note: The above table shall be applicable with suitable modifications to disclosures for position taken in derivatives also.

FORM C

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992

[Regulation 13(3) and (6)]

Regulation 13(3) – Details of change in shareholding in respect of persons holding more than 5% shares in a listed company

Name, PAN No. & address of shareholders	Shareholding prior to acquisition/sale	No. & % of shares/voting rights acquired/sold	Receipt of allotment advice/acquisition of shares/sale of shares specify	Date of intimation to company	Mode of acquisition (market purchase/public rights/preferential offer etc.)	No. & % of shares/voting rights post-acquisition/sale	Trading Member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell value
1	2	3	4	5	6	7	8	9	10	11	12	13

FORM D

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992

[Regulation 13(4), 13(4A) and (6)]

Details of change in shareholding or voting rights held by Director or Officer and his dependents or Promoter or Person who is part of Promoter Group of a listed company

Name, PAN No. & Address of Promoter/ Person who is part of Promoter Group/Director/ Officer.	No. & % of shares/ voting rights held by the Promoter/ Person who is part of Promoter Group/Director/ Officer	Date of receipt of allotment advice/ acquisition/ sale of shares/ voting rights	Date of intimation to company	Mode of Acquisition (market purchase/ public/rights/ preferential offer, etc.)/sale	No. & % of shares/ voting rights post acquisition/ sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell value