



INDIAN SUCROSE LIMITED



A. CODE OF FAIR DISCLOSURE PRACTICES FOR PREVENTION OF INSIDER TRADING

1. Overseeing and coordinating disclosure:

The Compliance Officer (Company Secretary) shall be responsible for ensuring timely and adequate disclosure of Unpublished Price Sensitive Information (UPSI) pursuant to this Code as required under the Regulation. The Compliance Officer with the approval of Senior Managing Director shall be responsible for continuous disclosure requirements, overseeing and coordinating disclosure of Price Sensitive Information to stock exchanges, analysts, shareholders and media, and educating staff on disclosure policies and procedures. The Compliance Officer shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.

2. Guidelines for Interacting with Media & External Public

All disclosures/dissemination whatsoever of any information (save and except disclosure required to be made under any law or under this code) on behalf of the Company shall be first marked to the Senior Managing Director for approval. Any such information shall be made public or published on behalf of the Company only if the same is approved by the Senior Managing Director as the case may be. Should any dissemination of information on behalf of the Company takes place without prior approval referred above, out of accidental omission, by any Employee or Director of the Company, such Employee/ Director shall forthwith inform immediately the Compliance Officer about such disclosure irrespective of the fact whether such information is UPSI or not.

3. Responding to market rumors:

The Directors/ employees of the Company shall promptly direct any queries or requests for the verification of market rumors received from Stock Exchanges or from the Press or Media or from any other source to the Compliance Officer.

The Compliance Officer shall on receipt of requests as aforesaid, consult the Senior Managing Director and respond to the same without delay.

The Compliance Officer shall also be responsible for deciding, in consultation with the Senior Managing Director of the Company as to the necessity of a public announcement for verifying, or denying~ rumors and thereafter making appropriate disclosures.

All the requests/ queries received shall be documented and so far as practicable, the Compliance Officer shall request for such queries/ requests in writing. No disclosure in response to the queries/request shall be made by the Compliance Officer unless the Senior Managing Director approves the same.

4. Timely reporting of shareholdings/ownership and changes in ownership:



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The Compliance Officer shall be responsible for ensuring that disclosures of shareholdings/ ownership of major shareholders and disclosure of changes in ownership as required under the Stock Exchange Listing Regulations and/or any rules/Guidelines made under the Securities & Exchange Board of India Act, 1992 are made in a timely and adequate manner.

5. Disclosure/ dissemination of Unpublished price sensitive information with special reference to analysts, institutional investors:

Other than the Directors no person, except those authorized by the Senior Managing Director shall disclose any information relating to the Company's Securities to analyst's/research persons and institutional investors. The Compliance Officer shall be invited to meetings/ conferences organized by the Company with the Analysts/ Institutional Investors., All the Directors, Officers, Designated Persons of the Company should follow the guidelines given hereunder while dealing with analysts and institutional investors:

(i) Sharing of non-public information:

The Directors, Officers and Designated Persons shall provide only public information to the analyst's/ research persons/ large investors like institutions. In case non-public information is proposed to be provided, the person proposing to do so shall provide information after consulting the Compliance Officer and in such cases shall ensure that the information provided to the analyst/research person/investor is made public simultaneously with such disclosure.

The Company shall take extreme care and caution when dealing with Analyst's questions that raise issues outside the intended scope of discussion.

(ii) Handling of unanticipated questions:

The Compliance Officer should tackle the unanticipated, questions carefully. The unanticipated questions may be noted and a considered response be given later in consultation with the Senior Managing Director. If the answer to any question requires dissemination of UPSI, the Compliance Officer shall report the same to the Senior Managing Director and obtain necessary approval for its dissemination to the Stock Exchanges/public announcement of such UPSI aforesaid and respond to such unanticipated questions.

(iii) Recording of discussion:

All the meetings with the analyst, broker or Institutional Investors may be attended by the Compliance Officer in order to avoid misquoting or misrepresentation. He may also arrange for recording the discussions at the meeting.

(iv) Simultaneous release of information:

Whenever the Company proposes to organize meetings with Investment Analysts/ Institutional Investors, the Company shall make a Press Release or post relevant information on its website after every such meeting. The Company may also consider live web casting of analyst meets. - The Compliance Officer shall be responsible for drafting of the press release or the text of the information to be posted on the Company's web-site, in consultation with the Senior Managing Director.

6. Medium of disclosure/ dissemination:



The Compliance Officer in consultation with and approval of the Senior Managing Director shall disseminate all UPSI on a continuous and in a timely manner to stock exchanges where its Securities are listed and thereafter to the press.

The UPSI disclosed to the Stock Exchanges and to the Press may also be supplemented by prompt updates on the Company's website by the Compliance Officer. The Company may also consider other modes of public disclosure of UPSI so as to improve investor access to the same.

The information filed by the Company with the Stock Exchange under the Listing Regulations shall also be posted on the Company's website.

7. Leak of unpublished price sensitive information

- (a) Appropriate inquiries shall be initiated on becoming aware of leak of UPSI or suspected leak of UPSI.
- (b) Procedure for inquiries shall be in accordance with the provisions followed by the Company prior to any disciplinary action against an employee.
- (c) The Board of directors of the company and SEBI shall be promptly informed about such leaks, inquiries and results of such inquiries.
- (d) In case of leak of UPSI by persons other than employees, the instances of leak shall be reported to concerned regulatory authorities/bodies.

8. Determination of 'legitimate purposes' and sharing of unpublished price sensitive information

The UPSI may be shared only for the legitimate purposes on need to know basis.

The 'legitimate purposes' shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.

The indicative list of 'legitimate purposes' for which UPSI can be shared is as under:

1. Sharing of information with auditors, debenture trustees or any other person during preparation of financial results.
2. Sharing of information with Merchant Bankers/Consultants in respect of capital restructuring such as buy-back of shares.
3. Sharing of information with Auditors/Bankers/Consultants for declaration of dividend.
4. Sharing of Information with Legal Advisors/Consultants for obtaining legal advice.

UPSI can be shared with the following in furtherance of the conduct/performance of their legal obligations/duties.



- Statutory Auditor(s)
- Secretarial Auditor(s)
- Internal Auditors & Cost Auditors
- Legal Advisors/Consultants
- Dividend Bankers
- Intermediaries like Registrar & Share Transfer Agent, Credit Rating Agency, Merchant Bankers etc.,
- Bankers/Financial Institutions Regulatory Authorities/ Government Departments
- Any other person not covered above may require access to UPSI to reasonably discharge his functions.

The UPSI may emanate from any department within the Company and hence the onus shall be on the concerned Head of Department who is the originator of such UPSI to justify the need to share it with other person on the basis of their functional/legal requirement.

The concerned HOD also needs to notify the Compliance Officer about sharing the UPSI and also ensure that due notice shall be given to such persons to maintain confidentiality of such UPSI in compliance with these regulations. The parties sharing UPSI under legitimate purposes shall execute agreements to maintain confidentiality and provide non-disclosure obligations and such parties shall keep information so received confidential. Parties shall not trade in securities of the Company when in possession of unpublished price sensitive information.

The name of the person with whom the UPSI is shared shall be provided promptly to the Compliance Officer along with Permanent Account Number (PAN) or any other identifier authorized by law where PAN is not available for monitoring compliance with this code. Any person in receipt of unpublished price sensitive information pursuant to a "legitimate purpose" shall be considered as "insider" for purposes of this code.

B. DISCLOSURE NORMS

[Pursuant to Regulation 7(1) of SEBI (Prohibition of Insider Trading) Regulations -2015]

Disclosures by Directors and Officers of the Company.

(A) Initial Disclosures:

Every person on appointment as a key managerial personnel or a director of the Company or on becoming promoter or member of the promoter group shall disclose holding of securities of the company as on the date of appointment to the company within seven days in **FORM A**.

(B) Continual Disclosures:

Every promoter, member of the promoter group, designated person and director of the company 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 **in FORM-B**.

Explanation- It is clarified for the avoidance of doubts that the disclosure of the incremental transactions after any disclosure under this sub-clause, shall be made when the transactions effected after the prior disclosure cross the threshold specified in clause (B).

(C) Disclosure by company to stock exchanges: The company, within two trading days of receipt, shall disclose to all stock exchanges on which the company's securities are listed, the information received under **Clause (B)** above.

(D) E-filing

The disclosures required under this regulation may also be made through electronic filing in accordance with the system devised by the stock exchange.

(E) Violation of provision relating to disclosure

Without prejudice to the directions under Regulation 11, if any person violates Provisions of these regulations, he/she shall be liable for appropriate action under section 11, 11B, 11D, Chapter VI A and Section 24 of the Act.

This Code will come into effect from 01.04.2019

By the order of Board

Kunal Yadav
(Managing Director)



CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDER
[PURSUANT TO REGULATION 9(1) OF SEBI (PROHIBITION OF INSIDER TRADING)
REGULATIONS 2015]

CHAPTER I – Preliminary

This Code of Conduct to Regulate, Monitor and Report Trading by Insider, herein referred as "the Code", is framed pursuant to Regulation 9(1) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended by Notification dated 319 December, 2018. This Code is being framed with the aim that Designated Persons and their immediate relatives shall not derive any benefit or assist others to derive any benefit from the access to and possession of UPSI about the Company which is not in the public domain and thus constitutes insider information.

"The Code" replaces the existing "Code" approved by the Board of Directors.

This Code will come into effect from 01.04.2019.

CHAPTER II- Terms, Definitions, Interpretations & Scope.

2.1 "Act" means the Securities and Exchange Board of India Act, 1992

2.2 "Board" means the Board of Directors of the Company.

2.3 "Body Corporate" means a body corporate as defined in Section 2(11) of the Companies Act, 2013.

2.4 means Code of Conduct to Regulate, Monitor and Report Trading by Insiders, including modifications made therein from time-to-time by the Company. "Code"

2.5 "Company" means Indian Sucrose Limited.

2.6 "Compliance Officer" means any senior officer, designated so and reporting to the board of directors 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 codes specified in these regulations under the overall supervision of the board of directors of the company. At present, the Company Secretary is the Compliance Officer for the purpose of the said Regulation.



[Explanation - "financially literate" shall mean a person who has the ability to read and understand basic financial statements i.e. balance sheet, profit and loss account and statement of cash flows]

2.7 "Connected Person" means-

(I) any person who is or has during the six months prior to the concerned act been associated with a company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the company or holds any position including a professional or business relationship between himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access:

(II) without prejudice to the generality of the forgoing, the person falling within the following categories shall be deemed to be Connected Persons unless the contrary is established, -

- (a) an immediate relative of connected persons specified in clause (I), or
- (b) a holding company or associate company or subsidiary company, or
- (c) an intermediary as specified in Section 12 of the Act or an employee or director thereof, or
- (d) an investment company, trustee company, asset management company or an employee or director thereof, or,
- (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 ten percent of the holding or interest.

2.8 "Dealing in Securities" means an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in the Securities of the Company either as principal or agent.

2.9 "Designated Persons" shall mean:

- (i) Every Promoter, All Directors, Key Managerial Personnel



(ii) All Executives at the level of Assistant General Managers and above and all the employees working in Finance, Accounts, Secretarial, Taxation & Legal Departments at the Corporate Office.

(iii) The Directors, Key Managerial Personnel and employees at the level of General Managers of the material Subsidiaries companies, if any.

(iv) Such other employees of the Company including that of material Subsidiary/Associate companies, temporary/ ad-hoc employees designated by the Board of Directors from time to time to whom the trading restrictions shall be applicable.

In case any of the designated persons leaves the services of the Company, due to superannuation/resignation/ termination etc., he/she shall continue to be considered as such for a further period of six months subsequent to the date of his/her leaving the Company as envisaged under SEBI (Prohibition of Insider Trading) Regulations, 2015.

2.10 "**Director**" means a member. of the Board of Directors of the Company.

2.11 "**Employee**" means every employee of the Company including the Directors in the employment of the Company.

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

2.13 "**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 of dependent financially on such person, or consults such person in taking decisions in relating to trading in securities,

2.14 "**Insider**" means any person who is:

(i) a connected person, or

(ii) in possession of or having access to UPSI;

2.15 "**Insider trading**" means when insiders use unpublished price sensitive information to arrive at securities trading (including buying as well as selling) decisions.

2.16 "**Key Managerial Persons**" means person as defined in Section 2(51) of the Companies Act, 2013.

(In case of the Company, presently Senior Managing Director, Chief Financial Officer & the Company Secretary are the Key Managerial Personnel pursuant to Section 203 of the Companies Act.)

2.17 "**Officer of the Company**" means any person as defined in clause 59 of Section 2 of the Companies Act, 2013 i.e. "officer" includes any director, managing director or key managerial personnel or any person in accordance with whose directions or instructions the Board of Directors or any one or more of the directors is or are accustomed to act;

2.18 "**Prohibited Period**" means the period during which the "Trading Window" is closed. Such prohibited Period normally begins 7 days prior to the date of the meeting in which the Board of Directors



is to consider any Price Sensitive Information and ending after 48 hours after the conclusion of the Board Meeting. In addition, such other period as may be specified by the Compliance Officer from time to time in consultation with the Senior Managing Director.

2.19 "Promoter" shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital & Disclosure Requirements) Regulations, 2018 or any modifications thereof.

2.20 "Promoter Group" shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital & Disclosure Requirements) Regulations, 2018 or any modifications thereof.

2.21 "Regulations" means the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 including modifications made therein from time to time.

2.22 "Securities" shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 or any modification thereof except Units of a mutual fund.

2.23 "Specified" means specified by the Board in writing;

2.24 "Stock Exchange" means a stock exchange which is recognized by the Central Government or Securities and Exchange Board of India under Section 4 of Securities Contracts (Regulation) Act, 1956;

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

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

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

2.28 "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 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) Change in key managerial personnel.

2.29 "Valid Trading Window" means any period other than prohibited period.

~~Words and expressions used and not defined in this code but defined in the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the~~



Companies Act, 2013 and rules and regulations made there under shall have the meanings respectively assigned to them in those legislation.

CHAPTER- III –APPLICABILITY

This Code shall be applicable to and binding on all the designated persons and their immediate relatives for trading in Securities of the Company.

CHAPTER-IV –COMPLIANCE OFFICER

4.1 Compliance Officer

The Compliance Officer shall report to the Board of Directors and in particular, shall provide reports to the Chairman of the Audit Committee, if any, or to the Senior Managing Director at such frequency as may be stipulated by the Board of Directors but not less than once in a year.

In order to discharge his functions effectively, the Compliance Officer shall be adequately empowered and provided with adequate manpower and infrastructure to effectively discharge his functions. In the performance of his duties, the Compliance Officer shall have access to all information and documents relating to the Securities, Designated Persons and Unpublished Price Sensitive Information of the Company.

The Compliance Officer shall maintain a Register of all Designated Persons and all changes taking place in the list from time to time shall be incorporated therein.

The Compliance Officer shall act as the focal point for dealing with SEBI in connection with all matters relating to the compliance and effective implementation of the Regulations and this Code.

4.2 Duties of the Compliance Officer:

- a. He shall maintain a record of Designated Persons and their immediate relatives & any changes made thereto in the prescribed form **(Form I)**.
- b. He may in consultation with the Senior Managing Director and shall as directed by the Board, specify Prohibited Period from time to time and immediately make an announcement thereof.
- c. He shall maintain a record of Prohibited Period specified from time to time in the prescribed format **(Form II)**
- d. He shall be responsible for setting forth policies, procedures, monitoring adherence to the Rules- for the preservation of 'Unpublished Price Sensitive Information', 'Pre-clearing of Designated Persons' and their Immediate Relatives' trades, monitoring of trades and the implementation of the Code of Conduct under the overall supervision of the Board of the Company.



- e. He shall maintain records of all the declarations submitted in the appropriate form by the Designated Persons for a minimum period of five years.
 - f. He shall place before the Senior Managing Director, on a monthly basis all the details of the dealing in the Securities by the Designated Persons including their immediate relatives and the accompanying documents that such persons had executed deal as per pre-dealing procedure as envisaged in these rules.
 - g. He shall be responsible for maintaining and implementation of the Code under the overall supervision of the Board of the Company.
 - h. He shall be assisting all the Designated Persons to whom this code is applicable in addressing any clarifications regarding the Regulations and this Code.
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- i. Any other responsibilities as assigned under this Code or under SEBI (Prohibition of Insider Trading) Regulations, 2015.

CHAPTER V- PRESERVATION OF "UNPUBLISHED PRICE SENSITIVE INFORMATION

5.1 No Designated Person/insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to the company, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performances of duties or discharge of legal obligations.

All Designated persons shall maintain confidentiality of all Unpublished Price Sensitive Information coming into their possession or control and shall not, inter- alia:

- (a) Pass on UPSI to any person directly or indirectly by way of making a recommendation for purchase or sale of securities of the Company, or.
- (b) Disclose UPSI to their family members, friends, business associates or any other individual, or
- c) Discuss UPSI in public places, or.
- (d) Disclose UPSI to any other employee who does not need to know the information for discharging his or her professional duties, or
- (e) Recommend to anyone that they may undertake trading in Securities of the Company while being in possession, control or knowledge of UPSI, or
- (f) Be seen or perceived to be trading in Securities of the Company on the basis of UPSI.

5.2 Limited access to confidential information

Files containing confidential information shall be kept secured. Computer files must have adequate security of log-in and password, etc.

5.3 Need to know:



(i) All the Designated Persons, who are priv to Unpublished Price Sensitive Information, shall handle the same strictly on a "need to know" basis. This means the Unpublished Price Sensitive Information shall be disclosed only to those persons within the Company who need to know the same in the course of performance or discharge of their respective professional duties and whose possession of Unpublished Price Sensitive Information will not in any manner give rise to a conflict of interest or likelihood of misuse of the information.

(ii) All non-public information directly received by any employee should immediately be reported to the Head of the Department.

5.4 Trading when in possession of unpublished price sensitive information.

No Designated Person/insider shall trade in securities of the company when in possession of unpublished price sensitive information.

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

5.5 Maintenance of Structured Digital Database.

Pursuant to Regulation 3(5) of SEBI('PIT') Regulations, 2015, the Company shall maintain a Structured Digital Database containing the names of such persons or entities as the case may be with whom information is shared under this Code read with SEBI (PIT) Regulations along with the PAN or any other identifier authorized by law where PAN is not available.

The said Digital Database shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.

CHAPTER VI- TRADING WINDOW

6.0 Trading Restriction:

All the Designated Persons of the company and their immediate relatives shall be subject to trading restriction as enumerated below.

6.1 Trading Window:

The Company shall specify a trading period, to be called "Trading Window", for trading in the Securities. The Designated Persons and their immediate relatives shall not trade in the Securities of the Company when the Trading Window is closed. The period during which the Trading Window is closed shall be termed as "Prohibited Period.

6.2 The Trading Window shall, inter alia, be closed in the following events: -

(a) Declaration of financial results (quarterly, half-yearly and" annually)

(b) Declaration of dividends (interim and final)

(c) Change in capital structure and/or issue of securities by way of public/rights/bonus etc.



(d) Amalgamation, mergers, de-mergers, acquisitions, delisting's, takeovers and buyback.

(e) Disposal of whole or substantially whole of the undertaking.

(f) Any other event as may be notified by the Company from time to time.

6.3 The period of closure

The period of closure shall be effective from 7 days prior to the date on which the meeting of the Board of Directors is proposed to be held and extend unto 48 hours after the information is made public.

6.4 All Designated Persons and their immediate relatives shall conduct their trading in the Securities of the Company only during the valid trading window and shall not trade 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.

6.5 In Case of Employee Stock Option Plan (ESOP), 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 the Trading Window is closed.

6.6 The Compliance officer shall intimate the designated persons the date of closure of the trading window when he determines that a designated person or class of designated persons can reasonably be expected to have possession of UPSI. Such closure shall be imposed in relation to such securities to which such UPSI relates. The information shall also be intimated to the Stock Exchange concerned and put on the Company's website for information of all concerned.

6.7 The trading window shall also be applicable to any intermediaries having contractual or fiduciary relation with the Company.

CHAPTER-VII TRADING PLANS BY DESIGNATED PERSONS [Pursuant to Regulation 5 of SEBI (Prohibition of Insider Trading) Regulations, 2015]

7.1 Trading Plans

A Designated Person is entitled to formulate a trading plan and present it to the compliance officer for approval and public disclosure pursuant to which trades may be carried out in accordance with such plan.

Such trading plan shall:

(a) Not entail commencement of trading earlier than six months from the public disclosure of the plan;

(b) Not entail trading for the period between the twentieth 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 Second trading day after the disclosure of such financial results;



- (c) Entail trading for a period of not less than twelve months;
- (d) Not entail overlap of any period for which another trading plan is already in existence;
- (e) 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
- (f) Not entail trading in securities for market abuse

The trading plan once approved shall be irrevocable and the designated person 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 the trading plan.

~~The implementation of the trading plan shall not be commenced if any UPSI of the designated person 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 UPSI becomes generally available information.~~

7.2 Duty of Compliance Officer

- (a) He shall review the trading plan to assess whether the plan would have any potential for violation of 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.
- (b) Upon approval of the trading plan, he shall notify the plan to the stock exchanges on which the securities are listed.

CHAPTER-VIII PRE-CLEARANCE OF TRADINGS IN SECURITIES

8.1 Applicability

All Designated Persons who intend to trade in the Securities either in his own name or in the name of their Immediate Relatives beyond the threshold limits mentioned below shall obtain Pre-clearance of the transactions as per the pre-dealing procedure as described hereunder.

Application for Pre-clearance shall be made only during valid Trading Window period. Applications submitted during a period when the Trading Window is closed shall be invalid and will be deemed to have been automatically rejected.

No designated persons shall apply for pre-clearance of any proposed trade if such designated person is in possession of unpublished price sensitive information even if the trading window is not closed.

Every Designated person is required to obtain pre-clearance from the Compliance Officer by making an application in Form III before he and /or any of his immediate relatives, deals in securities (either buy/acquire or sell/dispose), if the market value of securities involved in the deal, in aggregate, exceeds Rs. 10 Lakhs.

~~Pre- clearance of trades shall not be required for a trade executed as per an approved trading plan.~~



8.2 Pre-Clearance Procedure

An application for Pre-clearance of trade shall be made in the prescribed form (Form 111) to the Compliance Officer during valid Trading Window

An undertaking shall be executed in favor of the Company by such Designated Person incorporating, inter-alia, the following clauses as may be applicable:

(a) That he/she does not have any access or has not received UPSI up to the time of signing the Undertaking.

(b) That in case he/she has access to or receives UPSI after 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 and that he or she would completely refrain from trading in the Securities of the Company till the time such information becomes generally available information.

(c) That he or she has not contravened the Code of Conduct to Regulate, Monitor and report trading by Insider as notified by the Company from time to time.

(d) That he or she has made a full and true disclosure in the matter.

8.3 Approval

The Compliance Officer shall process the Pre-clearance applications and if 'Pre-clearance application' is in accordance and in compliance with the provisions of this Code, the Compliance Officer shall endeavor to communicate the Pre-clearance immediately but not later than two trading days from the date of receiving the application.

For Pre-clearance of trading in Securities by the Compliance Officer, approval of Senior Managing Director shall be required.

Every pre-clearance approval letter shall be issued in prescribed format (Form W). Every approval shall be dated and shall be valid for a period of one week from the date of approval. However, such approval is automatically deemed to be withdrawn if such period is superseded by closure of Trading Window.

The Compliance Officer shall retain copies of all applications and acknowledgements and also maintain the Register of Pre-clearance of trade in prescribed format (Form v).

In exceptional circumstances consent may not be given if the Compliance Officer is of the opinion that the proposed trade 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.

8.4 Other Restrictions

Designated persons and their immediate relatives shall execute their 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, the Designated Persons must Pre-clear the transaction again.

Designated Persons who buy or sell any number of shares of the company shall not enter into a reverse transaction i.e. sell or buy any number of shares during the reM six months following the prior transaction.



Designated Persons who buy or sell any number of shares of the company shall not enter into a reverse transaction i.e. sell or buy any number of shares during the next six months following the prior transaction. Designated Persons shall also not take positions in derivative transactions in the shares of the company at any time.

If a contra trade has been executed, inadvertently or otherwise, in violation of above restriction, the profit from such trade shall be liable to be disgorged for remittance to the SEBI for credit to the Investor protection and Education Fund.

Trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

In case where 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 waive of Holding Period shall be made to the Compliance Officer who shall maintain a Register of 'Waiver of restriction on holding investment in the Securities' for a minimum period of six months in the prescribed form (Form VI).

Provisions of the Code relating to reverse transaction shall not apply in case of dealing in securities of Indian Sucrose Limited acquired under Offer for Sale by promoter, Buy-Back, open offers, right issues, bonus issues, employee stock options etc.

8.5 Completion of Pre-Clearing Dealing

(a) The Designated Person shall file within seven days of the execution of the trade, the details of such trade, with the Compliance Officer in the prescribed form. In the event of executing the transaction or not executing the transaction, on, a report to that effect shall be filed with the Compliance Officer in **Form VII**.

(b) If a trade is not executed pursuant to the approval granted by the Compliance. Officer for pre-clearance of the transaction covered under the said approval.

Chapter-IX REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES

9.1 Furnishing of details of Securities

In addition to complying with the reporting requirements as prescribed under this Code, every Promoter, Director, Key Managerial Personnel and other Designated Person of the Company shall file with the Compliance Officer (**Form VIII**) the details of his holdings within 30 days of the date of implementation of this Code.

Initial disclosure at the time of joining (for new employees)

All initial holding in Securities to be disclosed in Form VIII at the time of joining the Company (including that of his/her immediate relatives) within seven days.

Subsequent/ Continual disclosure for any change in shareholding



Any subsequent change in shareholding of designated persons (including that of his/her immediate relatives) including shares acquired after Pre-clearance, shall be intimated to the Compliance Officer within two trading days of such change in **Form No. IX**.

Annual disclosure

Designated Persons shall furnish annual statements of all holdings (including his/her immediate relatives) in securities in the Company as at 31st March of each year to the Compliance Officer by the 7th of April in **FORM -X**.

~~Designated persons shall be required to disclose names and Permanent Account Number (PAN) or any other identifier authorized by law of the following persons to the Company on an annual basis and as and when the information changes in **FORM-X**.~~

- (a) Immediate relatives
- (b) Persons with whom such designated person(s) shares a material financial relationship
- (c) Phone, mobile and cell numbers which are used by them.

The names of educational institutions from which designated persons have graduated and names of their past employers shall also be disclosed on a one-time basis in **Form-XI**.

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

9.2 Records of disclosures received by the Company

The compliance officer shall maintain records of all the declarations in the appropriate form given by the Designated Persons for a minimum period of five years.

Note: The disclosures under these Regulations are in addition to the disclosures required to be made under the SEBI (Substantial Acquisition of Shares & Takeover) Regulations, 2011 or any other Regulations.

Chapter X

PENALTY FOR CONTRAVENTION OF CODE OF CONDUCT

10.1 Any Designated Person who trades in Securities or communicates any information for trading in Securities, in contravention of the Code of conduct, may be penalized and appropriate action may be taken by the Company including wage freeze, suspension, recovery claw back etc.

10.2 ~~Designated Persons of the Company who violate the Code of Conduct shall also be subject to disciplinary action by the Competent Authority as per the relevant Employees conduct rules.~~



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.

Under Section 15G of the SEBI Act, any Insider who indulges in insider trading in contravention of Regulation 3 is liable to a penalty of Rs. 25 Crore or three times of the amount of prints made out of insider trading, whichever is higher.

Under Section 24 of the SEBI Act, anyone who contravenes the Regulations is punishable with imprisonment for a maximum period of ten years or with one which may extend to Rs.25 Crore or with both. Without prejudice to its rights under Section 24 of the SEBI Act, SEBI can also pass any or all of the following orders to an Insider found indulging in insider trading:

- directing him / her not to trade in the Company's Securities in any particular manner.
- prohibiting him/her from disposing of any of the Securities acquired in violation of the Regulations.
- restraining him/her from communicating or counseling any other person to trade in Company's Securities.
- declaring the transactions in Securities as null and void.
- directing the person who acquired Securities in violation of the Regulations, to deliver the Securities back to the seller or alternatively pay the Seller the price as provided. directing him/her to transfer specified amount to Investor Protection Fund of a recognized Stock Exchange.

10.3 Information to SEBI in case of violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015. In case it is observed by the Company/Compliance Officer that there has been a violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015, SEBI shall be promptly informed by the Company.

10.4 Clarification for all queries concerning the Code, Designated Person may please contact the Compliance Officer.

10.5 Modifications:

Modification, if any, to the said Code shall only be made with the approval of the Board of Directors of the Company.

By Order of Board

Kunal Yadav
Managing Director



FORM-I

REGISTER OF DESIGNATED PERSONS

Sl. No.	Name	Designation/Status	Department (If applicable)	Place of work	Employee No.	PAN	Date of Joining
1	2	3	4	5	6	7	8

Date of becoming Designated Person	Date of cessation of Designated Person	DP ID or Folio No.	Names of immediate relative(s)	PAN of immediate relative(s)	Phone/ cell no. of immediate relative(s)
9	10	11	12	13	14

Names of person(s) with whom Designated person shares material financial relationship.	Phone/ cell no. and PAN of such person with whom Designated Person shares material financial relationship.	Institution of Graduation and above of Designated person	Name of past employer, if any, of Designated Person	Remarks
15	16	17	18	19



FORM- II

REGISTER OF PERIODS OF DCLOSURE OF TRADING WINDOW/ PROHIBITED PERIOD

Sl. No.	Purpose for which Trading Window closed	Start date of closure of Trading Window	Date of notifying closure of Trading Window, if any.	Date of opening of Trading Window	Date of notifying opening of Trading Window	Remarks



FORM- III

APPLICATION FOR PRE-CLEARANCE OF TRADES IN SECURITIES

To,

Indian Sucrose Limited,
G.T Road Mukerian,
Punjab-144211

Sub: Application for Pre-clearance approval in securities of the Company

Dear Sir;

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct for Prevention of Insider Trading, I seek approval to purchase / sale / subscription of _____ equity shares of the Company as per details given below:

Name of applicant	
Designation	
Number of securities held as on date	
Folio No./ DP ID/ Client ID No.	
The proposal is for:	1. Purchase of securities 2. Subscription to securities 3. Sale of securities [tick any one]
Proposed date of dealing in securities	
Estimated number of securities proposed to be acquired / subscribed / sold	
Whether the proposed transaction is in the name of Self or in the name of Dependent Family Member.	
Name of the Relative/ relationship if the transaction is in the name of Relative Immediate	
Price at which the transaction is proposed	
Current market price (as on date of this application)	
Whether the proposed transaction will be through stock exchange i.e. market or off-market deal	
Folio No./ DP ID. Client ID No. where the securities will be credited/ debited.	

Note: Preclearance is required if the transacted value of securities is to exceed Rs.10 lakh in a calendar quarter.

UNDERTAKING

In this connection, I solemnly confirm and declare:

- a) that I do not have access and / or have not received any "Unpublished Price Sensitive Information" (UPS) pertaining to the underlying securities of the Company, up to the time of signing this undertaking.



- 2 -

- b) that in case I have access to or receive UPSI after the signing of the undertaking but before the execution of the transaction, I shall inform the Compliance Officer of any change in my position and that I shall refrain from trading in Company's underlying Securities till the time such information becomes public.
- c) that I have not contravened the Code of Conduct to Regulate, Monitor and Report trading by insider read with Code of Fair Disclosure Practices for Prevention of Insider Trading as notified by the Company from time to time.
- d) that I have not entered into any sale transaction of the shares of the Company in the last six months prior to the proposed date of purchase/ that I have not entered into any purchase transaction of the shares of the company in the last six months prior to the proposed date of sale.
- e) that I undertake to submit the necessary report within seven days of execution of the transaction or "NIL" report, if the transaction is not undertaken.

If approval is granted, I shall execute the deal within 7 days of the receipt of approval failing which I shall seek pre-clearance.

I declare that I have made full and true disclosure in the matter.

Date:

Signature: _____



FORM IV

FORMAT FOR PRE- CLEARANCE ORDER

To,
Name : _____
Designation/Status : _____
Place : _____

This is to inform you that your request for dealing in _____ (nos) shares of the Company as mentioned in your application dated _____ is hereby approved. Please note that the said transaction must be completed on or before _____ (date) that is within 7 days from today.

In case you do not execute the approved transaction /deal on or before the aforesaid date you would have to seek fresh pre-clearance before executing any transaction/deal in the securities of the Company. Further, you are required to file the details of the executed transactions in the attached format within 2 days from the date of transaction/deal. In case the transaction is not undertaken a 'Nil' report shall be necessary.

Yours faithfully
For Indian sucrose Limited

Compliance Officer



FORM V

REGISTER OF PRE-CLEARANCE FOR TRADE IN SECURITIES BY DESIGNATED PERSONS

Sl. No.	Name	Employee No.	Designation/ Status	Department	Date & time of receipt of Preclearance application	Nate of transactions (purchase or sale)
1	2	3	4	5	6	7

Estimated number of securities indicated in the application	Estimated consideration in value indicated in the application	Name of the immediate relative if the transaction is in the name of the immediate relative	Date of communication of the clearance by the Compliance Officer
8	9	10	11

Reason for non-clearance, if not cleared	Date of Report to Board of Directors	Number of securities actually traded, if any	Remarks
12	13	14	15



FORM- VI

**REGISTER OF WAIVER OF RESTRICTION FOR DISPOSAL OF SECURITIES
WITHIN 6 MONTHS (30 DAYS IN CASE OF IPO ALLOTTMENT) OF ACQUISITION
(Clause 8.4 of Code of Conduct to Regulate, Monitor and Report Trading by Insider)**

Sl. No.	Name	Employee No.	Designation/ Status	Department	Name of the immediate relative(s) if the securities held in the name of immediate relative(s)
1	2	3	4	5	6

Number of shares / securities	Consideration value	Reasons for waiver	Date of commencement of waiver	Remarks
7	8	9	10	11



FORM VII
FORMAT FOR DISCLOSURE OF PRE-APPROVED TRANSACTIONS

(To be submitted within 7 days of transaction/ trading in securities of the Company)

The Compliance Officer,
Indian sucrose Limited
Mukerian Road,
Punjab-144211

Date: _____

Dear Sir,

DETAILS OF PRE-APPROVED TRANSACTION

Ref: Your Approval letter No. _____ dated _____

I hereby inform you that I

- have not bought/ sold/ subscribed any securities
- have bought / sold/ subscribed to the _____ securities (give description) as mentioned below on _____ (insert date).

Name of the holder	First or joint holder	No. of securities dealt with	Bought sold/ subscribed	DP ID/ Client ID (electronic form) where the securities will be debited or credited or Folio no. of physical securities	Price (Rs.)

In connection with the aforesaid transactions(s), I hereby undertake to preserve, for a period of 5(five) years and produce to the Compliance Officer/ SEBI any of the following documents.

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

I declare that the above information is correct and that no provisions of the Code of Conduct to Regulate, Monitor and Report trading by insider of the Company and/or applicable laws/ regulations have been contravened for effecting the above said transaction(s).

I declare that I have not entered and would not enter into a reverse transaction i.e. Purchase or Sale in the shares of the Company for a period of six (6) months from the date of this transaction. In case there is any urgent need to sell these securities within the said period, I shall approach the Company (Compliance officer) for necessary approval (applicable in case of purchase/ subscription)

Yours truly

Signature: _____

Name : _____

Employee No.: _____

Department/ Division: _____



FORM VIII
FORMAT FOR INITIAL DISCLOSURE OF SECURITIES ON BECOMING A DESIGNATED PERSON / DIRECTOR / KMP / PROMOTER

Name of the Company: _____

ISIN of the Company: _____

I, _____, in my capacity as _____ of the Company hereby submit the following details of securities held in the Company as on _____ (date of becoming Specified Person).

I. Details of securities held by me:

Name, PAN, CIN/ DIN & Address with contact No.	Category of person (Promoters/ KMP/ Directors/ Immediate relatives/ designated persons, etc)	Date of appointment of Director/ KMP or date of becoming promoter	Securities held at the time of becoming promoter/ appointment of director / KMP/ designated person	% of share-holding
1	2	3	4	5

II. Details of immediate relative(s):

Pursuant to the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Procedures and Conduct for Prevention of Insider Trading, I hereby declare that I have the following immediate relatives:

Sr. No.	Name of the relative	Relation with Director / Officer / Designated person

III. Details of securities held by immediate relative(s) :

Name of Relative	Relationship	Type of securities	No. of Securities held	Folio No B	Beneficiary A/c Client ID

Date: _____

Signature: _____



FORM IX

**PROFORMA FOR DISCLOSURE OF CHANGE IN SECURITIES HOLDING TO BE
SUBMITTED BY DIRECTORS / OFFICERS/ DESIGNATED PERSONS**

Dear sir,

I _____, Designated person of Company, Indian Sucrose Limited furnish below the details of transactions of my own / immediate relatives in the securities of DCM Shriram Industries Limited during the period from _____ to _____ in terms of clause 9.1 of the Code of Conduct to regulate, monitor and report trading by insider in trading with securities and Code of Fair Disclosure Practices for Prevention of Insider Trading of Company.

Name & Designation of the Designated Person:

Employee No:

Department of Designated Person:

Date of Joining/becoming Designated Person:

I. Details of any change in shareholding (on own account)

No. of Securities held as on (date of previous disclosure)	Date of Transaction	Details of Securities purchased		Details of securities sold		No. of securities held as on (Date of present disclosure)	Folio No./ DP ID and client ID
		No.	Conside-ration	No.	Conside-ration		



II. Details of any change in shareholding of immediate relative(s)

Name of immediate relative	Relationship	No. of Securities held as on	Date of Transaction	Details of Securities purchased		Details of securities sold		No. of securities held as on	Folio No./ DP ID and client ID
		(date of previous disclosure)					(Date of present disclosure)		
				No.	value	No.	value		

I declare that I have not entered and would not enter into a reverse transaction i.e. purchase or sale in the shares of the Company for a period of 6 months from the date of this transaction.

Place:

Date :

Signature: _____



FORM - X

**PROFORMA FOR ANNUAL DISCLOSURE OF SECURITIES HOLDING TO BE
SUBMITTED BY THE DIRECTORS/OFFICERS/DESIGNATED PERSONS.**

Dear Sir,

I, _____, Designated Person of Company Indian Sucrose Ltd. furnish below the details of transaction(s) in the Securities of DCM Shriram Industries Ltd., during the financial year _____ as well as shareholding as on 31st March, _____.

Name & Designation of the Designated Person:

Employee No:

Department of Designated Person:

Date of Joining/becoming Designated Person

III. Details of transaction/shareholding in own name

No. of Securities held as on 01.04.____ (date of previous disclosure)	Date of Transaction	Details of Securities purchased during the year.		Details of securities sold during the year		No. of securities held as on 31.3.____ (Date of present disclosure)	Folio No./ DP ID and client ID
		No.	Conside-ration	No.	Conside-ration		

IV. Other disclosures required

PAN	Phone/ Cell No. & email ID	Name and relationship of immediate relative	Phone / Cell No. and PAN of Immediate relative	Name, Phone/ cell no. of person with whom designated person shall have material financial relationship.
1	2	3	4	5



V. Details of transactions/ shareholding of immediate relatives

Name of immediate relative	relationship	No. of securities held as on 1.4._____	Details of securities purchased during the year	Details of securities sold during the year	No of Securities held as on 31.3._____	Folio No./ DP ID & Client ID
1	2			3	4	5

- a) I declare that I will comply / have complied with the requirements of not entering into a reverse transaction in the shares of the Company for a minimum period of 6 months following a prior transaction.
- b) The term "material financial relationship" shall mean a relationship in which designated person is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding 12 months, equivalent to at least 25% of such payer's annual income but shall exclude relationships in which the payment is based on arm's length transactions.

Place:

Date :

Signature: _____



FORM- XI

PROFORMA FOR DISCLOSURE OF INSTITUTION OF GRADUATION AND PAST EMPLOYER BY THE DESIGNATED PERSONS

Dear Sir,

I,Designated person of Indian Sucrose Limited furnish below:

Name:

Employee No.:

Department:

Date of joining/ becoming Designated Person:

Name	Employee No.	Designation	Institution of Graduation	Name of past employer, if any.
1	2	3	4	5

Signature

Place:

Date:

FORM -A
[Regulation 7 (1) (a) read with Regulation 6(2)]

Name of the company:
 ISIN of the company:

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

Name, PAN No., CIN/DIN & Address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relative to/others etc.)	Date of appointment of Director /KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/appointme nt of Director/KMP	% of Shareholding	Open Interest of the contracts held at the time of Becoming Promoter/appointment of Director/KMP		Open Interest of the Future contracts held at the time of Promoter/appointment of Director/KMP		Notional value in Rupee terms	Number of units (contracts * lot size)	Contract specifications	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms	
					Contract specifications	Number of units (contract * lot size)	Contract specifications	Number of units (contracts * lot size)							
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)												
1	2	3	4	5	6	7	8	9		10		11	12		

Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) SEBI(PIT)Regulations, 2015

Signature:
 Name:
 Designation:

Place:
 Date:
 Time:



FORM -B

(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 every Promoter, member of the promoter group, designated person and director of the company and other such persons as mentioned in Regulations 6(2).

Name CIN/DIN & address with contact nos.	PAN	Category of Person (Promoters/KMP Directors/mediate relative to/others etc.)	Securities held prior to acquisition /disposal		Securities acquired / Disposed			Securities held post acquisition/ disposal		Date of allotment /acquisition /sale of shares specify	Date of intimation to company	Mode of disposal (on market/public rights/preferential offer / off market/ inter-se transfer, ESOPs etc)		
			Type of security (For eg.- Shares Warrants Convertible Debentures etc.)	No. and % shareholding	Type of security (For et- Shares Warrants Convertible Debentur es etc.)	No.	Value	Transaction Type (Buy/Sale/ Pledge/Re voke / Invoke	Type of security (For eg.- Shares Warrants Convertible Debentures etc.)				No. and % shareholding	From To
		2	3	4	5	6	7	8	9	10	11	12	13	14

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



Details of trading in derivatives of the company by every Promoter, member of the promoter group, designated person and director of the company and other such persons as mentioned in Regulation 8(1) of the Code.

Trading derivatives (Specify type of contract, Futures or Options etc.)						Exchange on which trade was executed
Type of contract	Contract specifications	Buy		Sell		
		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:

