

Morganite Crucible (India) Limited
Morgan Advanced Materials
Molten Metal Systems
B-11, M.I.D.C., Waluj
Aurangabad - 431 136,
Maharashtra, (India)

MORGANITE CRUCIBLE (INDIA) LIMITED

INSIDER TRADING POLICY

[Amended UPTO February 14, 2022]

- 1st amendment effective April 1, 2019

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INSIDER TRADING POLICY

INTRODUCTION:

Morganite Crucible (India) Limited (the "Company") is a public company whose equity shares is listed on Bombay Stock Exchange Limited (BSE) pursuant to the rules and regulations issued by the Securities and Exchange Board of India (SEBI) and amended from time to time. The Board of Directors of the Company in their earlier meeting has adopted this Insider Trading Policy (the "Policy") to comply with the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("SEBI Regulations")

This policy is applicable to all Insiders including designated persons and immediate relatives of designated persons as defined in this policy. The SEBI Regulations prohibit an Insider from Trading in the securities of a company listed on any stock exchange when in possession of any unpublished price sensitive information.

Unpublished Price Sensitive Information ("UPSI") means any information, which relates, directly or indirectly, to the Company or its securities, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities of the Company.

"Generally available" information means information that is accessible to the public on a non- discriminatory basis. Information which is published on the website of stock exchange/s where the securities of the Company are listed or published by way of a press release by the company, would ordinarily be considered generally available.

UPSI includes, without limitation, information relating to the following:

- Financial results, financial condition, projections or forecasts;
- Dividends (both interim and final);
- Change in capital structure;
- Mergers, de-mergers, acquisitions, de-listings, disposals and expansion of business and such other transactions;
- Known but unannounced future earnings or losses;
- Significant corporate events, such as a pending or proposed acquisition or joint venture;
- Plans to launch new products or product defects that have a significant impact;
- Significant developments involving business relationships with customers, suppliers or other business partners;
- Changes in auditors as per statutory requirement or otherwise or auditor notification that the issuer may no longer rely on an audit report;

- Events regarding the Company's securities (such as repurchase plans, stock splits or changes in dividends, changes to the rights of security holders, public or private sales of additional securities or information related to any additional funding);
- Bankruptcies, receiverships or financial liquidity problems;
- Positive or negative developments in outstanding litigation, investigations or regulatory matters with significant impact on financial results; or
- Any changes to the Company's Board of Directors or the Company's key managerial personnel and key agreements with them;
- Any significant changes to the Company's capital structure.

Definitions

'**Act**' shall mean the Securities and Exchange Board of India Act, 1992 (15 of 1992).

'**Audit Committee**' shall mean Committee of the Board of the Company constituted pursuant to Section 177 of the Companies Act, 2013 read with Regulation 18 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

'**Board**' shall mean the Board of Directors of Morganite Crucible (India) Limited.

'**Compliance Officer**' means any senior officer or the Company Secretary who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under the 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 implementation of the codes specified under the SEBI Regulations under the overall supervision of the Board.

'**Connected Person**' includes –

- A director of the Company;
- A Key Managerial Personnel of the Company;
- An Officer of the Company;
- Any person who is or has been in a contractual, fiduciary or employment relationship at any time in the six-month period prior to the date of determining whether that person, as a result of such relationship, was, directly or indirectly, allowed access to UPSI or reasonably expected to be allowed access to UPSI;
- Any person who is or has been in frequent communication with an Officer of the Company at any time in the six-month period prior to the date of determining whether that person, as a result of such frequent communication, was, directly or indirectly, (x) allowed access to UPSI or (y) reasonably expected to be allowed access to UPSI;
- An employee of the Company who has access to UPSI or is reasonably expected to have access to UPSI; and

- The persons enumerated below shall be deemed to be Connected Persons if such person has access to UPSI or is reasonably expected to have access to UPSI -
 - A Relative of Connected Persons;
 - A holding company, associate company or subsidiary company;
 - An intermediary as specified in section 12 of the SEBI Act or an employee or director thereof;
 - An investment company, trustee company, asset management company or an employee or director thereof;
 - An official of a stock exchange or of clearing house or corporation;
 - A member of the board of trustees of a mutual fund, a member of the board of directors of the asset management company of a mutual fund or in each case, an employee thereof;
 - 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;
 - An official or an employee of a self-regulatory organization recognized or authorized by the SEBI;
 - A banker of the Company; and
 - A concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of the Company or his Immediate Relative or banker of the Company, has more than ten percent of the holding or interest.

Designated Person

The term "Designated Person" shall consist of:

- i. Promoters of the Company
- ii. Directors of the Company and its subsidiaries;
- iii. All employees in the Finance and Accounts Department, Supply Chain Management Department, Information Security and Human Resources Department or any other departments of the company, if any, on the basis of their functional role or access to unpublished price sensitive information
- iv. Managing Director or Chief Executive Officer
- v. Any other Person designated by the Company on the basis of their functional role and such function would provide access to UPSI;

Director

"Director" shall have the meaning assigned to it under the Companies Act, 2013.

Immediate Relative

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

Insider

An “Insider” means any person who is:

- (i) a Connected Person or
- (ii) in possession of or having access to UPSI.

Key Managerial Personnel

“Key Managerial Personnel” shall have the meaning assigned to it under the Companies Act, 2013.

Officer

“Officer” shall have the meaning assigned to it under the Companies Act, 2013.

Promoter and Promoter Group

- “Promoter” shall have the meaning assigned to it under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.
- “Promoter Group” shall have the meaning assigned to it under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.

Securities

- “Securities” shall have the meaning assigned to it under the Securities Contracts (Regulations) Act, 1956 or any modification thereof except units of a mutual fund and includes ADS.

Trading

- “Trading” means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, pledge, unpledge, deal in the company’s securities either directly or through portfolio management services, and “trade” shall be construed accordingly.

Legitimate purpose

- “Legitimate purpose” 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

Prohibition on communicating or procuring UPSI

An Insider shall not –

- i. communicate, provide, or allow access to any UPSI, relating to the Company or its securities, to any person including other Insiders, except to the extent allowed by these Rules or SEBI Regulations; or
- ii. procure from or cause the communication by an Insider of UPSI, relating to the Company or its securities.

Provided that nothing contained above shall be applicable when an UPSI is communicated, provided, allowed access to or procured:

- in furtherance of legitimate purposes, performance of duties or discharge of legal obligations pursuant to appropriate notice, confidentiality and non-disclosure agreements being executed; or
- in the event the Board of Directors directs or causes the public disclosure of UPSI in the best interest of the Company; or

iii. within a group of persons if such persons have been identified and secluded within a "chinese wall" or information barrier by the Compliance Officer from the rest of the Company for a particular purpose or for a specified period of time in furtherance of legitimate purposes, performance of duties or discharge of legal obligations, and are subjected to, among other conditions, additional confidentiality obligations, information barriers designed to prevent exchanges of UPSI outside the "chinese wall", and the execution of an undertaking by such persons to abstain and / or forego Trading during such seclusion or till the UPSI no longer constitutes UPSI and has become generally available.

Prohibition on Insider Trading

An Insider shall not, directly or indirectly, –

- i. Trade in securities of the Company that are listed or proposed to be listed when in possession of UPSI;
- ii. Trade in securities of the Company except when the Trading Window is open and the Insider is not in possession of UPSI.
- iii. provide advise/ tips to any third party on trading in Company's securities while in possession of UPSI and

An insider who has ceased to be associated with the Company shall not, for a period of six months from date of such cessation, directly or indirectly trade in the Company's Securities while in possession of UPSI.

Trading in Securities of other companies. No Insider may, while in possession of unpublished price sensitive information about any other public company gained in the course of employment with the Company, (a) trade in the securities of the other public company, (b) "tip" or disclose such material non-public information concerning that company to anyone, or (c) give trading advice of any kind to anyone concerning the other public company.

No Insider may take positions in derivative transactions in the securities of the Company at any time.

The restriction in 4 (i) above may not apply to:

- (a) a transaction that is an off-market inter-se transfer between Insiders who were in possession of the same UPSI without being in breach of these Rules and both parties had made a conscious and informed trade decision; and
- (b) Trades pursuant to a Trading Plan set up in accordance with these Rules and SEBI Regulations.

When a person has traded in securities while 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.

Trading Window

1) The Compliance Officer shall notify a 'trading window' during which the Designated Persons may Trade in the Company's securities after securing pre-clearance from the Compliance Officer in accordance with these Rules. The competent authority for pre-clearing the Trade of Compliance Officer shall be Board.

2) Designated Persons shall not Trade in the Company's securities when the trading window is closed.

3) The Trading restriction period shall be made applicable from the end of every quarter till 48 hours after the declaration of financial results. The gap between clearance of accounts by audit committee and board meeting should be as narrow as possible and preferably on the same day to avoid leakage of material information.

4) The trading window shall generally be closed on the following occasions –

- Declaration of financial results (quarterly, half-yearly and annually)
- Declaration of dividend (interim or final)
- Issue of securities by way of rights/ bonus/etc.
- Any major expansion plan or execution of new projects
- Amalgamation, merger, takeover, buy-back, etc
- Disposal of whole or substantially whole of the undertaking.

5) Additionally, the trading window shall be closed in particular for a Designated Person or class of Designated Persons when the Compliance Officer determines that a Designated Person or class of Designated Persons can reasonably be expected to have possession of UPSI, for such periods as determined by the Compliance Officer. Designated Person or class of Designated Persons will receive a notification on such special blackout periods.

6) The trading window may be re-opened after closure, not earlier than 48 hours after the UPSI in question becomes generally available.

Pre-clearance of Trading

- Designated Persons may Trade in the securities of the Company when the trading window is open, after obtaining approval of the Compliance Officer.
- The Compliance Officer shall not approve any proposed Trade by Designated Person if the Compliance Officer determines that such Designated Person is in possession of UPSI even though the trading window is open.

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- The Compliance Officer may, after being satisfied that the application and undertaking are true and accurate, approve Trading by a Designated Person, on the condition that the Trade so approved shall be executed within seven trading days following the date of approval.
- The Designated Person shall, within two days of the execution of the Trade, submit the details of such Trade to the Compliance Officer as per Annexure 3. In case the transaction is not undertaken, a report to that effect shall be filed in the said form.
- If the pre-cleared Trade is not executed within seven trading days after the approval is given, the Designated Person must secure pre-clearance of the transaction again.
- Pre-clearance of trades shall not be required for a trade executed as per an approved trading plan.
- A Designated Person who Trades in securities of the Company without complying with the pre- clearance procedure as envisaged in these Rules or gives false undertakings and/or makes misrepresentations in the undertakings executed by him/her while complying with the pre-clearance procedure shall be subjected to the penalties as envisaged in these Rules.

Additional trading restrictions on Designated Persons

- 1) No Insiders shall enter into derivative transactions in respect of the securities of the Company.
- 2) All Designated Persons who Trade in the securities of the company shall not enter into a contra trade during the next six months following the prior transaction. In case of any 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 SEBI for credit to the Investor Protection and Education Fund administered by SEBI.
- 3) The above restriction on contra trade shall not apply in case of exercise / sale of ESOP shares provided the Designated Persons do not possess UPSI and the sale is executed when the trading window is open and after obtaining pre-clearance.

Trading Plan

- 1) A Designated Person shall be entitled to formulate a Trading Plan that complies with the SEBI Regulations (a "Trading Plan") and present it to the Compliance Officer for approval and public disclosure. The trading plan may be executed only after the plan is approved by the Compliance officer and disclosed to the stock exchanges on which the securities of the Company are listed.

2) Designated person shall not exercise any influence over the amount of securities to be traded, the price at which they are to be traded, or the date of the trade. Designated person may delegate discretionary authority to his/her broker, but in no event Designated person may consult with the broker regarding executing transactions, or otherwise disclose information to the broker concerning the Company that might influence the execution of transactions, under the Trading Plan after it commences.

3) 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 the securities outside the scope of the Trading Plan. However, the implementation of the Trading Plan shall not be commenced, if at the time of formulation of the plan, the Designated Person is in possession of UPSI and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Trading Plan shall be deferred until such UPSI becomes generally available information.

Penalty for Insider Trading

1) An Insider who acts in contravention of these Rules shall be liable to have his services or relationship with the Company, as the case may be, terminated.

2) Directors, Officers and employees of the Company who violate these rules shall be subject to disciplinary action by the Company, which may include wage freeze, suspension, recovery, clawback etc and ineligibility for future participation in the Company's stock option plans or termination.

3) The SEBI or any other appropriate regulatory authority may also be informed of the violation of these Rules so that appropriate action may be taken.

Disclosure requirements

1) Initial Disclosure:

a. Every Promoter, member of the promoter group, Key Managerial Personnel, director of the Company and each of their Immediate Relatives shall disclose his holding of securities of the Company within thirty days of these Rules taking effect as per Form A set out in Annexure 4.

b. Every person, on appointment as a Key Managerial Personnel or a director of the Company or upon becoming a Promoter or member of the promoter group, shall disclose his / her and Immediate Relatives' holding of securities of the Company as on the date of appointment or becoming a promoter, to the Company within seven days of such appointment or becoming a promoter, as per Form B set out in Annexure 5.

c. Every Designated person shall disclose details like Permanent Account Number, names of educational institutions from which they have graduated and names of their past employers.

2) Continual Disclosure:

a. Every Designated person shall disclose names and Permanent Account Number or any other identifier authorized by law of the following persons to the company on an annual basis and as and when the information changes:

a1. Immediate relatives

a2. persons with whom such designated person(s) shares a material financial relationship

a3. Phone and mobile numbers which are used by them

b. Every Promoter, member of the promoter group, designated person, director of the Company and each of their Immediate Relatives shall disclose as per Form C set out in Annexure 6 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 Rs. Ten lakhs.

c. The disclosure shall be made within two working days of:

I. the receipt of intimation of allotment of shares, or

II. the acquisition or sale of shares or voting rights, as the case may be.

3) Disclosure to the Stock Exchange:

The Compliance Officer shall notify the stock exchanges, particulars of the Trades, within two trading days of the receipt of the Continual Disclosure or from becoming aware of such information.

4) Disclosures by other Connected Persons.

The Compliance Officer may, require any other Connected Person to disclose the holdings and trading in securities of the Company as per Form D set out in Annexure 7 at such frequency as he may determine.

5) All Designated Persons must make an annual disclosure of the number of Securities of the company held as on 31st March each year by them including details of purchase / sale of Securities of the Company during the financial year to the Compliance Officer. This disclosure must be made within 30 (thirty) days from the close of each financial year.

Miscellaneous

1) The Board of Directors shall be empowered to amend, modify, and interpret these Rules and such Rules shall be effective from such date that the Board may notify in this behalf.

2) The Compliance Officer shall provide the Audit Committee of the Board, on a quarterly basis, all the details of Trading in securities by the Designated Persons including any violations of the Rules.

3) The Compliance Officer shall maintain (a) an updated list of Designated Persons, (b) records of disclosures and pre-clearance applications and undertakings for a period of five years and (c) a confidential list of any 'restricted securities' to which the Compliance Officer may require Designated Persons to seek pre-clearance before Trading in such 'restricted securities'.

4) The Company shall require all Connected Persons to formulate and adhere to a code of conduct to achieve compliance with these Rules. In case such persons observe that there has been a violation of these Rules, then they shall inform the Board of Directors of the Company promptly.

6) Any suspected violation of leak of unpublished price sensitive information or violation of this policy can be reported under whistle blower policy.

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FORM I

Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (b) read with Regulation 6(2)]

Name of the company: MORGANITE CRUCIBLE (INDIA) LIMITED
ISIN of the company: INE599F01012

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter or member of the promoter group 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/ Member(s) of the promoter group/KMP / Directors/ immediate relatives/others* etc)	Date of appointment of Director /KMP OR Date of becoming Promoter or Member(s) of the promoter group	Securities held as on the date of appointment as Promoter/ member(s) of the promoter group Director/ KMP		% of Share-holding
			Type of security	No.	
(1)	(2)	(3)	(4)	(5)	(6)

Note:

1. "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.
2. 'Immediate Relative' means 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.
3. * 'Others' refer to any such person for whom the person being appointed as KMP/ director/ Promoter/member of promoter group, takes trading decisions.
4. Use Annexure, if required.

Signature:
Name:
Designation:
Date:
Place:

FORM II

Name of the company: MORGANITE CRUCIBLE (INDIA) LIMITED
 ISIN of the company: INE599F01012

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

Details of change in holding of Securities of Promoter, member of promoter group, Designated Person and Director of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoters / KMP / Directors/ immediate relative to/ others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition / disposal (on market / public / rights / preferential offer / off market / Inter-se transfer, ESOPs etc.)
		Type of security	No. and % of shareholding	Type of security	No.	Value	Transaction Type (Buy/Sale/ Pledge / Revoke/ Invoke)	Type of security	No. and % of shareholding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

Details of change in holding of Securities of Promoter, member of promoter group, Designated Person and Director of a listed company and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc)

Type of contract	Contract specifications	Buy		Sell		Exchange on which the trade was executed
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
15	16	17	18	19	20	21

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

Signature:
Name:
Designation:
Date:
Place:

ANNUAL DISCLOSURE - FORM III

Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7(1)]

Name of the company: MORGANITE CRUCIBLE (INDIA) LIMITED
ISIN of the company: INE599F01012

Details of securities held by Promoter, member of the promoter group, Director, Key Managerial Personnel & Specified Employees (collectively referred to as 'designated person') of the Company, his 'immediate relatives' and *Others'

'Designated Person', 'Immediate Relatives' and 'Others'				No. of securities held as on 31 st March / Type of Securities	DP ID / Client ID / Folio No.	Date of intimation to Company
Name	Relation / others	PAN	Address			

Note:

1. Annual Disclosure in the above format is to be given as on 31st March by 10th April every year.
2. "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.
3. 'Immediate Relative' means 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.
4. * 'Others' refer to any such person for whom the KMP/ director/ Promoter/member of promoter group, takes trading decisions.

Signature:

Name:

Designation:

Date:

Place:

FORM A

To
 The Compliance Officer
 Morganite Crucible (India) Limited
 B - 11, MIDC Industrial Area,
 Waluj,
 Aurangabad - 431136

Details of person filing the form (To be filled mandatorily)	
Name	
Address	
Designation /Association with the Company <i>(For employees/ contractors/ consultant- state department and current role). For third parties- state nature of work, department dealing with)</i>	
Whether employee or third party <i>(Tick the applicable box)</i>	Employee <input type="checkbox"/> Director <input type="checkbox"/> Contractor/ Consultant/ <input type="checkbox"/> Third Party
PAN <i>(Mandatory whethersharesheldornot)</i>	
Folio No. or DP ID & Client ID <i>(Mandatory whethersharesheldornot)</i>	
No. of Shares held in the Company, if any	
Whether Form being filed for self, relative or Others*	Self <input type="checkbox"/> Relative <input type="checkbox"/> Others <input type="checkbox"/>
In case, Form is being filed for relative/ Others*, name and relation to be mentioned	Name: Relation:

* 'Others' refer to any such person for whom the KMP/ director/ Promoter, takes trading decisions.

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Sr. no.	Purpose of filing the Form	Tick against purpose for which Form is being filed	
1.	Application for Pre-Clearance		
2.	Reporting of trades executed as per pre-clearance or decisions not to trade after securing pre-clearance		
3.	Application for waiver of holding Shares of the Company for period of six months		

1. Application for Pre-Clearance

Application to trade in the shares of the Company as per details hereunder:

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) - (B) + (C)	
Name of Depository participant & DP ID No. through whom Shares are proposed to be Debited/Credited	
DP ID / Client ID No	

Declaration:

I confirm on my own behalf and on behalf of my relative that:

- i. I do not have access to any unpublished price sensitive information and have complied with the Code of Conduct for Inside Trading as specified by the Company from time to time;
- ii. I shall execute the trade of shares within 7 days of your approval failing which I shall apply again to you for your approval.
- iii. I shall hold shares of the Company for a minimum period of six months from the date of acquisition. *(In case of application for purchase of shares)*
- iv. I have not entered into any opposite transaction in the previous six months and I shall not execute a contra trade within six months from execution of the proposed transaction.

I further confirm that the aforesaid facts are true and correct and shall be fully responsible for any wrongful acts of my Dependents including such penalties as may be imposed by the Company.

	Signature
	Name
Place	Designation
Date	Department

Approval/ Rejection of Pre-Clearance

I _____, Compliance officer of the Company hereby _____ (Approve/Reject) the above application.

Reasons for rejection, if any:

Place	Signature
Date	Compliance officer

2. **Reporting of trades executed as per pre-clearance or decisions not to trade after securing pre-clearance**

Date of receipt of pre-clearance approval	
Whether trade executed	Yes No <input type="checkbox"/>
In case, 'Yes', please fill in details below	
Date of purchase/ sale as per pre-clearance	
No. of shares purchased	
No. of shares sold	
Balance shares held	
In case, 'Yes', please fill in details below	
Reasons for not trading as per pre-clearance	

Place
Date

Signature
Name
Designation
Department

3. Application for relaxation from holding Shares of the Company for period of six months

Application for waiver of holding Shares of the Company for period of six months as per details hereunder:

Number of Shares held in the Company	
Number of Shares of the Company proposed to be sold	
Date of last purchase	
Balance shareholding	
Name of Depository participant & DP ID No. through whom Shares are proposed to be sold	
DP ID / Client ID No	
Reasons in details for waiver	

Declaration:

I confirm on my own behalf and on behalf of my _____ (*mention relation*) or _____ (*any other person*) that I do not have access to any unpublished price sensitive information and have complied with the Code of Conduct for Insider Trading as specified by the Company from time to time;

I further confirm that the aforesaid facts are true and correct and shall be fully responsible for any wrongful acts of my Dependents including such penalties as may be imposed by the Company.

	Signature
	Name
Place	Designation
Date	Department

Approval/Rejection of application for relaxation from holding Shares of the Company for period of six months

I, _____ Compliance officer of the Company hereby _____ (Approve/Reject) the above application.

Reasons for approval I rejection:

Place	Signature
Date	Compliance officer