

## **NPR FINANCE LIMITED**

### **CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING**

**(Effective till 14<sup>th</sup> May, 2015)**

NPR Finance Ltd. (the “Company”) believes in the attainment of high level of transparency, accountability and equity with the ultimate objective of providing maximum customer satisfaction & increasing long term shareholders value keeping in view the needs and interest of all stakeholders. The Company is therefore committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations.

#### **1. PREFACE**

1.1 ‘Insider Trading’ is the buying or selling, dealing in the securities, communicating , conselling or procuring directly or indirectly any price sensitive information of a listed company by a director, officer, a designated employee of the firm or by any other person such as internal auditor, statutory auditor, agent, advisor, analyst, consultant, deemed connected person who has knowledge of material ‘inside’ information not available to the general public.

1.2 Chapter IV of the Securities and Exchange Board of India (SEBI) had formulated SEBI (Prohibition of Insider Trading) Regulation 1992, require, inter alia, all listed Companies to frame a Code of Internal Procedures and Conduct as near thereto the Model Code specified in Schedule I to the Regulations. These regulations came into force with effect from 19<sup>th</sup> November 1992 and the same were made applicable to all companies whose shares were listed on Indian stock exchanges. SEBI has since amended the existing regulation. SEBI has since amended the existing regulation.

1.3 The Company endeavors to preserve the confidentiality of un-published price sensitive information and to prevent misuse of such information. To achieve these objectives, NPR Finance Ltd. hereby notifies that this Code of Conduct for Prevention of Insider Trading.

1.4 This code is to be followed by all Directors, officers, designated employees and connected persons (hereinafter referred to as the “specified persons”).

#### **2. DEFINITIONS**

2.1 “Act” means the Securities and Exchange Board of India Act, 1992 including any statutory modifications or re-enactment thereof.

2.2 “Code” means this Code of Conduct for Prevention of Insider Trading, as modified from time to time.

2.3 “Company” means NPR Finance Limited inclusive of its Registered Office and all Branch Offices.

2.4 'Compliance Officer' means the Company Secretary of the Company or the Officer appointed by the Board of Directors of the Company for the purpose of this Code and the Regulations.

2.5 “Connected Person” 'Connected Persons' means any person who

(i) is a director, as defined in clause (13) of section 2 of the Companies Act, 1956 , of a company, or is deemed to be a director of that company by virtue of sub-clause (10) of section 307 of that Act; or

(ii) occupies the position as an officer or an employee of the company or holds a position involving a professional or business relationship between himself and the company [whether temporary or permanent] and who may reasonably be expected to have an access to unpublished price sensitive information in relation to that company.

[Explanation: — the words “connected person” shall mean any person who is a connected person six months prior to an act of insider trading;]

2.6 “dealing in securities” means an act of subscribing, buying, selling or agreeing to subscribe, buy, sell or deal in any securities by any person either as principal or agent;

2.7 “Designated Employee” shall include :—

(i) officers comprising the top three tiers of the company management ;

(ii) the employees designated by the Board of Directors from time to time to whom the trading restrictions shall be applicable.

2.8 “insider” means any person who :

(i) is or was connected with the company or is deemed to have been connected with the company and is reasonably expected to have access to unpublished price sensitive information in respect of securities of company, or

(ii) has received or has had access to such unpublished price sensitive information.

2.9 “Officer of a company” means any person as defined in clause (30) of section 2 of the Companies Act, 1956 (including any statutory modification or re-enactment made thereof) including an auditor of the company.

2.10 “person is deemed to be a connected person”, if such person—

(i) is a company under the same management or group, or any subsidiary company thereof within the meaning of sub-section (1B) of section 370, or sub-section (11) of section 372, of the Companies Act, 1956 (1 of 1956) or sub-clause (g) of section 2 of the Monopolies and Restrictive Trade Practices Act, 1969 (54 of 1969) as the case may be; or

(ii) is an intermediary as specified in section 12 of the Act, Investment company, Trustee Company, Asset Management Company or an employee or director thereof or an official of a stock exchange or of clearing house or corporation;

(iii) is a merchant banker, share transfer agent, registrar to an issue, debenture trustee, broker, portfolio manager, Investment Advisor, sub-broker, Investment Company or an employee thereof, or is member of the Board of Trustees of a mutual fund or a member of the Board of Directors of the Asset Management Company of a mutual fund or is an employee thereof who have a fiduciary relationship with the company;

(iv) is a Member of the Board of Directors or an employee of a public financial institution as defined in section 4A of the Companies Act, 1956; or

(v) is an official or an employee of a Self-regulatory Organisation recognised or authorised by the Board of a regulatory body; or

(vi) is a relative of any of the aforementioned persons;

(vii) is a banker of the company.

(viii) relatives of the connected person; or

(ix) Any other person or category of persons mentioned in Regulation 2 of the SEBI (Prohibition of Insider trading) Regulations, 1992;

2.11 “price sensitive information” means any information which relates directly or indirectly to a company and which if published is likely to materially affect the price of securities of company.

Explanation.—The following shall be deemed to be price sensitive information :—

(i) periodical financial results of the company;

(ii) intended declaration of dividends (both interim and final);

(iii) issue of securities or buy-back of securities;

(iv) any major expansion plans or execution of new projects.

(v) amalgamation, mergers or takeovers;

(vi) disposal of the whole or substantial part of the undertaking;

(vii) any significant changes in policies, plans or operations of the company;

(viii) any information which, if disclosed, in the opinion of the person disclosing the same is likely to materially affect the prices of the securities of the Company;

2.12 “Regulation” means the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation, 1992 including any statutory modifications or re-enactment thereof.

2.13 “relative” means a person, as defined in section 6 of the Companies Act, 1956 (including any statutory modification or re-enactment made thereof)

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

2.15 “SEBI” means the Securities and Exchange Board of India.

2.16 “unpublished” means information which is not published by the company or its agents and is not specific in nature.

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

Words and expressions not defined in these Regulations shall have the same meaning as contained in SEBI (Prohibition of Insider Trading) Regulations, 1992 or the Securities and Exchange Board of India Act, 1992, including any statutory modification(s) or re-enactment(s) made thereon from time to time.

### **3. COMPLIANCE OFFICER**

3.1 Unless otherwise resolved by the Board of Directors, the Company Secretary of the Company shall be the Compliance Officer for the purpose of this Code and who shall report to the Managing Director/Chief Executive Officer / Board of Directors of the Company.

3.2 In order to discharge her functions effectively, the Compliance Officer shall be adequately empowered and provided with adequate manpower and infrastructure to effectively discharge his/her function. In the performance of his/her duties, the Compliance Officer shall have access to all information and documents relating to the Securities of the Company.

### 3.3 Functions, Duties and Responsibilities of the Compliance Officer

a. The compliance officer shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of "Price Sensitive Information", pre-clearing; of designated employees' and their dependents' trades (directly or through respective department heads as decided by the company), monitoring of trades and the implementation of the code of conduct under the overall supervision of the Board of Directors of the company.

b. The compliance officer shall maintain a record of the designated employees and any changes made in the list of designated employees.

c. The compliance officer shall assist all the employees in addressing any clarifications regarding the Regulations and the company's code of conduct.

d. She shall from time to time inform the Stock Exchanges of any price sensitive information on immediate basis.

e. She shall intimate to all Stock Exchanges on which the securities of the Company are listed the relevant information received.

f. She shall be responsible for overseeing and co-ordinating disclosure of price sensitive information to Stock Exchanges, analysts, shareholders and media and educating staff on disclosure policies and procedure and report to the CEO / Board of Directors.

g. The Compliance Officer shall obtain initial and continual disclosures from Directors, Officers and Designated Employees, major shareholders and give information in respect of the disclosures made to all the Stock Exchanges where the securities are listed in physical or electronic mode, within the time limit as prescribed under the Regulation from time to time.

## 4. PRESERVATION OF "PRICE SENSITIVE INFORMATION"

4.1 The Specified persons shall maintain the confidentiality of all Price Sensitive Information. Employees/ directors shall not pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sale of securities.

### 4.2 Need to know

Price Sensitive Information is to be handled on a "need to know" basis. It should be disclosed only to those within the Company who need the information to discharge their duty.

### 4.3 Limited access to confidential information

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password, etc.

## **5. PRESERVATION OF MISUSE OF "PRICE SENSITIVE INFORMATION"**

All specified persons of the Company shall be subject to trading restrictions as enumerated below:-

### **5.1 TRADING WINDOW**

a. Unless otherwise provided by the Compliance Officer with the approval of the Board of Directors, the trading Window shall remain open for Dealing in the Securities of the Company , except during the hereby prescribed period(s) /events during which the Trading Window shall be closed :

- i. Declaration of Financial results (quarterly, half-yearly and annual) ;
- ii. Declaration of dividends (interim and final) ;
- iii. Issue of securities by way of public/ rights/bonus, etc. ;
- iv. Any major expansion plans or execution of new projects ;
- v. Amalgamation, mergers, takeovers and buy-back ;
- vi. Disposal of whole or substantially whole of the undertaking ;
- vii. Any changes in policies, plans or operations of the Company ;
- viii. Any information which, if disclosed, in the opinion of the person disclosing the same is likely to materially affect the prices of the securities of the Company;

b. The date of intimation to the Stock Exchange regarding the date of Board Meeting/ Committee Meeting/ General Meeting for the aforesaid purpose(s) shall be the effective date of commencement of closure of the trading window.

c. The trading window shall be opened 24 hours after the information referred in sub-clause a. of Clause 5.1 is made public.

d. All specified persons shall conduct all their dealings in the securities of the Company only during the free period and shall not deal in any transaction involving the purchase or sale of the Company's securities during the closure of the trading window or during any other period as may be specified by the Company from time to time.

e. In case of ESOPs (Employee Stock Option Plan), exercise of option may be allowed in the period when the Trading Window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when Trading Window is closed.

### **5.2 PRE-CLEARANCE OF TRADES**

- a. Every Specified Person intending to deal in the securities of the Company in excess of
  - i. Rupees 5 lakh in value or;
  - ii. 25000 shares ; or

iii. 1% of total shareholding or voting rights ; - whichever is lower should pre-clear the transactions as per the pre-dealing procedure as provided hereunder:

Pre-clearance Procedure:

- i. An application for pre-clearance of trade shall be made to the Compliance Officer in **Form 'I' (as prescribed in "Annexure I")** indicating the estimated number of securities that he/she intends to deal in, the details as to the depository(ies) with which he/she maintains a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the Company in this behalf.
- ii. The specified person shall execute an undertaking in **Form 'I' (as prescribed in "Annexure I")** in favour of the Company, incorporating, therein, inter alia, the following clauses, as may be applicable :
  - a. That the said specified person does not have any access or has not received Price Sensitive Information upto the time of signing the undertaking ;
  - b. That in case the specified person has access to or receives "Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction, he/she shall inform the Compliance Officer of the change in his/her position and that he/she would completely refrain from dealing in the securities of the Company till the time such information becomes public ;
  - c. That he/she has not contravened any provisions of this Code, as may be notified by the Company from time to time ;
  - d. That he/she has made a full and true disclosure in the said matter.

## 6. OTHER RESTRICTIONS

6.1 All specified person(s) shall execute their transactions in respect of securities of the Company within one week after the approval of pre-clearance is given failing which the transaction has to be pre-cleared again.

6.2 All specified person(s) shall hold their investments in securities for a minimum period of 30 days irrespective of mode of acquisition in order to be considered as being held for investment purposes . The holding period shall also apply to subscription in the primary market (IPOs). In the case of IPOs, the holding period would commence when the securities are actually allotted.

6.3 In case the sale of securities is necessitated by personal emergency, the compliance officer may waive the holding period after recording in writing his or her reasons in this regard. An application for waiver of holding period shall be made to the Compliance Officer in **Form 'II (as prescribed in "Annexure II")** .

## 7. REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES

7.1 All existing Director or Officer or Designated Employee of the Company shall be required to forward the following details of their securities transactions including the statement of dependent family members to the Compliance Officer on or before date specified by the Compliance Officer, and the newly appointed Director, Officer and Designated Employee have to make disclosure within 2 working days of becoming a Director or Officer or Designated Employee of the Company or such other time limit as may be specified by the Compliance Officer:

- a. all holdings in securities of the Company by the Director or Officer or Designated Employee at the time of joining the Company in **Form 'III' (as prescribed in "Annexure III")**;

- b. a statement in **Form 'IV (as prescribed in "Annexure IV")** to be submitted by the 30<sup>th</sup> day of April and October every year giving details of all dealings in Securities of the Company during the preceding six months ;
- c. annual statements of all holdings in Company's Securities as on 31<sup>st</sup> March every year in **Form 'V (as prescribed in "Annexure V")** as may be prescribed by the Compliance Officer from time-to-time.

7.2 The Compliance Officer shall maintain records of all the above declarations in an appropriate form for a minimum period of 3 (three) years from the date of the filing thereof.

7.3 The Compliance officer shall place before the CEO / Board of Directors , on a monthly basis all the details of the dealing in the securities by the Designated Employees, Directors, Officers of the Company and the accompanying documents that such persons had executed under the pre-dealing procedure as envisaged in this code.

7.4 Disclosure of interest or holding by directors and officers and substantial shareholders –

a. Initial Disclosure

- i. Any person who holds more than 5% shares or voting rights in any listed company shall disclose to the company in "Form A" as provided by SEBI (subject to statutory modification or re-enactment thereof by SEBI from time to time), the number of shares or voting rights held by such person, on becoming such holder, within 2 working days of:-
  - (a) the receipt of intimation of allotment of shares; or
  - (b) the acquisition of shares or voting rights, as the case may be.
- ii. Any person who is a director or officer of a listed company shall disclose to the company in "Form B" as provided by SEBI (subject to statutory modification or re-enactment thereof by SEBI from time to time), the number of shares or voting rights held and positions taken in derivatives by such person and his dependents (as defined by the company), within two working days of becoming a director or officer of the company.

b. Continual Disclosure

- i. Any person who holds more than 5% shares or voting rights in any listed company shall disclose to the company in "Form C" as provided by SEBI (subject to statutory modification or re-enactment thereof by SEBI from time to time), the number of shares or voting rights held and change in shareholding or voting rights, even if such change results in shareholding falling below 5%, if there has been change in such holdings from the last disclosure made under sub-regulation (1) or under this sub-regulation; and such change exceeds 2% of total shareholding or voting rights in the company.
- ii. Any person who is a director or officer of a listed company, shall disclose to the company and the stock exchange where the securities are listed in "Form D" as provided by SEBI (subject to statutory modification or re-enactment thereof by SEBI from time to time), the total number of shares or voting rights held and change in shareholding or voting rights, if there has been a change in such holdings of such person and his dependents (as defined by the company) from the last disclosure made under sub-regulation (2) or under this sub-regulation, and the change exceeds Rupees 5 lakh in value or 25000 shares or 1% of total shareholding or voting rights, whichever is lower.

The aforesaid disclosure shall be made within two working days of;

- (a) the receipt of intimation of allotment of shares, or
- (b) the acquisition or sale of shares or voting rights, as the case may be.

c. Disclosure by Company to Stock Exchanges

Every listed company, within two working days of receipt, shall disclose to all stock exchanges on which the company is listed, the information received pursuant to the aforesaid disclosures in the respective formats as prescribed by SEBI in this regard.

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.

## **8. PENALTY FOR CONTRAVENTION OF CODE OF CONDUCT**

8.1 Every Specified person who trades in securities or communicates any information for trading in securities, in contravention of the code of conduct may be penalised and appropriate action may be taken by the Company.

8.2 Every Specified person who violates this Code of Conduct shall also be subject to disciplinary action by the Company, which may include wage /salary freeze, suspension, and/or any other disciplinary action which the management of the Company may decide from time to time.

8.3 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, 1992.

## **9. INFORMATION TO SEBI IN CASE OF VIOLATION OF THE SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 1992.**

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

## **10. POWER OF THE BOARD OF DIRECTORS OF THE COMPANY**

The Compliance Officer, subject to the approval of the Board of Directors , reserves the right to amend or modify this Code in whole or in part, at any time without assigning any reason whatsoever . The same should , however be, notified in writing to the specified persons.

Whilst best efforts have been made to define detailed procedures for implementation of this Code, there may be occasions when certain matters are not addressed or there may be ambiguity in the procedures. Such difficulties or ambiguities will be resolved in line with the broad intent of the policy. The Board may also establish further rules and procedures, from time to time, to give effect to the intent of this Code and further the objective of good corporate governance.

The decision of the Board of Directors of the Company with regard to any or all matters relating to this Code shall be final and binding on all concerned.



## **11. CLARIFICATIONS**

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

**ANNEXURE-I**

**Form I**  
**Application for Pre-clearance of Trade under SEBI**

Date: \_\_\_\_\_

The Compliance Officer  
 NPR Finance Limited  
 Todi Mansion, 9<sup>th</sup> Floor,  
 1, Lu-Shun Sarani  
 Kolkata 700 073.

<b>Internal use</b> Recd date and time :
---

Signature:
------------

Dear Sir/Madam,

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 1992 and the Company's Code of Conduct for Prevention of Insider Trading, I seek approval for purchase/ sale/subscription of the \_\_\_\_\_ Securities (give description) of the Company as per the details given below:

Serial No.	Particulars	Disclosure
1.	Name of the applicant	
2.	Designation	
3.	Number and value of securities in the Company held as on date (with folio/DP ID/Client ID No.)	
4.	Nature of securities held	*Equity Shares/Debentures/Other Securities
5.	Mode in which the securities are held	
6.	The Proposal is for	a) Acquisition in the open market (b) Subscription to the securities (c) Sale of securities
7.	Proposed date of dealing in securities	
8.	Nature of proposed dealing	Purchase / Sale of Securities
9.	Estimated number of securities proposed to be acquired / subscribed / sold	
10.	Price at which the transaction is proposed	
11.	Current market price (as on the date of application)	
12.	Whether the proposed transaction will be through stock exchange or off market deal	
13.	Proposed mode of dealing in securities	Physical / Dematerialised
14.	If securities are held/proposed to be dealt in dematerialised form	
15.	Name of the Depository DP ID Number Client ID number	

In relation to the above Dealing, I undertake that:

- a. I have no access to nor do I have any information that could be construed as "Price Sensitive Information" as define in the Code upto the time of signing this undertaking;

- b. In the event that I have access to or received any information that could be construed as “Price Sensitive Information” as defined in the Code, after signing the undertaking but before executing the transaction for which approval is sought , I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public;
- c. I have not contravened the provisions of the Code of conduct for prevention of insider trading as notified by the Company from time to time;
- d. I have made full and true disclosure in the matter;
- e. I hereby declare that I shall execute my order in respect of securities of the Company within one week after the approval of pre-clearance is given. If the order is not executed within one week after the approval is given, I undertake to obtain pre-clearance for the transaction again.

Signature

Place: \_\_\_\_\_

Date: \_\_\_\_\_

*\*strike whichever is not applicable*

**ANNEXURE-II**

**Form II**  
**Application for waiver of minimum holding period**

Date: \_\_\_\_\_

The Compliance Officer  
NPR Finance Limited  
Todi Mansion, 9<sup>th</sup> Floor,  
1, Lu-Shun Sarani  
Kolkata 700 073.

<b>Internal use</b> Recd date and time :  Signature:
---

Dear Sir/Madam,

I request you to grant me waiver of the minimum holding period of 30 days as required under clause 6.3 of the Code of Conduct for prevention of insider trading with respect to \_\_\_\_\_ shares of the Company held by me / \_\_\_\_\_ (name of relative) singly / jointly acquired by me on \_\_\_\_\_ (Date). I desire to deal in the said shares on account of \_\_\_\_\_ (give reasons).

Thanking You,  
Yours faithfully,

**(Name)**

**(Designation)**  
**(Department)**

**ANNEXURE-III**

**Form III  
FORMAT FOR DISCLOSURE OF PARTICULARS BY DIRECTORS/ OFFICERS/ DESIGNATED  
EMPLOYEES**

Date:\_\_\_\_\_

The Compliance Officer  
NPR Finance Limited  
Todi Mansion, 9<sup>th</sup> Floor,  
1, Lu-Shun Sarani  
Kolkata 700 073.

<b>Internal use</b> Recd date and time :
Signature:

Dear Sir/Madam,

My personal details are as under:

NAME OF DIRECTOR /OFFICER/ DESIGNATED EMPLOYEE :	
LOCATION :	
DEPARTMENT :	
DESIGNATION :	
DATE OF APPOINTMENT :	

Pursuant to the provisions of SEBI (Prohibition of Insider Trading) Regulations, 1992 and the Company's Code of Conduct for Prevention of Insider Trading, I hereby declare that I have the following Dependent(s):

Sr No.	Name of the dependant	Relationship with Director/Officer/ Designated Employee

I hereby declare that I / my dependants

- do not hold any Securities as on date
- hold Securities \_\_\_\_\_ (give description) as per the details given below :

Name of holder *	**First or joint holder	Folio No. (physical form )	Holding	DP ID/CLIENT ID (electronic form )	Holding

\*Include holdings where Director/ Officer / Designated Employee or dependant is a joint holder.

\*\* Indicate "F" where the named holder is the first holder of the Securities and "J" where he/ she is the joint holder of the Securities.

All DP Ids and Client Ids to be furnished even if no Securities of the Company are held.

I hereby undertake to inform the changes in the above details from time-to-time.

I hereby declare that the above details are true, correct and complete in all respects.

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Note: Please do not submit through electronic mail.

**ANNEXURE-IV**

**Form IV  
FORMAT OF HALF-YEARLY STATEMENT OF DEALINGS BY  
DIRECTORS/OFFICERS/DESIGNATED EMPLOYEES AND THEIR  
DEPENDANTS**

Date: \_\_\_\_\_

The Compliance Officer  
NPR Finance Limited  
Todi Mansion, 9<sup>th</sup> Floor,  
1, Lu-Shun Sarani  
Kolkata 700 073.

<b>Internal use</b> Recd date and time :  Signature:
---

Dear Sir/Madam,

STATEMENT OF DEALINGS IN SECURITIES OF NPR FINANCE LTD.

During \_\_\_\_\_, I along with my Dependents have undertaken the following transactions in the Securities of the Company:

Description of Security:

Name of Holder(s) with folio number / DP ID & Client ID	Nature of Transaction	Date of the Transaction	Number of Securities	Price at which Transaction undertaken	Holding post the Transaction

Yours truly,

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Department/Division: \_\_\_\_\_

**ANNEXURE-V**

**Form V**  
**FORMAT OF ANNUAL STATEMENT OF HOLDINGS BY**  
**DIRECTORS/OFFICERS/DESIGNATED EMPLOYEES AND THEIR**  
**DEPENDANTS**

Date: \_\_\_\_\_

The Compliance Officer  
NPR Finance Limited  
Todi Mansion, 9<sup>th</sup> Floor,  
1, Lu-Shun Sarani  
Kolkata 700 073.

<b>Internal use</b> Recd date and time :  Signature:
---

Dear Sir/Madam,

Dear Sir,

**STATEMENT OF SHAREHOLDING IN NPR FINANCE LTD.**

As on \_\_\_\_\_, I along with my Dependents hold the Securities of the Company, details whereof are as under:

Description of Security:

Name of Holder	Physical Holdings		Electronic Holdings		
	Folio No.	Total holdings	DP ID	Client ID	Total holdings

Yours truly,

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Department/Division: \_\_\_\_\_