

**AVT NATURAL PRODUCTS LIMITED
(AVT NATURAL)**

**CODE OF CONDUCT TO REGULATE,
MONITOR AND REPORT TRADING BY
DESIGNATED PERSONS**

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**CODE OF PRACTICES AND
PROCEDURES FOR FAIR DISCLOSURE
OF UNPUBLISHED PRICE SENSITIVE
INFORMATION**

*(This revised policy was approved by the Board of Directors at the meeting
held on 8th November 2019)*



AVT NATURAL PRODUCTS LIMITED, CHENNAI

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSONS & CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

PREAMBLE

"AVT Natural Products Limited" ('the Company') endeavors to preserve the confidentiality of unpublished price sensitive information and to prevent the misuse of such information. The Company is committed to transparency, fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations in force.

The Securities Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and Securities Exchange Board of India (Prohibition of Insider Trading) (Amendment) Regulations, 2018 make it mandatory for every Listed Company to lay down a Code of Conduct for Prevention of Insider Trading.

Every Director and other Designated Persons of the Company has a duty to safeguard the confidentiality of all information obtained during the course of his or her employment at the Company. No Director and other Designated Persons may use his or her position or knowledge of the Company to gain personal benefit or to provide benefit to any third party.

PART A

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSONS

1. CODE OF CONDUCT

- 1.1 This Code is formulated to regulate, monitor and report trading by Designated Persons and is applicable to all Designated Persons and Immediate Relatives of Designated Persons of AVT Natural Products Limited as defined in this Code.
- 1.2 This Code is formulated under the provisions of Securities and Exchange Board of India (Insider Trading) Regulations, 2015 and Securities and Exchange Board of India (Prohibition of Insider Trading) (Amendment) Regulations, 2018 and may be modified by the Board of Directors of the Company from time to time.

2. DEFINITIONS

- a) "Act" means the Securities and Exchange Board of India Act, 1992 (15 of 1992);
- b) "Regulations" means the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time;
- c) "Stock Exchange" means a Stock Exchange which is recognized by the Central Government or SEBI under Section 4 of Securities Contracts (Regulation) Act, 1956 (42 of 1956);
- d) "the Company" means AVT Natural Products Limited (AVT NATURAL);
- e) "Board of Directors" or "the Board" means the Board of Directors of AVT Natural Products Limited.
- f) "Director" means a member of the Board of Directors of the Company;



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- g) "Promoter" or "Promoter Group" shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof;
- h) "Key Managerial Personnel" or "KMP", means person as defined in Section 2 (51) of the Companies Act, 2013;
- i) "Code" means this Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons and Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information, as modified from time to time;
- j) "Compliance Officer" for the purpose of this Code is the Company Secretary of the Company;
- k) "Designated Persons" means a person occupying any of the following position in the Company:
 - 1) All Promoters and or members of promoter group;
 - 2) All Directors;
 - 3) Key Managerial Personnel (KMP);
 - 4) All Heads of Finance of Units / Division, Region;
 - 5) All employees in the grade of General Manager and above ;
 - 6) All employees in the finance, administration, sales and marketing;
 - 7) All employees working in Secretariat of Directors;
 - 8) Any other employee as may be determined and informed by HR Head to the Compliance Officer from time to time
 - 9) Internal Auditors, Statutory Auditors, Secretarial Auditors and any consultant firms;
 - 10) Persons who is in the opinion of the Chief Executive Officer or Chairman of the Company, has access to or is likely to have access to Unpublished Price Sensitive information relating to the Company.
- l) "Connected person" means,
 - 1) any person who is or has during the six months prior to the concerned act been associated with the 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.
 - 2) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established:
 - (i) an immediate relative of connected persons specified in clause (i) above; or



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- (ii) a holding company or associate company or subsidiary company; or
 - (iii) an intermediary as specified in Section 12 of the Act or an employee or director thereof; or
 - (iv) an investment company, trustee company, asset management company or an employee or director thereof; or
 - (v) an official of a stock exchange or of clearing house or corporation; or
 - (vi) 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
 - (vii) 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
 - (viii) an official or an employee of a self-regulatory organization recognized or authorized by the Board; or
 - (ix) a banker of the Company; or
 - (x) 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 10% of the holding or interest;
- m) "Immediate Relatives" means a spouse of a person and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities;
- n) "Insider" means any person who is,
- i) a connected person; or
 - ii) in possession of or having access to unpublished price sensitive information.
- o) "Generally Available Information" means information that is accessible to the public on a non-discriminatory basis; (Information published on the website of a stock exchange, would ordinarily be considered generally available.)
- p) "Unpublished Price Sensitive Information" or "UPSI" 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 the securities and shall, ordinarily including but not restricted to, information relating to the following: –
- i) financial results;
 - ii) dividends;
 - iii) change in capital structure;
 - iv) mergers, de-mergers, acquisitions, de listings, disposals and expansion of business and such other transactions;



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- v) changes in key managerial personnel;
 - vi) material events in accordance with the listing agreement; and
 - vii) any other information which in the opinion of Compliance Officer, is to be treated as price sensitive information and notified accordingly.
- q) "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.

- r) "Securities" shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund;
- s) "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 principle or agent.
- t) "Trading" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities and "trade" shall be construed accordingly;
- u) "Trading Day" means a day on which the recognized stock exchanges are open for trading where securities of the Company are listed;
- v) "Trading Window" means a trading period for trading in Company's Securities. All days shall be the trading periods except when trading window is closed;
- w) "Insider Trading" means when insiders use unpublished price sensitive information to arrive at securities trading (including buying as well as selling) decisions.
- x) "Prohibited Period" means the period effective from the date on which the Company sends intimation to the Stock Exchange(s) advising the date of the Board Meeting. up to 48 hours after the price sensitive information is submitted to the Stock Exchange(s).
- y) All other words and phrases will have the same meaning as defined under the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time. Words and expressions used and not defined in these regulations 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 & regulations made hereunder shall have the meanings respectively assigned to them in that legislation.

3. APPLICABILITY

- 3.1 This Code is applicable to all Designated Persons and Immediate Relatives of Designated Persons as defined in this Code.
- 3.2 This Code will be applicable to any transactions, made by the Designated Persons and Immediate Relatives of Designated Persons, in securities of the Company exceeding 50,000 shares or Rs. 10 lakhs in value or 1% of the total holdings in the Company, whichever is lower (in a trading day).

4. COMPLIANCE OFFICER



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- 4.1 Company Secretary shall be the Compliance Officer for the purpose of this Code. The Compliance Officer shall designate a Senior Official of the Company to act as Compliance Officer in his absence.
- 4.2 The Compliance Officer shall be responsible for setting forth the policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of UPSI, monitoring of trades, pre-clearance of trades to be entered into by the Designated Persons and the implementation of this Code under the overall supervision of the Board of Directors of the Company.
- 4.3 The Compliance Officer shall intimate Designated Persons, about Closure of Trading Window etc. from time to time. The trading window shall be closed from the end of every quarter till 48 hours after the declaration of financial results. Such closure shall be imposed in relation to such securities to which such UPSI relates. Designated Persons and their Immediate Relatives shall not trade in securities when the trading window is closed.
- 4.4 The timing for re-opening of the trading window shall be determined by the Compliance Officer taking into account various factors including the UPSI in question becoming generally available and being capable of assimilation by the market, which in any event shall not be earlier than 48 hours after the information becomes generally available.
- 4.5 The Compliance Officer shall assist Designated Persons and their Immediate Relatives in addressing any clarifications regarding SEBI (Prohibition of Insider Trading) Regulations, 2015 and this Code of Conduct.
- 4.6 The Compliance Officer shall maintain a record of the Designated Persons and their Immediate Relatives and any changes made in the list of Designated Persons.
- 4.7 The Compliance Officer shall oversee the entire corporate disclosures. He shall be responsible for ensuring that the Company complies with continuous disclosure requirements, overseeing and co-ordinating disclosure of Price Sensitive Information to Stock Exchanges, Analysts, Shareholders and Media and educating staff on disclosure policies and procedure. Information/disclosure/dissemination may normally be approved in advance and if information is accidentally disclosed without prior approval, the person responsible may inform the Compliance Officer, immediately, even if the information is not considered price sensitive.
- 4.8 The Compliance Officer shall make the employees of the Company aware of their duties and responsibilities attached to the receipt of inside information and the liabilities attached to misuse or unwarranted use of such information under this Code.
- 4.9 The Compliance officer shall report on insider trading to the Board of Directors of the Company and in particular, shall provide the reports to the Chairman of Audit Committee, immediately on the next Board/Audit Committee meeting on becoming aware of such insider trading.

5. DISCLOSURE BY DESIGNATED PERSONS

- 5.1 Designated persons shall disclose the 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 there is a change in information already furnished:
 - a) immediate relatives;
 - b) persons with whom such Designated Persons shares a material financial relationship;



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- c) phone, mobile and cell numbers which are used by them;

Explanation: The term "material financial relationship" shall mean a relationship in which one 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.

- 5.2 In addition, the names of educational institutions from which Designated Persons have graduated and names of their past employers shall be disclosed on a one-time basis.

6. PRESERVATION OF UPSI

- 6.1 All Designated Employees and Connected Persons shall maintain the confidentiality of price sensitive information. All information shall be handled within the organization on a need-to-know basis and no UPSI shall be communicated to any person including insiders except in furtherance of the legitimate purposes, performance of duties or discharge of legal obligations.

"Need-to-know" basis means that UPSI should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.

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

- 6.2 No insider shall communicate, provide or allow access to any UPSI, relating to the Company or securities listed or proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.
- 6.3 No Designated Person shall pass on any UPSI to any person directly or indirectly by way of making a recommendation for the purchase or sale of securities of the Company.
- 6.4 Notwithstanding anything contained in the Code, the UPSI may be communicated, provided, allowed access to or procured, in connection with a transaction that would:
- (i) entail an obligation to make an open offer under the takeover regulations where the Board of Directors of the Company is of informed opinion that the sharing of such information is in the best interests of the Company;
 - (ii) not attract the obligation to make an open offer under the takeover regulations but where the Board of Directors of the Company is of informed opinion that the sharing of such information is in the best interests of the Company and the information that constitute UPSI is disseminated to be made generally available at least two trading days prior to the sharing of such information being effected in such form as the Board of Directors may determine to be adequate and fair to cover all relevant and material facts.
- 6.5 All Designated Persons will have to keep the files containing confidential information relating to UPSI fully secured. Computer files must be kept with adequate security with login and password etc.

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- 6.6 For the purpose of prompt public disclosure of UPSI, the Company also adopts the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information set out in **PART-B**.

7. TRADING RESTRICTIONS WHEN IN POSSESSION OF UPSI

- 7.1 No insider shall trade in securities that are listed or proposed to be listed on a stock exchange when in possession of UPSI.
- 7.2 When a person who has traded in securities has been in possession of UPSI, his trades would be presumed to have been motivated by the knowledge and awareness of such information in his possession.
- 7.3 Trading in securities of the Company by an insider is allowed if such transaction is an off-market inter-se transfer between insiders who were in possession of the same UPSI without being in breach of Clause 6 of this Code and both the parties had made a conscious and informed decision.

Provided that such UPSI was not obtained under Clause 6.4 of this Code.

- 7.4 Such off-market trades shall be reported by the insiders to the Company within two working days. Every Company shall notify the particulars of such trades to the Stock Exchange on which the securities are listed within two trading days from receipt of the disclosure or from becoming aware of such information.

8. TRADING WINDOW

- 8.1 The trading window shall be closed as per clause 4.3 inter-alia, before Board Meeting/or any other meeting is held to consider:
- a) Declaration of financial results (quarterly, half yearly and annually);
 - b) Recommendation/declaration of dividends (interim and final);
 - c) Issue of securities by way of public/rights/bonus, etc.;
 - d) Any major expansion plan or execution of new project;
 - e) Amalgamation, mergers, takeovers and buy back;
 - f) Disposal of the whole or substantially whole of the undertaking;
 - g) Any changes in policies, plans or operations of the Company which may substantially affect share prices of the Company;
- 8.2 The trading window shall be re-opened as per clause 4.4. The Designated persons and their Immediate Relatives shall not trade in securities when the trading window is closed.
- 8.3 All Designated Persons and Immediate Relatives of Designated Persons shall conduct all their trading in the securities of the Company only in a valid trading window and shall not trade in Company's securities during the periods when trading window is closed, as referred to in clause 8.1 or during any other period as may be specified by the Company from time to time.



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- 8.4 The trading window restrictions shall also be applicable to any person having contractual or fiduciary relation with the Company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the Company.
- 8.5 The Compliance Officer shall intimate the closure of trading window to all the Designated Persons of the Company and in addition, the trading window closure notice shall be placed on the website of the Company and intimated to the Stock Exchanges to enable the Designated Persons and Immediate Relatives of Designated Persons to disseminate the information regarding the trading window closure.
- 9. PRE-CLEARANCE OF TRADES**
- 9.1 When the trading window is open, trading by Designated Persons shall be subject to pre-clearance by the Compliance Officer, if the transactions in securities of the Company exceeds 50,000 shares or Rs.10 lakhs in value or 1% of the total holdings in the Company, whichever is lower.
- 9.2 Procedures for Pre-Clearance:
- a) The Designated Persons shall make an application for pre-clearance to the Compliance Officer in the format prescribed in **Annexure 1**.
 - b) An undertaking in the format prescribed in **Annexure 2** shall be executed by the Designated Persons in favour of the Company incorporating inter-alia the following clauses, as may be applicable:
 - That the Designated Persons does not have any access to or receives UPSI upto the time of signing the undertaking;
 - That in case the Designated Persons has access to or receives UPSI 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;
 - That he/she has not contravened the Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons & Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information as notified by the Company from time to time, at the time of pre-clearance;
 - That he/she has made a full and true disclosure in the matter, at the time of Pre-clearance.
- 9.3 Based on the application, the Compliance Officer may issue pre-clearance order to the Designated Person in the format prescribed in **Annexure 3** only after receiving the clearance, the transaction should be carried out.
- 9.4 The execution of the order in respect of the securities of the Company will have to be completed within 7 trading days of approval of pre-clearance failing which fresh pre-clearance would be needed for the trades to be executed;
- 9.5 After completing the deal, the Designated Person shall intimate the Compliance Officer about the transactions in the format prescribed in **Annexure 4**. In case the transaction is not undertaken, a report to that effect shall be submitted to the Compliance Officer.



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- 9.6 A Designated Person who is permitted to trade shall not execute a contra trade during the next six months following the prior transaction. The Designated Persons shall also not take positions in derivative transactions in the shares of the Company at any time. In case of any contra trade has been executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

Provided that this shall not be applicable for trades pursuant to exercise of stock options.

- 9.7 In case of subscription in the primary market (initial public offers), the above mentioned entities shall hold their investments for a minimum period of 30 days. The holding period would commence when the securities are actually allotted.
- 9.8 In case the sale of securities is necessitated by personal emergency, the holding period may be waived by the Compliance Officer after recording in writing his/her reasons, in this regard.

10. OTHER RESTRICTIONS

- 10.1 The disclosures to be made by any person under this Code shall include those relating to trading by such person's immediate relatives and by any other person for whom such person takes trading decisions.
- 10.2 The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account for purposes of this Code.
- 10.3 The Compliance Officer shall maintain records of all the declarations given by the Designated Persons under this Code for a minimum period of 5 years.

11. TRADING PLANS

- 11.1 An Insider shall be 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 on his behalf in accordance with such plan.
- 11.2 Pre-clearance of trades shall not be required for a trade executed as per an approved trading plan. Trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.
- 11.3 Such trading plan shall:
- a) not entail commencement of trading on behalf of the insider 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 Company 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;



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- 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.
- 11.4 Parameters of such trading plan may inter-alia provide the following information such as acquisition or disposal of securities, value of securities or the number of securities to be invested or divested and specific dates or specific time intervals of transactions.
- 11.5 The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of the 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 as per provisions of the Regulations.
- 11.6 The trading plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.
- 11.7 The implementation of the trading plan shall not be commenced if any UPSI in possession of the insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation and in such event the Compliance Officer shall confirm that the commencement ought to be deferred until such UPSI becomes generally available information.
- 11.8 Upon approval of the trading plan, the Compliance Officer shall notify the plan to the Stock Exchanges on which the securities are listed.

12. REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES

12.1 Initial Disclosure

- a) Every Promoter, member of promoter group, Key Managerial Personnel, Director, Officers, Designated Persons of the Company, within thirty days of these regulations taking effect, shall forward to the Company the details of all holdings in securities of the Company presently held by them including the statement of holdings of dependent family members in **FORM A** prescribed by SEBI in pursuant to Regulation 7 (1) (a) read with Regulation 6 (2).
- b) Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter or member of promoter group shall disclose his holding of securities of the Company as on the date of appointment or becoming a Promoter or member of promoter group, to the Company within seven days of such appointment or becoming a Promoter or member of promoter group. Such Disclosure shall be in **FORM B** prescribed by SEBI in pursuant to Regulation 7 (1) (b) read with Regulation 6 (2).

12.2 Continual Disclosures

- a) Every Promoter, member of 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 Rs. 10 Lakhs.

The disclosure shall be made within 2 working days of:



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- (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.

Note: Disclosure of incremental transactions shall be made when transactions effected after the prior disclosure cross the threshold specified above.

- b) The Disclosure under Clause 11.2 (a) shall be in **FORM C** prescribed by SEBI in pursuant to Regulation 7 (2) read with Regulation 6 (2).
- c) Within 2 days of the receipt of intimation under Clause 11.2 (a), the Compliance Officer shall disclose the information received, to all Stock Exchanges on which the Company is listed.

12.3 Disclosures by other Connected Persons

The Compliance officer on his discretion may require any other Connected Person or class of Connected Persons to make disclosures of holdings and trading in securities of the Company in such form and at such frequency as may be determined by the Compliance Officer in order to monitor compliance with this Regulations / Code. Such disclosure shall be in **FORM D** prescribed by SEBI in pursuant to Regulation 7 (3).

13. DISSEMINATION OF PRICE SENSITIVE INFORMATION

- 13.1 No information shall be passed by Designated Persons by way of making a recommendation for the purchase or sale of securities of the Company.
- 13.2 Disclosure/dissemination of Price Sensitive Information with special reference to analysts, media persons and institutional investors.
- 13.3 The following guidelines shall be followed while dealing with analysts and institutional investors:
 - a) Only public information to be provided;
 - b) At least two Company representatives are present at meetings with analysts, media persons and institutional investors;
 - c) Unanticipated questions may be taken on notice and a considered response given later. If the answer includes price sensitive information, a public announcement should be made before responding; and
 - d) Simultaneous release of information after every such meet.

14. PENALTY FOR CONTRAVENTION OF CODE OF CONDUCT

- 14.1 Every Designated Persons and Immediate Relatives of Designated Persons who trades in securities or communicates any information for trading in securities in contravention of this Code of Conduct will be penalized and appropriate action will be taken against them by the Company after giving reasonable opportunity to them to show cause.
- 14.2 All the employees and Designated Persons violating this Code of Conduct shall also be subject to disciplinary action, as approved by the Chief Executive Officer of the Company, which may include wage or salary freeze, suspension, recovery, claw back, withholding of increment in salary/promotions, ineligibility of future participation in stock options, etc.
- 14.3 The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading), Regulations, 2015 as amended from time to time.



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- 14.4 In case it is observed by the Company/Compliance Officer that there has been a violation of SEBI (Prohibition of Insider Trading) Regulations, 2015, by the Designated Persons, the Company shall inform the Board, at the earliest.

Amendment to Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading by Insiders approved by the Board of Directors at its meeting held on November 08, 2019

Securities and Exchange Board of India (Prohibition of Insider Trading) (Third Amendment) Regulations, 2019 was notified on September 17, 2019 and the said notification is effective from 26th December, 2019.

“Employee who reports any alleged violations of Insider Trading laws to Securities and Exchange Board of India in accordance with the SEBI (Prohibition of Insider Trading) Regulations, 2015, will be protected against any discharge, termination, demotion, suspension, threats, harassment, directly or indirectly or discrimination”. Formats of Schedules D and E dealing with Informant's Voluntary Information Disclosure to the SEBI (“the Board”) and Informant's Reward Claim to be received as an Informant Reward, respectively were also notified.

The Disclosure Form and the Informants reward claim as per schedule D and E are attached and marked as Annexure 5 & 6 to this policy

(This policy is only internal code of conduct and one of the measures to avoid insider trading. It will be the responsibility of each Designated Persons to ensure compliance of SEBI guidelines and other related statutes fully.)

PART - B

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

The code aims at prompt public disclosure of Unpublished Price Sensitive Information (UPSI) that would impact price discovery so as to make such information generally available. The disclosure shall be done no sooner than credible and concrete information comes into being. The code also covers the practices and procedures for fair disclosure of UPSI.

1. CORPORATE DISCLOSURE POLICY

- 1.1 Uniform and universal dissemination of UPSI shall be ensured to avoid selective disclosure. In case of selective dissemination of UPSI inadvertently or otherwise, it shall be ensured promptly to make such information generally available.
- 1.2 The Chief Financial Officer shall be the Chief Investor Relations Officer (CIRO) of the Company under this Code to deal with dissemination of information and disclosure of UPSI.
- 1.3 CIRO / any other authorized person shall ensure that the information shared with analysts and research personnel is not UPSI and that the principles such as, equality of access to information, calls and meetings with analysts etc. are being followed.
- 1.4 CIRO shall ensure development of best practices to make transcripts or records of proceedings of meetings with analysts / other investor relations conferences available on the official website to ensure official confirmation and documentation of disclosures made.



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- 1.5 The CISO or any officer authorized by the Chief Executive Officer / Chairman shall be invited to meetings / conferences organized by the Company with the analysts / institutional investors. Apart from CISO, no person, except those authorized by the Chief Executive Officer / Chairman shall disclose any information relating to the Company's Securities to analysts and institutional investors.
- 1.6 In line with the Company practice, the Authorised Person who makes official communication shall ensure release of all official press releases simultaneously to Stock Exchanges and media with a copy to CISO and Company Secretary. These press releases shall also be posted on the website of the Company.
- 1.7 The Authorised Person who makes official communication shall ensure appropriate and fair response to queries on news reports and requests for verification of market rumour by regulatory authorities / stock exchanges in consultation with Head of the concerned department to which the news report / market rumour pertains and the CISO.
- 1.8 Company Secretary shall ensure that disclosures of shareholding pattern as required under Listing Agreement with Stock Exchanges are made in a timely and adequate manner.
- 1.9 Company Secretary shall ensure that disclosure with regard to quarterly & annual financial results, dividend and record date/book closure, etc., as required under SEB (LODR) Regulations, 2015 are made in a timely and adequate manner.
- 1.10 Appointment of Directors shall be promptly disclosed to the Stock Exchanges. With regard to other changes in KMP, the same shall be disclosed to the Stock Exchanges on the date of such change taking place. However, trading window shall not be closed in this regard unless Compliance Officer decides otherwise.
- 1.11 The Board may, if deemed fit, advise any additional disclosure with respect to decision on any agenda item placed before the Board. Company Secretary shall ensure prompt disclosure of the same in accordance with Board's directions.
- 1.12 Any other material event having bearing on the performance / operations of the Company as well as price sensitive information pertaining to any specific function / division / unit shall be promptly reported to CISO by concerned functional head or unit / division head. Compliance Officer after taking approval of Chief Executive Officer / Chairman shall communicate the same to Stock Exchanges, under intimation to CISO.
- 1.13 It shall be ensured that all UPSI shall be handled within the Company on a need-to-know basis and shall not be communicated, provided or allowed access to, except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations. Sharing of UPSI for legitimate purposes shall be subject to the prior approval of the Compliance Officer under this Code.

Explanation: "Legitimate Purpose" shall include sharing of UPSI 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.

Persons in receipt of UPSI pursuant to a "legitimate purpose" shall be considered as "insider" for purposes of these regulations and due notice shall be given to such persons to maintain confidentiality of such UPSI in compliance with these regulations.



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The Board of Directors of the Company shall ensure that a structured digital database is maintained containing the names of such persons or entities as the case may be with whom information is shared for legitimate purposes under this Code along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such databases shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.

2. RESPONDING TO MARKET RUMOURS

- 2.1 The Company shall have clearly laid down procedures for responding to any queries or requests for verification of market rumors by exchanges.
- 2.2 The official designated for corporate disclosure shall be responsible for deciding whether a public announcement is necessary for verifying or denying rumours and then making the disclosure.

3. SUBMISSION OF DISCLOSURES AND PRESCRIBED FORMS

All submissions, forms etc., envisaged in this Code should be addressed to the Compliance Officer and forwarded to the Secretarial Department of the Company at its Corporate Office, for administrative purpose and taking appropriate action.

The Secretarial Department shall acknowledge the receipt of declaration/form.

4. COMMUNICATIONS AND AMENDMENTS

This Code be communicated to each Designated Persons, Connected Persons and Directors by email or by hand and will be displayed in the website of the Company.

The Board of Directors shall have the full authority to amend or modify these guidelines and waive any procedural requirements of the Policies subject to the guidelines issued by SEBI from time to time.

5. ACKNOWLEDGEMENT OF RECEIPT

I hereby acknowledge that I have received a copy by email of the '**Procedures and guidelines governing Prohibition of Insider Trading**' and agree to comply with its terms. I understand that violation of the Insider Trading laws and regulations may subject me to civil as well as criminal penalties and that violation of the terms of this Policy may subject me to discipline by AvT Natural Products Limited.



AVT NATURAL PRODUCTS LIMITED, CHENNAI

Annexure -1

APPLICATION FOR PRE-CLEARANCE

Date:

To,
Compliance Officer
AVT Natural Products Limited, Chennai

Dear Sir,

Sub: Application seeking pre-clearance approval for trading in securities of the Company

Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's **Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons & Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information**, I seek approval to purchase / sale / subscription of _____ equity shares of the Company as per details given below:

A	Name of the Applicant	
B	Designation, if any	
C	Number of securities held as on date	
D	Folio No. / DP ID / Client ID No.	
E	The Proposal is for	a) Purchase of Securities b) Subscription of Securities c) Sale of Securities
F	Proposed date of dealing in Securities	
G	Estimated number of Securities proposed to be acquired / subscribed / sold	
H	Price at which the transaction is proposed	
I	Current Market price (as on date of application)	
J	Whether the proposed transaction will be through stock exchange or off-market deal	
K	Folio No. / DP ID / Client ID no. where the securities will be credited / debited	

I enclose herewith the undertaking signed by me.

Yours faithfully,

(Signature)



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Annexure -2

UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-CLEARANCE

To,
Compliance Officer
AVT Natural Products Limited, Chennai

I, (Name and Designation) residing at
....., am desirous of dealing in *shares of the
Company as mentioned in my application dated for pre-clearance of the
transaction.

As required by the Internal Code of Conduct under SEBI (Prohibition of Insider Trading)
Regulations, 2015 as amended upto date, of AVT Natural Products Limited, I hereby state
that:

- a) I have no access to nor do I have any information that could be construed as
"Unpublished Price Sensitive Information" as defined 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 "Unpublished Price Sensitive Information" as defined in the Code, after the signing of
this 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 Prohibition of Insider
Trading as notified by the Company from time to time.
- d) I have made full and true disclosure in the matter.

Date:

Signature:

Name:

*Indicate number of shares.



PRE-CLEARANCE APPROVAL LETTER

Date:

To

Name :

Emp. No :

Designation :

Sub: Pre-clearance approval for trading in shares of AVT Natural Products Limited

With reference to your application dated seeking approval for undertaking certain transactions in the equity shares of the Company, please be informed that you are hereby permitted to undertake the said transaction(s). You may buy/sell in not more than equity shares of the Company pursuant to this approval letter.

This approval is being issued relying on the various declarations and indemnities made by you in your said application.

This approval letter is valid till (i.e. for 7 trading days) If you don't execute the approved transaction / deal on or before this date, you would have to seek fresh pre-clearance approval before executing any transaction / deal. 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.

Yours faithfully,
For AVT Natural Products Limited

Compliance Officer



AVT NATURAL PRODUCTS LIMITED, CHENNAI

Annexure - 4

CONFIRMATION OF TRADE

To
Compliance Officer
AVT Natural Products Limited, Chennai

I hereby inform that I:

☐ have not bought / sold / subscribed any securities of the Company

☐ have bought/sold/subscribed to securities as mentioned below on
(date)

Name of the Holder	No. of Securities dealt with	Bought / Sold / Subscribed	DP ID / Client ID / Folio No.	Price (Rs.)

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 5 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 Instruction Slip (applicable in case of sale transaction).

I agree to hold the above securities for a minimum period of six months. In case there is any urgent need to sell these securities within the said period, I shall approach the Compliance Officer for necessary approval. (applicable in case of purchase / subscription).

I declare that the above information is correct and that no provisions of the Company's Code and / or applicable laws / regulations have been contravened for effecting the above said transactions(s).

Date:

Signature:

Name:

Designation:



AVT NATURAL PRODUCTS LIMITED, CHENNAI

Annexure- 5

SCHEDULE - D
[See regulation 78]

Form for Informant's Voluntary Information Disclosure to be submitted to the Board.

Note: For submission of information through a legal representative, the redacted copy of the Form expunging information that may identify the Informant shall be submitted by the legal representative without expunging any information relating to the legal representative and the details relating to the violation of securities laws.

(* Indicates that the required field is non-mandatorily, remaining fields are mandatory)

I. PERSONAL INFORMATION OF THE INFORMANT		
A. INDIVIDUAL 1:	First Name:	Title
Last Name:		
Address:	City/ State:	PIN:
Telephone (with State Code):	Mobile:	E-Mail address:
Employment Details * :	Permanent Account Number, if available	
II. LEGAL REPRESENTATIVE (where applicable)		
Last Name :	First Name :	Title :
Firm Name (if not self-employed):		
Contact address	City/ State:	PIN:
Residence address:	City / State:	PIN :
Telephone (with State Code):	Mobile:	E-Mail address
Bar Council Enrolment Number:		
III SUBMISSION OF ORIGINAL INFORMATION		
1. Is it a violation of securities laws? Yes/ No		
2. If yes to question (1), please describe the type of violation:		
3. Has the violation: Occurred/ Occurring/ Potential to occur in future		
4. If the violation has occurred, date of occurrence: dd/mm/yy (in case exact date is not known, an approximate period may be entered)		
5. Have the individual(s) or their representatives had any prior communication(s) or representations with the Board concerning this matter? Yes (Details thereof)/ No		
6. Does this violation relate to an entity of which the individual is or was an officer, director, counsel, employee, consultant or contractor? Yes (Details thereof) / No		
7. If yes to question (6), was the original information submitted first to your Head or internal legal and compliance office? Yes/ No		
8. If yes question (7) , then please provide,		



AVT NATURAL PRODUCTS LIMITED, CHENNAI

Date of submission of original information: dd/mm/yy
9. Please describe in detail why you think the information submitted is a violation?
10. What facts or supporting material is your allegation based on? Please attach any additional documents to this form, if necessary.
11. Identify any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents were disclosed to a third party.
12. Provide details of connection amongst the Informant, the company whose securities are involved and the person against whom information is being provided:
IV. DECLARATION
<p>A. I/we accept that the reward would be an ex-gratia payment which, subject to the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, shall be granted at the absolute discretion of the competent authority. The decision of the authority shall be acceptable to me/us and I/we shall not challenge it in any litigation, appeal, adjudication, etc.</p> <p>B. In the event of my/our death before the reward is paid to me/ us, it may be paid to (Details of nominee)</p> <p>C. I/we declare that the information contained herein is true, correct and complete to the best of my/our knowledge and belief and not obtained from the categories of persons indicated in sub-regulation (2) and sub-regulation (6) of regulation 7G of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and agree to indemnify the Board in case it is not so found. I/we fully understand that I/we may be subject to action under securities laws as well as Section 182 of the Indian Penal Code, 1860 (45 of 1860) and ineligible for Reward if, in my/our submission of information or in any other dealings with the Board, I/we knowingly and willfully make any false, fictitious, or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious, or fraudulent statement.</p>
<div style="display: flex; justify-content: space-between;"> Signature: Date: dd/mm/yy </div>
Place:
V. CERTIFICATE BY LEGAL REPRESENTATIVE (where the information is submitted through legal representative)
<p>I hereby certify as follows,-</p> <p>(a) I have reviewed the completed and signed Voluntary Information Disclosure Form for completeness and accuracy and the information contained therein is true, correct and complete to the best of my knowledge;</p> <p>(b) I have irrevocable consent from the Declarant, to provide to the Securities and Exchange Board of India, the original Voluntary Information Disclosure Form in the event of a request for it from the Securities and Exchange Board of India due to concerns that the Informant has not complied with these regulations or where the Securities and Exchange Board of India requires the said information for the purpose of verification for declaring any gratuitous reward to the Informant or where the Securities and Exchange Board of India determines that it is necessary to seek such</p>



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information to accomplish the purpose of the Securities and Exchange Board of India Act including for the protection of investors, sharing with foreign securities regulators and foreign and Indian law enforcement agencies, etc.;

- (c) I am and shall continue to be legally obligated to provide the original Voluntary Information Disclosure Form without demur within seven (7) calendar days of receiving such request from the Securities and Exchange Board of India.

Signature:.....

Date: dd/mm/yy

Place:

Annexure - 6

SCHEDULE - E

(See regulations 7D and 7E]

Form for Informant's Reward Claim to be submitted to the Board within the time specified in the intimation of prima facie eligibility to receive an Informant Reward.

(All fields are mandatory)

I. PERSONAL INFORMATION OF THE INFORMANT		
A. INFORMANT 1:	First Name:	Title
Last Name		
Address:	City/ State:	PIN:
Telephone (with State Code):	Mobile:	E-Mail address:
Employment Details * :	Permanent Account Number , if available	
II. ORIGINAL INFORMATION SUBMITTED		
Online Acknowledgment Receipt Number:		
(Annex Original Form for Voluntary Information Disclosure, if not yet submitted to Securities and Exchange Board of India)		
Subject matter of submission		Date of submission: dd/mm/yy
Case Name:	SEBI Order No.:	Date: dd/mm/yy
III. CONSIDERATION FOR REWARD		
Provide any material information that may be relevant in light of the criteria for determining the amount of Reward or denial thereof. Include any supporting documents if necessary.		
IV. DECLARATION BY INFORMANT		
I/we hereby declare that,-		



AVT NATURAL PRODUCTS LIMITED, CHENNAI

A. I/we have read and understood the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

B. I/we accept that mere furnishing of information by me/us does not by itself confer on me/us right to get reward and that I/we may not get any Reward at all. I/we would be bound by the decisions that the authority competent to grant reward may take;

I/We accept that the Securities Exchange Board of India is under no obligation to pay any reward or enter into any correspondence regarding action or inaction taken as a result of this communication.

D. I/we accept that the reward would be an ex-gratia payment which, subject to the Securities and Exchange Board of India Prohibition of Insider Trading) Regulations, 2015, shall be granted at the absolute discretion of the competent authority. The decision of the authority shall be acceptable to me/us and I/we shall not challenge it in any litigation, appeal, adjudication, etc.

E. In the event of my/our death before the reward is paid to me/us, it may be paid to..... (Details of nominee)

F. I/we declare that the information contained herein is true, correct and complete to the best of my/our knowledge and belief and not obtained from the categories of persons indicated in sub-regulation (2) and sub-regulation (6) of regulation 7G of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and agree to indemnify the Board in case it is not so found. I/we fully understand that I/we may be subject to action under securities laws as well as Section 182 of the Indian Penal Code, 1860 (45 of 1860) and ineligible for an Informant Reward if, in my/our submission of information or in any other dealings with the Board, I/we knowingly and willfully make any false, fictitious, or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious, or fraudulent statement.

Signature:
Place :

Date: dd/mm/yy

V. CERTIFICATE BY LEGAL REPRESENTATIVE {where applicable}

I hereby certify as follows,-

(a) I have reviewed the completed and signed claim form for completeness and accuracy and the information contained therein is true, correct and complete to the best of my knowledge; and

(b) The declarant is the person who signed the original Voluntary Information Disclosure Form .

Signature:.....
Place :

Date: dd/mm/yy



FORM A
Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
(Regulation 7 (1) (a) read with Regulation 6 (2))

Name of the Company : AVT NATURAL PRODUCTS LIMITED
ISIN of the Company : INE488D01021

Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)									
Name, PAN No. CIN/DIN & address with contact Nos.	Category of person (promoters/KMP /Directors/immediate relatives / others etc.,	Securities held as on the date of regulation coming into force		% of share holding	Open interest of the Future contracts held as on the date of regulation coming into force			Open Interest of the Option Contracts held as on the date of regulation coming into force	
		Type of security (For e.g.- shares, warrants, convertible Debentures etc.,	No.		Number of units (contracts * lot size)	Notional value in rupee terms	Number of units (contracts * lot size)		
1	2	3	4	5	6		7		

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

Signature:

Designation:

Date:

Place:



FORM B

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (1) (b) read with Regulation 6(2)]

Name of the Company: AVT NATURAL PRODUCTS LIMITED

ISIN of the company: INE488D01021

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

Name, PAN No., CIN/DIN & Address with contact nos.	Category of Person (Promoters/ KMP / Directors / immediate relatives/others etc.)	Date of appointment of Director /KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP		% of Shareholding	Open Interest of the Future contracts held at the time of becoming Promoter/appointment of		Open Interest of the Option Contracts held at the time of becoming Promoter/appointment of	
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contra * lots size)	Notional value in Rupee terms	Number of units (contra * lots size)	Notional value in Rupee terms
1	2	3	4	5	6	7	8	8	

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

Signature:

Designation:

Date:

Place:



FORM C

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

Name of the company: AVT NATURAL PRODUCTS LIMITED

ISIN of the company: INE488D01021

Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN No., CIN/DI N, & address of Promoter / Employee / Director with contact nos.	Category of Person (Promoters/ KMP / Directors/ Immediate relative s/ others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed		% of shareholding	Date of allotment advice/acquisition of shares/sale of shares specify		Date of intimating to company	Mode of acquisition (market purchase/public rights/preferential offer / off market/ Inter-se transfer etc.	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed	
		Type of security (For eg. – Shares, Warrants, Convertible	No.	Type of security (For eg. – Shares, Warrants, Convertible	No.		Pre transaction	Post transaction			From	To				
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

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

Signature:

Designation:

Date:

Place:



Form D

**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
Regulation 7(3) – Transactions by other connected persons as identified by the Company**

Name, PAN No., CIN/DIN & address of connecte d persons, as identified by the company with contact nos.	Connec tion with the compan y)	Securities prior acquisition /disposal		Securities held to		Securities acquired /Disposed		% of share holding		Date of allotment advice/ acquisition of shares/sle of shares specify		Date of intimat ion to compa ny	Mode of acquisition (market purchase/p ublic/ rights/ preferenti al offer / off market/ Inter-se transfer etc.)	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
		Buy		Sell		Val ue	Num ber of units (contr ac ts * lot size)	Val ue	Numbe r of units (contra cts * lot size)									
		Type of security (For eg. – Shares, Warrant s, Convert ible Debentu res etc.)	No.	Type of security (For eg. – Shares, Warrant s, Convert ible Debent ures etc.)	No.					Pre tran sa ctio n	Pos t tran sa ctio n			From	to			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17		

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

Name:

Signature:

Date:

Place:

