

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS

1. Preface

- 1.1 The Board of Directors (the "**Board**") of Expression 360 Services India limited (the "**Company**") has approved the Code of Conduct to Regulate, Monitor and Report Trading by Insiders (the "**Code**") at its meeting held on September 23, 2025. The Code is framed in accordance with the requirements of the Regulation 9 (1) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("**SEBI PIT Regulations**") as amended from time to time.

2. Objective

- 2.1 This Code aims to protect Unpublished Price Sensitive Information ("**UPSI**") of the Company and guide Designated Persons and Employees in trading the Company's securities in line with SEBI's Insider Trading Regulations. All such persons must maintain strict confidentiality of UPSI accessed during their duties and must not misuse or share it for personal benefit or advise others to do so. In case of any conflict, the applicable law shall override this Code.

3. Effective Date

- 3.1 This Code is effective from the date of board resolution approving the same.

4. Definitions

- 4.1 "**Act**" means the Securities and Exchange Board of India Act, 1992, as may be amended from time to time.
- 4.2 "**Applicable Law**" shall mean the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, including any amendments thereto, or any statute, law, listing agreement, regulation, ordinance, rule, judgment, order, decree, bye-law, clearance, directive, guideline, policy, requirement, notifications and clarifications, circulars or other governmental instruction and/or mandatory standards and or guidance notes as may be applicable in the matter of trading by an Insider.
- 4.3 "**Board of Directors**" or "**Board**" means the Board of Directors of the Company, as constituted from time to time.
- 4.4 "**Compliance Officer**" means the Company Secretary of the company or any other person designated by the Board of Directors as Compliance Officer from time to time; who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under the SEBI PIT Regulations.
- 4.5 "**Connected Person**" means
- 4.5.1 Any person who is or has during the six months prior to the concerned act been associated with a company, directly or indirectly, in any capacity including:
- i. by reason of frequent communication with its officers; or
 - ii. by being in any contractual, fiduciary or employment relationship; or

- iii. by being a director, officer or an employee of the company; or
- iv. 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.

4.5.2 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. a relative of connected persons;
- ii. a holding company or associate company or subsidiary company;
- iii. an intermediary as specified in section 12 of the Act or an employee or director thereof;
- iv. an investment company, trustee company, asset management company or an employee or director thereof;
- v. an official of a stock exchange or of clearing house or corporation;
- 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;
- 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;
- viii. an official or an employee of a self-regulatory organization recognised or authorized by the Board;
- ix. a banker of the company;
- 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 ten per cent. of the holding or interest;
- xi. a firm or its partner or its employee in which a connected person as defined above is also a partner; or
- xii. a person sharing household or residence with a connected person as defined above.

NOTE: It is intended that a connected person is one who has a connection with the company that is expected to put him in possession of unpublished price sensitive information. Relatives and other categories of persons specified above are also presumed to be connected persons but such a presumption is a deeming legal fiction and is rebuttable. This definition is also intended to bring into its ambit persons who may not seemingly occupy any position in a company but are in regular touch with the company and its officers and are involved in the know of the company's operations. It is intended to bring within its ambit those who would have access to or could access unpublished price sensitive information about any company or class of companies by virtue of any connection that would put them in possession of unpublished price sensitive information. In case of connected persons the onus of establishing that they were not in possession of UPSI is on connected persons.

4.6 "Contra Trade" means a trade or transaction which involves buying or selling any number of securities of the Company and within 6 (six) months, trading or transacting in an opposite transaction involving sell or buy following the prior transaction.

4.7 "Designated Person(s)" shall mean and include:

- i. All the Directors of the Company;
- ii. Employees of Company designated on the basis of their functional role or access to UPSI in the organization by their Board of Directors;
- iii. Promoters and members of promoter group;
- iv. Chief Executive Officer and employees up to two levels below Chief Executive Officer of the Company, intermediary and fiduciary irrespective of their functional role in the company or ability to have access to UPSI;
- v. Any support staff of the Company such as IT staff, employees of finance and accounts or secretarial staff who have access to UPSI; and
- vi. Any other person(s) as the Board of Directors shall in consultation with the Compliance Officer to be covered by the Code on the basis of their role and function in the Company and the access that such role and function would provide to UPSI in addition to seniority and professional designation.

For the purpose of this Code, the term Designated Person shall include his/her Immediate Relatives.

- 4.8 **"Dealing in Securities"** means an act of subscribing to, buying, selling, or agreeing to subscribe to, buy, sell or deal in securities of the Company either as Principal or Agent.
- 4.9 **"Employee"** means any individual who during employment in the Company may become privy to information relating to violation of insider trading laws and files a Voluntary Information Disclosure Form under SEBI PIT Regulations and is a director, partner, regular or contractual employee, but does not include an advocate.
- 4.10 **"Fiduciary"** means professional firms such as auditors, accountancy firms, law firms, analysts, insolvency professional entities, consultants, banks etc., assisting or advising Company shall be collectively referred to as fiduciaries.
- 4.11 **"Insider"** means a Designated Person, Connected Person or any other person who is in possession of or having access to UPSI; and includes all such personnel with whom the Company or its official shares UPSI for legitimate purpose.
- 4.12 **"Intermediaries"** shall include such persons as defined in Section 12 of the Securities and Exchange Board of India Act, 1992 viz., Stock Brokers, Sub-brokers, Share Transfer Agents, Banker to an Issue, Registrar to an Issue, Merchant Banker, Underwriter, Portfolio Manager, Investment Adviser and such other persons associated with Securities Market and registered with SEBI.
- 4.13 **"Independent Director"** means an Independent Director referred to in Section 149(6) of the Companies Act, 2013 and/ or Regulation 16(1)(b) of the Listing Regulations.
- 4.14 **"Material Subsidiary"** shall mean a subsidiary, whose income or net worth exceeds 10% of the consolidated income or net worth respectively, of the listed entity and its subsidiaries in the immediately preceding accounting year.
- 4.15 **"Material Unlisted Subsidiary"** shall mean an unlisted subsidiary, whose income or net worth exceeds 10% percent of the consolidated income or net worth respectively, of the listed entity and its subsidiaries in the immediately preceding accounting year.
- 4.16 **"Net Worth"** means net worth as defined under Section 2(57) of the Companies Act, 2013.

- 4.17 "SEBI" means the Securities and Exchange Board of India.
- 4.18 "Significant Transaction or Arrangement" shall mean any individual transaction or arrangement that exceeds or is likely to exceed 10% of the total revenues or total expenses or total assets or total liabilities, as the case may be, of the unlisted subsidiary for the immediately preceding accounting year.
- 4.19 "Subsidiary" means subsidiary company as defined under Section 2(87) of the Companies Act, 2013 and the rules made thereunder.
- 4.20 "Trading" means and includes subscribing, buying, selling, dealing, pledging (including invocation/releasing of pledge/ repledge), lien, encumbrance or agreeing to subscribe, pledge, buy, sell, deal in any securities, trading done on behalf of the employee by portfolio managers, trading through Portfolio Management Service providers, transposition and "trade" shall be construed accordingly.
- 4.21 "Trading day" means a day on which the recognized stock exchanges are open for trading.
- 4.22 "Trading window" refers to the period during which the Company's securities can be traded.
- 4.23 "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, delisting, disposals and expansion of business, award or termination of order/contracts not in the normal course of business and such other transactions;
 - v. Changes in key managerial personnel, other than due to superannuation or end of term, and resignation of a Statutory Auditor or Secretarial Auditor;
 - vi. change in rating(s), other than ESG rating(s);
 - vii. fund raising proposed to be undertaken;
 - viii. agreements, by whatever name called, which may impact the management or control of the company;
 - ix. fraud or defaults by the company, its promoter, director, key managerial personnel, or subsidiary or arrest of key managerial personnel, promoter or director of the company, whether occurred within India or abroad;
 - x. resolution plan/ restructuring or one-time settlement in relation to loans/borrowings from banks/financial institutions;
 - xi. admission of winding-up petition filed by any party /creditors and admission of application by the Tribunal filed by the corporate applicant or financial creditors for initiation of corporate insolvency resolution process against the company as a corporate debtor, approval of resolution plan or rejection thereof under the Insolvency and Bankruptcy Code, 2016;
 - xii. initiation of forensic audit, by whatever name called, by the company or any other entity for detecting mis-statement in financials, misappropriation/ siphoning or diversion of funds and receipt of final forensic audit report;
 - xiii. action(s) initiated or orders passed within India or abroad, by any regulatory, statutory, enforcement authority or judicial body against the company or its directors, key managerial personnel, promoter or subsidiary, in relation to the company;
 - xiv. outcome of any litigation(s) or dispute(s) which may have an impact on the company;

- xv. giving of guarantees or indemnity or becoming a surety, by whatever named called, for any third party, by the company not in the normal course of business;
- xvi. granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals;

Explanation 1- For the purpose of above sub-point (ix) :

'Fraud' shall have the same meaning as referred to in Regulation 2(1)(c) of Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003.

'Default' shall have the same meaning as referred to in Clause 6 of paragraph A of Part A of Schedule III of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Explanation 2- For identification of events enumerated in this clause as unpublished price sensitive information, the guidelines for materiality referred at paragraph A of Part A of Schedule III of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as may be specified by the Board from time to time, materiality as referred at paragraph B of Part A of Schedule III of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and materiality as determined by the Company as per Policy for determining Materiality of any event or information shall be applicable.

Note: It is intended that information relating to a company or securities, that is not generally available would be unpublished price sensitive information if it is likely to materially affect the price upon coming into the public domain. The types of matters that would ordinarily give rise to unpublished price sensitive information have been listed above to give illustrative guidance of unpublished price sensitive information.

Any other term not defined herein shall have the same meaning as defined in the Act, Listing Regulations or any other applicable law or regulation to the extent applicable to the Company.

5. Role Of Compliance Officer

The Company Secretary shall be the Compliance Officer and shall be responsible for monitoring and implementation of the Policy under the overall supervision of the Board and shall report on insider trading to the Board of Directors of the Company and in particular, shall provide reports to the Chairman of the Audit Committee or to the Chairman of the Board of Directors on yearly basis.

- 5.1 The Compliance Officer shall maintain a record of all Designated Persons and shall make changes to such record as and when intimation of any changes is received from the Human Resource (HR) Department.
- 5.2 He/ she shall set forth policies, procedures, monitor adherence to the Code and SEBI Regulations for the preservation of UPSI, approve and review the trading plans, pre-clear the trades and monitor the trades and implement this Code.
- 5.3 He/ she shall assist all employees in addressing any clarifications regarding the SEBI (PIT) Regulations and the Company's Code of Conduct.

- 5.4 He/ she shall in consultation with the Chairman and/or Managing Director, and as directed by the Board, specify Prohibited Period from time to time and immediately make an announcement thereof;
- 5.5 He/ she shall ensure that Prohibited Period is intimated to all concerned before the commencement of the Prohibited Period;
- 5.6 He/ she shall maintain records of all the declarations submitted in the appropriate form given by the Designated Persons;
- 5.7 He/ she shall make all disclosures to the stock exchanges on which the securities of the Company are listed, as required under Applicable Laws;
- 5.8 He/ she shall place details of the trading in the Company's securities by Designated Persons before the Managing Director and Chief Executive Officer on quarterly basis and the accompanying documents that such persons had executed under the pre-dealing procedure as mentioned in this Policy;
- 5.9 He/ she shall implement the punitive measures or disciplinary action prescribed for any violation or contravention of this Policy; and
- 5.10 He/ she shall do all such things as provided in the SEBI Insider Trading Regulations and as may be prescribed by SEBI or the stock exchange from time to time in relation to prevention of Insider Trading.
- 5.11 In the event of any doubt on the interpretation of this Code, the Compliance Officer
- 5.12 shall be entitled to approach external counsel for clarifications.

6. Preservation of "Unpublished Price Sensitive Information"

- 6.1 All information shall be handled within the Company on a need-to-know basis and no insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to the Company or its securities to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

6.2 Need to Know

Unpublished Price Sensitive Information is to be handled on a "need to know" basis, i.e., Unpublished Price Sensitive Information should be disclosed only to those within the company who need the information to discharge their duty.

6.3 Limited access to confidential information

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password, etc. Files containing confidential information should be deleted / destroyed after its use. Shredder should be used for the destruction of physical files.

6.4 Chinese Walls procedures & processes:

- i. To prevent the misuse of confidential information, the Company shall separate those areas of

the Company which routinely have access to confidential information, considered "inside areas" from those areas which deal with sale/marketing/ investment or other departments providing support services, considered "public areas".

- ii. The employees in the inside area shall not communicate any unpublished price sensitive information to any one in public area.
- iii. The employees inside area may be physically segregated from employees in public area.
- iv. Demarcation of the various departments as inside area may be implemented by the Company.

In exceptional circumstances, employees from the public areas may be brought "over the wall" and given confidential information on the "need to know" basis with approval of the CFO /MD/CEO.

Notwithstanding anything contained in this Code / Regulations, an unpublished price sensitive information 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 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 sharing of such information is in the best interests of the Company and the information that constitute unpublished price sensitive information is disseminated to be made generally available at least two trading days prior to the proposed transaction 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 For purposes of sub-clause (6.4), the Board of Directors shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the purpose of sub-clause (3.5), and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information.

7. Structured Digital Database

- 7.1 The Company will maintain an electronic record containing the nature of UPSI, the name, PAN / any other identifier authorized by law (in case PAN is not available) and such other details of persons who shared the information and name, PAN / any other identifier authorized by law (in case PAN is not available) and such other details of such person with whom UPSI is shared under the provisions of Clause 3 of this Code. Such databases shall be maintained internally with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.
- 7.2 The Heads of the departments / functions and / or Designated Persons who share UPSI for legitimate purposes will be responsible for reporting the aforementioned details as per Insider Trading Regulations from time to time, in the Digital Database to the Compliance Officer;
- 7.3 It should be ensured that in addition to obtaining the above details, confidentiality agreements are entered into with or notice is served on such persons with whom UPSI is shared for legitimate purposes before sharing such information. The above list of such persons and disclosures made by them under clause 7.2 should be reviewed annually.

- 7.4 The entry of such information which is not emanating from within the organisation, in structured digital database may be done not later than 2 calendar days from the receipt of such information.
- 7.5 The Audit Committee shall review on an annual basis the compliance with the provisions of the SEBI PIT Regulations and verify that the systems for internal control are adequate and operating effectively.
- 7.6 The Board of Directors shall ensure that the structured digital database is preserved for a period of not less than eight years after completion of the relevant transactions and in the event of receipt of any information from the Board regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.

8. Institutional mechanism for prevention of Insider Trading

The Chief Executive Officer by whatever name called, Managing Director or such other analogous person of the Company shall put in place adequate and effective system of internal controls by making standard operating procedures ('SOPs') to ensure compliance with the requirements given in these regulations and Company's Code of Conduct to prevent insider trading.

8.1 The Internal Controls shall include

- a. all employees who have access to unpublished price sensitive information are identified as Designated person;
 - b. all the unpublished price sensitive information shall be identified and its confidentiality shall be maintained as per the requirements of these regulations
 - c. adequate restrictions shall be placed on communication or procurement of unpublished price sensitive information as required by these regulations
 - d. lists of all employees and other persons with whom unpublished price sensitive information is shared shall be maintained and confidentiality agreements shall be signed or notice shall be served to all such employees and persons.
 - e. all other relevant requirements specified under these regulations shall be complied with
 - f. periodic process review to evaluate effectiveness of such internal controls.
- 8.2 The Board of Directors of the Company shall ensure that the Chief Executive Officer or the Managing Director or such other analogous person ensures compliance with these regulation and sub-regulations of this regulation.
- 8.3 The Audit Committee of the Company shall review compliance with the provisions of these regulations at least once in a financial year and shall verify that the systems for internal control are adequate and are operating effectively.
- 8.4 The Company shall formulate written policies and procedures for inquiry in case of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information, which shall be approved by Board of Directors of the Company and accordingly initiate appropriate inquiries on becoming aware of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information and inform the Board

promptly of such leaks, inquiries and results of such inquiries.

- 8.5 The Company shall have a whistle-blower policy and make employees aware of such policy to enable employees to report instances of leak of unpublished price sensitive information.
- 8.6 If an inquiry has been initiated by the Company in case of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information, the relevant intermediaries and fiduciaries shall co-operate with the Company in connection with such inquiry conducted by it.

9. Prevention of misuse of "Unpublished Price Sensitive Information"

- 9.1 All Designated Persons shall be governed by an internal code of conduct governing dealing in securities.
- 9.2 No Insider shall communicate, provide, or allow access to any unpublished price sensitive information, 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.
- 9.3 Further, to comply with this confidentiality obligation, no Insider shall, inter alia:
- a. pass on Price Sensitive Information to any person directly or indirectly by way of making a recommendation for the purchase or sale of securities of the Company, or
 - b. disclose Price Sensitive Information to their family members, friends, business associates or any other individual, or
 - c. discuss Price Sensitive Information in public places, or
 - d. disclose Price Sensitive Information to any other employee who does not need to know the information for discharging his or her professional duties, or
 - e. recommend to anyone that they may undertake dealing in Securities of the Company while being in possession, control or knowledge of Price Sensitive Information, or
 - f. be seen or perceived to be dealing in Securities of the Company on the basis of Unpublished Price Sensitive Information.

Provided that nothing contained above shall be applicable to any communication required in the ordinary course of business or profession or employment or under any law.

10. Trading Plan

- 10.1 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.
- 10.2 The Regulations recognize the concept of Trading Plans. Any Designated Person intending to formulate a Trading Plan shall consult the Compliance Officer to discuss the applicable rules and procedure. The Compliance Officer shall only approve a Trading Plan in accordance with the applicable provisions of the Regulations. However, he shall be entitled to take 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.

Provided that pre-clearance of trades shall not be required for a trade executed as per an approved trading plan.

Provided further that trading window norms shall not be applicable for trades carried out in accordance with an approved trading plan.

10.3 The compliance officer shall approve or reject the trading plan within two trading days of receipt of the trading plan and notify the approved plan to the stock exchanges on which the securities are listed, on the day of approval.

10.4 Such trading plan shall:

- a. not entail commencement of trading on behalf of the Insider earlier than one hundred and twenty calendar days from the public disclosure of the plan;
- b. not entail overlap of any period for which another trading plan is already in existence;
- c. set out following parameters for each trade to be executed:
 - i. either the value of trade to be effected or the number of securities to be traded;
 - ii. nature of the trade;
 - iii. either specific date or time period not exceeding five consecutive trading days;
 - iv. price limit, that is an upper price limit for a buy trade and a lower price limit for a sell trade, subject to the range as specified below:
 - for a buy trade: the upper price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent higher than such closing price;
 - for a sell trade: the lower price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent lower than such closing price.; and
- d. not entail trading in securities for market abuse.

The Trading Plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the plan without being entitled to either execute any trade in the securities outside the scope of the trading plan or to deviate from it except due to permanent incapacity or bankruptcy or operation of law.

Provided that, the implementation of the trading plan shall not be commenced if any unpublished price sensitive information 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.

10.5 If the insider has set a price limit for a trade the insider shall execute the trade only if the execution price of the security is within such limit. If price of the security is outside the price limit set by the insider, the trade shall not be executed.

- 10.6 The compliance officer shall approve or reject the trading plan within two trading days of receipt of the trading plan and notify the approved plan to the stock exchanges on which the securities are listed, on the day of approval.
- 10.7 In case of non-implementation (full/partial) of trading plan due to either reasons or failure of execution of trade due to inadequate liquidity in the scrip, the following procedure shall be adopted:
- i. The insider shall intimate non-implementation (full/partial) of trading plan to the compliance officer within two trading days of end of tenure of the trading plan with reasons thereof and supporting documents, if any.
 - ii. Upon receipt of information from the insider, the compliance officer, shall place such information along with his recommendation to accept or reject the submissions of the insider, before the Audit Committee in the immediate next meeting. The Audit Committee shall decide whether such non-implementation (full/partial) was bona fide or not.
 - iii. The decision of the Audit Committee shall be notified by the compliance officer on the same day to the stock exchanges on which the securities are listed.
 - iv. In case the Audit Committee does not accept the submissions made by the insider, then the compliance officer shall take action as per the Code of Conduct.

11. Trading Restrictions

All Designated Persons shall be subject to trading restrictions as enumerated below: -

11.1 Trading Window

“Trading window refers to the period during which the Company’s securities can be traded. The period prior to declaration of unpublished price sensitive information is particularly sensitive for transactions in the Company’s securities. This sensitivity is due to the fact that the Designated Persons will, during that period, often possess unpublished price sensitive information.

During such sensitive times, Designated Persons will have to forego the opportunity of trading in the Company’s securities. The Designated Persons shall not trade in the securities of the Company when the trading window is closed. The period during which the trading window is closed shall be termed as prohibited period.

11.2 Trading Window and Window Closure:

- i. When the trading window is closed, the Designated Persons shall not trade in the Company’s securities in such period, provided that this restriction shall not be applicable if the trade has been done in accordance with an approved trading plan.
- ii. All Designated Persons shall conduct all their trading in the securities of the Company only in a valid trading window and shall not trade in the securities of the Company during the periods when the trading window is closed or during any other period as may be specified by the Company from time to time.

The trading window can be, inter alia, closed:-

- i. From 1st day immediately after end of the quarter or such other day as may be decided by the Compliance Officer till the end of 48 (forty-eight) hours after the financial results (quarterly, half yearly and annually) are submitted to the Stock Exchanges.
- ii. All Designated Persons shall conduct all their dealings in the Securities of the Company only in a valid trading window and shall not deal in any transaction involving the purchase or sale of the Company's securities during the periods when the trading window is closed, as may be specified by the Company from time to time.
- iii. The Compliance Officer shall intimate the closure of trading window to all the designated employees of the Company when he determines that a Designated Person or class of Designated Persons can reasonably be expected to have possession of Unpublished Price Sensitive Information. Such closure shall be imposed in relation to such securities to which such Unpublished Price Sensitive Information relates.
- iv. The Compliance Officer after taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, shall decide the timing for re-opening of the trading window, however, in any event it shall not be earlier than 48 hours after the information becomes generally available.
- v. Any other period that may be designated by the Compliance Officer in case of any Unpublished Price Sensitive Information including periods prior to meetings where the following are proposed to be considered:
 - Declaration of dividends (interim and final);
 - Declaration of Financial Results (quarterly, half-yearly and annually).
 - Changes in Capital Structure by way of public/ rights/ bonus/ preferential, etc;
 - Amalgamation, mergers, de-mergers, acquisitions, takeovers, delisting, expansion of business and such other transactions;
 - Disposal of whole or substantially whole of the undertaking
 - Fund raising proposed to be undertaken;
 - Such other period(s) as may be decided and notified by the Compliance Officer from time to time.
- vi. For unpublished price sensitive information which is not emanating from within the Company, trading window may not be closed

The trading window restrictions mentioned this sub-clause shall not apply in respect of-

- a. Off-market Inter-se transfer between insiders;
- b. Transaction through Block deal window mechanism between insiders;
- c. Transaction due to statutory or regulatory obligations;
- d. Trade pursuant to duly approved Trading plan;
- e. Creation/release of pledge for bona fide purpose such as raising of funds;
- f. Transaction pursuant to the exercise/grant/sale of stock options
- g. Transactions which are undertaken in accordance with respective regulations made by the Board such as acquisition by conversion of warrants or debentures, subscribing to rights issue, further public issue, preferential allotment or tendering of shares in a buy-back offer, open offer, delisting offer or transactions which are undertaken through such other mechanism as may be specified by the Board from time to time.

- h. exercise of options granted under Employee Stock Options Scheme / Employee Stock Options Plan of the Company in respect of which the exercise price was pre-determined in compliance with applicable regulations.
 - i. In the case of non-individual insiders: –
 - (a) the individuals who were in possession of such unpublished price sensitive information were different from the individuals taking trading decisions and such decision-making individuals were not in possession of such unpublished price sensitive information when they took the decision to
 - (b) trade; and
 - (c) appropriate and adequate arrangements were in place to ensure that these regulations are not violated and no unpublished price sensitive information was communicated by the individuals possessing the information to the individuals taking trading decisions and there is no evidence of such arrangements having been breached
- vii. The trading window may, as per the directions of the Compliance Officer, 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.
- viii. Irrespective of whether such communication has been received or not, Designated Persons governed by this Code shall mandatorily verify with the Compliance Officer on the status of the Trading Window before undertaking any Trades in the Securities of the Company. Ignorance of the closure of the Trading Window or non-receipt of communication of closure of Trading Window shall not justify any Trades undertaken by Designated Persons during Quiet Period.
- ix. Every Designated Person should advise his/ her Immediate Relatives of the closure of trading window during which Trading in the Securities of the Company is prohibited.
- x. The Compliance Officer after taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, shall decide the timing for re-opening of the trading window, however in any event it shall not be earlier than 48 hours after the information becomes generally available.

12. Contra Trade

- i. All Designated Persons who buy or sell any number of shares of the Company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction, except where the restrictions on contra trade shall not be applicable where such trade is carried out in accordance with an approved trading plan or for trades pursuant to exercise of stock options. All Designated Persons shall also not take positions in derivative transactions in the shares of the Company at any time..
- ii. The Compliance Officer with approval of Chairman and Managing Director may grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate these regulations.
- iii. 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 the Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund administered by SEBI under the Act. However, this shall not be applicable for trades pursuant to exercise of trade options.

- iv. 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.
 - v. In case, the Designated Persons deal in any Securities of the Company through his/her portfolio manager/ investment manager, the same shall be disclosed to the Compliance Officer and restrictions relating to Trading in Securities of the Company under this Code will also apply to the trading in securities of the company through his/her portfolio manager/ investment manager.
- vi. Pre-Clearance of Trades**
- a. Designated Persons including their immediate relatives shall conduct their trading in the securities of the Company when the trading window is open.
 - b. Application for Pre-clearance shall be made for trades to be executed only during valid Trading Window period. Applications submitted for trade to be executed during a period when the Trading Window is closed shall be invalid and will be deemed to have been automatically rejected.
 - c. Designated Persons including their immediate relatives shall not be entitled to trade in securities without obtaining pre-clearance from the Compliance Officer, if:
 - ii. The market value of securities involved in aggregate of such trading in a calendar quarter in one or more transactions exceeds an amount of Rs. 10,00,000/- (Rupees Ten lacs).
 - iii. It is clarified that the threshold limit specified above shall be applicable to gross market value of the transactions executed during the relevant calendar quarter.
 - iv. The Designated Persons will have to obtain pre-clearance for the following transactions undertaken during the closure of Trading Window as per Clause 5 above, irrespective of the value of the proposed trade:
 - a) Off-market Inter-se transfer between insiders;
 - b) Transaction through Block deal window mechanism between insiders;
 - c) Transaction due to statutory or regulatory obligations;
 - d) Trade pursuant to duly approved Trading plan;
 - e) Creation/release of pledge for bona fide purpose such as raising of funds;
 - f) Transaction pursuant to the exercise of stock options;
 - v. However, no designated persons including their immediate relatives shall be entitled to apply for pre-clearance of any proposed trade if such designated persons are in possession of unpublished price sensitive information even if the trading window is

not closed and hence, he shall not be allowed to trade.

- vi. Pre-Clearance to deal in any securities of Company shall not be given to the
- vii. applicant if the Trading Window is closed for such applicant or if the Compliance Officer has reasonable cause to believe that such applicant is in possession of UPSI.
- viii. Pre-Clearance shall not be given to any designated person who is aware
- ix. /Expected to be aware of one or more of the events mentioned in (iii) above, due to his involvement in the proposed transaction or has been notified by the Compliance Officer to such effect, even though full details may not have been disclosed to him on the principle of 'need to know' basis.
- x. Pre-clearance shall not be required for the following transactions:
 - a. transactions pursuant to Transmission of shares in accordance with applicable law;
 - b. transactions involving transfer of Securities from Depository Participant to another provided that the shareholder and the beneficial owner of such Securities do not change; and
 - c. transactions pursuant to merger, demerger, or any other Court Order
- xi. Prior to approving any Trades, the Compliance Officer shall be entitled to seek any further declarations as he may deem fit from the applicant. He shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate. In case the Compliance Officer is of the opinion that the proposed Trade is on basis of possession of Unpublished Price Sensitive Information or he has a reason to believe that the proposed Trade is in breach of this Code or the Insider Trading Regulations, he will not grant approval against the said pre-clearance application and shall convey the reasons.
- xii. In the absence of the Compliance Officer due to leave etc., the Chief Financial Officer and in his absence, the Executive Director shall discharge the function referred in Clause 6.4 of this code.
- xiii. If a trading window closure is announced after the grant of pre-clearance but during the validity period of such pre-clearance, the pre-clearance shall immediately become void prospectively. Transactions already entered into prior to the announcement of the Trading window closure, will however not be considered to be in violation of this Code.
 - a. Persons to whom this Code applies must keep confidential the fact that they are intending to deal or that they have applied for clearance to deal or the clearance is granted/refused by the Compliance Officer.
 - b. Pre- Clearance shall not be given to any designated person during any period when the Compliance Officer otherwise has reasons to believe that the proposed dealing is in breach of this Code, or SEBI Regulations.

13. Pre-trading procedure

- i. An application may be made in the prescribed Form (Annexure 1) to the Compliance officer indicating the estimated number of securities that the Designated Person intends to trade in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the company in this behalf.
- ii. An undertaking (Annexure 2) shall be executed in favour of the Company by such Designated Person incorporating, inter alia, the following clauses, as may be applicable:
 1. That the employee/director/officer/insider does not have any access or has not received "Unpublished Price Sensitive Information" up to the time of signing the undertaking.
 2. That in case the Designated Person has access to or receives "Unpublished 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 position and that he/she would completely refrain from dealing in the securities of the Company till the time such information becomes public.
 3. That he/she has not contravened the Code of Conduct as notified by the Company from time to time.
 4. That he/she has made a full and true disclosure in the matter.
- iii. Pre-clearance by Compliance Officer to Designated Persons shall be given in prescribed Form (Annexure 3).
- iv. All Designated Persons shall execute their order in respect of securities of the Company within 7 (seven) trading days after the approval of pre-clearance is given. The Designated Person shall file within 2 (two) days of the execution of the deal, the details of such deal with the Compliance Officer in the prescribed form. In case the transaction is not undertaken, a report to that effect shall be filed. (Annexure 4).
- v. If the order is not executed within 7 (seven) trading days after the approval is given, the Designated Person must pre-clear the transaction again.

14. Reporting requirements for transactions in securities

14.1 Initial Disclosures

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 7 (seven) days of such appointment or becoming a promoter. (Annexure 6)

14.2 Continual Disclosures

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 2 (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.10,00,000/- (Rupees Ten lacs) or such other value as may be specified by SEBI from time to time. (Annexure 7)

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

Further, pursuant to SEBI circular SEBI/HO/ISD/ISD/CIR/P/2020/168 dated September 09, 2020, SEBI has implemented system driven disclosures with effect from October 01, 2020 which shall run parallel with existing manual based disclosures.

Pursuant to the system driven disclosures, the designated person whose name is included in the designated depository is not required to mandatorily provide manual disclosures to comply with Regulation 7(2) of the SEBI (PIT) Regulations with effect from August 13, 2021. The dealing in securities of the Company shall be updated in the system through automation.

14.3 Disclosure by the Company to the Stock Exchange(s)

Within 2 (two) trading days of the receipt of intimation under Clause 7.2, the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received.

The Compliance officer shall maintain records of all the declarations in the appropriate form given by the directors / officers / Designated persons for a minimum period of five years.

14.4 Disclosures by other connected persons

A Company may, at its discretion 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 Company in order to monitor compliance with these regulations. (Annexure 8)

14.5 Half yearly / Annual Disclosures

All Directors, KMP, Promoters, member of promoter group, Designated persons and their Immediate Relatives trading in the securities of the Company shall be required to forward following details of their Securities transactions including the holdings of Immediate Relatives to the Compliance Officer –

Annual statement of all holdings and trading in securities of the Company

(Annexure 9) as on March 31 of each year, before April 30 of that year.

14.6 Others

a. Designated persons shall be required to 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:

- i. immediate relatives

- ii. persons with whom such designated person(s) shares a material financial relationship
- iii. Phone, mobile and cell numbers which are used by them
- iv. In addition, the names of educational institutions from which designated persons have graduated and names of their past employers shall also be disclosed on a one-time basis.

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 designated person annual income but shall exclude relationships in which the payment is based on arm’s length transactions.

- b. In case a designated person resigns or retires from the services of the Company, all information which is required to be collected from such designated person should be collected till date of service of such employees with the company. Upon resignation from service of designated person, Company should maintain the updated address and contact details of such designated person. The Company should make efforts to maintain updated address and contact details of such persons for one year after resignation from service. Such data should be preserved by the company/ intermediary/ fiduciary for a period of 5 years.

14.7 **Records of disclosures received by the Company**

The Compliance officer shall place before the Chairman of the Audit Committee or to the Chairman of the Board of Directors, on yearly basis, all the details of the trading in securities of the Company, the accompanying documents that such persons had executed under the aforesaid pre-clearance/trading procedure and violations thereof, if any.

15. **PENALTY FOR CONTRAVENTION OF CODE OF CONDUCT**

Every Designated Person shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her immediate relative). Every Designated Person(s) who violates this Code shall in addition to any other penal action that may be taken by the Company pursuant to law, also be subject to disciplinary action.

- a. The penalty imposed/action by the Company may include but shall not be restricted to:
 - i. Reprimanding of defaulting Designated Person/Insider;
 - ii. Ban from engaging in any trade of the securities or exercise of stock options of the Company;
 - iii. Suspension from employment;
 - iv. Ban from participating in all future employee stock option schemes including lapse of all existing options;
 - v. No increment and/or bonus payment; and/or
 - vi. Termination from employment;

vii. Disgorgement of the gain accrued through the transactions in violation of the Code.

- b. In case it is observed by the Compliance Officer that there has been a violation of the Policy by any person, he/ she shall forthwith inform the Nomination and Remuneration Committee about the violation. The penal action will be initiated on obtaining suitable directions from the Nomination and Remuneration Committee.

16. Communication and dissemination of the policy

- 16.1 This Policy after duly approved by the Board of Directors shall be notified and communicated to the all employees / functional heads of respective departments of the Company. The new employees shall be informed about the Policy by the human resource and administration departments. For all the employees and Directors, whether existing or new, a copy of this Policy shall be posted on the website of the Company at www.expression360.in.

17. Amendments and Review

- 17.1 The Board may subject to the applicable laws amend any provision(s) or substitute any of the provision(s) with the new provision(s) or replace the Policy entirely with a new Policy. However, no such amendment or modification shall be inconsistent with the applicable provisions of any law for the time being in force.
- 17.2 The Board shall review the Policy from time to time based on the changing needs and make suitable modifications as may be necessary.

18. Scope and Limitation

- 18.1 In the event of any conflict between the provisions of this Policy and the LODR Regulations, as amended from time to time, the LODR Regulations shall prevail over this Policy and the part(s) so repugnant shall be deemed to sever from the Policy and the rest of the Policy shall remain in force.

ANNEXURE 1

SPECIMEN OF APPLICATION FOR OBTAINING PRE-CLEARANCE TO DEAL /TRADE IN SECURITIES OF THE COMPANY

Date:

To,
Expression 360 Services India limited
The Compliance Officer,

Dear Sir,

Sub: Application for obtaining pre-clearance to deal / trade in securities of the Company

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

1.	Name of the Designated Person	
2.	Designation (if applicable)	
3.	Number of securities held as on date	
4.	Folio No. / DP ID / Client ID No.)	
5.	Folio No. / DP ID / Client ID No.)	(a) Purchase of securities (b) Subscription to securities (c) Sale of securities
6.	Proposed date of trading in securities	
7.	Estimated number of securities proposed to be acquired/subscribed/sold	
8.	Price at which the transaction is proposed	
9.	Current market price (as on date of application)	
10.	Whether the proposed transaction will be throughstock	
11.	Folio No. / DP ID / Client ID No. where the securities	

Date.....
Place.....
Designation.....

Signature.....
Name &

ANNEXURE 2

**FORMAT OF UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR
PRE -CLEARANCE UNDERTAKING**

UNDERTAKING

In this connection I solemnly confirm and declare:

1. **THAT** I do not have access and /or have not received any "Unpublished Price Sensitive Information" up to the time of signing the undertaking.
2. **THAT** in case I have access to or receive "Unpublished Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction, I shall inform the Compliance Officer of any change in my position and THAT I shall refrain from dealing in the securities of the Company till the time such information becomes public.
3. **THAT** I have not contravened any of the provisions of the Code of Conduct and the SEBI Regulations, as amended from time to time.
4. **THAT** I have not entered into any sale transaction of the shares of the Company in the last six months prior to the proposed date of purchase/ THAT I have not entered into any purchase transaction of the shares of the Company in the last six months (30 days in case of IPO allotment) prior to the proposed date of sale.
5. I undertake to submit the necessary report within seven days of execution of the transaction/or Nil report if the transaction is not undertaken.
6. I am aware that, I shall be liable to face penal consequences as set forth in the Code including disciplinary action under the Code of the Company, in case the above declarations are found to be misleading or incorrect at any time.
7. I hereby solemnly declare that I have made a full and true disclosure in this regard to the best of my knowledge and belief.
8. I hereby undertake not to transact in securities in the sanctioned period in case trading window is declared closed subsequently. Pre-clearance may kindly be accorded in terms.

Date.....

Place.....

Designation.....

Signature.....

Name &

FOR OFFICE USE

Serial number of the application received _____

Date & time of receipt of the Application _____

Date & time of communication of the pre-clearance or otherwise _____

Reasons for not giving pre-clearance _____

Signature of the Compliance Officer
/ Authorised Officer

ANNEXURE 3**FORMAT FOR PRE- CLEARANCE ORDER**

To,
Name
Designation (if applicable):
Place:

With reference to your above application seeking approval for undertaking certain transactions in Securities of the Company detailed therein, this is to inform you that your request for dealing in _____ (nos) equity shares of the Company as mentioned in your application dated _____ is Approved/Not Approved.

Please note that the said transaction must be completed on or before ___ (date) that is within 7 trading days from today.

This approval is being issued to you based on the various declarations, representations and warranties made by you in your said application

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

Yours faithfully,
For Expression 360 Services India limited,
(Formerly known as Expression 360 Services India Private limited)

Compliance Officer
Date:

ANNEXURE 6

[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: Expression 360 Services India limited.
(Formerly known as Expression 360 Services India Private limited)
CIN:

ISIN of the company:

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).

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 Director / KMP		Open Interest of the Option Contracts held at the time of becoming Promoter / appointment of Director / KMP	
			Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts* lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee Terms
1	2	3	4	5	6	7	8		

Notes:

- None of my immediate relatives hold/trade in the securities of the Company & I do not take any decisions for trading in the Company's securities for any other persons. (Strike off whichever is not applicable)
- "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Signature:
Designation:

Date:
Place:

Expression 360 Services India Limited (INS Accredited)

(Formerly known as Expression 360 Services India Pvt. Ltd.)

Regd. Off: 203/1, A.J.C Bose Road, Circus Avenue, Kolkata-700017 Contact: (033) 2280 7550, (033) 4001 7501/7502
Email: expression.kol@gmail.com Website: www.expression360.in CIN: U74300WB2010PLC143636

ANNEXURE 7

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

Name of the company:
CIN:

ISIN of the company:

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/DIN, & address of Promoter / Employee / Director with contactnos.	Category of Person (Promoter /KMP/ Directors / immediate relatives/ 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 Intima- tion to comp- any	Mode of acquisition (market purchase/ public/ rights/ preferential offer / off market / Inter-se transfer etc.	Exchange on which the trade was executed		
		Type of security (For eg. - Shares, Warrants, Convert- ible Debent- ures etc.)	No.			Type of security (For eg. - Shares, Warrants, Convert- ible Debent- ures etc.)	No.				From	To
1	2	3	4	5	6	7	8	9	10	11	12	17

Expression 360 Services India Limited (INS Accredited)

(Formerly known as Expression 360 Services India Pvt. Ltd.)

Regd. Off.: 203/1, A.J.C Bose Road, Circus Avenue, Kolkata-700017 Contact: (033) 2280 7550, (033) 4001 7501/7502

Email: expression.kol@gmail.com

Website: www.expression360.in

CIN: U74300WB2010PLC143636

Notes:

1. None of my immediate relatives hold/trade in the securities of the Company & I do not take any decisions for trading in the Company's securities for any other persons. *(Strike off whichever is not applicable)*
2. "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Signature:
Designation:

Date:
Place:

Expression 360 Services India Limited (NS Accredited)

(Formerly known as Expression 360 Services India Pvt. Ltd.)

Regd. Off.: 203/1, A.J.C Bose Road, Circus Avenue, Kolkata-700017 Contact: (033) 2280 7550, (033) 4001 7501/7502
Email: expression.kol@gmail.com Website: www.expression360.in CIN: U74300WB2010PLC143636

ANNEXURE 8
Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7(3) – Transactions by Other Connected Persons]

Name of the company:
CIN:

ISIN of the company:

Name, PAN No., CIN/DIN & address of connected persons, as identified by the company with contact nos.	Connection with company)	Securities held prior to acquisition /disposal	Securities acquired/disposed	% of shareholding	Date of allotment advice/acquisition of shares/sale of shares specify	Date of intimation to company	Mode of acquisition (market purchase / public rights/preferential offer / off market/ Inter-se transfer etc)	Exchange on which the trade was executed

1	2	3	4	5	6	7	8	9	10	11	12	17

Notes:

1. None of my immediate relatives hold/trade in the securities of the Company & I do not take any decisions for trading in the Company's securities for any other persons. *(Strike off whichever is not applicable)*
2. "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Signature:
Designation:

Date:
Place

ANNEXURE 9

To,
The Compliance Officer
Company Name
(Formerly known as Company
Name)

Date

Annual Statement of shareholding for self and immediate relative

I. SELF DECLARATION

Name & Designation	DP ID No.	Client ID No. / Folio No.	No. of securities held on 1st day of the Financial Year	Securities bought during the Financial year	Securities sold during the Financial year	Total securities held on last day of the Financial year

II. Immediate Relative

Immediate Relative Name	Relation	DP ID No.	Client ID No. / Folio No.	No. of securities held on 1st day of the Financial Year	Securities bought during the Financial year	Securities sold during the Financial year	Total shares held on last day of the Financial year

I declare that the dealings in securities were carried out while trading window was open and in terms of the permission from Compliance Officer.

I further declare that the securities purchased / sold as mentioned herein above by me along with my Immediate Relatives, have not been purchased / sold by entering into any opposite transaction entered during the last 6 months

Yours truly,

Signature

Name

Designation