



CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSONS
[Under Regulation 9(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

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INTRODUCTION

SEBI (Prohibition of Insider Trading) Regulations, 2015 become effective from 15th May, 2015. These new Regulations had replaced the SEBI (Prohibition of Insider Trading) Regulations, 1992.

The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (Regulations) seek to govern the conduct of insiders, connected persons and persons who are deemed to be connected persons on matters relating to Insider Trading.

SEBI (Prohibition of Insider Trading) Regulations, 2015 are further amended vide SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 and the amendment is effective from April 1, 2019.

“Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons” is amended to align it with the new regulation i.e. SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018.

- This Code of Conduct will be known as “Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons” (hereinafter referred to as “Code”) and this Code is applicable to the designated persons as may be specified by the Board of Directors and their immediate relatives and insiders as per this code.
- This Code has been made pursuant to the SEBI (Prohibition on Insider Trading) Regulations, 2015 and SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 (hereinafter referred to as the “PIT Regulations”).

Definitions:

- **Act**" means the Securities and Exchange Board of India Act, 1992 (15 of 1992).
- **Board**” means the Securities and Exchange Board of India.
- **Board of Directors**" means the Board of Directors of the Company.
- **Companies Act**" means The Companies Act, 2013 and the rules made there under.
- **Company**" or "the Company" means My Money Securities Limited.

- **"Compliance Officer"** means the Company Secretary for the time being of the Company or any senior officer appointed by the Board of Directors of the Company for the purpose of this Code and the Regulations.
- **"Connected person" means-**
 - (i) 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 Company's officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the Company or holds any position including a professional or business relationship between himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.
 - (ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established -
 - (a) an immediate relative of connected persons specified in clause (i); or
 - (b) a holding company or associate company or subsidiary company; or
 - (c) an intermediary as specified in section 12 of the Act or an employee or director thereof; or
 - (d) an investment company, trustee company, asset management company or an employee or director thereof; or
 - (e) an official of a stock exchange or of clearing house or corporation; or
 - (f) a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
 - (g) a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
 - (h) an official or an employee of a self-regulatory organization recognized or authorized by the Board; or
 - (i) a banker of the company; or
 - (j) A concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten per cent of the holding or interest.

- **"Designated persons"** shall mean employees comprising the top three tiers of the Company's management, employees in Finance Department, Secretarial Department and such other employees who may be so designated, from time to time, by the Board of Directors for the purpose of this Code and who may be able to have access to any 'unpublished price sensitive information' as defined in this Code or the Regulations. Top three tiers of the Company's management shall mean and include Board of Directors, Promoters/Functional Directors and employees directly reporting to them.
- **"Generally available information"** means information that is accessible to the public on a non-discriminatory basis.
- **"Immediate relative"** means a spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities.
- **"insider"** means any person who is-
 - (i) Connected person; or
 - (ii) in possession of or having access to Unpublished Price Sensitive Information;
- **"Key managerial personnel"**, in relation to the Company, means—
 - (a) the Chief Executive Officer or the Managing Director or the manager;
 - (b) the Company Secretary;
 - (c) the Whole-time Director;
 - (d) the Chief Financial Officer; and
 - (e) Such other officer as may be prescribed under Companies Act, 2013.
- **"Promoter"** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof.
- **"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.
- **"Takeover Regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.
- **"Threshold Limit"** means the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregating to a traded value of **ten (10) lakh** rupees or such other value as may be specified by the Board from time to time.
- **"Trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly.
- **"Trading Day"** means a day on which the recognized stock exchanges are open for trading.

- **“Trading Window”** means a trading period for trading in the Company's Securities as specified by the Company from time to time in this Code.
- **"Unpublished Price Sensitive Information"** means any information, relating to the 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: –
 - (a) financial results;
 - (b) dividends;
 - (c) change in capital structure;
 - (d) mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
 - (e) changes in key managerial personnel; and
 - (f) Material events in accordance with the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Words and expressions used and not defined herein but defined in the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made there under shall have the meanings respectively assigned to them in those legislation as amended from time to time.

Responsibilities of Managing Director / Chief Executive Officer

The Managing Director/ Chief Executive Officer of My Money Securities Limited (MMSL) shall formulate/ amend and implement this Code with the approval of the Board of Directors of the Company to regulate, monitor and report trading by its designated persons and their Immediate relatives towards achieving compliance with SEBI (Prohibition on Insider Trading) Regulations, 2015 and SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 (“PIT Regulations”), adopting the minimum standards set out in Schedule B of PIT Regulations, as may be amended from time to time, without diluting the provisions of its regulations in any manner. The Managing Director/ Chief Executive Officer of MMSL shall put in place adequate and effective system of internal controls to ensure compliance with the requirements given in PIT Regulations to prevent insider trading.

Duties and responsibilities of the Compliance Officer

The Compliance Officer, subject to the supervision of the Board of Directors of the Company shall be responsible for –

- (a) Approval of trading plan, pre-clearance of trades and monitoring of trades.
- (b) Maintaining the record of the Promoters, Directors, Key Managerial Personnel, Designated Persons and other connected persons and incorporate changes from time to time as may be informed by such persons.

- (c) Advising all Directors, Promoters, Key managerial personnel and Designated Persons to furnish the details of transactions in the securities of the Company as stated in clauses 10-12 of this Code in the prescribed form and to maintain a record of all the intimations received for a period of at least five (5) years.
- (d) Obtaining disclosures from Promoters, Directors, Key Managerial Personnel, Designated Persons and other connected persons and to give information, in respect of the disclosures received, to all the Stock Exchanges where the securities are listed, as applicable.
- (e) Maintaining records of all disclosures as stated in this Code and to report the same to the Chairman of the Audit Committee, on a yearly basis.

Communication or procurement of unpublished price sensitive information

- (a) All information is to be handled on a "need to know" basis. It should be disclosed only to those within the Company who need the information to discharge their duty.
- (b) No insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to a company or 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.
- (c) Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password etc.
- (d) No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to the Company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- (e) Notwithstanding anything contained above, 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 the proposed transaction 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 proposed transaction 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 (2) trading days prior to the proposed transaction being effected in such form as the Board of Directors may determine.

- (f) For purposes of clause (5) above, the Board of Directors of the Company 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 clause (5) above, and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information.

Restriction on trading when in possession of unpublished price sensitive information

- (a) Save as provided in this Code and the Regulations, no insider shall trade in securities of the Company when in possession of unpublished price sensitive information.
- (b) Insiders shall maintain the confidentiality of all unpublished price sensitive information. They shall, while in possession of any unpublished price sensitive information, neither trade in the securities of the Company on the basis of unpublished price sensitive information nor pass on such information to any person directly or indirectly by way of making a recommendation for trading in securities of the Company.
- (c) The provisions of this Code shall also be applicable for trading either as a first named shareholder or as a joint holder

Prevention of misuse of unpublished price sensitive information:

- **Trading Window**

- (a) Designated persons may execute trades subject to compliance with this Code and the Regulations. Towards this end, a notional trading window shall be used as an instrument of monitoring trading by the Designated Persons. The trading window shall be closed when the Compliance Officer 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.
- (b) Designated Persons and their immediate relatives shall not trade in securities when the trading window is closed.
- (c) The notice of closure of Trading Window intimated to the Stock Exchange(s), if any, wherever the securities of the Company are listed, by the Compliance Officer, shall be deemed as intimation to the Designated Persons / Insiders for adherence and compliance with this Code.
- (d) The timing for re-opening of the trading window shall be determined by the Compliance Officer taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, which in any event shall not be earlier than forty-eight (48) hours after the information becomes generally available.

(e) The "Trading Window" shall, inter-alia, remain closed at the time of:

- Declaration of Financial results.
- Declaration of dividends (interim and final).
- Change in capital structure.
- Mergers, de-mergers, acquisitions, delisting, disposals and expansion of business.
- Changes in key managerial personnel.
- Material events in accordance with the listing agreement.
- Such other time as the Compliance Officer determines that a designated person or class of designated person is reasonably expected to have possession of unpublished price sensitive information.

The "Trading Window" shall, inter-alia, remain closed from:

- the date of intimation of the date of Board Meeting to the Stock Exchanges; if any,
- The actual date of Board Meeting whichever is earlier.

Until **48 hours** after the decision/ information is made generally available.

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

- Trading Window may be closed by the Company during such time in addition to the above period, as it may deem fit by the Compliance Officer.
- All Designated Person of the Company and their immediate relative(s) 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 Trading Window is closed as referred above or during any other period as may be specified by the Managing Director / Compliance Officer / Chief Financial Officer from time to time.
- However, subject to the SEBI Act, Rules and Regulations, in case of ESOPs, exercise of options shall be allowed during the period when the trading window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when the trading window is closed.

Pre-clearance of Trades

- (a) When the trading window is open, trading by Designated Persons and their immediate relatives shall be subject to pre-clearance by the Compliance Officer, if the value of the proposed trades is above threshold limit. No Designated Person/their immediate relatives shall apply for pre-clearance of any proposed trade if they are in possession of unpublished price sensitive information even if the trading window is not closed.

- (b)** Designated Persons / their immediate relatives intending to deal in the securities of the Company up to the threshold limit, as defined and provided hereinbefore, may do so without any pre-clearance from the Compliance Officer. In all other cases, they should pre-clear the transactions as per the pre-dealing procedure as provided hereinafter.
- (c)** Designated Persons / their immediate relatives shall make an application in the prescribed, to the Compliance Officer indicating the estimated number of securities that he/she intends to deal in, the details as to the depository (ies) with which he/she maintains a DEMAT/Trading account, the details as to the securities in such depository mode and such other details as may be required by the Compliance Officer in this matter.
- (d)** He / She shall execute an undertaking in favour of the Company, incorporating, therein, inter alia, the following clauses:
- that he/she does not have any access or has not received Unpublished Price Sensitive Information up to the time of signing the undertaking;
 - that in case he/she 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/her position and that he/she would completely refrain from dealing in the securities of the Company till the time such information becomes generally available;
 - That he/she has not contravened any provisions of this Code and the Regulations; that he/she has made a full and true disclosure in the said matter.
 - That he/she has made a full and true disclosure in the said matter.
- (e)** Designated Persons / their immediate relatives shall execute their transactions in respect of securities of the Company within seven (7) trading days after the approval of pre-clearance in Page 10 of 21 Form II is given, failing which the transaction has to be pre-cleared again. Reporting of trades executed or decisions not to trade shall be made/ done in Form III.
- (f)** They shall not execute a contra trade during the six (6) months following the prior transaction. In case of emergency the six (6) months holding period may be waived by the Compliance Officer (application to made in Form IV) after recording in writing the reasons in this regard provided that such relaxation does not violate this Code/ Regulations.

However, the restriction on contra trade shall not apply to:

- (a) Exercise of the options under the Company's ESOPs;
- (b) Sale of shares acquired under the Company's ESOPs, provided that designated person is not in possession of UPSI at the time of sale.

- (g) In case of the Compliance Officer intending to deal in the securities of the Company beyond the threshold limit, the pre-clearance of the Managing Director or in his absence, the Chairman of the Board, will have to be obtained. Similarly in case of emergency Compliance Officer may obtain the waiver from the Managing Director or in his absence, the Chairman of the Board, provided that such relaxation does not violate this Code/ Regulations.
- (h) In case a contra trade is 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 Board for credit to the Investor Protection and Education Fund administered by the Board under the Act.

CHINESE WALL

To prevent the misuse of confidential information, Company has laid down Chinese Walls procedures which separate those areas of the Company that routinely have access to confidential information, considered "inside areas" from those which deal with sale/marketing/investment advice or other departments providing support services, considered "public areas".

- The employees in the inside area shall not communicate any Unpublished Price Sensitive Information to anyone in public area.
- The Company shall have process of maintaining securely, computer files containing confidential information and physical storage of documents relating to UPSI.
- All the unpublished price sensitive information is to be handled on "need to know basis", i.e., Unpublished Price Sensitive Information should be disclosed only to those within MMSL 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 the non-public information directly received by any employee should immediately be reported to the head of the department. In exceptional circumstances employees from the public areas may be brought "over the wall" and given confidential information on the basis of "need to know" criteria.

Reporting Requirements

- **Initial Disclosures**

Every person on appointment as a Director or a Key Managerial Personnel of the Company or upon becoming a Promoter shall disclose his/her holding of securities of the Company as on the date of appointment or becoming a Promoter, to the Company within seven (7) days of such appointment or becoming a promoter in the Form as specified by the Board.

- **Continual Disclosures**

- (a) The Promoters, Directors, Employees of the Company shall disclose to the Company in the Form as specified by the Board, stating the number of such securities acquired or disposed of within two (2) 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, exceeds the threshold limits;
- (b) The Company shall notify the particulars of such trading to the stock exchanges on which the securities are listed, as applicable, within two (2) trading days of receipt of the disclosure or from becoming aware of such information.
- (c) The disclosure of the incremental transactions after any disclosure shall be made by persons as specified in (1) above, when the transactions effected after the prior disclosure crosses the threshold specified in this clause.

Note: Trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account for the purpose of making Initial/Continual disclosures.

- **Annual Disclosures**

Designated Persons shall furnish to the Compliance Officer the following:

- Annual statement of all their holdings in securities of the Company to be submitted within 30 days of the close of each Financial Year in **prescribed format**.

- **Disclosure by Designated Persons**

Initial Disclosure, Annual Disclosure and Continual Disclosure

The Designated person shall disclose the following information in Form VI annexed hereto, to MMSL within 30 days from the date on which this code shall become effective and on annual basis within 30 days from the end of the Financial Year and on continual disclosure basis, as and when the following information changes within 30 days of such change;

- I. His/her Phone, mobile and cell numbers
- II. His/her Permanent Account Number or any other identifier authorized by law
- III. Name of Immediate Relatives
- IV. Persons with whom such designated person(s) shares a Material Financial Relationship
- V. Permanent Account Number or any other identifier authorized by law of (iii) & (iv).
- VI. Phone, mobile and cell numbers of (III) & (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.

Explanations: -“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.”

Reporting to the Board and Preservation of disclosures

The Compliance Officer shall place before the Board of Directors, Chairman of Board of Directors and Chairman of Audit Committee of MMSL on annual basis, details of disclosures made by the Designated Persons.

The disclosures made under these regulations shall be maintained by the Compliance Officer, for a minimum period of five (5) years.

Penalty for non-compliance of this Code

- (a) Any Promoter, Director, Employee or other connected person, who trades in securities or communicates any information for trading in securities in contravention of this Code, shall be penalized and appropriate action shall be taken against them by the Company after giving reasonable opportunity to them to show-cause. He/she shall also be subject to disciplinary action, as deemed appropriate by the Board of Directors of the Company which may include wage freeze, suspension, recovery, claw back, termination etc.
- (b) In addition to the action which may be taken by the Company, the persons violating the Regulations or this Code shall also be subject to action under Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and SEBI Act and as amended from time to time.
- (c) In case of any violation, the Board of Directors shall inform the Board accordingly.

General

- **IDENTIFICATION OF UPSI AND MAINTAINING ITS CONFIDENTIALITY**

All the unpublished price sensitive information shall be identified and its confidentiality shall be maintained as per the requirements of this Code and PIT regulations;

- **DIGITAL DATABASE OF PERSONS WITH WHOM UPSI IS SHARED**

The Board of Directors 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 under this regulation 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 such as time stamping and audit trails to ensure non-tampering of the database.

- **PROCESS FOR HOW AND WHEN PEOPLE ARE BROUGHT 'INSIDE' ON SENSITIVE TRANSACTIONS**

A person(s) shall be brought inside on any proposed or ongoing sensitive transaction(s) of the Company who may be an existing or proposed partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants etc. for legitimate purpose which shall include the following;

- (a) In the ordinary course of business
 - (b) In furtherance of performance of duty(ies);
 - (c) For discharge of legal obligation(s).
 - (d) for any other genuine or reasonable purpose as may be determined by the Compliance Officer in consultation with Managing Director or CFO of the Company
 - (e) For any other purpose as may be prescribed under the Securities Regulations or Company Law or any other law for the time being in force, in this behalf, as may be amended from time to time.
- **INTIMATION OF DUTIES AND RESPONSIBILITIES AND THE LIABILITY TO THE PERSON(S) WHO HAS/HAVE BEEN BROUGHT 'INSIDE' ON SENSITIVE TRANSACTION(S).**

Any person(s) who has/have been brought inside on any proposed and/or ongoing sensitive transaction(s) and in receipt of unpublished price sensitive information shall be considered an "insider" for purposes of this Code and due notice shall be given to such persons by Designated Person who is sharing the UPSI;

- (a) To make aware such person that the information shared is or would be confidential.
 - (b) To instruct such person to maintain confidentiality of such unpublished price sensitive information in compliance with these regulations.
 - (c) To make aware to such person the duties and responsibilities attached to the receipt of such information and the liability attached to misuse or unwarranted use of such information.
- **INTERNAL CONTROL SYSTEM**

The Managing Director/ Chief Executive Officer of MMSL shall put in place adequate and effective system of internal controls to ensure compliance with the requirements given in these code and PIT regulations to prevent insider trading.

- **REVIEW OF COMPLIANCES OF PIT CODE AND VERIFICATION OF INTERNAL CONTROL SYSTEM**

The Audit Committee of MMSL shall review compliance with the provisions of these Code and PIT Regulations at least once in a Financial Year and shall verify that the systems for internal control are adequate and are operating effectively.

- The decision of the Board of Directors of the Company with regard to any or all matters relating to this Code shall be final and binding on all concerned. The Board of Directors of the Company shall have the power to modify, amend or replace this Code in part or full, as may be thought fit from time to time in their absolute discretion.

Forms

- **Disclosure Forms**

Form B: Form for Initial Disclosure.

Form C: Form for Continual Disclosures.

- **Internal Forms**

Form I: Application for Pre-Clearance and undertaking

Form II: Pre-Clearance Order

Form III: Application for waiver of minimum holding period.

Notes:

- i. Original "Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons" was made effective w.e.f. May 15, 2015 and the amended "Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons" shall become effective from 01st April, 2019.
- ii. Any amendment(s) made in SEBI (Prohibition of Insider Trading) Regulations, 2015 and other related Regulations shall apply mutatis mutandis to the "Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons."
- iii. In any circumstance where the terms of the Code differ from any law, rule, regulation etc. for the time being in force, the law, rule, regulation etc. shall take precedence over the Code.
- iv. This code is only an internal code of conduct and one of the measures to avoid Insider Trading. It will be the responsibility of each person covered under the SEBI Insider Trading Regulation to ensure compliance of the SEBI Act, Guidelines and other related statutes.

Specimen Format of Application for Pre-clearance and Trading Plan

Application for Pre-clearance of Trades in Securities

To
The Compliance Officer
My Money Securities Limited

Dear Sir,

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and Code for Prevention of Insider Trading in Equity shares / securities of XYZ Ltd., I seek approval for purchase/sale/ subscription of the Securities (give description) of the Company as per the details given below:

1	Name of the applicant	
2	Designation	
3	Relationship with the Applicant (Self/ Immediate Relative)	
4	Number of securities held as on date	
5	Folio No. / DP ID / Client ID No.	
6	The proposal is for	a) Purchase of securities b) Subscription to securities c) Sale of securities d) Pledge
7	Proposed date of trading in securities	

8	Estimated number of securities proposed to be purchased/subscribed/sold/pledge	
9	Current market price (as on date of application)	
10	Whether the proposed transaction will be through stock exchange or off-market trade	
11	Folio No. / DP ID / Client ID No. where the securities will be credited / debited	

I enclose herewith the Undertaking signed by me.

Date.....

Signature.....

Place.....

Name & Designation.....

UNDERTAKING

With reference to my application for pre-clearance of trades in securities, 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 the Code for Prevention of Insider Trading in XYZ Equity shares / securities, as notified by the Company from time to time
4. THAT 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.
5. THAT I have made a full and true disclosure in this regard to the best of my knowledge and belief.
6. THAT I hereby undertake not to transact in securities in the sanctioned period in case trading window is declared closed subsequently.
7. THAT I hereby undertaken not to make contra trade transactions in the securities of the company.

Pre-clearance may kindly be accorded in terms of provisions of the Code for Prevention of Insider Trading of the company.

Date.....

Signature.....

Place.....

Name & Designation.....

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

Specimen Format for Trading Plan

To
The Compliance Officer
My Money Securities Limited

Dear Sir,

I, _____, in my capacity as _____ of the Company hereby submit the trading plan with respect to dealing in securities of the Company for a total period of 12 months from _____ to _____.

DP ID/ Client ID / Folio No.	Type of security	No. of Securities held (as on date)	Nature of Trade (Buy/Sell)	Proposed Date/time period of trade	No. /total amount of securities proposed to be traded
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With respect to the above trading plan, I hereby undertake that I shall:

1. Not entail commencement of trading on behalf of the insider earlier than 6 months from the public disclosure of the plan.
2. Not entail trading for the period between the 20th 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 financial results for the said period;
3. Not commence the trading as per above plan if the Unpublished Price Sensitive Information which is in my possession at present, do not comes into public domain till the time of commencement of trading plan & shall defer the commencement of trading plan till such information becomes generally available.
4. Not tender any other trading plan for the period for which the above trading plan is already in force; and
5. Not entail trading in securities for market abuse

Date.....

Signature.....

Place.....

Name & Designation.....

FORM B

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (1) (b) read with Regulation 6(2) –Disclosure on becoming a Key Managerial Personnel/Director/Promoter/Member of the promoter group]

Name of the company:

ISIN of the company:

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN & Address with contact nos.	Category of Person (KMP / Director or Promoter or member of the promoter group /Immediate Relative to/others etc.	Date of appointment of KMP/Director / OR Date of becoming Promoter / member of the promoter group	Securities held at the time of appointment of KMP /Director or upon becoming Promoter or member of the promoter group		% of Shareholding
			Type of securities (For e.g. – Shares, Warrants, Convertible Debentures ,Rights entitlements , etc.	No.	

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

Details of Open Interest (OI) in derivatives on the securities of the company held on appointment of KMP or Director or upon becoming a Promoter or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).

Open Interest of the Future contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group			Open Interest of the Option Contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group		
Contract specifications	Number of Units (contracts lot size)	Notional value in Rupee term	Contract specifications	Number of Units (contracts lot size)	Notional value in Rupee term

Note: In case of Options, notional value shall be calculated based on premium plus strike price of options

Name & Signature:

Designation:

Date:

Place:

Note:

- a) "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015
- b) Value of transaction excludes taxes/brokerage/any other charges

Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of contract	Contract specification	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
1	2	3	4	5	6	7

Note: In case of Options, notional value shall be calculated based on Premium plus strike price of options.

Name & Signature:

Designation:

Date:

Place: