

**Code of Conduct and Fair Disclosure for
Prevention of Insider Trading**

CHAPTER – I

A] PRELIMINARY

1. Short title and commencement

1.1 This Code shall be called the Code of Conduct and Fair Disclosure for prevention of Insider Trading (hereinafter may be referred as ‘the code’)

1.2 The Code came into effect from 26th July, 2014 as amended from time to time.

2. Definitions

2.1 In the Code, unless the context otherwise requires, the following words, expressions and derivations therefrom shall have the meanings assigned to them as under:–

- (a) “**Act**” means the Securities and Exchange Board of India Act, 1992 (15 of 1992);
- (b) “**Board**” means the Securities and Exchange Board of India (herein may be referred as SEBI)
- (c) “**Code**” means this “**Ceinsys** Code of Conduct and Fair Disclosure for prevention of Insider Trading”, as modified from time to time.
- (d) “**Company**” means **CEINSYS Tech** Limited (hereinafter may be referred as **CEINSYS**).
- (e) “**Compliance officer**” means Company Secretary of **CEINSYS TECH LIMITED**.
- (f) “**Connected person**” includes-
 - (i) any person who is or has, during the six months prior to the concerned act, been associated with CEINSYS, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the company or holds any position including a professional or business relationship between himself and the company whether temporary/permanent, that allows such person, directly/indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.
 - (ii) an immediate relative of connected persons specified in clause (i);
 - (iii) 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 percent of the holding or interest;
 - (iv) such other person as may be defined in the regulations.

(g) **“Designated Person”** shall include a person occupying any of the following position in the Company:

- i. Promoters
- ii. Chairman-Cum- Managing Director and All Directors
- iii. All employees in the rank of Sr. Vice President and above.
- iv. All Heads of Departments
- v. All Senior Finance Executives working in corporate accounts, Budget and Direct Taxation Sections of Corporate Finance
- vi. All senior executives working in the offices of CMD/All Directors/ Compliance Officer Sr. Vice President and above
- vii. All executives working in Company Secretariat and supporting staff who have access to unpublished price sensitive information.
- viii. Fiduciary includes all professional firms such as auditors, accountancy firm, law firms, analyst, insolvency professional entities, consultants, banks etc. assisting or advising CEINSYS.

(h) **“Generally available information”** means information that is accessible to the public on a non- discriminatory basis;

(i) **“Immediate relative”** means a spouse of a connected 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;

(j) **“Insider”** means any person who is:

- i) a connected person; or
- ii) in possession of or having access to unpublished price sensitive information;

(k) **“Promoter”** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof;

- (l) "**Regulations**" means the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time. (herein referred as 'the regulations')
- (m) "**Key Managerial Persons (KMP)**" means Chairman-cum-Managing Director, Director (Finance) and Company Secretary of CEINSYS or as may be defined by the Board of Directors of CEINSYS from time to time.
- (n) "**Regulations**" means the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time. (herein referred as 'the regulations')
- (o) "**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;
- (p) "**Trading**" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;
- (q) "**Trading day**" means a day on which the recognized stock exchanges are open for trading;
- (r) "**Unpublished price sensitive information**" means any information, relating to CEINSYS or its securities, directly or indirectly, that is not generally available and 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 and such other transactions; and
 - (v) changes in key managerial personnel;

2.2 Words and expressions used and not defined here or in the regulations 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 legislations.

CHAPTER II

A] RESTRICTIONS ON COMMUNICATION AND TRADING BY INSIDERS

1. Prohibition on communication or procurement of unpublished price sensitive information

1.1 Except as provided in the code or the regulations, no insider shall communicate, provide, or allow access to any unpublished price sensitive information relating to CEINSYS 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.

1.2 No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to CEINSYS, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

1.3 Policy for determination of “Legitimate Purpose”

“Legitimate Purpose” shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with Government Agencies/Authorities, partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, and such other persons as may be prescribed by the Chairman-cum-Managing Director from time to time, provided that such sharing has not been carried out to evade or circumvent the prohibitions of this Code.

While deciding the legitimate purpose following shall be taken into consideration:

- i. Nature of information being shared.
- ii. Person to whom the information is being given.
- iii. Whether information may be categorized under unpublished price sensitive information.
- iv. Whether confidentiality clause is added in the information.
- v. Whether it is necessary to share such information with other persons.

1.4 Any person in receipt of unpublished price sensitive information pursuant to a “legitimate purpose” shall be considered an “insider” for purposes of these regulations and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with these regulations.

2. Trading when in possession of unpublished price sensitive information

2.1 Except as provided in the code or the regulations, no insider shall trade in securities of CEINSYS when in possession of unpublished price sensitive information.

***Explanation:** When a person who has traded in securities has been in possession of unpublished price sensitive information, his trades would be presumed to have been motivated by the knowledge and awareness of such information in his possession.*

3. Trading Plans

3.1 (a) An insider, if so desires, may formulate a trading plan for trading in the securities of CEINSYS 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.

(b) Compliance Officer shall make public disclosure of such trading plan.

3.2 The trading plan shall:–

(i) not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;(e.g. Trading can be done only after 6 months after the public disclosure of plan.

(ii) not entail trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced by CEINSYS and the second trading day after the disclosure of such financial results; (e.g. Insider can trade only 20 trading days prior to the last day of any financial period for which results are required to be announced by CEINSYS and after 2 days of announcement of financial results of each Quarter.)

(iii) entail trading for a period of not less than twelve months; (e.g. It is not desirable to have frequent announcements of trading plans. Insider presenting trading plan on 1st of January can start trading from 1st July till 30th June of the next year. However, it would be required to submit a trading plan on 1st January of every year for trading in future.)

(iv) not entail overlap of any period for which another trading plan is already in existence;

(v) set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected;

(vi) not entail trading in securities for market abuse.

3.3 The trading plan once approved by the compliance officer shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.

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. In such event, the compliance officer shall confirm that the commencement ought to be deferred until such unpublished price sensitive information becomes generally available information so as to avoid a violation of the code and the regulations.

3.4 After approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges (BSE) on which the securities of CEINSYS are listed. The format of Trading Plan and format for Public disclosure has been annexed as **Form E**.

CHAPTER III

A] DISCLOSURES OF TRADING BY INSIDERS

4. General provision

4.1 Every public disclosure under the code shall be made in **Forms** annexed hereto.

4.2 The disclosures to be made by any person shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.

4.3 The disclosures of trading in securities shall also include trading in derivatives of securities, if any, and the traded value of the derivatives shall be taken into account for purposes of threshold value of the permissible limit of the trade.

4.4 The disclosures shall be maintained by CEINSYS for a minimum period of five years and a register shall be maintained giving brief of the disclosures which will be duly initialled by the Compliance Officer.

5. Disclosures by certain persons

5.1 Initial Disclosures

(a) Every promoter, key managerial personnel and director of CEINSYS shall disclose his holding of securities of the company to the company within **30 days** after the code come into force.

(b) Every person on appointment as a key managerial personnel or a director of CEINSYS or upon becoming a promoter shall disclose his holding of securities of the company as on the date of appointment or becoming a promoter, to the company within **7 days** of such appointment or becoming a promoter.

Disclosure in respect of (a) and (b) shall be submitted in **Form-A and Form-B** annexed hereto.

5.2 Continual Disclosures.

(a) Every promoter, designated person and director of CEINSYS shall disclose to the company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of **ten lakh rupees**. Disclosure regarding the same shall be submitted in **Form-C** annexed hereto.

(b) The Compliance Officer shall notify the particulars of such trading to the stock exchange B S E) within two trading days of receipt of the disclosure or from becoming aware of such information.

5.3 Disclosures by other connected persons

CEINSYS may require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the company in **Form-D** on quarterly basis in order to monitor compliance with these regulations.

5.4 Annual Disclosure

Designated persons shall disclose names and Permanent Account Number or **any other identifier** authorized by law, of the following persons to the company on an annual basis and as and when the information changes in **Form- H**:

(a) immediate relatives

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

(c) Phone, mobile and cell numbers which are used by them.

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

CHAPTER –I

A] CODE OF FAIR DISCLOSURE

Company Secretary (Compliance Officer) shall be Chief Investor Relations Officer and deal with dissemination of information and disclosure of unpublished price sensitive information. **CEINSYS shall-**

1. promptly make public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available,
2. uniformly and universally disseminate the unpublished price sensitive to avoid selective disclosure,
3. promptly disseminate the unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise and shall make such information generally available,
4. appropriately and fairly respond to the queries on news reports and shall request for verification of market rumours by regulatory authorities,
5. ensure that information shared with analysts and research personnel is not unpublished price sensitive information,
6. make transcripts or records of proceedings of meetings with analysts and other investor relations conferences and put it on its website, in order to ensure official confirmation and documentation of disclosures made and
7. handle all unpublished price sensitive information on a need-to-know basis.
8. ensure that the Compliance Officer maintains a structured digital database containing the names of such persons or entities as the case may be with whom unpublished price

sensitive 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 checks such as time stamping and audit trails to ensure non-tampering of the database.

9. serve necessary notice, as may be required, upon designated persons and persons considered having unpublished price sensitive information.

CHAPTER V

A] STANDARDS FOR CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSON

1. The compliance officer shall report to the Board of directors and in particular, shall provide reports to the Chairman of the Audit Committee or to the Chairman of the Board of Directors if there is no chairman of audit committee, on half yearly basis . The Board shall be informed regarding compliances of the code on half yearly basis.

2. CEINSYS will not communicate unpublished price sensitive information to any person except in furtherance of the legitimate purposes, performance of duties or discharge of legal obligations.

3. The company will follow Chinese Wall Policy to prevent the misuse of confidential information. A “Chinese Wall” policy separates people into two groups, one, the Insiders (referred as the “Designated Persons”) possessing the unpublished price sensitive information and second, the Outsiders (i.e. the Public or a person below designated person). As per “Chinese Wall” policy, the designated person (termed as person of Insider Area) is not allowed to communicate the unpublished price sensitive information to other person in organization (termed as person of Public Area). In order to comply with the policy, the Compliance Officer shall take declaration in the form of an Undertaking from the designated person (**Form-G**) on quarterly basis, to ensure that, they have not communicated any price sensitive information to any outsider. There will be a wall between all the departments of the company in sharing the price sensitive information.

4. Designated persons and immediate relatives of designated persons in the company shall be governed by this internal code of conduct governing dealing in securities of the company.

5. If a designated person, having possession of the price sensitive information, intends to communicate the same in order to fulfill his legal obligations, then, he must ensure that any provisions of the applicable acts/laws/regulations or guidelines of the Government are not

violated and the information is not used for trading purpose in securities of CEINSYS. He shall make a disclosure in this regard to the compliance officer.

6. As present, CEINSYS is having only one kind of security (i.e. equity shares), the trading in the shares shall be covered under the code. The compliance officer is entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any unpublished price sensitive information before approving any trade.

B] TRADING WINDOW

1. Designated persons and immediate relatives of designated person may execute trades subject to compliance with the code and the regulations. The company shall maintain a register giving details of trades. The register shall be termed as the notional trading window for the purpose of monitoring trading by designated persons.

2. The trading restriction period shall commence not later than end of every quarter till 48 hours after declaration of financial results.

3. Audit Committee and Board Meeting, for approval of audited/unaudited accounts, shall preferably be held on the same day but not later than the next day from the conclusion of the meeting of Audit Committee.

4. Designated persons and their immediate relatives shall not trade in securities when the trading window is closed.

5. 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 hours after the information becomes generally available.

6. The trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

7. When the trading window is open, trading by designated persons shall be subject to pre-clearance (in **Form F**) by the compliance officer, if the value of the proposed trades is above Rupees one lakh. The pre-clearance of trades shall not be required for a trade executed as per the approved trading plan.

8. Trades that have been pre-cleared have to be executed by the designated person within 7 days of Pre- clearance, failing which fresh pre-clearance would be needed for the trades to be executed.

9. A designated person who is permitted to trade shall not execute a contra trade within 6 months. However, compliance officer may grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate the regulations.

10. If 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.

11. The designated persons shall make applications for pre-clearance, trades executed, reporting of decisions not to trade after securing pre-clearance, and for reporting level of holdings in securities at such intervals as may be determined as being necessary to monitor compliance with these regulations in the forms annexed with this code.

12. In case it is observed that there has been a violation of the code/ regulations, the Board shall be informed promptly.

CHAPTER VI

A] VIOLATION OF PROVISIONS

1. CEINSYS will ensure having a proper and effective mechanism in the form of internal control for prevention of insider trading.

2. CMD may take necessary disciplinary action as per extant rules of the company for violation of the code which may include wage freeze, suspension, recovery, clawback etc.

3. Any contravention of the Code or SEBI (Prohibition of Insider Trading) Regulations shall be dealt with by SEBI in accordance with the Act.

4. Any provisions contained in the Code shall, to the extent to which it is repugnant to the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 or any other law for the time being in force, be void.

5. Specimen formats are enclosed. In Case the periodical information is Nil, a Nil report should be submitted in the said format.

CHAPTER VII

A] POLICY AND PROCEDURE FOR INQUIRY IN CASE OF LEAK/SUSPECTED LEAK OF UNPUBLISHED PRICE SENSITIVE INFORMATION

1. CMD will constitute a committee for inquiry of leakage/suspected leakage of unpublished price sensitive information (UPSI).
2. CMD shall direct for inquiry of leakage/ may direct suspected leakage of UPSI.
3. The Committee shall conduct an internal inquiry into the leakage/suspected leakage of UPSI to determine possible role of following persons in this regard:
 - a) Persons / members of committees involved in generation of the original data for the purpose of determination of key figures pertaining to financial figures.
 - b) Persons involved in the consolidation of the figures for the financial results.
 - c) Persons involved in the preparation of board notes and presentations.
 - d) Persons involved in dissemination of information relating to financial results in the public domain.
 - e) Any other persons who had access to the information.
4. The inquiry shall be completed within a period of 1 month from the date of order of inquiry.
5. The Committee shall submit its report to the CMD within 3 days from the completion thereof.
6. In accordance with this code and company's rules, as applicable, appropriate action shall be taken against those persons who are found responsible for the leakage of UPSI.
7. The Compliance officer shall submit the findings in the report of inquiry committee to the SEBI promptly.

Form-A.

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (1) (a) read with Regulation 6 (2) – Initial disclosure to the company]

Name of the company: _____

ISIN of the company: _____

Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoters / KMP / Directors/immediate relative to/others etc.	Securities held as on the date of regulation coming in to Force		% of Shareholding
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5

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 of the company held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

Open Interest of the Future contracts held as on the date of regulation coming into force			Open Interest of the Option Contracts held as on the date of regulation coming into force		
Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
6	7	8	9	10	11

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

Name & Signature: _____

Designation: _____

Date: _____

Place: _____

FORM-B

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (1) (b) read with Regulation 6 (2) – Disclosure on becoming a Director/KMP/Promoter]

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 of a listed company and other such persons as mentioned in Regulation 6(2)

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP /Directors/immediate relative to/others etc.)	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
			Type of security (For e.g. –Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5	6

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 of the company 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)

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		
Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
6	7	8	9	10	11

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

Name & Signature:

Designation:

Date:

Place:

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

Name of the company: _____

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

Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of Contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
15	16	17	18	19	20	21

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

Name & Signature:

Designation:

Date:

Place:

FORM D
SEBI (Prohibition of Insider Trading) Regulations, 2015
Regulation 7(3) – Transactions by Other connected persons as identified by the company

Details of trading in securities by other connected persons as identified by the company

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

Details of trading in derivatives by other connected persons as identified by the company

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
15	16	17	18	19	20	21

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

Name & Signature:
 Designation:
 Date :
 Place:

FORM E
(Under clause 6.1)

*TRADING PLAN TO BE SUBMITTED FOR PUBLIC DISCLOSURE AND
APPROVAL AND SUBMISSION TO STOCK EXCHANGE*

I....., (Name, designation & dept.)
residing at.....as required under the Code hereby submit the following information:-

1. Period of Trading plan: From.....To.....
2. Cool off Period of 6 months end on:
3. Number of Security seeking clearance
4. Value of trades to be effected:
5. Nature of Trade:
6. Intervals (or Date) on which trade shall be effected:

I declare and undertake that:

- (1) Trading plan once approved shall be irrevocable.
- (2) I shall mandatorily implement the plan once approved.
- (3) Implementation of this plan shall not commence if any unpublished price sensitive information in my possession at the time of presenting this plan has not become generally available till the time of commencement of implementation.
- (4) Trading plan would not mean absolute immunity from bringing proceeding for market abuse.
- (5) I have no access to, nor do I have any information, that could be construed as “Price Sensitive Information” as defined in the code up to the time of signing this undertaking.
- (6) In the event that I have access to or received any information that could be construed as “Price Sensitive Information” as defined in the code after the signing of this Undertaking but before executing the transaction for which approval is sought, I shall inform the compliance officer of the same and shall completely refrain from dealing in securities of the company until such information becomes public.
- (7) I have not contravened the provisions of the code for prohibition of Insider Trading, as notified by the company from time to time.
- (8) I have made full and true disclosure in the matter.

Signature:

Name;

Designation:

Dept & EMP No.:

Date:

FORM-F

(Under Chapter V (B), Clause 7)

APPLICATION FOR PRE-CLEARANCE

Through: Division / Department Head

With reference to the Code for prohibition of Insider Trading of shares/securities of Ceinsys Tech Ltd, seek on behalf of myself / my relatives, your approval to subscribe to / agree to subscribe to / purchase / sell /deal as an agent /principle in..... (nos.) shares/securities of the Company value of which is Rs.....on the basis of closing market price as on.....(BSE/NSE).

I do hereby confirm that I have no access to nor do I have any information that could be construed as “Price Sensitive Information” as defined in the code up to the time of application and I have not contravened the provisions of the Code and the regulations particularly the one related to the Price sensitive information.

Details of shareholdings held as on the date of application for pre-clearance:

1. No. of securities held:
2. Approx Market Value Rs.

Signature:
Name:
Designation
Dept. & EMP No.:

Note: Pre-clearance will be required only if the value of the proposed trades is above one lakh rupees

PRE-CLEARANCE ORDER

This is to inform you that your request No..... dated for dealing by yourself / your Dependents in.....(Nos.) securities of the Company, as mentioned in your above mentioned application, is approved. Please ensure that the said transaction must be completed in accordance with the code on or before(date), i.e., within 7 days from today, failing which you are required to obtain the pre-clearance again.

For CEINSYS TECH LTD

Date :

COMPANY SECRETARY

FORM-G

(As per Chapter V (A), Clause 3)

UNDERTAKING TO BE SUBMITTED UNDER CHINESE WALL POLICY ON QUARTERLY BASIS BY DESIGNATED PERSONS

I,.....(Name, designation & dept.) residing at,
....., do hereby state that :-

1. I do have access to the information, that could be construed as “Price Sensitive Information” as defined in the code at the time of signing this undertaking.
2. I have not contravened the provisions of the code of conduct for prohibition of Insider Trading, as notified by the company from time to time.
3. If I have possession of the price sensitive information and I intend to communicate the same in order to fulfill my legal obligations, then, I must ensure that any provisions of the applicable acts/laws/regulations or guidelines of the Government are not violated and the information is not used for trading purpose in securities of Ceinsys Tech Ltd. I do hereby confirm, that, I have not communicated any price sensitive information to any outsider.
4. I have made full and true disclosure in the matter.

Date:

Signature:

Name;

Designation:

Dept & EMP No.:

FORM-H

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7.4 – Annual disclosure to the company]

Name of the company: _____

ISIN of the company: _____

Disclosure by Designated Persons and other identifiers as mentioned in Regulation 7.4

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoters / KMP / Directors / immediate relative to /others etc.	Securities held at the end of the year or as on the date of disclosure		% of Shareholding	Name of the Educational Institution from which designated person has graduated	Name of the past employer of the Designated persons
		Type of security (For eg. Shares Warrants,	No.			
1	2	3	4	5	6	7

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

Details of Open Interest (OI) in derivatives of the company by above persons

Open Interest of the Future contracts held as on the date of regulation coming into force			Open Interest of the Option Contracts held as on the date of regulation coming into force		
Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
8	9	10	11	12	13

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

Name & Signature:
 Designation:
 Date:
 Place

Registered Office -Nagpur

Ceinsys Tech Ltd. 10/5, IT Park, Opp . VNIT, Nagpur-440022.

Maharashtra, India

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Fax: +91 712 2249605

Corporate Office- Mumbai

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