



**CODE OF INTERNAL PROCEDURES AND CONDUCT FOR REGULATING, MONITORING AND REPORTING OF TRADING BY INSIDERS.
(Effective from 15th May, 2015)**

Introduction

Regulation 9(1) of the newly introduced SEBI (Prohibition of Insider Trading) Regulations, 2015 (the "Regulations") requires a listed company to formulate a Code of Conduct to Regulate, Monitor and Report Trading by its employees and other connected persons, towards achieving compliance with the said Regulations, adopting the minimum standards, set out in Schedule B to the Regulations.

Accordingly, a Code of Conduct to Regulate, Monitor and Report Trading by Insiders (the "Code") for Liberty Shoes Limited (the "Company") is hereby framed as under -

I. Definitions

1.1 "**Act**" means the Securities and Exchange Board of India Act, 1992.

1.2 "**Board**" means the Board of Directors of the Company.

1.3 "**Code**" or "**Code of Conduct**" shall mean the Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of trading by insiders of Liberty Shoes Ltd. as amended from time to time.

1.4 "**Company**" means Liberty Shoes Limited.

1.5 "**Compliance Officer**" means Company Secretary of the Company reporting to the Board of Directors and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board of Directors of the Company.

1.6 "**Connected Person**" shall generally include:-

(i) 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 by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the Company or holds any position including a professional or business relationship between himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.

(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. (e) an official of a stock exchange or of clearing house or corporation; or
- F. (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;
- 1.7 **"Dealing in Securities"** means an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in the securities of the Company either as principal or agent.
- 1.8 **"Director"** means a member of the Board of Directors of the Company.
- 1.9 **"Employee"** means every employee of the Company including the Directors in the employment of the Company.
- 1.10 **"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
- 1.11 **"Insider"** means any person who is,
(i) a connected person; or
(ii) in possession of or having access to unpublished price sensitive information.
- 1.12 **"Key Managerial Person"** means person as defined in Section 2(51) of the Companies Act, 2013
- 1.13 **"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:
- 1.14 **"Regulations"** shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.
- 1.15 **"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;
- 1.16 **"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 Window"** means the period during which trading may be carried out in Company's securities by Designated Persons.
- "Trading Plan"** ("TP") means a plan for dealing in securities of the Company for a period not less than 12 months by the persons who may be perpetually in possession of unpublished price sensitive information
- 1.17 **"Trading Day"** means a day on which the recognized stock exchanges are open for trading;
- 1.18 **"Unpublished Price Sensitive Information"** 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, delistings, disposals and expansion of business and such other
V. transactions;
VI. changes in key managerial personnel; and
VII. material events in accordance with the listing agreement and/or
VIII. Any such other information which may affect the price of securities
- 1.19 Other terms not specifically defined here shall have the same meaning as assigned under the SEBI (Prohibition of Insider Trading) Regulations, 2015.

II. Code

1. Reporting

The Compliance Officer shall report to the Board of Directors (“Board”) and in particular, shall provide reports to the Chairman of the Board, on a quarterly basis or at such frequency as may be stipulated by the Board.

2. Information on a need to know basis & Chinese Wall procedures

All information shall be handled within the organisation on a need-to-know basis and no unpublished price sensitive information shall be communicated to any person except in furtherance of the insider’s legitimate purposes, performance of duties or discharge of his/her legal obligations.

Norms for appropriate Chinese Walls procedures & processes will be as under –

- 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 advise or other departments providing support services, considered “public areas”.
- ii. The employees in the inside area shall not communicate any price sensitive information to any one in public area.
- iii. The employees in 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.
- v. In exceptional circumstances employees from the public areas may be brought “over the wall” and given Unpublished Price Sensitive Information on the basis of “need to know” criteria, under intimation to the Compliance Officer.

3. Designated Persons

The Chairman of the Board shall in consultation with the Compliance Officer specify the designated persons to be covered by such Code on the basis of their role and function in the organisation. Due regard shall be had to the access that such role and function would provide to unpublished price sensitive information in addition to seniority and professional designation.

4. Trading window

i. Designated Persons may execute trades subject to compliance with these Regulations. Towards this end, a notional Trading Window shall be used as an instrument for monitoring trading by the Designated Persons. The Trading Window shall be closed when the Compliance Officer determines that a Designated Person 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. Designated Persons and their immediate relatives shall not trade in securities when the trading window is closed.

1. The trading window shall remain closed for 1-2 weeks prior to the happening of any of the following events in general, as decided by Compliance Officer in consultation of Chairman of the Board:

ii. 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. The trading window shall also be applicable to any person having contractual or fiduciary relation with the Company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the Company

iii. In case of Employee Stock Option Plans (ESOPs), exercise of options may 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.

5. Trading Plan

b. Importance of Trading Plan

1. All Designated Person before possessing an UPSI may formulate a Trading Plan ('TP') and the same is required to be approved by the Compliance Officer subject to compliance of Code and Regulations
2. By virtue of TP, a designated Person can plan for trades to be executed by him/her in future
3. No pre-clearance would be required for dealing in the securities of the Company once the TP gets approved.
4. By doing so, the possession of UPSI when a trade under a TP is actually executed would not prohibit the execution of such trades as that was pre-decided even before the UPSI came into being.

c. Requisites of Trading Plan

1. A trading shall be executed on expiry of six months from the date of public disclosure of the TP
2. Trading as per TP shall not take place between 20th trading days prior to the last day of the financial period for which the results are required to be announced by the Company and 2 trading days after the disclosure of such financial results.
3. Designated Person shall give one TP at a time and the same shall not be less than 12 months i.e. there cannot be any overlapping of TP's
4. TP shall set out either the value of trades or the number of securities to be traded, along with specific dates and time intervals.
5. Trading on the basis of TP shall not lead to market abuse. If any manipulative activity is detected, it would open to initiate proceedings breach of SEBI (Prohibition of Fraudulent and Unfair Trade Practices relating to the Securities Market) Regulations, 2003.

d. Approval of Trading Plan

1. The Compliance Officer shall review the TP to assess whether such plan has any potential and in not in violation of the Regulations and shall be entitled to seek such express undertakings as may be considered necessary including but not limited to the effect that the applicant is not in possession of UPSI.
2. On the basis of such assessment, the Compliance Officer shall within 15 days of the receipt of TP, approve or dis-approve any trading plan so submitted. In case of dis-approval the Compliance Officer shall record the reasons for the same.

e. Notification to Stock Exchange(s)

The Compliance Officer shall notify the particulars of the approved TP to the stock exchange(s) where its securities are listed.

f. Execution of Trading Plan

1. TP once approved shall be irrevocable and has to be mandatorily implemented without any deviation.
2. The implementation of the TP shall be deferred if any UPSI in possession at the time of formulation of the plan has not become generally available at the time of commencement of implementation of such plan.

6. Pre-clearance & trades

- a. When the Trading Window is open, trading by designated persons shall be subject to preclearance by the Compliance Officer, if the value of the proposed trade(s) is above a minimum threshold limit of Rs. 10,00,000/- (Rupees Ten Lakh) in value over any calendar

quarter, or such other limits as the Board may stipulate. No Designated Person shall apply for pre-clearance of any proposed trade if such Designated Person is in possession of Unpublished Price Sensitive Information even if the Trading Window is not closed.

b. The Compliance Officer shall confidentially maintain a list as a “restricted list” as may be specified in the Regulations which shall be used as the basis for approving or rejecting applications for pre-clearance of trades.

c. Prior to approving any trades, the Compliance Officer shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any Unpublished Price Sensitive Information. He shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.

d. Order in respect of securities shall be executed within seven (7) trading days after approval is granted by the Compliance Officer, failing which fresh pre-clearance would be needed for the trades to be executed.

e. A Designated Person who is permitted to trade shall not execute a contra trade within a period of six (6) months following the prior transaction. Relaxation may be given from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate these Regulations. In the event, any such 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 SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

7. Disclosure Responsibilities & formats

A. Initial Disclosures of holdings

a) Every promoter, key managerial personnel and director of the Company shall disclose **(in Form A)** his holding of securities of the Company as on the date of these Regulations taking effect i.e. 15th May, 2015, to the Company within thirty (30) days of these Regulations taking effect;

b) Every person on appointment as a key managerial personnel or a director of the Company or upon becoming a promoter shall disclose **(in Form B)** his 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.

B. Continual Disclosures of trades

Every promoter, employee and director of the Company shall disclose to the Company **(in Form C)** 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 or after the prior disclosure made to the Company crosses the threshold limit as per Regulations i.e. aggregates to a traded value in excess of Rs. 10,00,000/- (Rupees Ten lakh) or such other value as may be specified;

The Company shall within a period of two (2) working days from the date of receipt of such disclosures, inform the Stock Exchanges particulars of such trading.

Any person/entities getting associated with the Company and falling within the ambit of ‘Insider’ shall make sure that their employees/associates are not in possession of UPSI enter into any securities trading pertaining to the Company. Also, such Insider or their employees and associates shall disclose the holdings and trading in the securities of the Company in Form D.

C. Other formats / disclosures, to monitor compliance with these Regulations would be as under –

Application for pre-clearance of trade (in **Form E**)

Undertaking for pre-clearance (as per **Form F**)

Report of execution of the deal of pre-clearance trade within 2 days of deal (as per **Form G**)

Reporting of holdings in securities by Designated Persons as on 31 March, on an annual basis by 10 April (as per **Form H**)

8. Penalty for contravention of Code of Conduct

i. Any contravention of these Regulations shall be dealt with by SEBI in accordance with the SEBI Act, and rules made thereunder.

ii. Any Designated Person contravening the Code will be liable to penalty and appropriate disciplinary action including remuneration freeze, suspension, dismissal etc. as may be decided by the Chairman of the Board in consultation with the Compliance Officer. Such disciplinary action shall be recommended by the Audit Committee and approved by the Board.

iii. The action by Company shall not preclude SEBI from taking any action in case of violation of Regulations.

9. Other Restrictions

i. A Designated Person who is permitted to trade shall not execute a contra trade within 6 month of such trade in securities of the Company. The Compliance Officer may be empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate these Regulations.

ii. Should a 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 Board for credit to the Investor Protection and Education Fund administered by the Board under the Act.

iii. In case it is observed by the Board of Directors that there has been a violation of Regulations, the Compliance Officer, being authorized by the Board of Directors, shall promptly inform SEBI.

10. Applicability of the Code to certain persons

The Regulations apply to certain persons who by being in any contractual, fiduciary or employment relationship or holding any position including a professional or business relationship with the Company whether temporary or permanent have access, directly or indirectly, to Unpublished Price Sensitive Information or are reasonably expected to allow such access. They are advised to adhere to the Regulations strictly. In case it is observed by such persons required to formulate a code of conduct under sub-regulation (1) and sub-regulation (2) of regulation 9, that there has been a violation of these Regulations, they shall inform SEBI promptly, with a copy to the Company.

11. Amendment to the Code

This Code and any subsequent amendment(s) thereto, shall be by way of a resolution by the Board of Directors and shall be circulated to Designated Persons as per the internal communication policy of the Company, if any.

This Code is subject to review from time to time. **LIBERTY SHOES LIMITED**

Regd. Office : Libertypuram, 13th Milestone, G.T. Karnal Road, Kutail, P.O. Bastara, Distt. Karnal, Haryana-132114

Corporate Identity Number (CIN) – L19201HR1986PLC033185

Form A

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

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

Name of the company: _____

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 No., CIN/DIN & address with contact nos	Category of Person (Promoters/ KMP / Directors/ immediate relatives/ others etc)	Securities held as on the date of regulation coming into force	% of Shareholding	Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option Contracts held as on the date of regulation coming into force
Type of security (For e.g. – Shares, Warrants, Convertible Debentures Etc.)	No.	Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)		Notional value in Rupee terms
1	2	3	4	5	6	7

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FORM B

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

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

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

Name of the company: _____

ISIN of the company: _____

LIBERTY SHOES LIMITED

Regd. Office : Libertypuram, 13th Milestone, G.T. Karnal Road, Kutail, P.O. Bastara, Distt. Karnal, Haryana-132114

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FORM C

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

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

Name of the company: _____

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 contact nos.	Category of Person (Promoters/ KMP / Director s/ immediate relative s/ others etc.)	Securities held prior to acquisition/disposal	Securities acquired/ Disposed	% of shareholding	Date of allotment advice/ acquisition of shares/ sale of shares specify	Date of intimation to company	Mode of acquisition (market purchase /public rights/ preferential offer / off market/ Inter-se transfer etc.	Trading in derivatives (Specify type of contract, Futures or Options etc)	Exchange on which the trade was executed
Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Pre transaction	Post transaction	From	To	Buy	Sell

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Form D (Indicative format)

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

Regulation 7(3) – Transactions by Other connected persons as identified by the company Name, PAN No., CIN/DIN & address of 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.)	Trading in derivatives (Specify type of contract, Futures or Options etc)	Exchange on which the trade was executed
Type of security (For eg. – Shares, Warrants, Convertible Debenture	No.	Type of security (For eg. – Shares, Warrant	No.	Pre transaction	Post transaction	From	To	Buy	Sell

es etc.)				s, Conver tible Debent ures etc.															
Value					Number of units (contracts * lot size)					Value					Number of units (contracts * lot size)				
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17			

Form - E

APPLICATION FOR PRE-DEALING APPROVAL

Date:

To,

The Compliance Officer,

Liberty Shoes Limited,

Libertypuram, 13th Milestone,

G.T. Karnal Road, Kutail, P.O. Bastara,

Distt. Karnal, Haryana-132114

SUBJECT : Application for Pre-dealing approval in shares of the Company

Dear Sir/Madam,

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct for to Regulate, Monitor and Report Trading by Insiders, I seek approval to purchase / sale/ subscription of _____ equity shares of the Company as per the details given below : 1		Name of the applicant
2		Designation
3		Number of shares held as on date
4		Folio No. / DP ID / Client ID No.)
5	The proposal is for	(a) Purchase of shares (b) Subscription to shares (c) Sale of shares
6		Proposed date of dealing in shares
7		Estimated number of shares 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 through stock exchange or off-market deal
11		Folio No. / DP ID / Client ID No. where the shares will be credited / debited

FORM - F

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

UNDERTAKING

To,

Liberty Shoes Limited,

Libertypuram, 13th Milestone,

G.T. Karnal Road, Kutail, P.O. Bastara,

Distt. Karnal, Haryana-132114

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

I further declare that I am not in possession of or otherwise privy to any Unpublished Price Sensitive Information (UPSI) (as defined in the Company's Code of Conduct to Regulate, Monitor and Report Trading by Insiders, (the Code) up to the time of signing this Undertaking.

In the event that I have access to or received any information that could be construed as "Unpublished Price Sensitive Information "(UPSI) as defined in the Code, after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the shares of the Company until such Unpublished Price Sensitive Information (UPSI) becomes public.

I declare that I have not contravened the provisions of the Code as notified by the Company from time to time.

I undertake to submit the necessary report within two days of execution of the transaction / a 'Nil' report if the transaction is not undertaken.

If approval is granted, I shall execute the deal within 7 days of the receipt of approval failing which I shall seek pre-clearance.

I declare that I have made full and true disclosure in the matter.

Place:

Date : Signature : _____

* Indicate number of shares

Form - G

DISCLOSURE OF TRANSACTIONS

(To be submitted within 2 days of transaction / dealing in shares of the Company)

To,

The Compliance Officer,

Liberty Shoes Limited,

Libertypuram, 13th Milestone,

G.T. Karnal Road, Kutail, P.O. Bastara,

Distt. Karnal, Haryana-132114

I hereby inform that I

- have not bought / sold/ subscribed any shares of the Company.

• _____ have bought/sold/subscribed to _____ shares mentioned below on _____ (date) Name and PAN of holder	No. of shares dealt with	Bought/sold/subscribed	DP ID/Client ID / Folio No	Value (Rs.)

FORM -H

ANNUAL DISCLOSURE OF SHARES

(As per Regulation _____)

(To be submitted within 10 days of the end of the Financial Year)

To,

The Compliance Officer,

Liberty Shoes Limited,

Libertypuram, 13th Milestone,

G.T. Karnal Road, Kutail, P.O. Bastara,

Distt. Karnal, Haryana-132114

I, _____, in my capacity as _____ of the Company hereby submit the following

details of equity shares held in the Company as at the end of the financial year i.e 31st March

Name, PAN No. & Address of Promoter / Person who is part of Promoter Group/ Director / Key Managerial Personnel	Beneficiary Account No. / CLID / Folio No.	No. of shares / voting rights held by the Promoter / Person who is part of Promoter Group/ Director / Key Managerial Personnel	% of shares / voting rights held by the Promoter / Person who is part of Promoter Group/ Director / Key Managerial Personnel	Date of intimation of initial disclosure to the Company
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Pursuant to the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code to Regulate, Monitor and Report Trading by Insiders, I hereby declare that I have the following immediate relatives as defined in the Regulations :

II. Details of immediate relative(s) :

Sr.No	Name of the immediate relative(s)*	Relation with Promoter, Director / Key Managerial Personnel
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Name, & Address of the Relative(s)	PAN No. of the Relative	Beneficiary Account No. / CLID / Folio No.	No. of shares held	% of shares
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III. Details of Shares held by immediate relative(s) :

Date : _____ Signature : _____

* **"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

