

CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING
[Pursuant to SEBI, (Prohibition of Insider Trading) Regulations, 2015]

OBJECTIVE OF THE CODE

This Code of Conduct is intended to prevent misuse of Unpublished Price Sensitive Information by Insiders.

The Code of Conduct adopted by Board of Directors of the Company at its meeting held on 14.05.2015 and shall be effective from 15.05.2015.

BACKGROUND

The Board of Directors of the Company have formulated and adopted this Code in compliance with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 .

2.DEFINITIONS: For the purpose of this Code:

- (i) **“Company”** means Vippy Spinpro Ltd.
- (ii) **“Code”** means this Vippy Spinpro Ltd. Code of Conduct for Prevention of Insider Trading, as modified from time to time.
- (iii) **“Act”** means the Securities and Exchange Board of India Act, 1992;
- (iv) **“Board”** means the Securities and Exchange Board of India
- (v) **“Regulations”** means the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time;
- (vi) **“Connected Person”** means-
 - a) 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the company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.

- b) 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,
- c) an immediate relative of connected persons specified in clause (i); or
- d) a holding company or associate company or subsidiary company; or
- e) an intermediary as specified in section 12 of the Act or an employee or director thereof; or
- f) an investment company, trustee company, asset management company or an employee or director thereof; or
- g) an official of a stock exchange or of clearing house or corporation; or
- h) 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
- i) 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
- j) an official or an employee of a self-regulatory organization recognized or authorized by SEBI; or
- k) a banker of the company; or
- l) 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;

(vii) **“Director”** means a member of the Board of Directors of the Company;

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

(Information published on the website of a stock exchange, would ordinarily be considered generally available.)

(ix) **“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;

- (x) **“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.
- (xi) **“Insider”** means any person who is:
 - a) a connected person; or
 - b) in possession of or having access to unpublished price sensitive information;
- (xii) **“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.
- (xiii) **“Stock Exchange”** means:
 - a). Bombay Stock Exchange
- (xiv) **“Trading”** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;
- (xv) **“Trading Day”** means a day on which the recognized stock exchanges are open for trading where securities of the Company are listed;
- (xvi) **“Trading Window”** means trading period for trading in the Company’s Securities. All days shall be the trading periods except when trading window is closed;
- (xvii) **“Unpublished Price Sensitive Information”** or **“UPSI”** means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: –
 - 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 listing agreement.
- (xviii) **“Insider”** means any person who is or was connected with the company or is deemed to have been connected with the company and who is reasonably expected to have access to unpublished price sensitive information in respect of securities of a company or who has received or has had access to such unpublished price sensitive information.

(xix) **“Takeover Regulations”** means the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.

(xx) **“Key Managerial Personnel”** shall include the following personnel:

- a) Managing Director, Chief Executive Officer;
- b) Whole-time Director;
- c) Company Secretary
- d) Chief Financial Officer and
- e) such other officer as may be prescribed under the Companies Act, 2013;

(xxi) **“Designated Employee”** means :-

- a) All Directors of the company
- b) Every Key Managerial Personnel
- c) every employee in the grade of General Manager and above in the Company
- d) every employee in Secretarial Department of the Company
- e) Senior Manager and above of Finance & Accounts, Department of Company
- f) Such other employee as may be determined by company from time to time.

3. COMPLIANCE OFFICER

The Company Secretary or such other officer of the Company as may be designated by the Board of Directors as such shall be the Compliance Officer (“the Compliance Officer”) for the purposes of the Regulations.

The Compliance officer shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of "Unpublished Price Sensitive Information", pre-clearing; of designated employees' and their immediate relatives' trades (directly or through respective department heads as decided by the company), monitoring of trades and the implementation of the code of conduct under the overall supervision of the Board of the Directors.

The Compliance Officer shall maintain records as mentioned in this Code, as received from time to time, for a period of five years.

The Compliance Officer shall report to the Board of Directors for the purpose of the Code and in particular, shall provide reports to the Chairman of the Audit Committee and to the Chairman of the Board annually.

The compliance officer shall assist all the employees in addressing any clarifications regarding the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the company's code of conduct.

4. PRESERVATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI)

- (i) All Designated Employees and Connected Persons shall maintain the confidentiality of price sensitive information. All information shall be handled within the organization on a need-to-know basis(*i.e., UPSI should be disclosed only to those within the Company who need the same to discharge their duty and whose possession of UPSI will not give rise to a conflict of interest or appearance of misuse of the information*) 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 legal obligations.
- (ii) No insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, to any

person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

(iii) No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

(iv) Notwithstanding anything contained in the Code, an unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction that would:-

a) 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;

b) 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 2(two) trading days prior to the proposed transaction being effected in such form as the board of directors may determine.

(v) For the purpose of the above sub clause (iv), the Board of Directors shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the purpose of aforesaid sub clause (iv) and shall not otherwise trade in securities of the company when in possession of unpublished price sensitive information.

(vi) For the purpose of prompt public disclosure of UPSI, the Company also adopts the Code regarding practice & procedure for Fair Disclosure set out at **Annexure-1**.

5. TRADING WHILE IN POSSESSION OF UPSI

No Insider shall trade in securities that are listed or proposed to be listed on a stock exchange when in possession of UPSI, provided that the Insider may prove his/her innocence by

demonstrating the circumstances including the following:

- (i) The transaction is an off-market inter-se transfer between Promoters who were in possession of the same UPSI without being in breach of aforesaid clause-4 of the code of conduct (regulation 3) and both parties had made a conscious and informed trade decision.
- (ii) In case of non- individual Insiders :
 - a) The individuals who were in possession of such UPSI were different from the individuals taking trading decisions and such decision-making individuals were not in possession of such UPSI when they took the decision to trade; and
 - b) Appropriate and adequate arrangements were in place to ensure that the Regulations/code are not violated and no UPSI was communicated by the individuals possessing the information to the individuals taking Trading decisions and there is no evidence of such arrangements having been breached.
- (iii) The trades were pursuant to a trading plan set up in accordance with the Regulation/Code.

In the case of Connected Persons the onus of establishing, that they were not in possession of UPSI, shall be on such Connected Persons and in other cases, the onus would be on SEBI.

6.PROHIBITION ON FORWARD DEALINGS IN SECURITIES BY DIRECTORS OR KMP

No Director/ Key Managerial Personnel of the company shall buy in the company or in its subsidiary or associate company—

- (i) a right to call for delivery or a right to make delivery at a specified price and within a specified time, of a specified number of relevant shares or a specified amount of relevant debentures; or
- (ii) a right, as he/ she may elect, to call for delivery or to make delivery at a specified price and within a specified time, of a specified number of relevant shares or a specified amount of relevant debentures.

Explanation—For the purposes of this clause, “relevant shares” and “relevant debentures” mean

shares and debentures of the company in which the concerned person is a Whole-time Director or other Key Managerial Personnel or shares and debentures of the subsidiary companies /associates companies.

7. TRADING WINDOW

Trading Window means trading period for trading in company's securities. All days shall be the trading period except when trading window is closed. When the trading window is closed, all directors / designated employees and their immediate relative shall not buy/sell in the company's securities during the closure of "Trading Window" in such period. The trading window shall be closed during the following period:

- (i) 7(seven) days prior to Board Meeting for declaration of quarterly, half- yearly and annual financial results till 2(two) days after the announcement of the financial results for the relevant period to the Stock Exchanges.

- (ii) From the date of circulation of the agenda of the meeting of the Board of Directors ,in which any material, price sensitive and unpublished event, including the following are proposed :
 - a) dividends;
 - b) change in capital structure;
 - c) mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
 - d) changes in key managerial personnel; and
 - e) material events in accordance with the listing agreement.

However, if the circumstances so allows the time for closing the window may be increased or decreased with the approval of Compliance Officer and Managing Director.

The trading window shall open after 2 (two) days of close of board meeting at which decisions in respect of the above events are taken.

Designated Employee and their immediate relative shall conduct all their trading in the Securities of the Company only in a valid trading window and shall not trade in any transaction involving the purchase or sale of the company securities during the periods when the trading

window is closed or during any other period as may be specified by the company from time to time.

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

8. TRADING PLANS

- (i) An insider shall be entitled to formulate a Trading Plan and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.
- (ii) Such trading plan shall:—
 - a) not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the Trading Plan.
 - b) 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 such financial results;
 - c) entail trading for a period of not less than twelve months;
 - d) not entail overlap of any period for which another trading plan is already in existence;
 - e) set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
 - f) not entail trading in securities for market abuse.
- (iii) The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of the Regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.
- (iv) The trading plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.

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 and 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.

- (v) Upon approval of the trading plan, the Compliance Officer shall notify the plan to the stock exchanges on which the securities are listed.

9. PRE-CLEARANCE OF TRADES

- (i) All Designated Employees and their immediate relative who intend to trade in the securities of the company above a minimum of 5000 share per transaction, should pre-clear the transactions as per the pre-dealing procedure as described hereunder.
- (ii) An application shall be made in Form set out at **Annexure-2** to the compliance officer indicating the estimated number of securities that the designated employee intends to trade in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the company in this behalf.
- (iii) All Designated Employees and their immediate relatives shall execute their order in respect of securities of the company within 7(seven) trading days after the approval of pre-clearance is given. If the order is not executed within the aforementioned specified period, the Designated Employee must pre-clear the transaction again.
- (iv) Designated Employee or his/ her immediate relative who have obtained the pre- clearance are required to submit a report of the transactions done (including a NIL report, if no transaction is done within 9 days) within seven days from the expiry of the specified time period to Compliance Officer in form and manner as specified in **Annexure -3** of the Code.
- (v) No Designated Employee or his/ her immediate relative shall apply for pre-clearance of any proposed trade when the trading window is closed or if he/ she is in possession of

unpublished price sensitive information.

(vi) 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.

(vii) It shall be the responsibility of Designated Employees to ensure compliance of aforesaid clauses in case of their immediate relatives also.

(viii) All Designated Employees and their relative who buy or sell any number of shares of the company shall not execute a contra trade i.e. sell or buy any number of shares during the next six months following the prior transaction.

(ix) The 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.

(x) 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 SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

10.LIMITED ACCESS TO CONFIDENTIAL INFORMATION

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and pass word etc. without prejudice to the above.

11.DISCLOSURES BY CERTAIN PERSONS

Every promoter, key managerial personnel, and director of the Company shall disclose his/her holding of Securities of the Company as on the date of the regulations taking effect to the Company within 30 days of the Regulation taking effect.

Every person on appointment as a key managerial personnel or a director 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 7 days of such appointment or becoming a Promoter.

a) **Continual Disclosure**

Every promoter, employee and director of the Company shall disclose to the Company the number of securities acquired or disposed of within 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, aggregates to a traded value in excess of Rs. 10,00,000 or such other value as may be specified by SEBI.

b) **Disclosure by the Company**

Company shall notify the particulars of Trading to the Stock Exchanges within 2 trading days of receipt of the disclosure or from becoming aware of such information.

12. PENALTY FOR CONTRAVENTION OF THE CODE

- (i) All Designated Employees and Connected Persons who trades in securities or communicates any information for trading in securities in contravention of the code of conduct may be penalized and appropriate action may be taken by the Company.
- (ii) All Designated Employees who violate this Code of Conduct shall also be subject to disciplinary action by the company, which may include wage, salary freeze, suspension, withholding of promotions etc.
- (iii) The action by the Company shall not preclude SEBI from taking any action in case of violation of the Regulations.
- (iv) In case it is observed by the Company and/or Compliance Officer that there has been violation of the Regulations, SEBI shall be informed by the Company.

13. UPLOADING OF CODE ON WEBSITE

This Code and any amendments thereto shall be available on the website of the Company.

14. AMENDMENT

The Board of the Company reserves its right to amend or modify this Code in whole or in part, at any time without assigning any reason whatsoever.

15. DISCLOSURE REQUIREMENTS

Initial Disclosures

By Whom	What to be disclosed	When to be disclosed	Form
Promoter/ Director/ to Compliance Officer KMP the	Holding of securities of the Company as on the date of this Code taking effect i.e. 15.05.2015.	Within 30(thirty days) of this Code taking effect i.e. 15.05.2015	In Prescribed Form
Promoter/ Director/ to Compliance Officer KMP the	Holding of securities of the Company as on date of appointment or becoming Promoter	Within 7(seven) days of such appointment or of becoming Promoter	In Prescribed Form

Continual Disclosures

By Whom	What to be disclosed	When to be disclosed	Form
Promoter/ Director/ Employee to the Compliance Officer	Number of such securities acquired or disposed	Within 2(two) trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 10 lakh or such other value as may be specified. <i>*disclosure of incremental transactions shall be made when transactions effected after the prior disclosure cross the threshold specified above.</i>	In Prescribed Form
Company	Details of above disclosure	Within 2(two) trading days of receipt of disclosure or becoming aware of such disclosure	In Prescribed Form

- (i) 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.
- (ii) The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account for purpose of aforesaid clause

All Designated Persons are advised to familiarize themselves with the SEBI Regulations and comply with the same, as well as with this Code. Designated Persons are also advised to ensure compliance by their Immediate Relatives.

CODE OF PRACTICE & PROCEDURE FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

[Under Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015]

1. The Company shall ensure prompt public disclosure of unpublished price sensitive information (UPSI) that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. The Company shall ensure follow uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. Company Secretary /Compliance Officer of the Company designated as the Chief Investor Relations Officer of the Company to deal with dissemination of information and disclosure of UPSI.
4. The Company shall make prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall ensure appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. The Company shall ensure that information shared with analysts and research personnel is not UPSI.
7. The Company shall develop best practices to make transcripts or record of proceedings of meetings with analyst and other investor relations conference on the official website to ensure official confirmation and documentation of disclosures made.
8. The Company shall handle all UPSI on a need-to-know basis.
9. This code shall come into effect from 15.05.2015

To,
The Compliance Officer,
Vippy Spinpro Ltd.

Dear Sir,

I am desirous of trading in the below-mentioned securities of the Company in my own name or on behalf of my immediate relatives (write name of relative and relationship) and seek your approval as under:

1.	Name of the applicant, Address ,&PAN(Name of the applicant, Address ,&PAN of the relatives , if the transaction is in the name of the immediate relatives)	
2.	Designation	
3.	Number of securities held as on date	
4.	Folio No. / DP ID / Client ID No.	
5.	The Proposal is for	a) Purchase of securities b) Subscription to securities c) Sale of securities
6.	Proposed date of trading in securities	
7.	Estimated number of securities proposed to be acquired/subscribed/sold	
8.	Price at which the transaction is proposed	
9.	Current market price (as on date of application)	
10.	Whether the proposed transaction will be through stock exchange or off-market deal	
11.	Folio No. / DP ID / Client ID No. where the securities will be credited / debited	

I hereby confirm and declare that:

1. I do not have any access to the unpublished price sensitive information and also have not received unpublished price sensitive information till today;
2. In case I, have access to the price sensitive information or receives it after approving the trading plan I shall inform the change and refrain from dealing in securities till the information becomes public;
3. If approval is granted, I shall execute the trade within 7 (seven)days of the receipt of approval failing which I shall seek pre-clearance again, if necessary.
4. I undertake to submit the necessary report within 2(two) days of execution of the transaction / a 'Nil' report if the transaction is not undertaken (within 9 days from the date of pre-clearance).
5. I have not contravened the code of conduct for prevention of insider trading as notified by the Company.
6. that whatever is stated above is true and correct to the best of knowledge and nothing has been concealed.

Yours truly,
Signature:
Name:
Designation:
Department:
Place:

Annexure-3

Format for Disclosure of Transactions

(To be submitted within 2 days of transaction in securities of the Company)

To
The Compliance Officer,
Vippy Spinpro Ltd.

I hereby inform that I

- have not bought/sold/subscribed any securities of the Company due to the following reason:
- have bought/sold/subscribed to -----securities as mentioned below on ----- (date)

Name of holder Address, PAN No.	No. of securities dealt with	Bought/sold/subscribed	DP ID/ Client ID/ Folio No	Price (Rs.)

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 3 years and produce to the Compliance Officer/SEBI any of the following documents:

1. Broker's contract note.
2. Proof of payment to/from brokers.
3. Extract of bank passbook/statement (to be submitted in case of demat transactions).
4. Copy of Delivery instruction slip (applicable in case of sale transaction)
5. Any other documents in connection with transaction

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

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

Signature: -----

Name:

Designation:

Date: -----

Format for Pre-clearance Order

To,

Name: -----

Designation: -----

Place: -----

This is to inform you that your request for dealing in ----- (nos) shares of the Company as mentioned in your application dated ----- is approved. Please note that the said transaction must be completed on or before ----- (date) that is within 7 days from today.

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

Yours faithfully,

Vippy Spinpro Ltd.

Compliance Officer

Date:

Disclosure of change in shareholding

The Compliance Officer,
Vippy Spinpro Limited

I, _____, in my capacity as _____ of the Company hereby submit the following details of change in holding of securities of the Company:

Name, PAN No. & Address				Trading Member Through Whom the Trade was Executed with SEBI Registration No. of the TM	Exchange On which The trade Was executed
Folio No. / DP ID / Client ID No.	No. of Securities held before the transaction	Receipt of Allotment Advice/ Acquisition of / sale of securities	Nature of transact ion & quantity		

Details of shares held by the immediate relatives

Name, PAN No. & Address				Trading Member Through Whom the Trade was Executed with SEBI Registration No. of the TM	Exchange On which The trade Was executed
Folio No. / DP ID / Client ID No. & Relations hip	No. of Securities held before the transaction	Receipt of Allotment Advice/ Acquisition of / sale of securities	Nature of transact ion & quantity		

I/We declare that I/We have complied with the requirement of the minimum holding period of six months with respect to the securities purchased/sold.

I hereby declare that the above details are true, correct and complete in all respects.

Signature: -----

Date:-----