



ACE INTEGRATED SOLUTIONS LIMITED

**CODE FOR PREVENTION OF INSIDER TRADING IN THE SECURITIES OF
ACEINTEG**



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ACE INTEGRATED SOLUTIONS LIMITED

CODE FOR PREVENTION OF INSIDER TRADING IN THE SECURITIES OF ACEINTEG

1. INTRODUCTION

For the protection of investors at large, Securities and Exchange Board of India ('SEBI') vide notification dated 15.01.2015 repealed the SEBI (Prohibition of Insider Trading) Regulations, 1992 and replaced the same with SEBI (Prohibition of Insider Trading) Regulations, 2015 and amended the same by SEBI from time to time to put in place a framework for fair Disclosure of Unpublished Price Sensitive Information and for prohibition of insider trading in securities and to strengthen the legal framework thereof.

In compliance with the PIT Regulations, Ace Integrated Solutions Limited had introduced a Code of Conduct for Regulating & Reporting Trading by Insiders (this "Code"). In line with the Companies (Amendment) Act, 2017 and SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018, the Board hereby adopted the revised Code for prevention of insider trading in the securities of ACEINTEG, which came into force with effect from the 1st day of April, 2019.

SEBI has further notified amendments in the year 2019, 2020, 2021 and 2022 in the SEBI (Prohibition of Insider Trading) Regulations, 2015, which have been covered in the revised Insider Trading code, which was adopted by the Board on 26.12.2022.

This Code has been made pursuant to Regulation 9 of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as the "**Regulations**").

2. OBJECTIVE OF THE CODE

The objective of the Code is to regulate, monitor and report trading by Designated Persons and immediate relatives of Designated Persons towards achieving compliance with SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended. The Code shall also provide for practices and procedures for fair disclosure of unpublished price sensitive information.

3. DEFINITIONS

In this Code, unless the context otherwise requires:

- (i) "**Act**" or "**SEBI Act**" means the Securities and Exchange Board of India Act, (15 of 1992; as amended.
- (ii) "**Board**" means the Securities and Exchange Board of India.
- (iii) "**Board of Directors**" means the Board of Directors of the Company.
- (iv) "**Company**" means Ace Integrated Solutions Limited (hereinafter called ACEINTEG).



- (v) **“Companies Act”** means The Companies Act, 2013.
- (vi) **“Compliance Officer”** means any senior officer, designated so and reporting to the board of directors or head of the organization in case board is not there, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations 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 listed Company. For this purpose “financially literate” shall mean a person who has the ability to read and understand basic financial statements i.e. balance sheet, profit and loss account, and statement of cash flows.”
- (vii) **“Connected Person”** means –
- (i) any person who is or has during the six months prior to the concerned act been associated with the Company, directly or indirectly, in any capacity including by reason of frequent communication with 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) an official of a stock exchange or of clearing house or corporation; or
 - (f) 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
 - (g) an official or an employee of a self-regulatory organization recognized or authorized by SEBI; or
 - (h) a banker of the Company; or
 - (i) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of the Company or his immediate relative



or banker of the Company, has more than ten per cent of the holding or interest.

(viii) “Designated Persons” means –

- (i) Members of the Board of Directors of ACEINTEG;
 - (ii) Chief Executive Officer, Chief Financial Officer and Company Secretary;
 - (iii) All employees of the Accounts, Finance, Secretarial, Compliance and Marketing Department of ACEINTEG
 - (iv) CFOs, CEOs and CSs of the Holding Company, Subsidiary Company, Associate Company* and Joint Venture of ACEINTEG;
 - (v) All the Functional and Departmental Heads of the Company;
 - (vi) Secretaries / Executive Assistants reporting to the Chairman and / or the Managing Director / any Executive Director / CFO;
 - (vii) Auditors of the Company;
 - (viii) All Promoters of the Company;
 - (ix) Employees of other Departments/Divisions on a case-to-case basis, who could reasonably be expected to have access to unpublished price sensitive information(s) relating to the Company, to be decided by the Compliance Officer;
 - (x) Any support staff of the Company, such as IT Department staff who have access to unpublished price sensitive information; and
 - (xi) Such other persons as may be identified by the Compliance Officer as per the directions of the Board.
- (ix) “Generally available information”** means information that is accessible to the public on a non-discriminatory basis. For this purpose the information published on the website of stock exchanges, would ordinarily be considered generally available.
- (x) “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.
- (xi) “Insider”** means any person who is:
- i) A Connected Person; or
 - ii) In possession of or having access to unpublished price sensitive information.



- (xii) **“Investor Protection and Education Fund”** means the Investor Protection and Education Fund created by the Board under section 11 of the Act;
- (xiii) **“Informant”** means an individual(s), who voluntarily submits to the Board a Voluntary Information Disclosure Form relating to an alleged violation of insider trading laws that has occurred, is occurring or has a reasonable belief that it is about to occur, in a manner provided under these regulations, regardless of whether such individual(s) satisfies the requirements, procedures and conditions to qualify for a reward;
- (xiv) **“Informant Incentive Committee”** means the High Powered Advisory Committee constituted by the Board in the manner as may be specified under regulation 11 of the Securities and Exchange Board of India (Settlement Proceedings) Regulations, 2018.
- (xv) **“Insider trading laws”** means the following provisions of securities laws, -
- i) Section 15G of the Act;
 - ii) Regulation 3 of these regulations;
 - iii) Regulation 4 of these regulations;
 - iv) Regulation 5 of these regulations; and
 - v) Regulation 9 or regulation 9A of these regulations, in so far as they pertain to trading or communication of unpublished price sensitive information.
- (xvi) **“irrelevant, vexatious and frivolous information”** includes, reporting of information which in the opinion of the Board, -
- i) Does not constitute a violation of insider trading laws; or
 - ii) Is rendered solely for the purposes of malicious prosecution; or
 - iii) Is rendered intentionally in an effort to waste the time and resource of the Board.
- (xvii) **“Key managerial personnel”**, in relation to the Company, means—
- i) the Chief Executive Officer or the Managing Director or the manager;
 - ii) the Company Secretary;
 - iii) the Whole-time Director;
 - iv) the Chief Financial Officer; and
 - v) such other officer as may be prescribed under the Companies Act
- (xviii) **“Legal Representative”** means a duly authorised individual who is admitted to the practice of law in India;
- (xix) **“Legitimate purpose”** shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibition of these regulations.
- (xx) **“Monetary Sanctions”** shall mean any non-monetary settlement terms or any direction of the Board, in the nature of disgorgement under securities laws aggregating to at least Rupees one crore arising from the same operative facts contained in the original information.



- (xxi) **“Need to Know”** basis means that unpublished price sensitive information should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to any conflict of interest or appearance of misuse of information.
- (xxii) **“Original Information”** means any relevant information submitted in accordance with these regulations pertaining to any violation of insider trading laws that is:-
- i) derived from the independent knowledge and analysis of the Informant;
 - ii) not known to the Board from any other source, except where the Informant is the original source of the information;
 - iii) is sufficiently specific, credible and timely to - (1) commence an examination or inquiry or audit, (2) assist in an ongoing examination or investigation or inquiry or audit, (3) open or re-open an investigation or inquiry, or (4) inquire into a different conduct as part of an ongoing examination or investigation or inquiry or audit directed by the Board;
 - iv) not exclusively derived from an allegation made in a judicial or administrative hearing, in a Governmental report, hearing, audit, or investigation, or from the news media, except where the Informant is the original source of the information; and
 - v) Not irrelevant or frivolous or vexatious.
- Explanation. – Information which does not in the opinion of the Board add to the information already possessed by the Board is not original information.
- (xxiii) **“own analysis”** means the examination and evaluation of the relevant information by the Informant that may be publicly available, but which reveals analysis that is not known to SEBI:
Provided that such analysis is not derived from professional or confidential communication protected under the Indian Evidence Act, 1872 (1 of 1872);
- (xxiv) **“own knowledge”** means relevant information in the possession of the Informant not derived from publicly available sources:
Provided that such knowledge is not derived from professional or confidential communications protected under the Indian Evidence Act, 1872 (1 of 1872);
- (xxv) **“Promoter”** and **“Promoter Group”** shall have same meaning assigned to it under Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any amendment thereof.
- (xxvi) **“Reward”** means any gratuitous monetary amount for which an Informant is declared eligible as per the provisions of these regulations;
- (xxvii) **“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.
- (xxviii) **“Securities laws”** means the Act, the Securities Contract (Regulations) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996), the relevant provisions of any other law to the extent it is administered by the Board and the relevant rules and regulations made thereunder;



- (xxix) **“Stock Exchanges”** means a stock exchange which is recognized by the Central Government or SEBI under Section 4 of Securities Contracts (Regulation) Act, 1956 (42 of 1956).
- (xxx) **“Takeover regulations”** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.
- (xxxi) **“Threshold limit”** means the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregating to a traded value of ten lakh rupees.
- (xxxii) **“Trading”** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly.
- (xxxiii) **“Trading day”** means a day on which the recognized stock exchanges are open for trading.
- (xxxiv) **“Trading Window”** means a trading period for trading in Company's Securities by Directors, Officers and Designated Persons or as specified by the Company from time to time.
- (xxxv) **“Unpublished price sensitive information”** (UPSI) means any information, relating to the Company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: –
- (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;
 - (v) changes in key managerial personnel;
 - (vi) Material events in accordance with Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015;
 - (vii) Such other information, as the Managing Director/Whole-time Director/Compliance Officer/CFO may prescribe from time to time.
- (xxxvi) **“voluntarily providing information”** means providing the Board with information before receiving any request, inquiry, or demand from the Board, any other Central or State authorities or other statutory authority about a matter, to which the information is relevant;.

4. FUNCTIONS, DUTIES AND RESPONSIBILITIES OF THE COMPLIANCE OFFICER



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

- (1) Setting forth policies, procedures and ensuring its compliance, monitoring adherence to the Code and Regulations for the preservation of unpublished price sensitive information, approval of trading plan, pre-clearance of trades and monitoring of trades and implementation of this Code.
- (2) Maintaining the record of the Promoters, Directors, Key Managerial Personnel, Designated Persons and other connected persons and incorporate changes from time to time.
- (3) Advising all Designated Persons not to trade in securities of the Company when the Trading Window is closed.
- (4) Advising all Directors, Promoters, members of the promoter group, Key managerial personnel and Designated Persons to furnish the details of transactions in the securities of the Company.
- (5) Obtaining disclosures from Promoters, members of the promoter group, Directors, Key Managerial Personnel and Designated Persons and to give information, in respect of the disclosures received, to all the Stock Exchanges where the securities are listed, as applicable.
- (6) Maintaining records of all disclosures as stated in clauses 12-14 of this Code and to report the same to the Chairman of the Audit Committee, on a half yearly basis.
- (7) Report to the Audit Committee/Board of Directors any amendment to SEBI (PIT) Regulations, 2015 and accordingly this code will be amended by Audit Committee/Board of Directors depending upon the effect of proposed amendment.

5. RESPONSIBILITY OF MANAGING DIRECTOR

The Managing Director of ACEINTEG shall formulate/amend this Code with the approval of the Board of Directors of the Company to regulate, monitor and report trading by its designated persons and their Immediate relatives towards achieving compliance with SEBI (Prohibition on Insider Trading) Regulations, 2015 (“PIT Regulations”), adopting the minimum standards set out in Schedule B of PIT Regulations, as may be amended from time to time, without diluting the provisions of its regulations in any manner.

6. COMMUNICATION OR PROCUREMENT OF UNPUBLISHED PRICE SENSITIVE INFORMATION

- (1) All information shall be handled within the organization on a need to know basis and no UPSI shall be communicated to any person except in furtherance of the insider’s legitimate purposes, performance of duties or discharge of his legal obligations.
- (2) 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.



For this Purpose, the term “Legitimate purpose” shall include sharing of unpublished price sensitive information in the ordinary course of business by an “Insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of such regulations.

- (3) The Board of Directors of the Company through the Compliance Officer shall ensure that a structured digital database is maintained containing the names of persons or entities, as the case may be, with whom information is shared under this Code along with the Permanent Account Number (PAN) or any other identifier authorized by law, where PAN is not available. Adequate internal controls and checks such as time stamping and audit trails should be maintained.
- (4) All Designated Persons need to ensure that the details of the Persons/Entities with whom UPSI is shared, is submitted to the Compliance Officer within 2 days to enable maintenance of the structured database.
- (5) Notwithstanding anything contained above, an unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction that would:–
 - (i) entail an obligation to make an open offer under the takeover regulations where the Board of Directors is of informed opinion that the sharing of such information is in the best interests of the Company;
 - (ii) not attract the obligation to make an open offer under the takeover regulations but where the Board of Directors is of informed opinion that the sharing of such information is in the best interests of the Company and the information that constitute unpublished price sensitive information is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the Board of Directors may determine to be adequate and fair to cover all relevant and material facts.
- (6) For purposes of sub-clause (5) above, the Board of Directors shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the purpose of sub-clause (5) above, and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information. Due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with these Regulations.

7. TRADING WHEN IN POSSESSION OF UNPUBLISHED PRICE SENSITIVE INFORMATION:

- (i) No insider shall either on his own behalf or on behalf of any other person trade in securities of ACEINTEG when in possession of Unpublished Price Sensitive Information.
- (ii) When an insider trades in securities while 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 unless proved otherwise as detailed under proviso to Regulation 4 (1) of the Regulations.



8. TRADING WINDOW

- (i) When the Trading Window is closed, Insider shall not trade in securities of ACEINTEG.
- (ii) Unless otherwise specified by the Compliance Officer, the Trading Window shall remain closed for the following events and shall remain open after 48 hours after the information is generally available / intimated to the Stock Exchanges.
- (iii) The Trading Window shall be closed from time to time as follows:

Sr. No.	Event/s	Date of Commencement & Date of Closure
1.	Board Meeting to consider Quarterly Unaudited Financial Results and its announcement to stock exchanges	Closing Period shall be: From the end of relevant Quarter till 48 hours after the date of Board Meeting for consideration of Quarterly Financial Results and announcement to the Stock Exchanges.
2.	Board Meeting to consider Audited Financial Results and declaration of dividend (if any)	Closing Period shall be: From the end of relevant Financial Year till 48 hours after the date of Board Meeting for consideration of Audited Financial Results and announcement to the Stock Exchanges
3.	Declaration of Dividends	From the date of Notice of Board Meeting to the Stock Exchanges for considering dividend till 48 hours after the declaration is conveyed to the Stock Exchanges.
4.	Issue of Securities by way of Public/Rights/Bonus	From the date of Notice of Board Meeting to the Stock Exchanges for considering Issue of Securities by way of Public/Rights/Bonus till 48 hours after the declaration is conveyed to the Stock Exchanges.
5.	Mergers, de-mergers, acquisitions, delisting, disposal and expansion of business and such other transactions.	Will be notified by the Company from time to time.
6.	Any buy back of securities	
7.	Disposal of the Whole or substantially the whole of undertaking. Any changes in policies, plan or operations of the Company	

- (iv) All Insiders shall conduct all their dealings in the securities of the Company only in a valid Trading Window after meeting the Trading Plans requirements. Further,



they should not enter into “Contra Trade” i.e. opposite or reverse transactions during the next six months following the prior transactions.

(v) Procedure for trading by Insiders:

All Insiders should adhere to the Trading Plans as follows, if they desire to trade in the shares / securities of ACEINTEG.

- a) The Company shall specify trading period called “Trading Window’ for trading in the Company's securities. When the Trading Window is closed, Insiders as specified from time to time shall not trade in the securities of ACEINTEG.
- b) Trading Window will be opened 48 hours after the Price Sensitive information is made Public.

(vi) In the case of Insiders, the onus of establishing, that they were not in possession of unpublished price sensitive information, shall be on such Insiders and in other cases, the onus would be on SEBI.

9. CHINESE WALL:

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

- (i) The employees in the inside area shall not communicate any Unpublished Price Sensitive Information to anyone in public area.
- (ii) The Company shall have process of maintaining securely, computer files containing confidential information and physical storage of documents relating to UPSI.
- (iii) All the unpublished price sensitive information is to be handled on “need to know basis”, i.e., Unpublished Price Sensitive Information should be disclosed only to those within ACEINTEG who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information. All the non- public information directly received by any employee should immediately be reported to the head of the department. In exceptional circumstances employees from the public areas may be brought "over the wall" and given confidential information on the basis of "need to know" criteria, under intimation to the Compliance Officer.

10. TRADING PLANS

- (i) An Insider shall be entitled to formulate a trading plan for dealing in securities of the Company and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his/her behalf in accordance with such plan in “**Annexure A**”.
- (ii) Such trading plan shall :-
 - a) not entail commencement of trading on behalf of the insider earlier than 6 months from the public disclosure of the 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 issuer of the securities and the second trading day after the disclosure of such financial results;
- c) entail trading for a period of not less than 12 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.

The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of this code and regulations and shall be entitled to seek such express undertaking as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.

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

- (iii) 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 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 and in any such similar event in future during the trading plan period, 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 sub-regulation (1) of regulation 4.

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

11. PRE-CLEARANCE OF TRADES

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

However, pre-clearance of trades shall not be required for a trade executed as Per an approved trading plan.



- (ii) All Designated Persons should pre-clear the transactions by making an application at least 15 days before next proposed closure date of trading window, if any in the format set out in “**Annexure B**”.
- (iii) Application along with Undertaking should be forwarded by the Insiders for clearance as follows:
 - a) to the Compliance Officer
 - b) for trades by Compliance Officer to C & MD.
- (iv) C&MD / Compliance Officer will consider the application and grant approval within 2 working days of receipt of application in the form of Approval for Pre-Clearance Deal only if the application is fully complete with all details.
- (v) An undertaking in “**Annexure C**” executed in favour of the Company, forming part of the Application Form as mentioned hereinabove, shall incorporate, inter alia, the following clauses:
 - a) That the Designated Person(s) and/or their immediate relative(s) does not have any access or has not received “Price Sensitive Information” up to the time of signing the undertaking.
 - b) That in case the Designated Person(s) and/or their immediate relative(s) has access to or receives “Price Sensitive Information” after the signing of the undertaking but before the execution of the transaction, he/ she shall inform the Compliance Officer of the fact and that he / she would completely refrain from dealing in the securities of the Company till the time such information becomes public.
 - c) That he / she has not contravened the Code of Conduct for prevention of Insider Trading as notified by the Company/SEBI from time to time.
 - d) That he / she has made a full and true disclosure in the matter.
 - e) All Designated Persons of the Company and their immediate relatives shall execute their order in respect of securities of the Company within 7 (seven) days after the approval of pre-clearance in “**Annexure D**” is given. If the order is not executed within 7 (seven) days after the approval is given, the Designated Person must obtain the pre- clearance for the transaction again.
 - f) The details of the transactions in securities of the ACEINTEG should be informed by the insiders to the Compliance Officers within 7 days of completion of the transactions as mentioned in para given below.
- (vi) Minimum Threshold Limit for Pre-clearance:

When the Trading Window is not closed, the pre-clearance of transactions by Designated Persons is not necessary for trading in the securities of the Company whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value upto Rupees 10,00,000/- in value or 15000 number of shares, whichever is lower.

12. REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES:-

General Provisions:



- a) Every disclosure under this Chapter shall be made within 2 (two) days. The disclosure to be made by any Insider under this chapter and by any other person for whom such Insider takes trading decisions. 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 purposes of this Chapter.

Provided that trading in derivatives of securities is permitted by any law for the time being in force.

- b) The disclosure made under this Chapter shall be maintained by ACEINTEG, for a minimum period of 5 (five) years, in such form as may be specified.

13.1. INITIAL DISCLOSURE

Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter or member of the promoter group 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 (seven) days of such appointment or becoming a Promoter / Key Managerial Personnel / Director in **Form B** annexed as “**Annexure E**” (as prescribed or amended by SEBI, from time to time).

13.2. CONTINUAL DISCLOSURE

- (i) Every Promoter or member of the promoter group, Designated person and Director of the Company shall disclose to the Company in the format set out in **Form C** annexed as “**Annexure F**” (as prescribed or amended by SEBI, from time to time), the number of such securities acquired or disposed of within 2 (two) trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs.10,00,000/- (Rupees Ten Lakh Only) or such other value as may be specified.
- (ii) The Company shall notify the particulars of such trading to the stock exchanges on which the securities are listed, as applicable, within 2 (two) trading days of receipt of the disclosure or from becoming aware of such information.
- (iii) The disclosure of the incremental transactions after any disclosure shall be made by persons as specified in (1) above, when the transactions effected after the prior disclosure crosses the threshold specified in this clause.

13.3. ANNUAL DISCLOSURE

Every Promoter, Member of the Promoter Group, KMP, Director and Designated Person of the Company shall disclose annual statements of their holding, and the holding of their Immediate Relatives and of any other person for whom such person takes trading decisions, of the Company's Securities (including derivatives) to the Compliance Officer as on 31st March every year in such form and manner annexed as “**Annexure G**” as may be prescribed by the Compliance Officer from time-to-time. Such statement shall be submitted by 15th April every year.



14. DISCLOSURE BY OTHER CONNECTED PERSONS

The Compliance Officer at his discretion may require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the Company as and when he deems fit in order to monitor compliance with these Regulations in the format set out in “**Annexure H**” (as prescribed or amended by SEBI, from time to time).

15. WHISTLE BLOWER POLICY:

Any ACEINTEG employee may report any instances of leak of UPSI in conformity with the Whistle Blower Policy of the ACEINTEG. The Whistle Blower Policy is hosted on the website of the Company www.aceintegrated.com

16. MECHANISM FOR COMMUNICATION & PROTECTION FOR INFORMANTS:

16.1. Submission of Information by Informant:

An Informant shall submit Original Information by furnishing the Voluntary Information Disclosure Form (VIDF) to the Office of Informant Protection of the Board (Refer **Annexure I** of the Code) either on his own or through legal representative in the manner prescribed under SEBI Notification dated 17.09.2019.

16.2. Receipt of Original Information by the Board:

On receipt of the Voluntary Information Disclosure Form, the Office of Informant Protection shall communicate the substance of the information along with the evidence submitted by the informant to the relevant department or division of the Board for examination and initiation of necessary action, if any.

The Office of Information Protection shall maintain confidentiality of the identity of the informant or his legal representative and act as an interface between the informant and the officers of the Board and also interact with the Informant Incentive Committee.

16.3. Informant Reward:

- i. The amount of the Reward, if payable, shall be determined by the Board.
- ii. Upon collection or substantial recovery of the monetary sanctions amounting to at least twice the Reward, The Board may at its sole discretion, declare an Informant eligible for Reward of ten percent of such monetary sanctions so collected or recovered which shall not exceed Rupees Ten Crore or such higher amount as the Board may specify and intimate the Informant/legal representative to file the Informant Reward Claim Form provided in SEBI Notification dated 17.09.2019 for claiming such Reward.
- iii. The Reward under these regulations shall be paid from the Investor Protection and Education Fund.
- iv. Circumstances for rejection of claim for Reward includes the following:
 - a. Non-submission of “Original Information”.
 - b. Where Original Information acquired through or as a member, officer, or an employee of any regulatory agency
 - c. Knowingly makes any false, fictitious, or fraudulent statement or representation.



16.4. Informant Confidentiality and Protection against Retaliation and Victimization:

- i. The confidentiality in respect of the identity and existence of the Informant shall be maintained throughout the process of investigation, inquiry and examination as well as during any proceedings before the Board.
- ii. This Code provides for suitable protection against any discharge, termination, demotion, suspension, threats, harassment, directly or indirectly or discrimination against any Informant who files a Voluntary Information Disclosure Form, irrespective of whether the information is considered or rejected by the Board or he or she is eligible for a Reward under these regulations.
- iii. Nothing in these regulations shall be deemed to provide any amnesty or immunity to an Informant for violation of securities law.

17. PENALTY FOR NON-COMPLIANCE

Any insider who trades in securities in contravention of the provisions of this Code or the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 shall be guilty of insider trading and shall be inter-alia liable for punishment and penalty as mentioned in this Code and the Securities & Exchange Board of India Act, 1992, as mentioned below.

A. PENALTY FOR CONTRAVENTION OF INSIDER TRADING CODE:

- (i) Every person, to whom the Code is applicable, shall be individually responsible for complying with the provisions of this Code (including to the extent the provisions hereof are applicable to his/ her immediate relatives).
- (ii) Any person who violates the Code, shall also be subject to disciplinary action by the Company, which may include monetary penalty, wage freeze, suspension, termination of employment, non-participation in future employee stock option or any other appropriate action as may be imposed by the Audit Committee / Board.
- (iii) The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading), Regulations, 2015.

B. PENALTY FOR NON-COMPLIANCE WITH SECURITIES & EXCHANGE BOARD OF INDIA ACT, 1992

The penalties and punishments for committing insider trading have been defined under Chapter IV-A of the SEBI Act. The penalties have been discussed below according to the SEBI (Amendment) Act, 2002.

Section 15 A

If any person, who is required under this Act or any rules or regulations made there under-

- (i) to furnish any document, return or report to the Board, fails to furnish the same, he shall be liable to a penalty of one lakh rupees for each day during which such failure continues or one crore rupees, whichever is less;
- (ii) to file any return or furnish any information, books or other documents within the time specified therefore in the regulations, fails to file return or furnish the



same within the time specified therefore in the regulations, he shall be liable to a penalty of one lakh rupees for each day during which such failure continues or one crore rupees, whichever is less;

- (iii) to maintain books of accounts or records, fails to maintain the same, he shall be liable to a penalty of one lakh rupees for each day during which such failure continues or one crore rupees, whichever is less.

Section 15 G

If any insider who –

- (i) either on his own behalf or on behalf of any other person, deals in securities of a body corporate listed on any stock exchange on the basis of any unpublished price sensitive information; or
- (ii) communicates any unpublished price sensitive information to any person, with or without his request for such information except as required in the ordinary course of business or under any law; or
- (iii) counsels, or procures for any other person to deal in any securities of any body corporate on the basis of unpublished price sensitive information, shall be liable to minimum penalty of Rs. 10 Lakhs which can go upto Rs. 25 crores or three times the amount of profits made out of insider trading, whichever is higher.

Section 24

- (i) Without prejudice to any award of penalty by the adjudicating officer under this Act, if any person contravenes or attempts to contravene or abets the contravention of the provisions of this Act or of any rules or regulations made thereunder, he shall be punishable with imprisonment for a term which may extend to ten years, or with fine, which may extend to twenty- five crore rupees or with both.
- (ii) If any person fails to pay the penalty imposed by the Adjudicating Officer or fails to comply with any of his directions or orders, he shall be punishable with imprisonment for a term which shall not be less than one month, but which may extend to ten years or with fine, which may extend to twenty- five crore rupees or with both.

Without prejudice to the directions under regulation 11, if any person violates provisions of these regulations, he shall be liable for appropriate action under Sections 11, 11 B, 11D, Chapter VIA and Section 24 of the Act.

18. Amendment to the Code:

Any amendments in the Code shall be done with the approval of Board of Directors of ACEINTEG. However, Compliance Officer of ACEINTEG is authorized to amend any changes in the format of disclosures due to amendments in the SEBI Regulations.



(Annexure-A)

TRADING PLAN
(Under Code of Conduct of the Company read with SEBI Insider Trading Regulation, 2015)

The

Compliance officer Ace Integrated Solutions Limited
B-13, DSIDC Complex, Functional Industrial Estate,
Industrial Area Patparganj, New Delhi-110092

Dear Sir,

Ref: DP's name :.....
DP ID/CLIENT ID :.....
Name of Insider :.....
Address :.....

Your approval is solicited for proposed Trading Plan for purchase/sale of securities of the Company in demat form. I am furnishing details of trade to be made by me after expiry of six month from the date of your approval to the proposed trading plan:-

S. No.	Nature of Trade	Number of Securities to be traded	Time intervals Between Two Trades	Date of proposed Trade

With respect to the above trading plan, I hereby undertake that:

- a) the proposed trading plan shall not entail commencement of trading on behalf of the insider earlier than 6 months from the public disclosure of the plan.
- b) the proposed trading plan shall not entail trading for the period between the 20th trading day prior to the last day of any financial period for which results are required to be announced by the Company and the second trading day after the disclosure of financial results for the said period;
- c) I shall not commence the trading as per above plan if the unpublished price sensitive information which is in my possession at present, does not come into public domain till the time of commencement of trading plan & shall defer the commencement of trading plan till such information becomes generally available.
- d) I shall not tender any other trading plan for the period for which the above trading plan is already in force; and
- e) the proposed trading plan shall not entail trading in securities for market abuse.

Yours truly,

Signature _____
Name _____
Designation _____



(Annexure-B)

APPLICATION FOR PRE-CLEARANCE OF TRADES

Date:

The

Compliance officer Ace Integrated Solutions Limited
B-13, DSIDC Complex, Functional Industrial Estate,
Industrial Area Patparganj, New Delhi-110092

Dear Sir,

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct for Prevention of Insider Trading, I, Shri/Smt. _____ Director/KMP/Connected Person/Designated Person of ACEINTEG, intend to carry out transaction(s) in the shares of ACEINTEG as per the details given below:

1	Name of the applicant	
2	Designation	
3	No. of securities held as on Date	
4	Folio No. / DP ID / Client ID No.	
5	The proposal is for (tick <input checked="" type="checkbox"/>) (a) Purchase of securities <input type="checkbox"/> (b) Sale of securities <input type="checkbox"/>	
6	Proposed date of trading in securities	
7	Estimated number of securities proposed to be purchased / subscribed / sold	
8	Current market price (as on date of application)	
9	Whether the proposed transaction will be through stock exchange or off-market trade	
10	Folio No. / DP ID / Client ID No. where the securities will be credited / debited	

I enclose herewith the form of undertaking signed by me

Yours faithfully

(Signature of Designated Person)



(Annexure-C)

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

To,

The Compliance officer Ace Integrated Solutions Limited
B-13, DSIDC Complex, Functional Industrial Estate,
Industrial Area Patparganj, New Delhi-110092

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

In this connection | solemnly confirm and declare:

- a) That | do not have access and/or have not received any “Unpublished Price Sensitive Information” upto the time of signing the undertaking.
- b) That in case | have access to or receive “Unpublished Price Sensitive Information” after the signing of the undertaking but before the execution of the transaction, | shall inform the Compliance Officer of any change in my position and that | shall completely refrain from dealing in the securities of ACEINTEG till the time such information becomes public.
- c) That | have not contravened the Code of Conduct for prohibition of insider trading as notified by the ACEINTEG from time to time.
- d) That | hereby confirm that | abide by the provisions of various clauses of the Code with regard to time norms for holding/buying/selling securities.
- e) I undertake to submit the necessary report within four days of execution of the transaction/s ‘Nil’ report if the transaction is not undertaken.
- f) If approval is granted, I shall execute the deal within 7 days of the receipt of approval failing which I shall seek preclearance.

| hereby solemnly declare that | have made a full and true disclosure in this regard to the best of my knowledge and belief.

Pre-clearance may kindly be accorded in term of clause _____ of the Code of Conduct for prohibition of insider trading in dealing with the securities of the ACEINTEG.

Signature: _____

Date: _____

Name: _____

Place: _____

Designation: _____



(Annexure-D)

PRE-CLEARANCE ORDER

Date:

To,

Name of Applicant

Designation

This is to inform you that your request for dealing in _____ (no.) 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].

In case you do not execute the approved transaction /deal on or before the aforesaid date you would have to seek fresh pre-clearance before executing any transaction/deal in the securities of the Company. Further, you are required to file the details of the executed transactions in the prescribed forms as per Company's Code of Conduct for Prevention of Insider Trading. In case the transaction is not undertaken a 'Nil' report shall be necessary.

Yours Faithfully,

For Ace Integrated Solutions Limited

Compliance Officer



(Annexure-E)

FORM B
SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) read with Regulation 6(2)] - Disclosure on becoming a
Director / KMP / Promoter]

To,

Ace Integrated Solutions Limited
B-13, DSIDC Complex, Functional Industrial Estate,
Industrial Area Patparganj, New Delhi-110092

ISIN of the company: INE543V01017

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 / Director s/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 shares holding	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).					
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		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 (contract * lot size)	Notional value in Rupee terms	Contract specifications	Number of units (contract * lot size)	Notional value in Rupee terms
1	2	3	4	5	6	7	8	9	10	11	12
Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.						Note: In case of Options, notional value shall be calculated based on premium plus strike price of options					

Signature (_____)

Name:

Designation:

Date:

Place:



(Annexure-F)

FORM C
SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (2) read with Regulation 6(2)] – Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons]

(To be submitted within 2 Trading Days of transaction/Dealing in Securities (including derivatives) of the Company)

To,

Ace Integrated Solutions Limited
B-13, DSIDC Complex, Functional Industrial Estate,
Industrial Area Patparganj, New Delhi-110092

ISIN of the company: INE543V01017

Details of change in holding of Securities of Promoter, member of the Promoter group, Designated Persons, 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/ KM P / Director s/ immediate relative to/ others etc.)	Securities held prior to acquisition/ disposal		Securities acquired/ Disposed		Date of allotment/ advice/ acquisition of shares/ sale of shares specify		Date of Intimation to the 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. & % of shares held	P r e - T r a n s a c t i o n	P o s t - T r a n s a c t i o n	F r o m	T o			Buy		Sell		
										Value	Number of units (contract size * lot size)	Value	Number of units (contract size * lot size)	

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

Signature (_____)

Name:
Designation:
Date:
Place:



(Annexure-G)

FORMAT OF ANNUAL STATEMENT OF HOLDINGS BY PROMOTER / MEMBER OF PROMOTER GROUP / KEY MANAGERIAL PERSONNEL /DIRECTOR/ DESIGNATED PERSON AND THEIR IMMEDIATE RELATIVES

Date:

To,

The Compliance officer Ace Integrated Solutions Limited
B-13, DSIDC Complex, Functional Industrial Estate,
Industrial Area Patparganj, New Delhi-110092

Dear Sir,

STATEMENT OF SHAREHOLDINGS IN THE COMPANY (Ace Integrated Solutions Limited)

As on March 31, I hereby declare the following details to be true, correct and complete in all respects:

Name of Promoter / Member of Promoter Group/ Director/KMP/ Designated Person	Designation	PAN/ Other identification no.:	Folio No./DP Id. & Client Id.	Details of Security/(ies) Held	Address, Phone & Mobile No.

Sr. No.	Name of Immediate Relative ¹	Relationship with Director/KMP/ Designated Person	PAN/ Other id.no.:	Folio No. / DP Id. & Client Id.	Details of Security/(ies) Held	Address, Phone & Mobile No.

Sr. No.	Name of Person with whom I share a Material Financial Relationship ²	PAN/ Other id. no.:	Folio No./DP Id. & Client Id.	Phone & Mobile No.

I hereby also undertake to promptly inform changes, if any, in the above details from time-to-time.

Yours truly,



Signature: _____

Name: _____

Designation: _____

#Emp. No.: _____

#Dep. /Div.: _____

Notes:

1. "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;
2. "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 from a designated person during the immediately preceding 12 months, equivalent to at least 25% of the annual income of such designated person] but shall exclude relationships in which the payment is based on arm's length transactions.

To be filled in only by Employees



(Annexure-H)

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. of other connected persons as identified by the company	Connection with company	Securities held prior to acquisition/ disposal		Securities acquired / Disposed				Securities held post acquisition/ disposal		Date of allotment advice/ acquisition of shares/ disposal of shares specify		Date of intimation to company	Mode of acquisition/ disposal (on market/ public / rights/ Preferential offer / off market/ Inter-se transfer, ESO Ps etc.)	Exchange on which the trade was executed
		Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of share holding	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No.	Value	Transaction Type (Purchase/ Sale/ Pledge/ Revocation / Invoication/ Others-please specify)	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of share holding	From	To			

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

Details of trading in derivatives on the securities of the company 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)	

Signature (_____)

Name:

Date:

Place:



(Annexure-I)

VOLUNTARY INFORMATION DISCLOSURE FORM

Note: For submission of information through a legal representative, the redacted copy of the Form expunging information that may identify the Informant shall be submitted by the legal representative without expunging any information relating to the legal representative and the details relating to the violation of securities laws.

*Indicates that the required field is non-mandatorily, remaining fields are mandatory

I. PERSONAL INFORMATION OF THE INFORMANT		
A. INDIVIDUAL 1:		
Last Name:.....	First Name:.....	Title:.....
Address:	City / State:	PIN:
Telephone (with STD code):	Mobile:	E-mail address:
Employment Details*:	Permanent Account Number, if available:	
II. LEGAL REPRESENTATIVE (where applicable)		
Last Name:.....	First Name:.....	Title:.....
Firm Name (if not self-employed):		
Contact address :	City / State:	PIN:
Residence address:	City / State:	PIN:
Telephone (with STD code):	Mobile:	E-mail address:
Bar Council Enrolment Number:		
III. SUBMISSION OF ORIGINAL INFORMATION		
1. Is it a violation of securities laws? Yes / No		
2. If yes to question (1), please describe the type of violation:		
3. Has the violation: Occurred / Occurring / Potential to occur in future		
4. If the violation has occurred, date of occurrence: dd/mm/yy (in case exact date is not known, an approximate period may be entered)		
5. Have the individual(s) or their representatives had any prior communication(s) or representations with the Board concerning this matter? Yes (Details thereof) / No		



- | |
|---|
| 6. Does this violation relate to an entity of which the individual is or was an officer, director, counsel, employee, consultant or contractor? Yes (Details thereof) / No |
| 7. If yes to question (6), was the original information submitted first to your Head or internal legal and compliance office? Yes / No |
| 8. If yes question (7), then please provide, Date of submission of original information: dd/mm/yy |
| 9. Please describe in detail why you think the information submitted is a Violation? |
| 10. What facts or supporting material is your allegation based on? Please attach any additional documents to this form, if necessary. |
| 11. Identify any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents were disclosed to a third party. |
| 12. Provide details of connection amongst the Informant, the company whose securities are involved and the person against whom information is being provided: |

IV. DECLARATION

I/we hereby declare that,-

- A. I/we have read and understood the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;
- B. I/we accept that mere furnishing of information by me/us does not by itself confer on me/us right to get reward and that I/we may not get any Reward at all. I/we would be bound by the decisions that the authority competent to grant reward may take;
- C. I/we accept that the Securities and Exchange Board of India is under no obligation to enter into any correspondence regarding action or inaction taken as a result of my/our information.
- D. I/we accept that the reward would be an ex-gratia payment which, subject to the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, shall be granted at the absolute discretion of the competent authority. The decision of the authority shall be acceptable to me/us and I/we shall not challenge it in any litigation, appeal, adjudication, etc.
- E. In the event of my/our death before the reward us paid to me/us, it may be paid to.....(Details of nominee)



F. I/we declare that the information contained herein is true, correct and complete to the best of my/our knowledge and belief and not obtained from the categories of persons indicated in sub-regulation (2) and sub-regulation (6) of regulation 7G of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and agree to indemnify the Board in case it is not so found. I/we fully understand that I/we may be subject to action under securities laws as well as Section 182 of the Indian Penal Code, 1860 (45 of 1860) and ineligible for Reward if, in my/our submission of information or in any other dealings with the Board, I/we knowingly and willfully make any false, fictitious, or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious, or fraudulent statement.

Signature:.....

Date: dd/mm/yy

Place:

V. CERTIFICATE BY LEGAL REPRESENTATIVE (where the information is submitted through legal representative)

I hereby certify as follows,-

- (a) I have reviewed the completed and signed Voluntary Information Disclosure Form for completeness and accuracy and the information contained therein is true, correct and complete to the best of my knowledge;
- (b) I have irrevocable consent from the Declarant, to provide to the Securities and Exchange Board of India, the original Voluntary Information Disclosure Form in the event of a request for it from the Securities and Exchange Board of India due to concerns that the Informant has not complied with these regulations or where the Securities and Exchange Board of India requires the said information for the purpose of verification for declaring any gratuitous reward to the Informant or where the Securities and Exchange Board of India determines that it is necessary to seek such information to accomplish the purpose of the Securities and Exchange Board of India Act including for the protection of investors, sharing with foreign securities regulators and foreign and Indian law enforcement agencies, etc.;
- (c) I am and shall continue to be legally obligated to provide the original Voluntary Information Disclosure Form without demur within seven (7) calendar days of receiving such request from the Securities and Exchange Board of India.

Signature:.....

Date: dd/mm/yy

Place:
