



CAPTAIN TECHNOCAST LIMITED
CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

(Under Regulation 9(1) and (2) of SEBI (Prohibition of Insider Trading Regulations, 2015)

I. INTRODUCTION

- i. To protect the interests of investors in general, the Securities and Exchange Board of India had formulated the SEBI (Insider Trading) Regulations, 1992 under the powers conferred on it under the SEBI Act, 1992. The SEBI (Insider Trading) Regulations, 1992 have been repealed and replaced by the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("**Insider Trading Regulations**") which came into force with effect from May 15, 2015 and the same is applicable to all companies whose shares are listed or proposed to be listed on the Stock Exchange.
- ii. It is also mandatory in terms of the Insider Trading Regulations for every listed company / entity and market intermediary to formulate a Code of Conduct (as defined below) to regulate, monitor and report trading by Designated Persons (as defined below) as also a code of practices and procedures for fair disclosure of Unpublished Price Sensitive Information (as defined below).
- iii. In order to comply with the mandatory requirements of the Insider Trading Regulations, it was necessary to formulate a specific Code of Conduct for **CAPTAIN TECHNOCAST LIMITED** (hereinafter referred to as "**the Company**") for use by its **Designated Persons**.
- iv. In line with the Insider Trading Regulations, the following Code of Conduct has been adopted by the Board of Directors of the Company for use by its Designated Persons and shall be effective from 15/06/2017
- v. The Code is based on the principle that Designated Persons of the Company owe a fiduciary duty to, among others, the shareholders of the Company to place the interest of the shareholders above their own and conduct their personal Securities transactions in a manner that does not create any conflict of interest situation. The Code is also intended to serve as a guiding charter for all concerned persons associated with the functioning of the Company and their dealings in Securities of the Company. Further, the Code also





CAPTAIN TECHNOCAST LIMITED

CIN NO.: L27300GJ2010PLC061678

Manufacture of : Precision Casting, Investment (Lost Wax) Casting, of all Ferrous, Non Ferrous and Super Alloys...



seeks to ensure, timely and adequate disclosure of Unpublished Price Sensitive Information to the investor community by the Company to enable them to take informed investment decisions with regard to the Company's Securities.

II. DEFINITIONS

- i. **"Act"** shall mean the Securities and Exchange Board of India Act, 1992 (15 of 1992) and any amendments thereto;
- ii. **"Board"** shall mean the Board of Directors of the Company;
"CEO" shall mean the Chief Executive Officer of **CAPTAIN TECHNOCAST LIMITED**
- iii. **"Code"** or **"Code of Conduct"** shall mean the Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of trading by insiders of **CAPTAIN TECHNOCAST LIMITED** as amended from time to time.;
- iv. **"Compliance Officer"** shall mean the company secretary or such other senior officer designated so and reporting to the Board, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under the Insider Trading 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 the Insider Trading Regulations under the overall supervision of the Board.;
- v. **"Connected Person"** shall mean,-
 - 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, -
 - an Immediate Relative (as defined below) of connected persons specified in clause (a); or
 - a holding company or associate company or subsidiary company; or
 - an intermediary as specified in Section 12 of the Act or an employee or director thereof; or
 - an investment company, trustee company, asset management company or an employee or director thereof; or
 - an official of a stock exchange or of clearing house or corporation; or





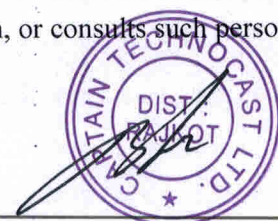
CAPTAIN TECHNOCAST LIMITED

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- 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
 - 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
 - an official or an employee of a self-regulatory organization recognized or authorized by the Board; or
 - a banker of the company; or
 - 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;
- vi. **“Designated Employees”** shall mean and include officers comprising the top three tiers of the Company management as given under:
- A. Tier 1:
Board of Directors of the Company
 - B. Tier 2:
CEOs including the CEO, the Delivery Head, the Chief Finance Officer, the Chief People Officer, the Chief Information Officer and the Chief Strategy Officer
 - C. Tier 3:
Members of the Management Council
 - D. Employees designated by the Company to whom these trading restrictions under this Code shall be applicable:–
 - i. Category I (The list of employees designated by the Company as above 3 tiers of the management to this Code);
 - ii. Category II (Any other employee to whom this Code is made applicable from time to time based on price sensitive events, if in the opinion of the Company the circumstances so demand and the concerned employee is so notified by the Company;
- vii. **“Designated Persons”** shall mean and include the Designated Employees and Connected Person;
- viii. **“generally available information”** means information that is accessible to the public on a non-discriminatory basis;
- 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. **“Insider”** shall mean any person who is:





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- (i) A Connected Person; or
- (ii) in possession of or having access to unpublished price sensitive information
- xi. **"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;
- xii. **"SEBI"** shall mean the Securities and Exchange Board of India;
- xiii. **"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;
- xiv. **"Takeover regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;
- xv. **"Trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;
- xvi. **"Trading Window"** shall mean the period during which trading in the Company's Securities is allowed;
- xvii. **"Trading Day"** means a day on which the recognized stock exchanges are open for trading;
- xviii. **"Unpublished Price Sensitive Information"** means any information, relating to a Company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to the following:-
 - (i) financial results;
 - (ii) dividends;
 - (iii) change in capital structure;
 - (iv) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
 - (v) changes in key managerial personnel; and
 - (vi) material events in accordance with the listing agreement.

All other words and phrases will have the same meaning as defined under the Insider Trading Regulations as amended from time to time. Words and expressions used and not defined in the Insider Trading Regulations but defined in the Act, the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislations.



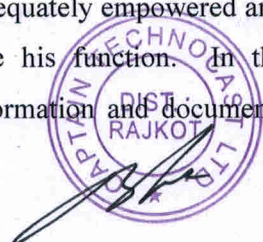


III. APPLICABILITY

- i. The Code shall come into force with effect from **15/06/2017**.
- ii. This Code shall be applicable to all the Designated Persons of the Company

IV. COMPLIANCE OFFICER

- i. The Company has presently appointed Miss. URVI KESARIYA Company Secretary as the Compliance Officer, who shall report to the Board of Directors and provide reports to the Chairman of Audit Committee for the compliances under this Code.
- ii. The Compliance Officer shall be inter alia, responsible for:
 - a) setting forth policies and procedures;
 - b) monitoring adherence to the rules for preservation of Unpublished Price Sensitive Information;
 - c) pre-clearing trades of Designated Persons;
 - d) monitoring of trades and implementation of the Code of Conduct under the overall supervision of the Board;
 - e) maintaining records of the Designated Persons and any change therein;
 - f) maintaining records of the disclosures made pursuant to the Insider Trading Regulations for a minimum period of 5 (five) years;
 - g) Reporting on insider trading to the Board and in particular, providing reports to the chairman of the audit committee, if any, or to the chairman of the Board at such frequency as may be stipulated by the Board;
 - h) Reviewing and approving the trading plan subject to receipt of the requisite declaration from the Insider that such Insider is not in possession of Unpublished Price Sensitive Information or that such Insider shall ensure that any Unpublished Price Sensitive Information in his possession becomes generally available before he commences executing his trades;
 - i) Notifying the approved trading plan to the stock exchanges on which the Securities are listed.
- iii. In order to discharge the functions effectively, the Compliance Officer shall be adequately empowered and provided with adequate manpower and infrastructure to effectively discharge his function. In the performance of his duties, the Compliance Officer shall have access to all information and documents relating to the Securities of the Company.





- iv. The Compliance Officer shall act as the focal point for dealings with SEBI in connection with all matters relating to the compliance and effective implementation of the Insider Trading Regulations and the Code.

V. PRESERVATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION:

- i. All information shall be handled within the Company on a need-to-know basis and no Unpublished Price Sensitive Information shall be communicated to any person except in furtherance of the Insider's legitimate purposes, performance of duties or discharge of his legal obligations.
- ii. Unpublished Price Sensitive Information may be communicated, provided, allowed access to or procured, in connection with a transaction which entails:
- a) an obligation to make an open offer under the Takeover Regulations where the Board is of informed opinion that the proposed transaction is in the best interests of the Company; or
- b) not attracting the obligation to make an open offer under the Takeover Regulations but where the Board is of informed opinion that the proposed transaction is in the best interests of the Company and the information that constitutes 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 may determine.

However, the Board 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 limited purpose and shall not otherwise trade in Securities of the Company when in possession of Unpublished Price Sensitive Information.

- iii. All information that is not generally available and directly received by any Designated Persons should be reported to the head of his/her department/Compliance Officer.
- iv. Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password etc.





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v. Chinese Wall:

- a) To prevent the misuse of confidential information the Company shall adopt a "Chinese Wall" policy which separates those areas of the Company which routinely have access to confidential information, considered "inside areas" from those areas which deal with sales, marketing or other departments providing support services, considered "public areas". The employees in the inside area shall not communicate any Unpublished Price Sensitive Information to anyone in public areas.
- b) The employees in the inside areas may be physically segregated from employees in public areas.
- c) Demarcation of the various departments as inside areas may be implemented by the Company.
- d) 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.

VI. 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 behalf in accordance with such trading plan.
- ii. The 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 twentieth 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 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 consider the trading plan made as above and shall approve it forthwith. However, he/she shall be entitled to take express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the trading plan as per provisions of the Insider Trading Regulations.
- iv. The trading plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the trading plan, without being entitled to either deviate from it or to execute any trade in the Securities outside the scope of the trading plan.
- v. However, the implementation of the trading plan shall not be commenced, if at the time of formulation of the trading plan, the Insider is in possession of any Unpublished Price Sensitive Information and the said information has not become generally available at the time of the commencement of implementation. The commencement of the trading plan shall be deferred until such Unpublished Price Sensitive Information becomes generally available information. Further, the Insider shall also not be allowed to deal in Securities of the Company, if the date of trading in securities of the Company, as per the approved trading plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.
- vi. Upon approval of the trading plan, the Compliance Officer shall notify the trading plan to the stock exchanges on which the Securities are listed.

VII. TRADING WINDOW

All Designated Persons shall be subject to certain trading restrictions as enumerated below:

- i The Trading Window will be closed before 7 days of the happening of the following events and shall remain closed 48 hours after the publication of the price sensitivity information i.e.
 - (i) Declaration of Financial Results (Quarterly, Half Yearly & Annual)
 - (ii) Declaration of Dividends (Interim & Final)
 - (iii) Issue of securities by way of Public/ Rights /Bonus etc.
 - (iv) Any major expansion plan or execution of new project
 - (v) Amalgamation, Mergers, takeovers or any buy back.
 - (vi) Disposal of the whole or substantially the whole of the undertaking.
 - (vii) Any major change in policies, plans or operation of the Company.





ii The Compliance Officer after taking into account various factors including the Unpublished Price Sensitive Information in question becoming generally available and being capable of assimilation by the market, shall decide the timing for re-opening of the Trading Window, however in any event it shall not be earlier than 48 (forty-eight) hours after the information becomes generally available.

iii The Designated Persons shall not trade in the Company's Securities during the period when the Trading Window is closed and will have to forego the opportunity to trade in the Company's Securities during such period.

iv All the Designated Persons shall conduct their dealings in the Securities of the Company only in a valid Trading Window and shall not deal in any transaction involving the purchase or sale of the Company's Securities during the periods when the Trading Window is closed or during any other period as may be specified by the Company from time to time.

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

VIII. PRE-CLEARANCE OF TRADES:

All the Designated Persons who intend to deal in the Securities of the Company when the Trading Window is open and exceeding Rs. 10,00,000/- (Rupees Ten lakhs) in value shall get the transactions pre-cleared in the manner enumerated below:

- i. an application (attached as **Proforma I**) shall be made to the Compliance Officer by the Designated Persons indicating the estimated number of Securities that such person intends to deal in, details of depository with which such person has a demat account, 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.. The Compliance Officer shall assess the applications and grant approval for pre-clearance of trade (in format attached as **Proforma II**) within a reasonable time.





CAPTAIN TECHNOCAST LIMITED

CIN NO.: L27300GJ2010PLC061678

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- ii. The Designated Persons shall execute a declaration(attached as **Proforma III**) in favour of the Company incorporating inter-alia, the following clauses, and submit the same to the Compliance Officer along with the application form as mentioned in clause (i) above :
- a) the Designated Persons does not have any access, has not received or does not possess any Unpublished Price Sensitive Information, upto the time of signing the said declaration;
- b) in case the Designated Persons has access to , receives or possesses Unpublished Price Sensitive Information after the signing of this declaration but before the execution of the transaction, he/she shall inform the Compliance Officer of the change in his/her position and that he/she shall completely refrain from dealing in the Securities of the Company till such time such information becomes public;
- c) he/she has not contravened the Code as notified by the Company from time to time; and
- d) he/she has made full and true disclosure in the matter.
- iii. The Compliance Officer shall confidentially maintain a list of such securities as a “restricted list” which shall be used as the basis for approving or rejecting applications for pre-clearance of trades.
- iv. However, no Designated Person shall be entitled to apply for pre-clearance of any proposed trade if such Designated Person is in possession of Unpublished Price Sensitive Information even if the Trading Window is not closed and hence he shall not be allowed to trade.

IX. PERIOD FOR COMPLETING THE TRANSACTIONS

- i. All Designated Persons shall execute their order in respect of the Securities of the Company within 7 (seven) trading days after pre-clearance approval is received from the Compliance Officer. The date on which the order is executed shall be intimated forthwith to the Compliance Officer (in format attached as **Proforma IV**).
- ii. If the order is not executed within 7 (seven) trading days after the approval is given, fresh pre-clearance would be needed for the trades to be executed.



X. HOLDING PERIOD

All Designated Persons who are permitted to buy or sell any number of Securities of the Company shall not enter into a contra transaction i.e. sell or buy any number of Securities during the next 6 (six) months following the prior transaction. In case any contra trade is executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

XI. WAIVER OF HOLDING PERIOD

The Compliance Officer may be empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate these regulations. An application in this regard (attached as Proforma V) shall be made to the Compliance Officer.

XII. DISCLOSURES & REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES:

The disclosures of trading in Securities shall also include trading in derivatives of Securities subject to applicable laws and the traded value of the derivatives shall be taken into account for purposes of this Code.

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.

A. INITIAL DISCLOSURE

- i. Every Promoter, Key Managerial Personnel and Director of the Company whose Securities are listed on any recognized stock exchange shall disclose his holdings of Securities of the Company within 30 (thirty) days of the coming into effect of the Insider Trading Regulations, i.e., 15/06/2017 (format attached in **Proforma-VI**);
- ii. Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter shall disclose his holding of Securities of the Company as on the date of appointment or becoming a Promoter, to the Company within 7 (seven) days of such appointment or becoming a Promoter (format attached in **Proforma-VII**);.





B. Continual Disclosure

- i. Every Promoter, employee and Director of the Company shall disclose to the Company 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 lakhs only) (format attached in **Proforma-VIII**);.
- ii. The Company shall within 2 (two) trading days of receipt of the disclosure or from becoming aware of such information, disclose the particulars of such trading to all the Stock Exchanges on which the Securities of the Company are listed..

C. Disclosures by other Connected Persons:

The Company may at its discretion, require any other connected person or class of connected persons to make disclosures of holding and trading in Securities of the Company in such form as may be determined by the Company(format attached in **Proforma-IX**);.

XIII. MAINTENANCE OF RECORDS OF DISCLOSURE

- i. The Compliance Officer shall maintain records of all the disclosures made under this Code for a minimum period of 5 (five) years.

XIV. PENALTY FOR CONTRAVENTION OF CODE OF CONDUCT:

- i. Any Designated Persons who trades in Securities of the Company or communicates any information for trading in the Securities of the Company, in contravention of the Code shall be held guilty and penalized and appropriate action shall be taken by the Company, which may include wage freeze, suspension, ineligibility for future participation in employee stock option plans or termination of their employment/contract, or such other action, as the Company may in this regard deem fit.
- ii. The penal action taken by the Company shall not preclude SEBI from taking any action in case of violation of the Insider Trading Regulations.





CAPTAIN TECHNOCAST LIMITED

CIN NO.: L27300GJ2010PLC061678

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- iii. In case the Company /Compliance Officer observes that there has been a violation of the Insider Trading Regulations by any Designated Persons, the Compliance Officer shall inform SEBI about such violation. The concerned Designated Persons shall provide all the requisite information and render necessary co-operation as may be required by the Company / Compliance Officer /SEBI in this connection.

XV. CLARIFICATIONS:

For all queries concerning this Code, the Designated Persons may please contact the Compliance Officer, Miss Urvi Kesariya @ compliance@captaintechnocast.in.

Code of Fair Disclosure

A code of practices and procedures for fair disclosure of unpublished price sensitive information for adhering each of the principles is set out below:

1. Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
3. Designation of a senior officer as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.



6. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.
7. Developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
8. Handling of all unpublished price sensitive information on a need-to-know basis.

PROFORMA – I

APPLICATION FORM FOR PRE-CLEARANCE OF TRADES IN COMPANY'S SECURITIES [Clause VIII (i)]

The Compliance Officer

Captain Technocast Limited Code of Conduct for

Prevention of Insider Trading

Captain Technocast Limited

Date :

Dear Sir,

I _____ intend to deal in the Securities of the Company as per the particulars furnished below:

Name of the person for whom the transaction is to be executed	
Relationship with the applicant	
No. of Securities (specify) covered by the transaction	
Nature of transaction for which approval is sought	Purchase / Sale / Both*
Depository I.D. No.	
Client I.D. No.	
Particulars of the broker through whom the transaction is to be executed	Name: Address: Tel. No.:



Pursuant to Clause VIII (ii) of the Code of Conduct, I enclose duly stamped and executed undertaking executed in favour of the Company, containing the prescribed particulars.

I request you to kindly pre-clear the above transaction at the earliest.

Thanking you,

Yours faithfully,

(Name of the Applicant)

Employee No.:

Department:

Date:

Place:

PROFORMA – II

Date:

To;

Dear Sir,

Sub: Pre-clearance of transaction in Company's Securities

Re: Your application dated ____ for pre-clearance of transaction for ____ shares of the Company in your name.

With reference to your above application pursuant to Clause VIII(i) of Code of Conduct, seeking pre-clearance of your transaction in shares of the Company, we hereby accord our approval to the proposed transaction.

You may kindly note that pursuant to Clause IX of the said Code of Conduct, the aforesaid transaction shall be executed within 7 (seven) trading days from the date of receipt of this approval letter, failing which, an application seeking pre-clearance to the proposed transaction together with undertaking in the prescribed format, shall be made afresh.

Thanking you,

Yours faithfully,

For Captain Technocast Limited



PROFORMA III

Draft undertaking to be accompanied with every pre-clearance application [Clause VIII (ii)]

The Compliance Officer

Code of Conduct for Prevention of Insider Trading

Captain Technocast Limited

Dear Sir,

I, _____ being a Director / Designated Person of the Company, am desirous of dealing in _____ shares of the Company as mentioned in my application date _____ for pre-clearance of the transaction.

Pursuant to Clause VIII(ii) of the Code of Conduct, I hereby confirm:

- That I did not have any access or received or possessed any "Unpublished Price Sensitive Information" upto the date of signing this declaration;
- That in case I have access to or receive or possess "Unpublished Price Sensitive Information" after the signing of this declaration but before the execution of the transaction, I shall inform the Compliance Officer of the change in my position and that I shall completely refrain from dealing in the Securities of the Company till such time such information becomes public;
- That I have not contravened the Code of Conduct for Prevention of Insider Trading as notified by the Company from time to time; and
- That I have made full and true disclosure in the matter.

(Signature)

Name of Directors and Designated Person

Employee No.:

Division:

Location:

Place:

Date:





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PROFORMA IV

Confirmation of date of completion of transaction – [Clause IX(i)]

The Compliance Officer
Code of Conduct for Prevention
Of Insider Trading
Captain Technocast Limited

Dear Sir,

Sub: Date of completion of transaction

I hereby confirm that the transaction for dealing in the shares of the Company for which, pre-clearance was granted on _____ was completed on _____ by purchasing / selling _____ (nos.) Securities of the Company.

Thanking you,

Yours faithfully

(Signature)

Name of Directors and Designated Person

Employee No.:

Division:

Location:

Place:

Date:





PROFORMA V

Application for waiver of minimum holding period – [Clause XI]

The Compliance Officer
Code of Conduct for Prevention
Of Insider Trading
Captain Technocast Limited

Dear Sir,

Sub: Waiver of minimum holding period

I request you to grant me waiver of the minimum holding period under the Code of Conduct for Prevention of Insider Trading with respect to _____ (nos.) of Securities of the Company held by me / _____ (name of relative) singly / jointly, acquired by me on _____ (date). I propose to deal in the said shares on account of _____

Thanking you,
Yours faithfully

(Signature)

Name of Directors and Designated Person

Employee No.:

Division:

Location:

Place:

Date:



PROFORMA VI

FORM A

**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (1) (a)
read with Regulation 6 (2)]**

Name of the company: Captain Technocast Limited

ISIN of the company: INE931X01010

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

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

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

Signature:

Designation:

Date:

Place:

