



**CODE OF PRACTICES AND PROCEDURES
AND
CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING IN SECURITIES
AND
FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION
PURSUANT TO THE REQUIREMENTS OF THE SECURITIES AND EXCHANGE BOARD OF INDIA
(PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015**

PART - A

PREAMBLE

Vide notification dated January 15, 2015 published in the official gazette, Securities and Exchange Board of India (SEBI) has notified the SEBI (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as “Regulations”). The Revised Regulations will come into force on the 120th day from the date of its publication in the official gazette, i.e. w.e.f. 15th May, 2015.

In view of the fact that provisions of Regulation 8 and 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 will be applicable to our Company immediately upon the listing of its Equity Shares on the Stock Exchange. We shall comply with the requirements of the SEBI (Prohibition of Insider Trading) Regulations, 2015 on listing of our Equity Shares on stock exchange. Further, Board of Directors have approved and adopted this policy on insider trading in view of the proposed Public Offer.

Our Board is responsible for setting forth policies, procedures, monitoring and adherence to the rules for the preservation of price sensitive information and the implementation of the code of conduct under the overall supervision of the board.

The Policy and Obligations

The Insider Trading Regulations *inter alia*, direct the Board of Directors of the Company whose securities are listed on Stock Exchange to do the following:-

- a) To lay down the Code of practices and procedures for fair disclosure of Unpublished Price Sensitive Information that it would follow in order to adhere to each of the principles set out in the Revised Regulations without diluting its provisions in any manner.
- b) To formulate a Code of conduct to regulate, monitor and report trading by its Promoters, Directors, employees and other connected persons towards achieving compliance with the Regulations, while adopting the minimum standards set out in the Revised Regulations without diluting their provisions in any manner.

To achieve the objectives as stated in the Regulations, the Company hereby notifies that the **“Code of practices and procedures and Code of conduct to regulate, monitor and report trading in securities and fair disclosure of unpublished price sensitive information”** shall become effective and operational from the date as stated herein above.

PART - B

DEFINITIONS

For the purposes of this code, the words and expressions given below shall carry the meaning as stated hereinafter.



- B.1.** “Act” means the Securities and Exchange Board of India Act, 1992 (15 of 1992).
- B.2.** “Board” shall mean the Securities Exchange Board of India.
- B.3.** “Board of Directors” means the Board of Directors of the Company.
- B.4.** ‘Company’ means Saketh Exim Limited;
- B.5.** ‘Compliance Officer’ means the Company Secretary of the Company or any other person designated by the Board of Directors as Compliance Officer from time to time;
- B.6.** "Connected person" means,-
- i. any person who is or has during the six months prior to the concerned act been associated with a company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the company or holds any position including a professional or business relationship between himself and the company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.
 - ii. Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established, -
 - a. an immediate relative of connected persons specified in clause (i) above; 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 board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
 - g. a member of the board of directors or an employee, of a public financial institution as defined in section 2(72) of the Companies Act, 2013; or
 - h. an official or an employee of a self-regulatory organization recognised or authorized by the Board; or
 - i. a banker of the company; or
 - j. a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten per cent of the holding or interest;
- B.7.** “Designated employees” Shall include –
- a. CEO/CFO;
 - b. All employees in the cadre of Executive Sr. Vice President and above;
 - c. Employees in the Finance, Accounts and Secretarial Department as may be determined by the Compliance Officer,
 - d. Immediate relative of (a) to (c) above;



- e. Employees designated by the Compliance Officer from time to time.
- B.8.** "generally available information" means information that is accessible to the public on a non-discriminatory basis;
- B.9.** "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;
- B.10.** "insider" means any person who is:
- i. a connected person; or
 - ii. in possession of or having access to unpublished price sensitive information;
- B.11.** "Key Managerial Person" means person as defined in Section 2(51) of the Companies Act, 2013.
- B.12.** "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;
- B.13.** "Regulations" shall mean the SEBI (Prohibition of Insider Trading) Regulations, 2015.
- B.14.** "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;
- B.15.** "takeover regulations" means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;
- B.16.** "trading" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;
- B.17.** "trading day" means a day on which the recognized stock exchanges are open for trading;
- B.18.** "unpublished price sensitive information" (abbreviated as "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; and
 - vi. material events in accordance with the listing agreement.

.PART – C

APPLICABILITY

This Code shall apply to all insiders as defined at B.10 including Directors, Designated employees and connected persons.



PART - D

RESTRICTION ON COMMUNICATIONS AND TRADING BY INSIDERS

D.1. Communication or procurement of unpublished price sensitive information.

- a. No insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to securities of SEL or securities proposed to be listed by SEL, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- b. No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to securities of the Company or securities proposed to be listed by the Company, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- c. Notwithstanding anything contained in this Code, 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 of the company is of informed opinion that the proposed transaction 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 of the company is of informed opinion that the proposed transaction is in the best interests of the company and the information that constitute unpublished price sensitive information is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the board of directors may determine.
- d. For the purpose of (c) 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 (c) above, and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information.
- e. Trading by insiders including promoters, non-individual insiders when in possession of unpublished price sensitive information shall be governed by Regulation 4 of the Regulations.

D.2. Trading Plans.

- a. An insider shall be entitled to formulate a trading plan and present it to the compliance officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.



- b. Such trading plan shall –
- i. not entail commencement of trading on behalf of the insiders earlier than six months from the public disclosure of the plan;
 - ii. not entail trading for the period between the 20th trading day prior to the last day of any financial period for which results are required to be announced by the Company and the second trading day after the disclosure of such financial results;
 - iii. entail trading for a period of not less than 12 months;
 - iv. not entail overlap of any period for which another trading plan is already in existence;
 - v. set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
 - vi. not entail trading in securities of the Company for market abuse.
- c. The compliance officer shall review the trading plan to assess whether the plan would have any potential for violation of this Code or “Regulations” and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.
- d. The trading plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.
- Provided that the implementation of the trading plan shall not be commenced if any unpublished price sensitive information in possession of the insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation and in such event the Compliance Officer shall confirm that the commencement ought to be deferred until such unpublished price sensitive information becomes generally available information so as to avoid a violation of this code or “Regulations”.
- e. Upon approval of the trading plan, the Compliance Officer shall notify the plan to the Stock Exchanges on which the securities of the Company are listed.



PART E

DISCLOSURE OF TRADING BY INSIDERS

E.1 General Provisions

- a. Every public disclosure shall be made in the Form/s as prescribed under the Regulations from time to time.
- b. The disclosures to be made by any person under this code shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.
- c. The disclosure of trading in securities shall also include trading in derivatives of securities and traded value of the derivatives shall be taken into account. Provided that trading in derivatives of securities is permitted by any law for the time being in force.
- d. The disclosures made under this Part shall be maintained by the Company, for a minimum period of five years, in such form as may be specified.

E.2 Disclosure by certain persons

a. Initial Disclosures

- i. Every Promoter, Key Managerial Person and Director of the Company shall disclose his / her holding in securities of the Company as on date the company gets listed on the stock exchange.
- ii. Every person on appointment as a Key Managerial Person 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 seven days of such appointment or becoming a Promoter.

b. Continual Disclosures

- i. Every Promoter, employee and director of the Company shall disclose to the Company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of **Rs. 10 lacs**.
- ii. The Compliance Officer of the Company shall notify the particulars of such trading to the Stock Exchange on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.

Explanation — It is clarified for the avoidance of doubts that the disclosure of the incremental transactions after any disclosure under this sub-code, shall be made when the transactions effected after the prior disclosure cross the threshold specified in clause b.(i) above.

c. Disclosures by other connected persons.

The Company may own its discretion require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the Company in such form and at such frequency as may be determined by the Company in order to monitor compliance with this Code.



PART - F

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

F.1. The Company,

- a. shall make 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.
- b. shall ensure uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- c. appoints **Compliance Officer as a Chief Investor Relations Officer** to deal with dissemination of information and disclosure of unpublished price sensitive information.
- d. shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- e. shall give appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- f. Shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
- g. shall develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the website of the Company to ensure official confirmation and documentation of disclosures made.
- h. shall ensure that all the unpublished price sensitive information are handled on a need-to-know basis.

PART – G

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING IN SECURITIES

G.1 Duties of Compliance Officer

- (a) He shall maintain a record of Designated employees and any changes made therein.
- (b) He may in consultation with the Chairman and shall as directed by the Board, specify Prohibited Period from time to time and immediately make an announcement thereof to all concerned.
- (c) He shall maintain a record of Prohibited Period specified from time to time.
- (d) He shall be responsible for setting forth Policies, Procedures, Monitoring adherence to the rules for the preservation of 'Price-Sensitive Information', 'pre-clearing of Designated employees' and their immediate relatives' trades,



- Monitoring of trades and the implementation of this Code under the overall supervision of the Board of Directors of the Company.
- (e) He shall maintain records of all the declarations submitted in the appropriate form given by the Directors and Designated employees for a minimum period of five years.
 - (f) He shall place before the Board, on a quarterly basis all the details of the dealing in the securities by the Designated employees, Directors with relevant documents that such persons had executed under the pre-dealing procedure as envisaged in this Code.
 - (g) He shall from time to time inform the Stock Exchanges of any price sensitive information on immediate basis.
 - (h) He shall intimate to all Stock Exchanges on which the securities of the Company are listed the relevant information received.
 - (i) He shall be responsible for overseeing and co-ordinating disclosure of price sensitive information to Stock Exchanges, analysts, shareholders and media and educating staff on disclosure policies and procedure.
 - (j) He shall inform SEBI of any violation of SEBI (Prohibition of Insider Trading) Regulations, 2015 within 7 days of knowledge of any such violation.

G.2. Preservation of "Price Sensitive Information"

Directors and Designated employees shall maintain the confidentiality of all Price Sensitive Information. Directors/ Designated employees shall not pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sale of securities of the Company. Following practices should be followed in this regard.

2.1 Need to know

Unpublished Price Sensitive Information is to be handled on a "need to know" basis, i.e., 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 a conflict of interest or appearance of misuse of information.

2.2 Limited access to confidential information

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and pass word, etc. Files containing confidential information should be deleted / destroyed after its use. Shredder should be used for the destruction of physical files.

G.3. Prohibition on Dealing, Communicating or Counselling on Matters Relating to Insider Trading

No Insider shall –

- (a) either on his own behalf, or on behalf of any other person, trade in securities of the Company when in the possession of any unpublished price sensitive information;
- (b) communicate, counsel or procure, directly or indirectly any unpublished price sensitive information to any person. However these restrictions shall not be applicable to any communication required in the ordinary course of business or under any law.



G.4. Trading Restrictions

All Directors and Designated employees of the Company shall be subject to trading restrictions as enumerated below:-

4.1 Trading Window

The period prior to declaration of price sensitive information is particularly sensitive for transactions in the Company's securities. This sensitivity is due to the fact that the Directors and Designated employees will, during that period, often possess unpublished price sensitive information.

During such sensitive times, the Directors and Designated employees will have to forego the opportunity of trading in the Company's securities.

The Directors and Designated employees of the Company shall not deal in the securities of the Company when the trading window is closed. The period during which the trading window is closed shall be termed as prohibited period.

4.2 The trading window shall be, inter alia, closed at the time of:-

- (a) Declaration of Financial results (quarterly, half-yearly and annual)
- (b) Declaration of dividends (interim and final)
- (c) Issue of securities by way of public/ rights/bonus, etc.
- (d) Any major acquisition/ expansion plans or execution of new projects
- (e) Amalgamation, mergers, takeovers and buy-back
- (f) Disposal of whole or substantially whole of the undertaking
- (g) Commencement of any new commercial production/commercial operations where the contribution there from is likely to exceed 10% of the last audited consolidated turnover of the Company during that financial year;
- (h) Litigation/dispute with a material impact;
- (i) Any information which, if disclosed, in the opinion of the person disclosing the same is likely to materially affect the prices of the securities of the Company;

4.3. The period of closure shall be effective from the date on which the Company sends intimation to the Stock Exchange advising the date of the Board Meeting, up to 48 hours after the Price sensitive information is submitted to the Stock Exchange.

4.4 The trading window shall be opened 48 hours after the information referred in 4.2 is made public.

4.5 All Directors and Designated employees of the Company shall conduct all their dealings in the securities of the Company only during the free period and shall not deal in any transaction involving the purchase or sale of the Company's securities during the prohibited periods or during any other period as may be specified by the Company from time to time.

G.5. Pre-clearance of trades

Any Director or Designated employee (including immediate relatives) of the Company, who intend to trade in the securities of the Company during free period exceeding



market price of Rs.5,00,000/- shall require to pre-clear the transactions as per the pre-dealing procedure as described hereunder. The Compliance Officer is authorised to change the limit of market dealing of Rs.5,00,000/- from time to time.

No Director / Designated employee shall apply for pre-clearance of any trade if such person is in possession of Unpublished Price Sensitive Information even if the trading window is not closed.

5.1 Pre-dealing Procedure

An application for pre-clearance of trade shall be made in **Form 'A'** to the Compliance Officer along with an undertaking (UT) in favour of the Company by such Director / Designated employee incorporating, *inter alia*, the following clauses, as may be applicable:

- (a) That the Director / Designated employee 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 Director / Designated employee has access to or receives "Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction he or she shall inform the Compliance officer of the change in his position and that he or she would completely refrain from dealing in the securities of the Company till the time such information becomes public.
- (c) That he or she has not contravened the provisions of this Code or Regulations as amended from time to time.
- (d) That he or she has made a full and true disclosure in the matter.
- (e) The Compliance Officer shall on receiving an application provide the Director / Designated employee with an acknowledgement on the duplicate of the application.
- (f) The Compliance Officer shall grant approval within 2 days from the date of acknowledgement.
- (g) The Compliance Officer shall retain copies of all applications and acknowledgements.
- (h) In exceptional circumstances consent may not be given if the Compliance officer is of the opinion that the proposed trade is on the basis of possession of any unpublished Price sensitive information. There shall be no obligation to give reasons for any withholding of consent.
- (i) If so requested by the Compliance Officer, Director/ Designated employee must ensure that his stockbroker is authorised to disclose to the Company all matters relevant to his share dealings.

5.2 Other restrictions

The Director/ Designated employee shall execute their order in respect of securities of the Company *within one week* after the approval of pre-clearance is



given. If the order is not executed within one week after the approval is given, the Director/ Designated employee must pre clear the transaction again.

The Director/ Designated employee shall hold their investments in securities for a minimum period of six months irrespective of mode of acquisition in order to be considered as being held for investment purposes. The Director / Designated employee permitted to trade shall not be permitted to execute a contra trade within a period of six months from the date of said trade.

In case the sale of securities is necessitated by personal emergency, the Compliance Officer may waive the holding period after recording in writing his or her reasons in this regard. An application for waiver of holding period shall be made to the Compliance Officer in **Form 'B'**.

G.6. Half yearly / Annual Disclosures

In addition to disclosures mentioned under Part E of this Code, all Directors and Designated employees of the Company shall be required to forward following details of their Securities transactions, including the holdings of immediate relatives, to the Compliance officer:

- (a) All holdings in securities of the Company at the time of joining the Company in **Form C**;
- (b) In respect of existing Directors and Designated employees, all holdings in securities of the Company as on the date specified by the Compliance Officer in **Form D**.
- (c) Statement of any transactions in securities of the Company, whether pre-clearance of trade was obtained or not, in **Form 'E'** on a half yearly basis within 10 days from the end of half year, and
- (d) Annual statement of all holdings in securities of the Company in **Form 'F'** as on March 31 of each year, before April 15 of that year.

G.7 Records of disclosures received by the Company

The Compliance Officer shall maintain records of all the declarations in the appropriate form given by the Directors and Designated employees for a minimum period of five years.

The Compliance Officer shall place before the Board of Directors, on a **quarterly basis** all the details of the dealing in the securities by the Director/ Designated employees of the Company and the accompanying documents that such persons had executed under the pre-dealing procedure as envisaged in this Code.

G.8. Penalty for contravention of this Code

Any Director / Designated employees, who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalised and appropriate action will be taken by the Company.

Designated employees of the Company who violate this Code shall also be subject to disciplinary action by the Company, which may include wage salary freeze, suspension, withholding of promotions, etc. The action by the Company shall not preclude SEBI from taking any action in case of violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015.



G.9. Information to SEBI in case of violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015

In case it is observed by the Company and / or Compliance Officer that there has been a violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Compliance Officer shall inform the SEBI within a period of 30 days from the date of knowing the same.

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Form A

**Application for Pre-clearance of trading in securities of the Company
(in terms of Clause 5.1 of G.5 of the Code)**

From

Name:-

Director / Designated employee:

Designation:-

DIN/ Employees Code:-

PAN :-

Address:-

Date :- ____ ____

To

The Compliance Officer Saketh Exim Limited

PlotNo. PAP D-146/147,

TTC MIDC, Turbhe,

Navi Mumbai 400705

Sir,

With reference to above, I wish to inform you that I want to purchase/ sale _____ equity shares/ other securities of the Company from the open market/ private arrangement, details of the same are as mentioned below :-

Sr. No.	Heading	Particulars
1	Existing holding of the shares/ other securities	
2	Folio No./ DP_ID and CL_ID	
3	Nature of new transaction : Sale / Purchase	
4	Quantity want to purchase/ Sale	
5	Price at which you want to purchase/ Sale	
6	Estimated consideration	
7	Mode of transaction – private / Open market	
8	Purpose of Purchase / Sale	
9	In whose name (with relation) the transactions will take place	

I/ We declare that I/ we have complied with the requirements of Company's "Code of practices and procedures and code of conduct to regulate, monitor and report trading in securities and fair disclosure of unpublished price sensitive information" based on the Securities and Exchange Board of India (SEBI) (Prohibition of Insider Trading) Regulations, 2015. I am executing an Undertaking as required and enclose herewith.

You are requested kindly to give your permission to trade in the equity shares/ other securities of the Company as requested above.

Signature: _____

(Name : _____)

Encl. Duly executed Undertaking.



**Undertaking
(in terms of Clause 5.1 of G.5 of the Code)**

From

Name:-

Director / Designated employee:

Designation:-

DIN/ Employees Code:-

PAN :-

Address:-

Date :- ____ ____

To

The Compliance Officer Saketh Exim Limited

PlotNo. PAP D-146/147,

TTC MIDC, Turbhe,

Navi Mumbai 400705

Sir,

With reference to my application dated _____ for pre-clearance of trade for purchase/
Sale of _____ equity shares/ other Securities of the Company, I confirm, declare
and undertake as follow :-

- (a) That I do not have any access or has not received "Price- sensitive information" up to the time of signing the Undertaking.
- (b) That in case I have access to or receive "Price- sensitive information" after the signing of the Undertaking but before the execution of the transaction, I shall inform you the change in my position and I shall completely refrain from trading in the securities of the Company till such information becomes public.
- (c) That I have not contravened the Code of practices and procedures and code of conduct to regulate, monitor and report trading in securities and fair disclosure of unpublished price sensitive information pursuant to the requirements of the Securities and Exchange Board of India (SEBI) (Prohibition of Insider Trading) Regulations, 2015 (Code) as notified by the Company from time to time.
- (d) That I hereby confirm that I abide by the provisions of Clause 5.2 of G.5 of the Code with regard to time norms for execution and holding of securities.

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

Signature: _____

(Name : _____)



Form B

**Application for waiver of holding period
(in terms of Clause 5.2 of G.5 of the Code)**

From

Name:-

Director / Designated employee:

Designation:-

DIN/ Employees Code:-

PAN :-

Address:-

Date :- ____ ____

To

The Compliance Officer

Saketh Exim Limited

PlotNo. PAP D-146/147,

TTC MIDC, Turbhe,

Navi Mumbai 400705

Sir,

With reference to above, I wish to inform you that I had purchased _____ equity shares/ other Securities of the Company on _____, the details are as mentioned below:-

Sr. No.	Heading	Particulars
1	No. of equity shares/ other Securities purchased	
2	Folio No./ DP_ID and CL_ID	
3	Date of purchase and price of purchase	
4	From whom purchased	
5	Existing total holding	
6	Quantity want to sale	
7	Reason for early selling	
8	Price at which you want to sale	
9	Mode of transaction – private / Open market	

I understand that as provisions of the Code of practices and procedures and code of conduct to regulate, monitor and report trading in securities and fair disclosure of unpublished price sensitive information pursuant to the requirements of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (Code), I need to hold this Investment for a minimum period of six months, but, due to reason as mentioned above, I need to sale the same before prescribed period.

You are requested kindly to give your permission to sale aforesaid Securities as requested.

Signature: _____

(Name : _____)



Form C

**Form for initial disclosure of holdings of equity shares/ other securities of the Company
(in terms of Clause G.6(a) of Code)**

From

Name:-

Director / Designated employee:

Designation:-

DIN/ Employees Code:-

PAN :-

Address:-

Date :- ____

To

The Compliance Officer

Saketh Exim Limited

PlotNo. PAP D-146/147,

TTC MIDC, Turbhe,

Navi Mumbai 400705

Sir,

With reference to above, I wish to inform you that I have joined the Company w.e.f. _____ as _____ (Director/ Designated employee) and have read the "Code of practices and procedures and code of conduct to regulate, monitor and report trading in securities and fair disclosure of unpublished price sensitive information pursuant to the requirements of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015" (Code) of the Company and declare that I alongwith my immediate relatives are holding equity shares/ other Securities of the Company as follows :-

I Statement of holdings in my name:

Name	Folio No./ DP ID/ Client ID	No. of Securities	Date on which purchased/ acquired

II Details of Securities held by my immediate relatives:

Name of Relative and PAN	Relationship	Folio No./ DP ID/ Client ID	No. of Securities	Date on which purchased/ acquired

I also confirm that whatever I have declared above is true and I or my immediate relatives are not holding any other Securities of the Company.

Signature: _____

(Name : _____)



FORM D

**Form for disclosure of existing holdings of equity shares/ other securities of the Company
(in terms of Clause G.6(b) of Code)**

From

Name:-

Director / Designated employee:

Designation:-

DIN/ Employees Code:-

PAN

Address:-

Date :- ____

To

The Compliance Officer

Saketh Exim Limited

PlotNo. PAP D-146/147,

TTC MIDC, Turbhe,

Navi Mumbai 400705

Sir,

With reference to above, I wish to inform you that I am working as _____ (Director/ Designated employees) and declare that have read the "Code of practices and procedures and code of conduct to regulate, monitor and report trading in securities and fair disclosure of unpublished price sensitive information pursuant to the requirements of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015" (Code) of the Company and declare that I alongwith my immediate relatives are holding equity shares/ other Securities of the Company as follows :-

I Statement of holdings in my name:

Name	Folio No./ DP ID/ Client ID	No. of Securities	Date on which purchased

II Details of Securities held by my immediate relatives:

Name of Relative and PAN	Relationship	Folio No./ DP ID/ Client ID	No. of Securities	Date on which purchased

I also confirm that whatever I have declared above is true and I or my immediate relatives are not holding any other Securities of the Company.

Signature: _____

(Name : _____)



FORM E

**Form for disclosure of holdings of equity shares/ other securities of the Company on half yearly basis
(in terms of Clause G.6(c) of Code)**

From

Name:-
Director / Designated employee:
Designation:-
DIN/ Employee's Code:-
PAN
Address:-

Date :- ____ __

To
The Compliance Officer
Saketh Exim Limited
PlotNo. PAP D-146/147,
TTC MIDC, Turbhe,
Navi Mumbai 400705

Sir,

With reference to above, I wish to inform you that I alongwith my immediate relatives are holding equity shares/ other Securities of the Company as follows:

I. Details of holdings in my name:

Name	No. of Securities held on 01.04.____	No. of Securities bought during the half year	No. of Securities sold during the half year	No. of Securities held on 30.09.____	Folio No./ DP ID/ Client ID

II. Details of holdings in my name

Name of Relative and PAN	Relationship	No. of Securities held on 01.04.____	No. of Securities bought during the half year	No. of Securities sold during the half year	No. of Securities held on 30.09.____	Folio No./ DP ID/ CL_ID

I/ We declare that I/ we have complied/ will be complied with the requirements of Company's Code of practices and procedures and code of conduct to regulate, monitor and report trading in securities and fair disclosure of unpublished price sensitive information pursuant to the requirements of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 pertaining to the minimum holding period of six months with respect to the Securities purchased during the half year.

Signature: _____

(Name : _____)



FORM F

Form for Annual disclosure of holdings of equity shares/ other securities of the Company (in terms of Clause G.6(d) of Code)

From

Name:-
 Director / Designated employee:
 Designation:-
 DIN/ Employee's Code:-
 PAN :-
 Address:-

Date :- ____ __

To
 The Compliance Officer
 Saketh Exim Limited
 PlotNo. PAP D-146/147,
 TTC MIDC, Turbhe,
 Navi Mumbai 400705

Sir,

With reference to above, I wish to inform you that I alongwith my immediate relatives are holding equity shares/ other Securities of the Company as follows:

I. Details of holdings in my name:

Name	No. of Securities held on 01.04.____	No. of Securities bought during the year	No. of Securities sold during the year	No. of Securities held on 31.03.____	Folio No./ DP ID/ Client ID

II. Details of holdings in my name

Name of Relative and PAN	Relationship	No. of Securities held on 01.04.____	No. of Securities bought during the year	No. of Securities sold during the year	No. of Securities held on 31.03.____	Folio No./ DP ID/ CL_ID

I/ We declare that I/ we have complied with the requirements of Company's Code of practices and procedures and code of conduct to regulate, monitor and report trading in securities and fair disclosure of unpublished price sensitive information pursuant to the requirements of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 pertaining to the minimum holding period of six months with respect to the Securities purchased during the year.

Signature: _____

(Name : _____)