

# CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS

## 1. LEGAL FRAMEWORK

This Code of Conduct to regulate, monitor and report trading by insiders is framed by the Board of Directors of KLG Capital Services Limited (hereinafter referred to as 'the Company' or 'KLG') in accordance with the requirement of Regulation 9(1) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, which became effective from May 15, 2015.

## 2. DEFINITIONS

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

2.2 **"Code"** or **"Code of Conduct"** shall mean the Code of Conduct to regulate, monitor and report trading by insiders as amended from time to time.

2.3 **"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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board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 or the head of an organization, as the case may be.

2.4 **"Connected Person"** shall have the meaning given to it under Regulation 2(1)(d) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

2.5 **"Designated Persons"** means: -

- (i) Directors; and
- (ii) Every employee in the grade of Senior Manager and above;

2.6 **"Director"** means a director appointed to the Board of the Company.

2.7 **"Employee"** means every employee of the Company including the Directors in the employment of the Company.

2.8 **“Generally available information”** means information that is accessible to the public on a non-discriminatory basis.

2.9 **“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.

2.10 **“Insider”** means any person who is:

- i) a connected person; or
- ii) in possession of or having access to unpublished price sensitive information.

2.11 **“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;

2.12 **“trading day”** means a day on which the recognized stock exchanges are open for trading.

2.13 **“Regulations”** shall mean the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.

2.14 **“Unpublished price sensitive information”** means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: –

- i) Financial results;
- ii) Dividends;
- iii) Change in capital structure;
- iv) Mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
- v) Changes in key managerial personnel; and
- vi) Material events in accordance with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

**All terms used in this Code but not defined hereinabove shall have the meanings ascribed to them under the Regulations.**

### **3. ROLE OF COMPLIANCE OFFICER**

3.1 Unless otherwise decided by the Board of Directors, the Company Secretary of the Company shall be the Compliance Officer for the purpose of compliance under this Code of Conduct and the Regulations.

3.2 In the event of the office of the Company Secretary falling vacant till such time a successor is appointed, the Manager, and in his absence, the Chief Financial Officer shall, in the interim period, act as the Compliance Officer.

3.3 The Compliance Officer shall report on insider trading to the Board of Directors of the Company and in particular, shall provide reports to the Chairman of the Audit Committee, if any, or to the Chairman of the Board of Directors at such frequency as and when deemed fit but at least in one Audit Committee meeting in a financial year.

3.4 The Compliance Officer 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.

3.5 The Compliance Officer shall assist all employees in addressing any clarifications regarding the Regulations and the Company's Code of Conduct.

#### **4. PRESERVATION OF PRICE SENSITIVE INFORMATION**

4.1 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.

Unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction which entails:

- 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; or
- not attracting 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.

However, 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 limited purpose and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information.

#### 4.2 Need to Know:

“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 a conflict of interest or appearance of misuse of the information.

#### 4.3 Limited access to confidential information

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password, etc.

### **5. CHINESE WALLS**

5.1 The Compliance Officer shall monitor and regulate the Company’s Chinese walls.

5.2 In general, Chinese Walls separate areas that have access to confidential inside information from those who do not have such access. The Company shall formulate Chinese Walls to operate as barriers to the passing of inside information and confidential information and a means of managing Conflicts of Interest. Designated Persons shall be deemed to be working within an insider area.

5.3 The employees working within an insider area are prohibited from communicating any confidential or inside information to employees in public areas without the prior approval of Compliance Officer. Known or suspected breaches of the Chinese Wall must be referred to the Compliance Officer immediately.

5.4 The establishment of Chinese Walls is not intended to suggest that within insider areas, material, confidential information can circulate freely. Within insider areas, need-to-

know shall be in effect.

5.5 Only in exceptional circumstances, designated persons from the public areas are brought “over the wall” and given UPSI on the basis of “need to know” criteria, under intimation to the Compliance Officer.

## **6. TRADING WINDOW:**

Other than the period(s) for which the Trading Window is closed as prescribed hereunder, the same shall remain open for Trading in the Securities of the Company.

Unless otherwise specified by the Compliance Officer, the Trading Window for Trading in Securities of the Company shall be closed for the Designated Persons when the Compliance Officer determines that a Designated Person or class of Designated Persons are reasonably expected to have UPSI, including for the following purposes-

- (a) declaration of financial results,
- (b) declaration of dividends,
- (c) change in capital structure,
- (d) Mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions
- (e) changes in key managerial personnel, and
- (f) material events in accordance with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

The trading window shall be, inter alia, closed 7 (seven) days prior to and during the time the unpublished price sensitive information is published.

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 forty-eight hours after the information becomes generally available.

The Designated Persons and 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 shall not trade in the securities of the Company when the Trading Window is closed.

## **7. PRE-CLEARANCE OF TRADES**

Every Designated Person shall obtain a pre-trading approval as per the procedure prescribed hereunder for any Trading in the Securities of the Company proposed to be undertaken by such Designated Person / his / her Immediate Relatives. Such pre-trading approval would be necessary, only if

- a. the cumulative trading (including trading in derivatives of Securities, if permitted by law) whether in one transaction or a series of transactions in any financial year exceeds Rs. 10 lakhs (market value); and
- b. the trading is not in the nature of obligation which is arising out of financial default (like a transaction of invocation) or pursuant to an order of any statutory/ regulatory authority or out of breach of any contract.

### **A) The application for pre-trading approval shall be made as hereunder:**

7.1 An application complete in all aspects may be made in the prescribed Form (Annexure 1) to the Compliance officer.

7.2 An undertaking (Annexure 2) shall be executed in favour of the Company by such Designated Person.

7.3 Such application for pre-trading approval with enclosures may be sent through electronic mail or any other mode to the Compliance Officer. The e-mail should be sent to the address i.e. [company.secretary@klgcapital.com](mailto:company.secretary@klgcapital.com)

7.4 No Designated Person shall apply for pre-trading approval if such person is in possession of UPSI, even if the Trading Window is not closed.

### **B) Approval:**

7.5 The Compliance Officer shall consider the application made as above and shall approve it within a period of 2 (two) trading days unless he is of the opinion that grant of such an approval would result in a breach of the provisions of this Code or the Regulations. If such approval/rejection is not received within a period of 2 (two) Trading Days, the applicant can presume that the approval is deemed to be given. While considering the application, the Compliance Officer shall have due regard to whether the declaration provided in Annexure 2 is reasonably capable of being rendered inaccurate.

7.6 Every approval letter shall be issued in such format (Annexure 3) or such other other format as deemed fit by the Compliance Officer or as may be prescribed by the Company from time to time. Every approval shall be dated and shall be valid for a period of 7 (seven) Trading Days from the date of approval.

7.7 In the absence of the Compliance Officer due to leave etc., the Employee designated by the Manager shall discharge the function referred to in 7.5 above.

### **C) Completion of Pre-cleared Trading:**

7.8 All Designated Persons shall execute their order in respect of securities of the Company within 7 (seven) Trading Days after the approval of pre-clearance is given. The Designated Person shall file within 2 (two) days of the execution of the deal, the details of such deal with the Compliance Officer in the prescribed form. In case the transaction is not undertaken, a report to that effect shall be filed. (Annexure 4).

7.9 If the order is not executed within seven days after the approval is given, the employee/director must pre-clear the transaction again.

### **8. TRADING PLANS:**

The Regulations recognize the concept of Trading Plans. Any Designated Person intending to formulate a Trading Plan shall do so ensuring there it is not in violation of Company's Code of Conduct or the Regulations.

### **9. OPPOSITE TRANSACTIONS IN THE SECURITIES:**

9.1 All Designated Persons who buy or sell any number of shares of the Company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction. All Designated Persons shall also not take positions in derivative transactions in the shares of the Company at any time. In case of any contra trade 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 Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

9.2 On application, the Compliance Officer can grant relaxation from strict application of the above restriction after recording the reasons in this regard provided that such relaxation does not violate the Regulations. It may, however, be noted that in terms of the Regulations,

no such purchase/ sale will be permitted when the Trading Window is closed.

## **10. OTHER RESTRICTIONS**

10.1 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.

10.2 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 Code.

## **11. Reporting Requirements for transaction securities**

### **A) Initial Disclosure**

11.1 Every promoter, key managerial personnel and director of every Company whose securities are listed on any recognised stock exchange shall disclose his holding of securities of the Company as on the date of these regulations taking effect, to the company within thirty days of these regulations taking effect (Annexure 5 – Form A).

11.2 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 seven days of such appointment or becoming a promoter (Annexure 5 – Form B).

### **B) Continual Disclosure**

11.3 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 ten lakh rupees or such other value as may be specified (Annexure 5 – Form C).

Every 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.

### **C) Disclosures by other connected persons**



11.4 The Company may, at 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 these regulations.

#### **D) Periodic Disclosure by Designated Persons**

11.5 Every Promoter, key managerial personnel, 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 31<sup>st</sup> March every year in such form and manner (Annexure 6) as may be prescribed by the Compliance Officer from time-to-time. Such statement shall be submitted within 30 days of the end of the financial year.

#### **E) Records**

11.6 The Company shall maintain records of all the declarations in Clause 11 in the appropriate form for a minimum period of five years.

### **12. PENALTY FOR CONTRAVENTION OF THE CODE OF CONDUCT**

12.1 Every Designated Person shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her dependents).

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

12.3 Designated Persons who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, etc.

12.4 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.

### **13. INFORMATION TO SEBI IN CASE OF VIOLATION OF THE SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015**

In case it is observed by the Board of Directors that there has been a violation of the Regulations, the same shall be immediately intimated to SEBI.

#### **14. MISCELLANEOUS**

Any terms used hereinabove but not defined shall have the same meaning ascribed to it in the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and the Rules and Regulations made thereunder.

#### **15. AMENDMENT**

Any subsequent amendment/modification in the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and/or other applicable laws in this regard shall automatically apply to this Code.

Further, the Board may amend this Code as and when it deems fit.

## ANNEXURE 1

### SPECIMEN OF APPLICATION FOR PRE-TRADING APPROVAL

Date:

To,  
The Compliance Officer,  
\_\_\_\_\_ Limited,

Dear Sir/Madam,

#### **Application for Pre-trading approval in securities of the Company**

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's **Code of Conduct to regulate, monitor and report trading by insiders**, I seek approval to trade in \_\_\_\_\_ securities of the Company as per details given below:

1	Name of the applicant	
2	Designation	
3	Folio No. / DP ID / Client ID No	
4	Number of securities held as on date	
5	Nature of transaction	
6	Proposed date of dealing in securities	
7	Estimated number of securities proposed to be traded	
8	Any other relevant information	

I enclose herewith the form of Undertaking signed by me.

Yours faithfully,

\_\_\_\_\_  
(Signature of Applicant)

## ANNEXURE 2

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

#### UNDERTAKING

To,  
\_\_\_\_\_ **Limited,**

I, \_\_\_\_\_, resident of \_\_\_\_\_ hereby declare that I am Designated Person of \_\_\_\_\_ [INSERT NAME OF THE COMPANY].

I am desirous of dealing in \_\_\_\_\_ \* securities of the Company as mentioned in my application dated \_\_\_\_\_ for pre-clearance of the transaction.

I further declare that I am not in possession of or otherwise privy to any unpublished Price Sensitive Information (as defined in the Company's Code of Conduct to regulate, monitor and report trading by insiders (the Code) up to the time of signing this Undertaking.

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

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

I undertake to submit the necessary report within two Trading Days of execution of the transaction/a NIL report if the transaction is not undertaken.

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

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

Date :

Signature :

\* Indicate the number and nature of securities

### ANNEXURE 3

#### FORMAT FOR PRE- TRADING APPROVAL/DISAPPROVAL

Date: \_\_\_\_\_

To,

Name : \_\_\_\_\_

Designation : \_\_\_\_\_

Dear Sir/Madam,

**Sub.: Pre-Trading Approval/Disapproval – Your Application Dt. \_\_\_\_\_**

With reference to your above application seeking approval for undertaking certain transactions in Securities (including derivatives) of the Company detailed therein, please be informed that you are / your Immediate Relative \_\_\_\_\_ is hereby authorised/not authorised to undertake the transaction(s) as detailed in your said application.

This approval/disapproval is being issued to you based on the various declarations, representations and warranties made by you in your said application.

This approval letter is valid till 7 trading days from date hereof. 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 attached format within 2 days from the date of transaction/deal. In case the transaction is not undertaken a 'Nil' report shall be necessary.

Yours faithfully,

For **KLG CAPITAL SERVICES LIMITED**

COMPLIANCE OFFICER

Date : \_\_\_\_\_

Encl: Format for submission of details of transaction

## ANNEXURE 4

### FORMAT FOR DISCLOSURE OF TRANSACTIONS

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

Date:

To,  
The Compliance Officer,  
\_\_\_\_\_ Limited,

Dear Sir/Madam

#### Sub.: Details of Pre-Approved Transaction

Ref: Your Approval letter No. \_\_\_\_\_ dated \_\_\_\_\_

I hereby inform that I

- have not bought/ sold/ subscribed any securities (including derivatives) of the Company (along with reasons)
- have bought/sold/subscribed to \_\_\_\_\_ securities (including derivatives) as mentioned below on \_\_\_\_ (date)

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

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 5 years and produce to the Compliance officer / SEBI, any of the following documents:

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

I agree to hold the above securities (including derivatives) for a minimum period of six months. In case there is any urgent need to sell these securities (including derivatives) within the said period, I shall approach the Compliance Officer for necessary approval. (*applicable in case of purchase / subscription*).

I declare that the above information is correct and that no provisions of the Company's Code of Conduct to regulate, monitor and report trading by insiders and/or applicable laws/regulations have been contravened for effecting the above said transactions(s).

Signature : \_\_\_\_\_

Name :

Designation:

**FORM A****SEBI (Prohibition of Insider Trading) Regulations, 2015  
[Regulation 7 (1) (a) read with Regulation 6 (2) – Initial disclosure to the company]**

Name of the company: \_\_\_\_\_

ISIN of the company: \_\_\_\_\_

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

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relative to/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5

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

**Details of Open Interest (OI) in derivatives of the company held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)**

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		
Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
6	7	8	9	10	11

*Note: In case of Options, notional value shall be calculated based on premium plus strike price of options*

Name &amp; Signature:

Designation:

Date:

Place:

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**FORM B**

**SEBI (Prohibition of Insider Trading) Regulations, 2015  
[Regulation 7 (1) (b) read with Regulation 6(2) – Disclosure on becoming a  
director/KMP/Promoter]**

Name of the company: \_\_\_\_\_

ISIN of the company: \_\_\_\_\_

**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 / Directors/ 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 Shareholding
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5	6

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

**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).**

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 (contracts * lot size)	Notional value in Rupee terms	Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
7	8	9	10	11	12

*Note: In case of Options, notional value shall be calculated based on premium plus strike price of options*

Name & Signature:

Designation:

Date:

Place:

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**FORM C**

**SEBI (Prohibition of Insider Trading) Regulations, 2015  
[Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]**

Name of the company: \_\_\_\_\_

ISIN of the company: \_\_\_\_\_

**Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).**

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relative to/others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition / disposal (on market/public/ rights/ preferential offer / off market/ Inter-se transfer, ESOPs etc.)
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge / Revoke/ Invoke)	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

*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 of the company by Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).**

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)	
15	16	17	18	19	20	21

*Note: In case of Options, notional value shall be calculated based on Premium plus strike price of options.*

Name & Signature:

Designation:

Date:

Place:

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**ANNEXURE 6**

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

Date:

To,  
The Compliance Officer,  
**KLG Capital Services Limited**

Dear Sir,

**STATEMENT OF SHAREHOLDINGS IN KLG CAPITAL SERVICES LIMITED**

As on \_\_\_\_\_, I along with my Immediate Relatives hold the Securities (including derivatives) of the Company, details whereof are as under:

Name of Holder	PAN	Nature of security	Physical Holdings		Electronic Holdings		
			Folio No.	Total holdings	DP ID	Client ID	Total holdings

*(Details in the above table to be filled for self as well as Immediate Relatives even if no shares may be held by self.)*

Yours truly,

Signature: \_\_\_\_\_

Name: