



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

POLYGENTA TECHNOLOGIES LIMITED

IMS (ISO 9001, ISO 14001 and OHSAS 18001), Oekotex and Control Union certified

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

1. INTRODUCTION:

Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015, (*hereinafter referred to as "Insider Trading Regulations"*) the Board of Directors of the Company in its meeting held on 28th May, 2015 approved the "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information and Code of Conduct to regulate, monitor and report trading", which came into force with back-dated effect from May 15, 2015. The amendments to the Code effective from 1st April, 2019 have been approved by the Board of Directors of the Company at its meeting held on 21 March, 2019 to be in compliance with the amendments made by SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018. The objective of the Code is to prevent dealing in securities of the Company by an Insider either on his own behalf or on behalf of any other person, on the basis of unpublished price sensitive information.

This Code shall be called as the "Polygenta Code of Conduct to Regulate, Monitor and Report Trading in Company Securities".

2. THE PRINCIPLES AND OBLIGATION:

The Company endeavours to preserve the confidentiality of unpublished price sensitive information and to prevent misuse of such information. The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations.

Every Promoter and Person who is part of Promoter Group, Director and Designated Employees of the Company with unpublished price sensitive information has a duty to safeguard the confidentiality of all such information obtained in the course of his or her work at the Company. No Promoter and Person who is part of Promoter Group, Director/Chief Executive Officer/Chief Financial Officer/Senior Management Personnel/ other designated employees and their immediate relatives shall use his or her position or knowledge of the Company to gain personal benefit or to provide benefit to any third party.

3. APPLICABILITY:

This Code shall be applicable to Promoters/Directors/designated persons of the Company/ connected persons and their immediate relatives.

4. DEFINITIONS:

In this Code unless the context otherwise requires:

(a) "**Act**" means the Securities and Exchange Board of India Act, 1992 (15 of 1992).

(b) "**Board**" means the Board of Directors of "**Polygenta Technologies Limited**".

(c) "**Companies Act**" means the Companies Act, 2013.

- (d) **"Compliance Officer"** means - The officer appointed by the Board for the purpose of compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for preservation of unpublished price sensitive information, monitoring of trades and the implementation of this Code of Conduct as well as the provisions of SEBI (Prohibition of Insider Trading) Regulation, 2015 as amended from time to time, under the overall supervision of the Board.
- (e) **"connected person"** means 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.
- (f) **"Deemed to be connected persons"** shall mean the persons falling within the following categories unless the contrary is established, -
- (i) an immediate relative of connected persons specified in clause (e); or
 - (ii) a holding company or associate company or subsidiary company; or
 - (iii) an intermediary as specified in section 12 of the Act or an employee or director Page 4 thereof; or
 - (iv) an investment company, trustee company, asset management company or an employee or director thereof; or
 - (v) an official of a stock exchange or of clearing house or corporation; or
 - (vi) 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
 - (vii) 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
 - (viii) an official or an employee of a self-regulatory organization recognised or authorized by the Board; or
 - (ix) a banker of the company; or
 - (x) 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.
- (g) **"Designated Employee"** means
- (i) every employee in the role of functional head and above.
 - (ii) Chief Executive Officer/ Incharge and employees upto two levels below Chief Executive Officer / Incharge of the company irrespective of their functional role in the company or ability to have access to unpublished price sensitive information.

- (iii) Identified employees in the Secretarial / Finance / Accounts Department, who have access to unpublished price sensitive information.
- (iv) Any other employee, as may be determined and informed by the Compliance Officer from time to time based on their role and function and access to o unpublished price sensitive information.
- (h) "**Designated Person**" means all the Promoters, Promoters Group, Directors, Key Managerial Personnel, connected persons and designated Employees of the Company and shall include immediate relatives of the persons referred above.
- (i) "**Generally available information**" means information that is accessible to the public on a non-discriminatory basis;
- (j) "**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;
- (k) "**Insider**" means any person who is
 - i) a connected person; or
 - ii) in possession of or having access to unpublished price sensitive information;
- (l) "**Material Subsidiary**"- means an unlisted subsidiary, incorporated in India, whose income or net worth (i.e. paid up capital and free reserves) exceeds 20% of the consolidated income or net worth respectively, of the listed holding company and its subsidiaries in the immediately preceding accounting year).
- (m) "**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;
- (n) "**Regulations**" means Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
- (o) "**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;
- (p) "**Trading**" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;
- (q) "**Trading day**" means a day on which the recognized stock exchanges are open for trading;
- (r) "**Unpublished price sensitive information**" 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, 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.

The words and/or phrases which are not defined in this code but are defined under the SEBI Act, 1992 or SEBI (Prohibition of Insider Trading) Regulations, 2015 or Companies Act, 2013 as amended from time to time, shall have the same meaning as defined under the said Act and/or Regulations.

5. COMPLIANCE OFFICER

The Company Secretary of the Company shall be the Compliance Officer for setting forth the policies and procedures and to implement and monitor adherence to this 'Code of Conduct' and applicable laws and regulations and policies and procedures. The Compliance Officer shall report to the Board.

The Compliance Officer under this Code shall be responsible for:

- (i) compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for preservation of unpublished price sensitive information;
- (ii) pre-clearing of Designated Persons' trades in Company Securities;
- (iii) monitoring of trades in Company Securities and the implementation of this Code of Conduct as well as the provisions of SEBI (Prohibition of Insider Trading) Regulation, 2015 as amended from time to time, under the overall supervision of the Board.
- (iv) The Compliance Officer shall maintain a record of the Designated Persons and any changes made in the list of Designated Persons.
- (v) The Compliance Officer shall place before the Chairman of the Audit Committee on a yearly basis, all the details of dealing in securities by Designated Persons and the accompanying documents that such persons had executed under the pre-dealing procedure envisaged in this code of conduct.
- (vi) The Compliance Officer shall assist all the designated persons in addressing any clarifications regarding the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct.

6. CHINESE WALL PROCEDURE

- (i) In order to prevent the misuse of confidential information it is necessary to adopt a "CHINESE WALL POLICY" which separates those areas (employees) of the company,

which routinely have access to confidential information, considered as “inside areas” from those areas that deal with customer service, back office, operations or other departments providing support services, considered “public areas”.

- (ii) The employees in the inside areas shall not communicate any Price Sensitive Information to any one in public area.
- (iii) Inside areas will comprise of the following:-
 - Accounts
 - Operations
 - Taxation
 - Corporate Planning
 - Such other departments as stated by the Compliance Officer considering to be privy to price sensitive information.
- (iv) 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.

7. NEED TO KNOW CRITERIA

Unpublished price sensitive information is to be handled on a "need to know" basis. 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 rise to a conflict of interest or appearance of misuse of the information. Unpublished price sensitive information can however be shared by insiders with collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

8. PRESERVATION OF PRICE SENSITIVE INFORMATION

- (i) No person shall either on his own behalf or on behalf of any other person, deal in Company Securities when in possession of any unpublished price sensitive information.
- (ii) No person shall communicate, counsel or procure directly or indirectly any unpublished price sensitive information to any person who, while in possession of such unpublished price sensitive information, shall not deal in Company Securities.
- (iii) Designated Persons shall maintain the confidentiality of all Price Sensitive Information. They shall not pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sale of the Company Securities.

9. TRADING WINDOW:-

- (i) The trading restrictions shall be applicable to designated persons.

- (ii) The trade in Company securities is permitted only during a specific trading period called “Trading Window” to be specified by the Company. Trading in Company Securities is prohibited during the time information referred to in sub-clause (iii) below is unpublished and during the period the “Trading Window” is closed.
- (iii) The “Trading Window” shall be, *inter alia*, closed at the time of:—
 - (a) Declaration of financial results (quarterly, half-yearly and annually).
 - (b) Declaration of dividends (interim and final).
 - (c) Issue of securities by way of public/rights/bonus etc.
 - (d) Any major 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) Any changes in policies, plans or operations of the company.
 - (h) Such other information as specified by various law, rules and regulations and ascertained by the Compliance Officer for this purpose.

The “**Trading Window**” closure shall initiate from such day as determined by the Compliance Officer which generally will be the date and time wherein intimation for convening Board Meeting for transacting the aforesaid matters listed in (b) to (h) is disseminated to the Stock Exchanges. The Trading Window shall be opened 48 hours after the information referred to in sub-clause (iii) is made generally available.

- (iv) In case of ESOPs, exercise of option shall be allowed during the period when the Trading Window is closed. However, any other form of buying or selling or trading in Company shares is prohibited when Trading Window is closed.
- (v) The gap between clearance of accounts by the Audit committee and Board Meeting shall be as narrow as possible and unless circumstances warrant otherwise, will be on same day to avoid leakage of material information.

10. PRE-CLEARANCE OF TRADES

- (i) All Designated Persons, who intend to deal in the Company Securities above Rs.5 lakhs in value or Rs.25000 shares or 1% of the total securities of the class dealt, whichever is lower shall seek the prior approval of the Compliance officer in the form of pre-clearance of trade, by making an application in the prescribed form as given at Form 1.

Prior to approving any trade, the Compliance Officer shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any UPSI. He shall have also regard to whether any such declaration is reasonably capable of being rendered inaccurate.

- (ii) All Designated Persons shall execute their order in respect of securities of the company within seven trading days of pre-clearance as approved by the Compliance Officer. If the

order is not executed within the stipulated time, the Designated Persons shall pre-clear the transaction again.

- (iii) In case the Compliance Officer wishes to deal in the Company Securities, he would have to make the application in the prescribed (Form I) to the Chairperson of the Company. The remaining provisions of this section, as applicable to Designated Persons, would also apply to the Compliance Officer.

11. CONTRA TRADE PROVISIONS:-

- (i) All Designated Persons who buys or sells 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.
- (ii) The compliance officer may grant relaxation from strict application of such Contra trade restriction in Form V. (Application for Waiver) from such designated persons by recording in writing the justification for such opposite transaction. The Compliance Officer while providing such relaxation shall ensure that it is not in violation of these regulations.
- (iii) However, if a contra trade is executed, inadvertently or otherwise, in violation of such a restriction, the Compliance Officer on having knowledge of the same shall ensure that the profits from such trade liable to be disgorged for remittance to the Board for credit to the Investor Protection and Education Fund administered by the Board under the Act.

Provided that these provisions shall not be applicable for trades pursuant to exercise of stock options.

12. REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES

All designated persons will have to forward details of their securities transactions including the statement of their dependent family members to the Compliance Officer in the following manner:-

- (i) Every person on appointment as a key managerial personnel or a director of the Company or upon becoming a promoter or member of the promoter group shall disclose his holding of securities of the Company and that of his immediate relatives as on the date of appointment or becoming a promoter, to the Company within seven days of such appointment or becoming a promoter in Form VII
- (ii) Every designated person 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 Rupees Ten lakhs.

The disclosure shall be made within 2 working days of:

- (a) the receipt of intimation of allotment of shares, or
- (b) the acquisition or sale of shares or voting rights, as the case may be.

Such Disclosures shall be made in Form VIII.

- (iii) The Directors and Employees holding security in the Company shall give Statement(s) in Form IX disclosing the total number of shares or voting rights held, by him/her and / or immediate relative(s) as at the end of the financial year of the company, within 7 working days the end of the financial year. This is irrespective of whether there is any change in the holdings.
- (vi) The compliance Officer shall maintain records of all declarations in the form given by the Designated Persons for a minimum period of five years.

13. DISCLOSURE BY THE COMPANY TO THE STOCK EXCHANGE(S)

- (i) Within 2 days of the receipt of intimation under Clause 12(ii) the Compliance Officer shall disclose to all Stock Exchanges on which the securities of the Company are listed, the information received.

14. TRADING PLAN

- (i) An insider may formulate a Trading Plan and present it to the compliance officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.
- (ii) Such Trading Plan shall not entail:-
 - (a) commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
 - (b) 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) trading for a period of less than 12 months;
 - (d) overlap for any period for which another trading plan is already in existence submitted.
 - (e) trading for market abuse
- (iii) Such Trading Plan shall 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;
- (iv) The compliance officer shall review the trading plan to assess whether the plan would have any potential for violation of these 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.

- (v) 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.
- (vi) Upon approval, the Compliance Officer shall notify the Trading Plan to the stock exchanges on which the securities of the company are listed.

15. SUBMISSION OF INFORMATION

- (i) All Designated persons shall be required to disclose names and Permanent Account Number of the following persons to the Compliance Officer company on an annual basis and as and when the information changes:
 - (a) immediate relatives
 - (b) persons with whom such designated person(s) shares a material financial relationship
 - (c) Phone, mobile and cell numbers which are used by them

Explanation—The term “material financial relationship” shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding twelve months, equivalent to at least 25% of such payer’s annual income but shall exclude relationships in which the payment is based on arm’s length transactions.”

- (ii) In addition, the names of educational institutions from which designated persons have graduated and names of their past employers shall also be disclosed on a one time basis.

16. LEAKAGE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

- (i) Introduction:

Leakage of unpublished price sensitive information (covered under the definition of UPSI) is prohibited and is in contravention of regulation 3(1) and (2) of SEBI (Prohibition of Insider Trading) Regulations 2015 (“PIT Regulations”) read with section 12A(e) of the Securities and Exchange Board of India Act, 1992 (“SEBI Act”) which prohibit procurement or communication of UPSI. As per the provisions, no insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations. No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

- (ii) Inquiry into leakage of information or suspected leakage of information

In compliance with Regulation 9A(5) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended, the Board shall be informed immediately of the leakage or suspected leakage of unpublished price sensitive information and an inquiry shall be initiated into the leakage of unpublished price sensitive information or suspected leakage of unpublished price sensitive information. The Managing Director, the Incharge, Company secretary / Compliance Officer and CFO are authorized to conduct the inquiry either by themselves or employ outside consultants to conduct the inquiry which shall be completed within a period of 15 days of the suspected leakage of information.

If an inquiry is initiated in case of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information, all intermediaries and fiduciaries associated with the company shall co-operate in connection with such inquiry conducted.

A report shall be submitted to the Board of Directors within 5 days thereafter and such report shall cover the following:

- a) Persons / members of committees involved in generation of the original data
- b) Persons involved in the consolidation of the data.
- c) Persons involved in the preparation of board notes and presentations.
- d) Persons involved in dissemination of information in the public domain.
- e) Any other persons who had access to the information as per the Legitimate Purpose Policy.
- f) Reports from the Structured Database maintained by the company giving the audit trail of the persons who had access to the unpublished price sensitive information.
- g) Identification of the person or persons who are responsible for such leakage of information

The Board shall deliberate on the report so submitted and recommend appropriate action which will include sanctions and disciplinary actions, including wage freeze, suspension, recovery, clawback etc., In case there has been a leakage of unpublished price sensitive information, and action has been taken based on the inquiry report, the Board shall also take necessary steps to inform SEBI promptly.

(iii) Employees being whistle blowers

The Company Secretary / Compliance Officer shall communicate to all employees by way of email or by way of disclosure on the website of the company to report instances of any leakage or suspected leakage of unpublished price sensitive information to their supervisor/HR/Compliance Officer.

No unfair treatment will be meted out to the Whistle Blower by virtue of his/ her having reported a Protected Disclosure under this policy. The company, as a policy, condemns, any kind of discrimination, harassment, victimization or any other unfair employment practice being adopted against Whistle blower. Complete protection will, therefore, be given to Whistle Blowers against any unfair practice like retaliation, threat or intimidation of termination / suspension of service, disciplinary action, transfer demotion, refusal of

promotion or the like including any direct or indirect use of authority to obstruct the Whistle Blower's right to continue to perform his duties / functions including making further Protected disclosures.

The identity of the Whistle Blower shall be kept confidential to the extent possible and permitted under the law and will not be revealed unless he himself has made either his details public or disclosed his identity to any other office or authority. In the event of the identity of the Whistle Blower being disclosed, the Audit Committee is authorized to initiate appropriate action as per extant regulations against the person or agency making such a disclosure.

17. PENALTY FOR CONTRAVENTION

- (i) Persons to whom this code is applicable who trade in securities or communicate any information for trading in securities in contravention of this Code of Conduct will be penalised and appropriate action will be taken by the Board or any other Authority appointed by the Board after giving reasonable opportunity to show-cause and adherence to the principles of natural justice. The penalty may include wage freeze, suspension, recovery, clawback, ineligibility for future participation in employee stock option plans, etc.
- (ii) In addition to the action which may be taken by the Company, the persons violating or contravening these Code of Conduct shall also be subject to action by SEBI as per SEBI Act. In case of any violation, the Compliance Officer shall inform SEBI accordingly.

18. AMENDMENT TO CODE OF CONDUCT

The Board of Directors of Polygenta Technologies Limited reserves the right to add, amend, modify this Code of Conduct as and when it deems appropriate.

19. SAVINGS CLAUSE:

If any rules under the code are in conflict with or inconsistent with the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time, then the SEBI (Prohibition of Insider Trading) Regulations, 2015 as modified/ amended from time to time, shall prevail and shall deemed to have been included in this code.

Form I
Application for Pre-clearance

(For use by Directors/Officers/ Key Managerial Personnel in case deal in the securities of Company for Rs.5 lakhs in value or Rs.25000 shares or 1% of the total securities of the class dealt, whichever is lower)

To,
 The Compliance Officer
 Polygenta Technologies Limited
 Dear Sir,

I / my immediate relative am desirous of dealing in the below-mentioned securities of the Company in my own name or on behalf of my immediate relative(write name of family member and relationship) and seek your approval to acquire/ purchase/ sell them

Type of Security	No. of Shares	Market Price on date of Application (To give last trading day's closing price)	Nature of Trade Buy / Sell	Date by which trade is proposed to be executed	Folio No./ DP ID No./Client ID No. Along with the name of depository	Present Holding (No. of Shares	
						Physical	Demat
<i>Equity shares</i>							

My undertaking for the purpose of pre-clearance is attached herewith. I/ my immediate relative is aware that if the order is not executed within seven trading days after the approval is given, I would have to pre-clear the transaction again.

I have made full and true disclosure in this application.

Signature:
 Name:
 Designation:
 Department:
 Location:

Form II

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

UNDERTAKING

In compliance of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the Polygenta Code for Prohibition for Prevention of Inside Trading, I, _____ (Name of the Designated Person) hereby undertake/declare that:

1. I do not have any access to or have not received any "Price Sensitive Information" upto the time of signing this undertaking.
2. In case I have access to or receive any "Price Sensitive Information" after the signing of this undertaking but before the execution of the deal, I shall inform the Compliance Office of the change in the position and that I would completely refrain from dealing in Securities till the time such information is made available to public by Company.
3. I have not contravened the Code as notified by the company from time to time.
4. I have made full and true disclosure in the matter.

Signed this _____ day of _____, 20__

Signature:
Name:
Designation:
Department:
Location

FORM III

FORMAT FOR PRE-DEALING APPROVAL LETTER

Date: _____

Approval No: __ of __

To,

Mr. /Mrs. _____

Emp No. : _____

Designation: _____

PRE-DEALING APPROVAL/DISAPPROVAL -Your application Dtd._____

Dear Mr. /Mrs. _____

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

This approval 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 _____ (i.e. for {7 trading days}). If you do not execute the approved transaction /deal on or before this date you would have to seek fresh pre-dealing approval 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 four {4} days from the date of transaction/deal. In case the transaction is not undertaken a “Nil” report shall be necessary.

Yours truly,

Compliance Officer

Form IV

Format for Confirmation of Trades executed, pursuant to pre clearance

From:
Name:
Designation:

To
The Compliance Officer
Polygenta Technologies Limited

Dear Sir,

Pursuant to your pre clearance datedI / my immediate relative have dealt in the below-mentioned securities of the Company in my own name or on behalf of my immediate relative(write name of family member and relationship)

Type of Security	No. of Shares	Price at which transacted	Nature of Trade Buy / Sell	Date on which executed	Folio No./ DP ID No./Client ID No. Along with the name of depository	Present Holding (No. of Shares)	
<i>Equity shares</i>						<i>Physical</i>	<i>Demat</i>

I hereby confirm that I did not have any access to or have not received any "Price Sensitive Information" upto the time of execution of this transaction.

I have made full and true disclosure in the matter.

Signed this _____ day of _____, 20__

Signature:
Name:
Designation:
Department:
Location

Form V

(Declaration by Designated Person(s) and dependent family members under Code for Prevention of Insider Trading for permission to sell within 6 months days of purchase / sale)

From;

Shri/Smt: _____
Designation _____
Employee No.: _____

To,:
The Compliance Officer
Polygenta Technologies Limited

Dear Sir,

Sub: **PERMISSION FOR DO A CONTRA TRADE WITHIN 6 MONTHS OF PURCHASE**

In terms of the captioned subject the details of my/immediate relative member(s) Shri/Smt. _____, purchased shares of the company as specified below:

Date of Purchase	Number of Shares	Pre-Clearance No and Date	DP ID/ Client ID

Whereas in terms of the requirement of Polygenta Code for prevention of Insider Trading, shares are required to be held for a period of at least 6 months from the day of purchase, however, on account of the exigent circumstances mentioned hereunder, I desire to dispose the shares forthwith:

In view of the aforesaid I earnestly request that the Company accords its approval to my request for sale.

Thanking you,

(SIGNATURE)

Form VI (Form A as specified by SEBI)

Form A

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

Name of the company: Polygenta Technologies Limited

ISIN of the Company : INE441D01020 :

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 & Signature:

Designation:

Date:

Place:

Form VII (Form B as specified by SEBI)

Form B

**Securities and Exchange Board of India (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: Polygenta Technologies Limited
ISIN of the Company : INE441D01020

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)	Notional value in Rupee terms	Contract specifications	Number of units (contracts)	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:

Form VIII (Form C as specified by SEBI)

Form C

**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (2) read with Regulation 6(2) - – Continual disclosure]**

Name of the company: Polygenta Technologies Limited

ISIN of the company: INE441D01020

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoters/ KMP / Director/s/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:

Form IX

ANNUAL STATEMENT OF HOLDINGS OF DIRECTORS / OFFICERS/ KMPs AND THEIR IMMEDIATE RELATIVES

(Refer Clause 11(1)(C) of the Code for Prohibition of Insider Trading)

Date:
To,
The Compliance Officer
Polygenta Technologies Limited

Dear Sir,

STATEMENT OF SHAREHOLDINGS IN POLYGENTA TECHNOLOGIES LIMITED

As on _____, I along with my immediate relatives, hold the Securities of the Company, details whereof are as under:

Description of Security:

Name of the Holder	Physical Holdings		Electronic Holdings		
	Folio No	Total Holdings	DP ID	Client ID	Total Holdings

Yours truly,

Signature: _____

Name: _____

Form X (Form D as specified by SEBI)

Form D

Regulation 7(3) – Transactions by Other connected persons as identified by the company Details of trading in Securities by other connected persons as identified by the Company

Name, PAN, CIN/DIN, & address with contact nos. of other connected persons as identified by the company	Connection with company	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/acquisition of shares/sale of		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 share holding	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

Name & Signature:

Designation:

Date:

Place:
