

MEGA CORPORATION LIMITED

INTERNAL CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING IN DEALING WITH SECURITIES OF MEGA CORPORATION LIMITED

(PURSUANT TO REGULATION 9(1) OF SEBI (PROHIBITION OF INSIDER TRADING)
REGULATIONS, 2015)

(Updated in March 2025)

Mega Corporation Limited

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1. PREAMBLE:

This Internal Code of Conduct for the Prevention of Insider Trading has been formulated in accordance with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time. Designated as the *Internal Code of Conduct for the Prevention of Insider Trading* in relation to the securities of Mega Corporation Limited ("**MegaCorp.**" or "the **Company**"), this Code is instituted to ensure that individuals classified as Insiders do not exploit, nor enable others to exploit, access to Unpublished Price Sensitive Information (**UPSI**) pertaining to the Company. Such information, being non-public in nature, qualifies as insider information, and its misuse is strictly prohibited under this framework.

2. DEFINITION:

2.1 "**Act**" means the Securities and Exchange Board of India Act, 1992;

2.2 "**Board/ SEBI**" means the Securities and Exchange Board of India;

2.3 "**Board of Directors**" means the collective body of the Directors of the Company;

2.4 "**CODE**" means this Internal Code of Conduct for Prevention of Insider Trading in Dealing with Securities of Mega Corporation Limited including modification made thereto from time to time by the Company;

2.5 "**Company/ MegaCorp.**" means Mega Corporation Limited;

2.6 "**Compliance Officer**" for the purpose of this CODE and who is under the overall supervision of the Board of Directors of the Company, means the Designated Company Secretary of the Company who reports to the Board of Directors and is financially literate. In absence of such Designated Company Secretary, the Board of Directors may designate any other qualified Company Secretary of the Company, who will report to the Board of Directors and is financially literate, to discharge the duties of Compliance Officer under this CODE;

2.7 "**Connected Person**" means:

i.) any person who is or has been, during the six months prior to the concerned act, associated with a company, in any capacity, directly or indirectly, 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, whether temporary or permanent, with the Company, that allows such a person, directly or indirectly, access to UPSI 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) a 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, association of persons or LLP, wherein a director of a Company or his Relative or banker of the Company, has more than **ten** per cent of the holding or interest; or
- k) a firm or its partner or its employee in which a connected person specified in sub-clause 2.7.(i) is also a partner; or
- l) a person sharing household or residence with a connected person specified in sub-clause 2.7.(i);
- m) Professional firms such as auditors, accountancy firms, law firms, analysts, insolvency professional entities, consultants, banks etc., assisting or advising the Company.

Connected Person of the Company shall be deemed to have due notice of this CODE and it is the responsibility of such Connected Person to ensure adherence to this CODE.

2.8 “Designated Persons” means:

- i.) Promoter(s);
- ii.) All Directors as appointed on Board of Directors of the Company;
- iii.) Key Managerial Personnel of the Company;
- iv.) Official as mentioned below who might have access to UPSI as defined in the CODE:
 - Executive Vice President (Operations)
 - General Manager (Accounts)
 - Manager (Accounts)
 - Legal Coordinator
- v.) Directors, Chief Executive Officer, Chief Financial Officer and Employees upto two levels below CEO of the Material Subsidiary, if any;
- vi.) Such other employees of the Company including employees that may be notified by the Compliance Officer from time to time.

2.9 “Generally Available Information” means information that is accessible to the public on a non- discriminatory basis and shall not include unverified event or information reported in print or electronic media;

NOTE: *It is intended to define what constitutes generally available information so that it is easier to crystallize and appreciate what constitutes UPSI. Information published on the website of a stock exchange, would ordinarily be considered generally available.*

- 2.10 “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;
- 2.11 “Insider”** means any person who is:
- i.) a Connected Person;
 - ii.) in possession of or having access to UPSI;
 - iii.) in receipt of UPSI pursuant to a “legitimate purpose”;

Insider of the Company shall be deemed to have due notice of this CODE and it is the responsibility of such Insider to ensure adherence to this CODE.

- 2.12 “Key Managerial Personnel / KMP”**, in relation to the Company, means key managerial personnel as defined under Section 2(51) of the Company Act, 2013;
- 2.13 “Material Financial Relationship”** shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift from a Designated Person during the immediately preceding twelve months, equivalent to at least 25% of the annual income of such Designated Person but shall exclude relationships in which the payment is based on arm’s length transactions;
- 2.14 “Promoter”** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof;
- 2.15 “Promoter Group”** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof;
- 2.16 “Regulations”** means the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendment thereof;
- 2.17 “Relative”** shall mean the following:
- i.) spouse of the person;
 - ii.) parent of the person and parent of its spouse;
 - iii.) sibling of the person and sibling of its spouse;
 - iv.) child of the person and child of its spouse;
 - v.) spouse of the person listed at sub-clause (iii); and
 - vi.) spouse of the person listed at sub-clause (iv)

Note: *It is intended that the Relatives of a “Connected Person” too become Connected Persons for the purpose of these Regulations. It is a rebuttable presumption that a Connected Person had UPSI.*

- 2.18 “Securities”** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof;

2.19 “Trading” means and includes subscribing, redeeming, switching, buying, selling, dealing, or agreeing to subscribe, redeem, switch, buy, sell, deal in any Securities, and "trade" shall be construed accordingly;

Note: Trading would include creation/ invocation/ revocation of pledge. Further, dealing in Securities to include direct dealing, forward or similar dealing or through portfolio management route, dealing by Designated Person or through Immediate Relatives.

2.20 “Trading Day” means a day on which the recognized stock exchanges are open for Trading;

2.21 “Unpublished Price Sensitive Information/ UPSI” 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, delisting, disposals and expansion of business, award or termination of order/contracts not in the normal course of business and such other transactions;
- v. changes in Key Managerial Personnel, other than due to superannuation or end of term, and resignation of a Statutory Auditor or Secretarial Auditor;
- vi. change in rating(s), other than ESG rating(s);
- vii. fund raising proposed to be undertaken;
- viii. agreements, by whatever name called, which may impact the management or control of the company;
- ix. fraud or defaults by the company, its promoter, director, key managerial personnel, or subsidiary or arrest of key managerial personnel, promoter or director of the company, whether occurred within India or abroad;
- x. resolution plan/ restructuring or one-time settlement in relation to loans/borrowings from banks/financial institutions;
- xi. admission of winding-up petition filed by any party /creditors and admission of application by the Tribunal filed by the corporate applicant or financial creditors for initiation of corporate insolvency resolution process against the company as a corporate debtor, approval of resolution plan or rejection thereof under the Insolvency and Bankruptcy Code, 2016;
- xii. initiation of forensic audit, by whatever name called, by the company or any other entity for detecting mis-statement in financials, misappropriation/ siphoning or diversion of funds and receipt of final forensic audit report;
- xiii. action(s) initiated or orders passed within India or abroad, by any regulatory,

statutory, enforcement authority or judicial body against the company or its directors, key managerial personnel, promoter or subsidiary, in relation to the company;

- xiv. outcome of any litigation(s) or dispute(s) which may have an impact on the company;
- xv. giving of guarantees or indemnity or becoming a surety, by whatever named called, for any third party, by the company not in the normal course of business;
- xvi. Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.

Explanation 1- For the purpose of sub-clause (ix):

- **'Fraud'** shall have the same meaning as referred to in Regulation 2(1)(c) of Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003.
- **'Default'** shall have the same meaning as referred to in Clause 6 of paragraph A of Part A of Schedule III of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Explanation 2- For identification of events enumerated in this clause as unpublished price sensitive information, the guidelines for materiality referred at paragraph A of Part A of Schedule III of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as may be specified by the Board from time to time and materiality as referred at paragraph B of Part A of Schedule III of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 shall be applicable.

NOTE: *It is intended that information relating to the Company or Securities, that is not generally available would be UPSI if it is likely to materially affect the price upon coming into the public domain. The types of matters that would ordinarily give rise to UPSI have been listed above to give illustrative guidance of UPSI.*

3. INTERPRETATION:

- a) All terms used in this CODE but not defined herein shall have the meanings assigned to them under the Regulation, Acts or the Companies Act, 2013 as the case may be;
- b) Words importing the singular number shall include the plural and vice versa;
- c) References to one gender shall include all genders;
- d) The index hereto and headings herein shall not affect the construction of this CODE;
- e) Reference herein to any enactment shall be deemed to include reference to such enactment as re-enacted, amended or extended.
- f) Any phrase introduced by the terms "including", "include" or any similar expression shall be construed as illustrative and shall not limit the sense of the words preceding those terms.

- g) The Appendix and Forms are an integral and inseparable part of this CODE.

4. RESTRICTION ON COMMUNICATION AND TRADING BY INSIDERS

4.1 Communication or procurement of UPSI

1. No Insider shall communicate, provide, or allow access to any UPSI, 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.
2. No person shall procure from or cause the communication by any Insider of UPSI, 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.
3. Any Department(s) of the Company, which is engaging any intermediary/ fiduciary, shall take an undertaking in **Form A** and the same may be considered as due notice to maintain confidentiality.

4.2 Structured Digital Database

1. All Insiders need to ensure that details of the persons/ entities, including Name and Permanent Account Number (PAN) or any other identifier authorized by law where PAN is not available, with whom UPSI is shared, is immediately provided to the Compliance Officer to enable maintenance of the structured digital database as required under Regulations.
2. The Compliance Officer of the Company shall, on receipt of the information from the Insider or of such UPSI shared by him directly with other Insiders, maintain a structured digital database containing the nature of UPSI and the names & other details of Insider who have shared the information and other Insider with whom information is shared.
3. Such database shall not be outsourced and shall be maintained internally with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database. Provided that entry of information, not emanating from within the organisation, in structured digital database may be done not later than 2 calendar days from the receipt of such information. Such database shall be preserved for a period of not less than eight years after completion of the relevant transactions and in the event of receipt of any information from the SEBI regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.

4.3 Trading when in possession of UPSI

1. Subject to the provisions of the Regulations, no Insider shall Trade in Securities of the Company that are listed or proposed to be listed on any stock exchange when in possession of UPSI.

Explanation: When a person who has traded in Securities has been in possession of UPSI, his Trades would be presumed to have been motivated by the knowledge and awareness of such information in his possession.

2. In the case of Connected Persons the onus of establishing, that they were not in possession of UPSI, shall be on such Connected Persons and in other cases, the onus would be on the SEBI.
3. No Designated Persons or their Immediate Relatives shall take any positions or enter into derivative(s) trading in the Securities of the Company at any time. Should a derivative Trading be executed, inadvertently or otherwise, in violation of such a prohibition, the Designated Person shall intimate the Company about such trade in **Form C** (hard copies) within two Trading Days of such transaction and penalty shall be levied for such violation/ contravention of this CODE and the profits, if any, from such Trade shall be liable to be disgorged for remittance to the SEBI for credit to the Investor Protection and Education Fund administered by the SEBI under the Act.

5. TRADING PLANS

- 5.1 An Insider/ Designated Person shall be entitled to formulate a trading plan that complies with the Regulations 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. (Refer **Appendix**)
- 5.2 The trading plan shall be as per Regulations and Application for trading plan shall be given in **Form I**.
- 5.3 The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of this CODE/ 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 as per the Regulations. In the absence of the Compliance Officer, the officer authorized by the Compliance Officer/ Director shall process the trading plan application.

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

Provided further that trading window norms shall not be applicable for Trades carried out in accordance with an approved trading plan.

- 5.4 The trading plan once approved shall be irrevocable and the Insider/Designated Person shall mandatorily have to implement the plan, without being entitled to either execute any Trade in the Securities outside the scope of the trading plan or to deviate from it except due to permanent incapacity or bankruptcy or operation of law.

Provided that the implementation of the trading plan shall not be commenced if any UPSI in possession of the Insider/ Designated Person at the time of formulation of the plan has not become generally available at the time of the commencement of implementation.

- 5.5 Letter of intimation of approval/ rejection of trading plan is at **Form II**.
- 5.6 Upon approval of the trading plan, the Compliance Officer shall notify the plan to the stock exchanges on which the Securities are listed as per Regulations.
- 5.7 Such Insider/ Designated Person is required to intimate the Compliance Officer regarding implementation/ non-implementation of trading plan within two Trading Days of each transaction intimated under the trading plan as per performa provided in **Form**

III and the same shall be dealt with accordingly as per the Regulations.

5.8 The Compliance Officer shall maintain a register of trading plan of securities by the Insiders and notification to Stock Exchange as given in **REG I**.

5.9 In case of trading plan of the Compliance Officer or the Immediate Relatives of the Compliance Officer, the Compliance Officer shall present the trading plan to the Chairman & Managing Director of the Company in respect thereto. The remaining provisions of this Clause 5 shall be applicable *mutatis-mutandis* to such an application made by the Compliance Officer.

6. **TRADING WINDOW**

6.1 Designated Persons of MegaCorp. or their Immediate Relatives shall not Trade in Securities of MegaCorp. when trading window is closed. The trading window shall be closed when the Compliance Officer is of the view that a Designated Person or class of Designated Persons can reasonably be expected to have possession of UPSI.

6.2 In case of financial results, trading window shall be closed from the end of every quarter. In cases other than the financial results, the trading window shall remain closed as decided by the Compliance Officer and the timing for re-opening of the trading window shall be determined by the Compliance Officer taking into account various factors including the UPSI in question becoming generally available and being capable of assimilation by the market, which in any event shall not be earlier than 48 hours after the information becomes generally available.

For unpublished price sensitive information not emanating from within the Company, trading window may not be closed.

6.3 The trading window restrictions mentioned above shall not apply in respect of:

1. transactions specified in clauses (i) to (iv) and (vi) of the proviso to sub-regulation (1) of regulation 4 of the Regulations or allowed under any other provisions of the Regulations and in respect of a pledge of shares for a bonafide purpose such as raising of funds, subject to pre-clearance by the Compliance Officer and compliance with the respective regulations made by the SEBI;
2. transactions which are undertaken in accordance with respective regulations made by the SEBI such as acquisition by conversion of warrants or debentures, subscribing to rights issue, further public issue, preferential allotment or tendering of shares in a buy-back offer, open offer, delisting offer or transactions which are undertaken through such other mechanism as may be specified by the SEBI from time to time;
3. Trades pursuant to exercise of stock options.

6.4 The remaining days of a financial year when the trading window is not closed shall be called "**Valid Trading Window**".

6.5 All Designated Persons shall conduct their Trading in the Securities of the Company only in the "Valid Trading Window" period as mentioned above and shall not enter into "**Contra Trade**" i.e. opposite or reverse transactions, in the Securities of the Company during the next six months following the immediate previous transaction. The Compliance Officer is empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate these

CODE/ Regulations. Should a Contra Trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such Trade shall be liable to be disgorged for remittance to the SEBI for credit to the Investor Protection and Education Fund administered by the SEBI under the Act.

7. PRE-CLEARANCE OF TRADES

- 7.1** During Valid Trading Window, a Designated Person, who intends to Trade in the Securities of the Company above the minimum threshold limit of 1,00,000 number of Securities to be Traded whether in one transaction or a series of transactions over any calendar month, shall obtain pre-clearance of the transaction as per the procedure as described hereunder.
- 7.2** Application along with undertaking for pre-clearance shall be made only during Valid Trading Window in **Form IV**. Application submitted during closure of trading window shall be invalid.
- 7.3** No Designated Person shall apply for pre-clearance of any proposed Trade, if such Designated Person is in possession of UPSI even if the trading window is not closed.
- 7.4** Letter of intimation of approval/ rejection is at **Form II**.
- 7.5** Immediately on receipt of the pre-clearance application, the Compliance Officer shall process the pre-clearance applications and if the pre-clearance application is in accordance and in compliance with the provisions of this CODE, the Compliance Officer shall endeavour to communicate the pre-clearance immediately but not later than two Trading Days from the date of receiving the application. In the absence of the Compliance Officer, the officer authorized by the Compliance Officer/ Director shall process the pre-clearance.
- 7.6** The Designated Person shall, within seven Trading Days, execute the Trade after the pre-clearance. If the Trade is not executed within seven Trading Days after the pre-clearance is given, the Designated Person shall obtain fresh pre-clearance. Such Designated Person is required to intimate the Compliance Officer regarding execution/ non-execution of pre-approved transaction within two Trading Days as per proforma provided in **Form III**.
- 7.7** For any transactions in the Company's Securities proposed to be entered into by the Compliance Officer or the Immediate Relatives of the Compliance Officer, the Compliance Officer shall seek pre-clearance from the Chairman of the Company in respect thereto. The remaining provisions of this Clause 7 shall be applicable *mutatis-mutandis* to such an application made by the Compliance Officer.

8. DISCLOSURE OF TRADING BY INSIDERS

8.1 General Provisions

The disclosures to be made by Designated Person/ Connected Person/ Insider 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.

Initial Disclosures

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 as on the date of appointment or becoming a Promoter or member of the Promoter Group, to the Company within seven days of such appointment or becoming a Promoter or member of the Promoter group in **Form B**.

8.2 Continual Disclosures

1. Every Promoter, member of the Promoter Group, Designated Persons 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 by the Compliance Officer from time to time in **Form C**.
2. 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 that for the avoidance of doubts that the disclosure of the incremental transactions after any disclosure under this clause, shall be made when the transactions effected after the prior disclosure cross the threshold specified above.

8.3 Other Disclosures

1. In case of transaction of Securities in an off-market *inter-se* transfer between Insiders who were in possession of the same UPSI without being in breach of regulation 3 of the Regulation and both parties had made a conscious and informed Trade decision, such off- market Trades shall be reported by the Insiders to the Compliance Officer within two working days. The Company shall notify the particulars of such Trades to the stock exchange on which the Securities are listed within two Trading Days from receipt of the disclosure or from becoming aware of such information. Provided that such UPSI was not obtained under sub-regulation (3) of regulation 3 of the Regulations.
2. **Disclosure by other Connected Person:** The other Connected Person or class of Connected Persons may be required, to make disclosures of holdings and/or Trading in Securities of the Company in **Form D**, and at such frequency as may be determined, by the Compliance Officer from time to time.

8.4 Disclosures on an appointment/ annual basis/ upon changes in information:

Designated Persons shall disclose in **Form E** (including undertaking), along with their shareholding, the name and PAN or any other identifier authorized by law (Aadhaar, Voter ID, Driving License, Passport) if PAN is not obtained, of the following persons to the Company on an appointment/ annual basis, within 30 days, of the end of the financial year or as and when the information changes:

1. Immediate Relatives;
2. Persons with whom such Designated Person shares a Material Financial Relationship;

3. Phone, mobile and cell numbers which are used by them;

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.

8.5 Disclosure of Pledge Details:

Subject to the provisions of the Regulations or the CODE, whenever the Designated Persons or their Immediate Relatives enter into transaction of creation of pledge or invocation of pledge or revocation of pledge in the Securities of the Company at any time. The Designated Person shall intimate the Company about such transaction in **Form C** (hard copies) within two Trading Days of such transaction.

9. MISCELLANEOUS

9.1 The Compliance Officer shall be responsible for:

1. Compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of UPSI, monitoring of Trades and the implementation of the CODE under the overall supervision of the Board of Directors of the Company.
2. Putting up a report to the Board of Directors and to the Audit Committee, after the closure of the financial year, providing details of transactions by Designated Persons or approval of any trading plan, pre-clearance of Trade, etc. and the Board of Directors and the Audit Committee shall review the compliances of this CODE.
3. Taking such other measures as necessary in the interest of due compliance of this CODE and the Regulations.
4. Unless express otherwise, maintenance of records of disclosures made under this CODE shall be for a period of 5 years.
5. In the performance of his duties, the Compliance Officer shall have access to all information and documents relating to the Securities or any other information as may be required by the Compliance Officer in order to ensure compliance with this CODE and the Regulations. All Designated Persons/ Insiders shall co-operate with the Compliance Officer in this regard.

9.2 The obligation to obtain pre-clearance, trading plan, submission of report on Trade executed/ not executed, restriction on Trade during trading window closure, restriction on Contra-Trade is not only applicable to standalone Trade of Designated Person but on all Trades done by Immediate Relatives, collectively considered as one & the same series of Trade, on consolidated basis, for the purpose of the CODE and the Regulations.

9.3 Penalty for Contravention of CODE

1. Any Designated Persons, who Trades in Securities of the Company, or communicates any UPSI, in contravention of this CODE, may be penalized and appropriate action may be taken by the Competent Authority as defined under Conduct.
2. A Report on violation of the CODE and Regulations shall be promptly informed to the stock exchange(s) where the concerned Securities are traded.
3. In case of violation of the CODE and/or Regulations, the following penalties shall be imposed on the Designated Person/ Insiders:

S. No.	Violation	Penalty*
1.	Trading in Securities of megaCorp. either in name of the Designated Person/ Insider or in the name of their Immediate Relative, when the trading window remains closed.	Rs.5,000/- per occasion
2.	In case of entering into Contra Trade	Rs.5,000/- per occasion
3.	Non-Update of data on software as informed by the Company from time to time or any other violation/ contravention of the Regulations/ the CODE	Rs.2,000/- per occasion

**In case of any instance of violation by the Designated Person/ Insider, the amount of penalty shall be deducted from the Salary/ outstanding bills of the Designated Person/ Insiders directly and be deposited to Investor Protection and Education Fund of SEBI (IPEF A/c).*

4. The Compliance Officer shall place non-compliance/ violation of the CODE/ Regulations before the Audit Committee and Board of Directors before depositing the amount of penalty into IPEF A/c.
5. The Audit Committee may recommend the relaxation of, and/or the Board of Directors may relax, in their absolute discretion, the above-mentioned penalties/ any other disciplinary action, if deemed fit on the merits of the case.

9.4 Power of SEBI

The action by the Company shall not preclude SEBI and other authorities from taking any action in case of violation of the Regulations. In case the Regulations or any Statutory Provisions are more stringent than those contained in the CODE, the Regulations/ Statutory Provisions shall prevail.

9.5 Clarifications and Modifications

1. For all queries concerning this CODE, Designated Person/ Insider may please contact the Compliance Officer.
2. In case any provision(s) of this CODE is contrary to or inconsistent with the provisions of the Regulations due to amendments or otherwise, the Regulations shall prevail.
3. The Compliance Officer shall have the right to amend and modify this CODE in consultation with the Chairman & Managing Director provided that any such amendment or modification to the CODE are statutory required in compliance with the Regulations and shall be tabled before the Board of Directors at the immediate next meeting.

DISCLAIMER

THIS CODE IS ONLY INTERNAL CODE OF CONDUCT AND ONE OF THE MEASURES TO AVOID INSIDER TRADING. EVERY CONNECTED PERSON/ INSIDER IS REQUIRED TO FAMILIARISE HIMSELF WITH THE REGULATIONS AS IT WILL BE THE RESPONSIBILITY OF EACH CONNECTED PERSON/ INSIDER (AND HIS IMMEDIATE RELATIVES) TO ENSURE COMPLIANCE OF THIS CODE, REGULATIONS AND OTHER RELATED STATUTES FULLY.

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION FOR PREVENTION OF INSIDER TRADING (“Fair Disclosure Code”)

[PURSUANT TO REGULATION 8(1) OF SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015]

1. Overseeing and coordinating disclosure:

Company Secretary or any other person authorized by the Chairman will be Chief Investor Relation Officer (**CIRO**). She/ He shall be responsible for ensuring timely and adequate disclosure of UPSI pursuant to this Fair Disclosure Code as required under the Regulations.

Information disclosure/ dissemination shall be approved in advance by any Director. If information is accidentally disclosed without prior approval, the person responsible may inform the CIRO immediately, even if the information is not considered price sensitive.

2. Responding to market rumors: The CIRO shall determine, in consultation with the Director and/ or the Chairman, if deemed necessary, as to the necessity of a public announcement for verifying or denying rumors and thereafter making appropriate disclosures, if required, as per SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

3. Timely reporting of shareholdings/ownership and changes in ownership:

The Compliance Officer shall be responsible for ensuring that disclosures of shareholdings/ ownership of major shareholders and disclosure of changes in ownership, as required under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and/ or any rules/ regulations made under the Securities & Exchange Board of India Act, 1992, are made in a timely and adequate manner.

4. Disclosure/ dissemination of UPSI with special reference to analysts/ research personnel, or during investor relations conferences/ investors meet:

Other than the Directors and CIRO, no person, except those authorized by the CIRO, shall disclose any information relating to the Company's Securities to analysts/ research personnel, or during investor relations conferences/ investors meet and shall follow the guidelines given hereunder.

Sharing of non-public information:

Directors or CIRO or other officers authorized by CIRO shall provide only public information to the analysts/ research personnel, or during investor relations conferences/ investors meet. The non-public information shall only be provided after consulting the CIRO in advance. The CIRO in such cases, shall ensure making appropriate disclosure of such information provided to the analyst/research personnel, or during investor relations conferences/investors meet.

Mega Corporation Limited

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Okhla Industrial Estate-III,
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P +91 11 46557134

E info@megacorppltd.com

www.megacorppltd.com

CIN: L65100DL1985PLC092375

Handling of unanticipated questions:

The Directors/ CISO should tackle the unanticipated questions carefully. The unanticipated questions may be noted and a considered response be given later in consultation with the any Director and/ or the Chairman. If the answer to any question requires dissemination of UPSI, the CISO shall report the same to the Director and/ or Chairman and obtain necessary approval for its dissemination to the Stock Exchanges. The CISO after dissemination of such UPSI aforesaid, respond to such unanticipated questions.

The Directors/ CISO shall take extreme care and caution when dealing with questions of analysts/ research personnel, or during investor relations conferences/ investors meet that raise issues outside the intended scope of discussion.

Recording of discussion:

All investor relations conferences/ investors meet shall be attended by the Directors/ CISO and/ or other officers authorized by CISO with the approval of the any director. All the discussion during quarterly con-calls will be recorded and transcripts will be placed on website under "Investor" page.

Simultaneous release of information:

Whenever the CISO proposes to organize investor relations conferences/ investors meet, the Company shall make a press release or post relevant information on its website after every such meeting.

5. Institutional Mechanism for Prevention of Insider Trading:

The CISO shall put in place adequate and effective system of internal controls to ensure compliance with the requirements of these Regulations to prevent insider trading.

6. Whistle Blower Mechanism to report any leak of UPSI:

In case any employee suspects any leak of UPSI, he may immediately blow the whistle and address the instance to the any Director of the Company or to CISO.

Further, the Company shall inform the SEBI promptly of such leaks, inquiries and results of such inquiries. Further also, the relevant intermediaries/ fiduciaries, if any, shall co-operate with the Company in connection with such inquiry conducted by the Company.

7. Policy for Determination of "Legitimate Purpose"

Meaning of Legitimate Purpose:

In this Policy, the term "Legitimate Purpose" shall generally include any purpose for which UPSI has been shared in the ordinary course of business or in the interest of the Company or performance of duties or discharge of legal obligations, on a need- to-know basis *inter alia*, including sharing of UPSI for any assignment in furtherance of the business interests of the Company, in respect of any proposed assignments or in order to avail professional services or other business purposes.

The sharing of UPSI by an Insider shall be deemed to be for "Legitimate Purpose" if it satisfies the following criteria which includes:

- The UPSI shall be shared strictly on 'need to know' basis;
- Such sharing of UPSI shall be in the ordinary course of business such as performance

of duties, discharge of legal obligations, etc. with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the Regulations and the CODE;

- The Insider shall share the UPSI with the external agencies only in the interest of the Company and/ or in compliance with the requirements of the law including the Regulations;
- Any person in receipt of UPSI pursuant to a legitimate purpose shall be considered an "Insider" and due notice shall be given to such person to maintain confidentiality of UPSI;
- All Insiders shall ensure non-disclosure or confidentiality agreements with the persons with whom UPSI is shared and the duties and responsibilities of such person with respect to such UPSI and the liabilities involved if such person misuses or uses such UPSI in breach of the CODE.

8. Medium of disclosure/ dissemination:

The CIRO with approval of the any Director shall disseminate all UPSI in a timely manner to stock exchanges where its Securities are listed and thereafter to the press.

As a good corporate practice, the UPSI disclosed to the Stock Exchanges and to the Press may also be supplemented by prompt updates on the Company's web-site by the CIRO.

The Company may also consider other modes of public disclosure of UPSI so as to improve investor access to the same.

Pursuant to SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, the information filed by the Company with the stock exchanges shall also be posted on the Company's website.

MEGA CORPORATION LIMITED

FORM-I

APPLICATION FOR TRADING PLAN TO TRADE IN SECURITIES OF MEGA CORPORATION LIMITED

To
The Compliance Officer
MEGA CORPORATION LIMITED
62, UGF, Okhla Industrial Estate,
Phase-III, New Delhi-110020

Dear Sir/ Madam,

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended, and the Company's Internal Code of Conduct for Prevention of Insider Trading in dealing with Securities of Mega Corporation Limited and Fair Disclosure Code, I seek approval for trading plan in Securities of Mega Corporation Limited as per the details given below:

S. No.	No. & %age of Securities/ voting rights held (including that of the Immediate Relative as on the date of application)	Folio No. / DP ID & Client ID	Nature of new Transaction for which approval is sought	Specific Dates / intervals of Trades/ Date of allotment
1	2	3	4	5

Estimated number of Securities/ to be dealt for each date/ intervals	Estimated Aggregated Consideration Value for each date/ intervals	Whether proposed transaction under self-name or by Immediate Relative	Name & PAN of the Immediate relative, if the transaction is made by Immediate relative	Previous approval no. and date of purchase/ allotment
6	7	8	9	10

UNDERTAKING

In this connection I solemnly confirm and declare:

1. that I do not have access and/ or have not received any UPSI up to the time of signing the undertaking;
2. trading plan once approved shall be irrevocable and the Insider/ Designated Person shall mandatorily have to implement the plan, without being entitled to either execute any Trade in the Securities outside the scope of the trading plan or to deviate from it except due to permanent incapacity or bankruptcy or operation of law;
3. that the implementation of the trading plan shall not be commenced, if any UPSI in my possession at the time of the formulation of the plan, has not become generally available at the time of the commencement of implementation of any part of trading plan;
4. that I have not contravened/ will not contravene the CODE, Fair Disclosure Code as notified by the Company from time to time;
5. I shall intimate the Compliance Officer regarding implementation/ non-implementation of trading plan within two Trading Days of each transaction approved under the trading plan.

6. that I am aware that, I shall be liable to face penal consequences as set forth in the CODE including disciplinary action under the CODE of the Company, in case the above declarations are found to be misleading or incorrect at any time.
7. that I hereby made a full and true disclosure in the matter.

Name: _____

Signature: _____

Date: _____

Place: _____

(For Office use)

Date of receipt of the application: _____

MEGA CORPORATION LIMITED

FORM-II

LETTER OF INTIMATION OF PRE-CLEARANCE/ APPROVAL OF TRADING PLAN

Full Name	
Immediate Relatives, if any	
Date of receipt of the Application	
Date of communication of approval or rejection	

Dear Sir,

Approval

With reference to your above application seeking approval for undertaking transactions in Securities detailed therein, please be informed that you are hereby authorized to undertake the transaction(s) as detailed in your said application for approval of Trading Plan/ Pre-clearance subject to following.

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

Kindly note that in terms of the Internal Code of Conduct for Prevention of Insider Trading in Dealing with Securities of Mega Corporation Limited and Fair Disclosure Code of Mega Corporation Limited, the above-mentioned transaction is to be completed within seven Trading Days of the pre-clearance, in case of pre-clearance. In case of approval of trading plan, such plan shall be irrevocable and you have to mandatorily 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.

Further, you are required to file the details of the executed transactions in the attached format within two {2} trading days from the date of transaction/ deal.

In case of pre-clearance, the above sanction automatically stands withdrawn if subsequently the trading window is declared closed involving the period of sanction therein.

OR

Rejection

With reference to your above application seeking approval for undertaking transactions in Securities detailed therein, please be informed that you are hereby not authorized to undertake the transaction(s) as detailed in your said application for approval of Trading Plan/ Pre-clearance:

Conditions / Reasons for Rejection (if any):

For Mega Corporation Limited

Compliance officer/ Authorized person

MEGA CORPORATION LIMITED
FORM III

FORMAT FOR DISCLOSURE OF PRE-APPROVED/ TRADING PLAN TRANSACTIONS

(To be submitted within two Trading Days of Trade/ Dealing in Securities of the Company)

Date:

To
The Compliance Officer
MEGA CORPORATION LIMITED
62, UGF, Okhla Industrial Estate,
Phase-III, New Delhi-110020

Dear Sir/ Madam,

Ref: Your Approval, if any, dated _____

I hereby inform you that, I,

[] have not traded any Securities, (in case of pre-clearance only)

[] have traded in the Securities as mentioned below

Name & PAN of person who executed trade (singly/ jointly)	No. of securities for which approval was obtained (if any)	Date of Trade	No. of securities traded	Type of Trade (viz. buy/ sell/ subscribed)	Folio No. / DP ID & Client ID	Price	Remark
1	2	3	4	5	6	7	8

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 3 (Three) years and produce to the Compliance Officer/ SEBI all the related records.

Further, enclosing following documents:

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

I declare that the above information is correct and that no provisions of the Company's CODE and/ or applicable laws/ regulations have been contravened for effecting the above said transaction(s).

Yours truly,
Signature:
Name:
Dept/ Div.

Strike out whichever is not applicable.

MEGA CORPORATION LIMITED

FORM-IV

APPLICATION FOR PRE-CLEARANCE TO TRADE IN SECURITIES OF MEGA CORPORATION LIMITED

To
The Compliance Officer
MEGA CORPORATION LIMITED
62, UGF, Okhla Industrial Estate,
Phase-III, New Delhi-110020

Dear Sir/ Madam,

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended, and the Company's Internal Code of Conduct for Prevention of Insider Trading in dealing with Securities of Mega Corporation Limited and Fair Disclosure Code, I seek pre-clearance for Trading in Securities of Mega Corporation Limited as per the details given below:

Full Name:
PAN No:
Designation and Department
Email ID:
KMP: Y/N

S. No.	No. & %age of Securities/ voting rights held (including that of the Immediate Relative as on the date of application)	Details (Date, Number/ value and Type) of Trades/ deals done during six months before the date of this application by Designated Persons/ Immediate Relative	Folio No. / DP ID & Client ID	Nature of new Transaction for which approval is sought	Estimated number of Securities/ to be Trades
1	2	3	4	5	6

Estimated Aggregated Consideration Value to proposed Trade (as per latest available current market price)	Whether proposed transaction under self-name or by Immediate Relative	Name & PAN of the Immediate Relative, if the transaction is to be made by Immediate Relatives	Proposed Date of Trades/ Date of allotment	Previous approval no. and date of purchase/ Allotment
7	8	9	10	11

UNDERTAKING

In this connection I solemnly confirm and declare:

1. that I do not have access and/ or have not received any UPSI up to the time of signing the undertaking;
2. that in case I have access to or receive UPSI after the signing of the undertaking but before the execution of the transaction, I shall inform the Compliance Officer of any change in my position and that I shall refrain from Dealing in Securities till the time such information becomes public;
3. that I have not contravened the Internal Code of Conduct for Prevention of Insider Trading in dealing with Securities of Mega Corporation Limited and Fair Disclosure Code as notified by the Company from time to time.
4. I shall Trade, that have been pre-cleared, within seven Trading Days from approval of pre-clearance;
5. I shall not execute a Contra Trade within a period of six months from the executed Trade;
6. that 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;
7. that I am aware that, I shall be liable to face penal consequences as set forth in the CODE including disciplinary action under the CODE of the Company, in case the above declarations are found to be misleading or incorrect at any time.
8. that I hereby undertake **not** to transact in Securities in the sanctioned period in case trading window is declared closed subsequently;
9. that I hereby made a full and true disclosure in the matter.

In the event of any statement made above is found to be untrue or in the event of my failure to comply with the assurance and undertaking given by me as above, I shall assume total responsibility for any consequences whatsoever including by way of penalties, claims, damages, expenses and losses arising as a result of such failure.

Name: _____

Signature: _____

Date: _____

Place: _____

(For Office use)

Date of receipt of the application: _____

MEGA CORPORATION LIMITED

FORM A

Undertaking from Intermediary/ Fiduciary

S. No.	Particulars	Details
1.	Name and Address of Entity	
2.	Type/ Nature of Entity	
3.	Point of Contact – Name, Designation, Email-Id and Mobile Number	
4.	PAN of Entity/ other identifier, if PAN not applicable	
5.	Whether related/ connected/ associated etc. either directly/ indirectly with Promoters, Promoters Group, Directors and/ or KMP of the Company	
6.	Whether Code of Conduct under Schedule C of SEBI PIT is made or not (Yes / No)	
7.	Confidentiality/ Non-Disclosure Agreement (Yes / No)	
8.	Date of Confidentiality / Non-Disclosure Agreement	
9.	Others Details, if any	

I, on behalf of the entity, undertake to confirm that I have received Mega Corporation Limited' CODE and deemed to have due notice to maintain confidentiality of any UPSI in compliance with this CODE and will comply with the CODE and the Regulations.

For _____

Name: _____

Signature: _____

Date: _____

Place: _____

FORM B

SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015 [REGULATION 7 (1) (B) READ WITH REGULATION 6(2) – DISCLOSURE ON BECOMING A KEY MANAGERIAL PERSONNEL/DIRECTOR/PROMOTER/MEMBER OF THE PROMOTER GROUP]

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 or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN / DIN & Address with contact nos.	Category of Person (KMP / Director or Promoter or member of the Promoter Group / Immediate Relative to/ others, etc.)	Date of appointment of KMP/ Director / OR Date of becoming Promoter/ member of the Promoter Group	Securities held at the time of appointment of KMP/ Director or upon becoming Promoter or member of the Promoter Group		% of Shareholding
			Type of Securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements, etc.)	No.	

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 on the securities of the company held on appointment of KMP or Director or upon becoming a Promoter or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).

Open Interest of the Future contracts held at the time of appointment of Director/KMP or upon becoming Promoter/ member of the Promoter Group			Open Interest of the Option Contracts held at the time of appointment of Director/KMP or upon becoming Promoter/ member of the Promoter Group		
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

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

Name & Signature:

Designation:

Date:

Place:

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, Member of the Promoter Group, Designated Person or Director of a listed company and Immediate Relatives of such persons and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/ DIN, & addresses with contact nos.	Category of Person (Promoter/ member of the Promoter Group/ Designated Person/ 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/ disposal 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.)	Exchange on which the trade was executed
		Type of Securities (For eg. – Shares, Warrants, Convertible Debentures , Rights entitlements etc.)	No. and % of share holding	Type of Securities (For eg. – Shares, Warrants, Convertible Debentures , Rights entitlement, etc.)	No.	Value	Transaction Type (Purchase/ sale Pledge / Revocation / Invocation/ Others- please specify)	Type of Securities (For eg. – Shares, Warrants, Convertible Debentures , Rights entitlement, etc.)	No. and % of share holding	From	To			

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

(ii) Value of transaction excludes taxes/brokerage/any other charges

Details of Trading in derivatives on the Securities of the Company by Promoter, member of the Promoter Group, Designated Person or Director of a listed company and Immediate Relatives of such persons 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)	

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

Date:
 Place:

Name & Signature:
 Designation:

FORM D
SEBI (Prohibition of Insider Trading) Regulations, 2015
Regulation 7(3) – Transactions by Other Connected Persons as identified by the Company

Name of the Company:
 ISIN of 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	Connect ion with Compan y	Securities held prior to acquisition/ disposal		Securities acquired/ disposed				Securities held post acquisition/ disposal		Date of allotment advice/ acquisition of shares/ disposal of shares, specify		Date of intimatio n to Company	Mode of acquisition / disposal (on market/ public/ rights/ preferentia l offer/ off market/ Inter-se transfer, ESOPs, etc.)	Exchang e on which the trade was executed
		Type of Securities (For eg. – Shares, Warrants, Convertible Debentures , Rights entitlement s etc.)	No. and % of share holdin g	Type of Securities (For eg. – Shares, Warrants, Convertible Debentures , Rights entitlement, etc.)	No .	Valu e	Transactio n Type (Purchase/ sale Pledge / Revocation / Invocation/ Others- please specify)	Type of Securities (For eg. – Shares, Warrants, Convertible Debentures , Rights entitlement, etc.)	No. and % of share holdin g	From	To			

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

(ii) Value of transaction excludes taxes/brokerage/any other charges

Details of trading in derivatives on the securities of the company by other connected persons as identified by the company

Trading in derivatives (Specify type of contract, Futures or Options etc.)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	

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

Date:
 Place:

Signature:
 Name:

MEGA CORPORATION LIMITED

FORM E

(Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 Regulation 9(A) read with Schedule B)

I _____, S/o or D/o _____, R/o _____, a Designated Person (as defined in the CODE), hereby disclose the following:

Details of the Immediate Relatives & person with whom a material financial relationship is shared:

S. No.	Particulars	Name	PAN or where PAN is not available, then (Aadhaar, Voter ID, Driving License, Passport)	Phone/mobile numbers	Securities held/ Open Interest of the Future or Options contracts as on the date of appointment/ as on March ____
1.	Myself				
2.	Spouse				
3.	Father				
4.	Mother				
5.	Brother				
6.	Sister				
7.	Son				
8.	Daughter				
9.	Spouse's Father				
10.	Spouse's Mother				
11.	Spouse's Brother				
12.	Spouse's Sister				
13.	Person(s) with whom you share Material Financial Relationship, not in ordinary course				
14.	Any other				

Further, below are my additional details as required under the Regulations:

Names of Educational Institutional from which graduated	
Names of Past Employers	

UNDERTAKING

I, _____, hereby confirm that:

1. I shall preserve the confidentiality and/or prevent the unauthorized disclosure of UPSI;
2. I shall adhere to the compliance of this CODE and the Regulations; and
3. In case of any change in the above-mentioned information, I shall notify the change to the
4. Compliance Officer.
5. I hereby undertake that I will keep the Company informed by email at cs@megacorpId.com through hard copy about any changes in above-mentioned details till one year post ceasing to be Designated Person (due to transfer/ resignation/ superannuation/ termination etc.).

Name: _____

Signature: _____

Date: _____

Place: _____
