

TRESCON LIMITED

POLICY FOR PREVENTION OF INSIDER TRADING

Approved and adopted by the Board of Directors at its meeting held on May 30, 2019

INTRODUCTION

Insider Trading is dealing (buying and / or selling) in the securities by any connected or deemed to be connected persons while in possession of any material un-published price sensitive information, in breach of a fiduciary duty or other relationship of a trust and confidence, to gain personal benefit out of such dealing.

The Securities and Exchange Board of India (“SEBI”) in its endeavor to protect the interests of investors in general, has formulated the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (Regulations) under the powers conferred on it under the SEBI Act, 1992. These regulations came into force with effect from 15th May, 2015 i.e. from the date of its publication in the official Gazette and the same is applicable to all listed companies. This code also incorporates the amendments so as to align it with the amendment regulations i.e. the Securities and Exchange Board of India (Prohibition of Insider Trading) (Amendment) Regulations, 2018 and the Securities and Exchange Board of India (Prohibition of Insider Trading) (Amendment) Regulations, 2019 (“the Amendment Regulations”).

In Compliance with the said requirements, the Company has introduced a code for prohibition of Insider Trading (hereinafter referred to as the “Code”).

This Code came into force on 30th May, 2019.

Applicability:-

1. All the Directors of the Company and Immediate Relatives of the Directors;
2. The Designated Employees of the Company and Immediate Relatives of Designated Employees; and
3. Employees and other Connected persons

DEFINITIONS

- 1.1 “**Board**” means the Board of Directors of the Company.
- 1.2 “**Code**” or “**Code of Conduct**” shall mean the Code of Conduct to regulate, monitor and report trading by insiders as amended from time to time.
- 1.3 “**Compliance Officer**” means any senior officer, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under the Regulations (defined hereunder) designated so and reporting to the Board of Directors and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in the Regulations under the overall supervision of the Board of Directors of the Company.
- 1.4 “**Connected Persons**” means,
- i any person who is or has during the six months prior to the concerned act been associated with a company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the company or holds any position including a professional or business relationship between himself and the company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.
 - ii Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established, -
 - a) an immediate relative of connected persons specified in clause (i); 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 recognized or authorized by the Board; or
- i) a banker of the company; or
- j) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten per cent of the holding or interest.

1.5 **“Designated Persons/Employees”** means

- Directors and their Immediate Relatives;
- Key managerial personnel and their Immediate Relatives;
- All functional heads
- Every employee in the grade of Senior Manager and above
- Such other person as may be determined by the Board and Compliance officer from time-to-time

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

1.7 **“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.

1.8 **“Insider”** means any person who is,

- i. A “Connected Person”, or
- ii. In possession of or having access to such unpublished price sensitive information.

1.9 **“Trading”** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, and sell. Deal in securities, and “trade” shall be construed accordingly;

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

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

- financial results;
- dividends;
- change in capital structure;
- mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
- changes in key managerial personnel; and
- Material events in accordance with the listing agreement (LODR, 2015).

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

PRESERVATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION

All information shall be handled within the organization on a **need-to-know basis** and no unpublished price sensitive information shall be communicated or accessible to any person except in furtherance of the insider's legitimate purposes, performance of duties or discharge of his legal obligations.

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

- an obligation to make an open offer under the takeover regulations where the Board is of informed opinion that the proposed transaction is in the best interests of the Company; or
- not attracting the obligation to make an open offer under the takeover regulations but where the Board is of informed opinion that the proposed transaction is in the best interests of the Company and the information that constitute unpublished price sensitive information is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the Board may determine.

The Board shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the limited purpose and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information.

All unpublished price sensitive information shall be communicated or provided to any person on a **"need to know basis"**. **Need to Know basis** means that unpublished price sensitive information should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of information.

Any unpublished price sensitive information directly received by any employee, not entitled or required to have access of such information in its ordinary course of business or performance of duties or discharge of his legal obligations should immediately be reported to the head of the department or the Compliance Officer.

The Company while dealing with any market intermediary, client, agent or any other person, who is required to handle unpublished price sensitive information shall ensure that such person has formulated a code of conduct as per the requirements of the Regulations.

"Limited access to confidential information" means Files containing confidential information shall be kept secure. Computer files must have adequate security of login and pass word, etc. Files containing confidential information should be deleted / destroyed after its use

TRADING WINDOW

Other than the period(s) for which the Trading Window is closed, the same shall remain open for Trading in the Securities of the Company. Unless otherwise specified the Trading Window for Trading in Securities of the Company shall be closed for the Designated employee when determined by the Board that a Designated employee or class of Designated employee are reasonably expected to have UPSI, including for the purposes as specified above in the definition of (Unpublished price sensitive information).

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

- Declaration of Financial results;
- Declaration of dividends (interim and final)
- Change in capital structure
- Mergers, de-mergers, acquisitions, delisting's, disposals and expansion of business
- Changes in key managerial personnel
- Such other time as the Compliance Officer determines that a designated person or class of designated person is reasonably expected to have possession of unpublished price sensitive information.

The trading window shall be opened 48 hours after unpublished price sensitive information is brought under the public review. The trading restriction period can also be made applicable from the end of every quarter till 48 hours after the declaration of financial results.

TRADING PLANS

An insider shall be entitled to formulate a Trading Plan and present it to the Board/Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan. (Annexure I)

Upon approval of the trading plan, the Compliance Officer shall notify the plan to the stock exchanges on which the securities are listed.

PRE-CLEARANCE OF TRADES

All Designated Persons who intend to trade in securities of the Company should pre-clear the transaction as per the pre-dealing procedure as described hereunder.

No Designated Persons shall be entitled to apply for pre-clearance of any proposed trade if such person is in possession of unpublished price sensitive information even if the trading window is not closed and hence he shall not be allowed to trade.

Pre-dealing Procedure:

- An application complete in all respects may be made in the prescribed Form (***Annexure II***) to the Compliance officer.
- An undertaking (***Annexure III***) shall be executed in favor of the Company by such Designated Employee/Persons incorporating, inter-alia, the following clauses, as may be applicable:
 - Designated Person does not have any access or has not received "Price Sensitive Information";
 - He/she has access to or receives "Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction, he/she shall inform the Compliance Officer of the change in his position and that he/she would completely refrain from dealing in the securities of the Company till the time such information becomes public;
 - That he or she has not contravened the "Policy for Prevention of Insider Trading" as notified by the Company from time to time; and
 - That he or she has made a full and true disclosure in the matter.
- The Compliance Officer shall in consultation with the Board, grant approval within 2 days from the date of acknowledgement. The Compliance Officer shall retain copies of all applications and acknowledgements either in physical or electronic mode.
- In exceptional circumstances consent may not be given if it is in the opinion that the proposed deal is on the basis of possession of any unpublished Price sensitive information. There shall be no obligation to give reasons for any withholding of consent.

- Every Approval letter shall be issued in such format (**Annexure IV**) or such other format as deemed fit by the Compliance Officer or as may be prescribed by the Company from time to time. Every approval shall be dated and shall be valid for a period of 7 (seven) Trading Days from the date of approval.
- In the absence of the Compliance Officer due to leave etc., the Employee designated by the Board shall discharge the function referred to above.
- All the Designated Persons shall execute their order in respect of securities of the Company within 7 (seven) Trading Days after the approval of pre-clearance is given. The Designated Person shall file within 2 (two) days of the execution of the deal, the details of such deal with the Compliance Officer in the prescribed form. In case the transaction is undertaken/not undertaken, a report to that effect shall be filed. (**Annexure V**).
- All Designated Employees/Persons and their immediate relatives who buy or sell any number of shares of the Company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction. All Designated Persons shall also not take positions in derivative transactions in the shares of the Company at any time. In case of any contra trade executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund administered by SEBI under the Act.
- Any relaxation of such contra trade shall be recorded in writing by the Compliance Officer in his approval of such trade. It may, however, be noted that in terms of the Regulations, no such purchase/ sale will be permitted when the Trading Window is closed.

DISCLOSURES REQUIREMENTS

The disclosures to be made by any person under this Code of Conduct shall include those relating to trading by such person's Immediate Relatives, and by any other person for whom such person takes trading decisions.

The disclosures made under this Code of Conduct shall be maintained for a period of five (5) years by the Company.

Initial Disclosures:

Every Promoter, Key Managerial Personnel and Director of the Company, within thirty (30) days of the Regulations taking effect, shall forward to the Company the details of all holdings in securities of the Company. ***(Annexure VI) – Form A (Insider Regulations)***

Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter shall disclose his holding of securities of the company as on the date of appointment or becoming a Promoter, to the company within seven (7) days of such appointment or becoming a Promoter. ***(Annexure VII) – Form B (Insider Regulations)***

Continual Disclosures:

Every Promoter, Key Managerial Personnel, Employee and Director of every 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 (10) lakh rupees. ***(Annexure VIII) – Form C (Insider Regulations)***

The disclosure required above shall be made within two (2) working days of:

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

Disclosures by other connected persons

The Company, at its discretion requires any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the company in such form and at such frequency as may be determined by the company in order to monitor compliance with this Code of Conduct and the Regulations. ***(Annexure IX) – Form D (Insider Regulations)***

Disclosure by the Company to Stock Exchanges

Within two (2) working days of the receipt of the information or disclosure under the Regulations and this Code of Conduct, the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received.

The Compliance officer shall maintain records of all the declarations in the appropriate form given by the Designated Employees for a minimum period of five (5) years.

Periodic disclosure by Designated Persons

Every Promoter, key managerial personnel, Director and Designated Person of the Company shall disclose annual statements of their holding, and the holding of their Immediate Relatives and of any other person for whom such person takes trading decisions, of the Company's Securities (including derivatives) to the Compliance Officer as on 31st March every year in such form and manner (***Annexure X***) as may be prescribed by the Compliance Officer from time-to-time. Such statement shall be submitted within 30 days of the end of the financial year.

PENALTY FOR CONTRAVENTION OF CODE OF CONDUCT

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

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

The Designated Person of the Company who violate this Code of Conduct shall also be subject to disciplinary action by the Company, which may include wage, salary freeze, suspension, termination etc.

The action by the Company shall not preclude SEBI from taking any action in case of violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

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

Any violation of the Code of Conduct and the Regulations shall be immediately intimated to the Compliance Officer or the Board of the Company.

In case it is observed by the Board of Directors that there has been a violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015 in relation to securities of the Company, the same shall be immediately intimated to SEBI.

MISCELLANEOUS

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

AMENDMENT

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

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

ANNEXURE I

FORMAT FOR REQUEST OF TRADING PLAN

To,
The Compliance Officer,
Trescon Limited

I [Insert Name of the employee], in my capacity as [Insert Designation] of the company hereby submit the following trading plan for your review and approval in terms of the Code of Conduct and Insider Trading Regulations.

Trading Plan

Date/Interval of Trade Execution	No of Securities to be traded	Nature of Transaction and Qty			Trading Account Details	Trading member details
		Purchase	Sale	Others		

Details of securities held by Immediate Relative of the Employee

Name of the person and relationship with the Designated Employee	Date of trading in securities	No of Securities to be Traded	Nature of Transaction and Qty			Trading Account Details	Trading member details
			Purchase	Sale	Others		

I hereby undertake that I am not in violation of Company's Code of Conduct or SEBI Insider Trading Regulations while formulating the aforesaid trading plan.

I undertake to furnish such information as required by the Company with regard to the Trading Plan.

Date: [Insert]

Signature

ANNEXURE II

SPECIMEN OF APPLICATION FOR PRE-TRADING APPROVAL

Date:

To,
The Compliance Officer,
Trescon Limited

Dear Sir/Madam,

Application for Pre-trading approval in securities of the Company

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

1.	Name of the Applicant	
2.	Designation	
3.	Folio No/ DP ID/ Client ID	
4.	Number of securities held as on date	
5.	Nature of Transaction (Purchase/Sale/Subscription)	
6.	Proposed date of dealing in securities	
7.	Estimated number of securities proposed to be traded	
8.	Price at which transaction is proposed	
9.	Current Market Price (as on date of application)	
10.	Whether proposed transaction will be through stock exchange or off-market deal	
11.	Any other relevant information	

I enclose herewith the form of undertaking signed by me.

Date:

Signature

ANNEXURE III

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

Date:

To,
Trescon Limited

Dear Sir/Madam,

I, [name of the Person], [Designation] resident of [Address] hereby declare that I am Designated Person of M/S [Name of Company].

I am desirous of dealing in _____ [No of securities and nature] securities of the Company as mentioned in my application dated _____ for pre-clearance of the transaction.

I further declare that I am not in possession of or otherwise privy to any unpublished price sensitive information (as defined in the Company's code of conduct to regulate, monitor and report trading by insiders) up to the time of signing of this undertaking.

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

I declare that I have not executed any opposite transaction in past six months and not contravened the provisions of the code as notified by the company from time-to-time.

I undertake to submit the necessary report within 2 (Two) trading days of execution of the transaction/a NIL report if the transaction is not undertaken.

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

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

Date:

Signature

ANNEXURE IV

FORMAT FOR PRE-TRADING APPROVAL/DISAPPROVAL

Date:

To,

Name:

Designation:

Sub: Pre-Trading Approval/Disapproval – Application dated _____

Dear Sir/Madam,

With reference to your above application seeking approval for dealing in [Insert number of shares] securities of the Company as mentioned in your application dated [Insert Date] is approved/disapproved.

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

This approval letter is valid till 7 trading days from date hereof. In case you do not execute the approved transaction/ Deal on or before the aforesaid date this approval shall stand withdrawn and you would have to seek fresh pre-clearance before executing any transaction/deal in the securities of the Company. Further, you are required to file the details of the executed transactions in the attached format within 2 days from the date of transaction/deal. In case the transaction is not undertaken a 'Nil' report shall be necessary.

Based on undertaking it is understood that you have not executed any opposite transaction in past six (6) months and not contravened the provisions of the code as notified by the company from time-to-time.

Please note this approval can be withdrawn, if subsequently the information provided by you in the application form or the undertaking is found incorrect

Yours faithfully,

For Trescon Limited

Authorised Signatory Name:

Designation:

Encl: Format for submission of details of transaction

ANNEXURE V

FORMAT FOR DISCLOSURE OF TRANSACTION

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

Date:

To,
The Compliance Officer,
Trescon Limited

Dear Sir/Madam,

Details of pre-approved transaction

Ref: Approval Letter dated _____(Name of Employee/Designation)

I hereby inform that I

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

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

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

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

I agree to hold the above securities (including derivatives) for a minimum period of six (6) months. In case there is any urgent need to sell these securities (including derivatives) within

the said period, I shall approach the Board/compliance officer for necessary approvals. (Applicable in case of purchase/subscription)

I declare that the above information is correct and that no provisions of the Company's Code of Conduct to regulate, monitor and report trading by insiders have been contravened for effecting the aforesaid transaction.

Signature

Name Designation

ANNEXURE VI**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:

ISIN OF THE COMPANY:

DETAILS OF SECURITIES HELD BY PROMOTER, KEY MANAGERIAL PERSONNEL (KMP) OR DIRECTOR AND OTHER SUCH PERSONS AS MENTIONED IN REGULATION 6(2).										
1	2	3	4	5	6	7	8	9	10	11
NAME, PAN, CIN/DIN, ADDRESS WITH CONTACT NO	CATEGORY OF PERSON (PROMOTER/KMP/DIRECTOR/IMMEDIATE RELATIVE TO/OTHERS ETC)	SECURITIES HELD AS ON THE DATE OF REGULATION COMING INTO FORCE		% OF SHAREHOLDING	OPEN INTEREST OF THE FUTURE CONTRACTS HELD AS ON THE DATE OF REGULATION COMING INTO FORCE			OPEN INTEREST OF THE OPTION CONTRACTS HELD AS ON THE DATE OF REGULATION COMING INTO FORCE		
		TYPE OF SECURITY (FOR EG - SHARES/WARRANTS/CONVERTIBLE DEBENTURES ETC)	NO		CONTRACT SPECIFICATIONS	NUMBER OF UNITS (CONTRACTS* LOT SIZE)	NOTIONAL VALUE IN RUPEES TERMS	CONTRACT SPECIFICATIONS	NUMBER OF UNITS (CONTRACTS* LOT SIZE)	NOTIONAL VALUE IN RUPEES TERMS

NOTE:-

- "SECURITIES" SHALL HAVE THE MEANING AS DEFINED UNDER REGULATION 2(1)(i) OF SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015
- IN CASE OF OPTIONS, NOTIONAL VALUE SHALL BE CALCULATED BASED ON PREMIUM PLUS STRIKE PRICE OF OPTIONS

SIGNATURE _____

NAME:

DESIGNATION

DATE

PLACE

ANNEXURE VII**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:

ISIN OF THE COMPANY:

DETAILS OF SECURITIES HELD ON APPOINTMENT OF KEY MANAGERIAL PERSONNEL (KMP) OR DIRECTOR OR UPON BECOMING A PROMOTER OF A LISTED COMPANY AND OTHER SUCH PERSONS AS MENTIONED IN REGULATION 6(2)											
1	2	3	4	5	6	7	8	9	10	11	12
NAME, PAN, CIN/DIN, ADDRESS WITH CONTACT NO	CATEGORY OF PERSON (PROMOTER/KMP/DIRECTOR/IMMEDIATE RELATIVE TO/OTHERS ETC)	DATE OF APPOINTMENT OF DIRECTOR/KMP OR DATE OF BECOMING PROMOTER	SECURITIES HELD AT TIME OF BECOMING PROMOTER/APPOINTMENT OF DIRECTOR/KMP		% OF SHAREHOLDING	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		
			TYPE OF SECURITY (FOR EG - SHARES/WARRANTS/CONVERTIBLE DEBENTURES ETC)	NO		CONTRACT SPECIFICATIONS	NUMBER OF UNITS (CONTRACTS * LOT SIZE)	NOTIONAL VALUE IN RUPEES TERMS	CONTRACT SPECIFICATIONS	NUMBER OF UNITS (CONTRACTS* LOT SIZE)	NOTIONAL VALUE IN RUPEES TERMS

NOTE:-

- "SECURITIES" SHALL HAVE THE MEANING AS DEFINED UNDER REGULATION 2(1)(i) OF SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015
- IN CASE OF OPTIONS, NOTIONAL VALUE SHALL BE CALCULATED BASED ON PREMIUM PLUS STRIKE PRICE OF OPTIONS

SIGNATURE
NAME:
DESIGNATION
DATE
PLACE

FORM C

Securities and Exchange Board of India (Prohibition of Insider Trading)

Regulations, 2015 [Regulation 7 (2) read with Regulation 6(2)]

Name of the company: _____

ISIN of the company: _____

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

Name, PAN No., CIN/DIN, & address of Promoter/ Employee /Director with contact nos.	Category of Person (Promoters/ KMP / Directors / immediate relatives/ others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed		% of shareholding		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition (market purchase/ public rights/ preferential offer / off market/ Inter-se transfer etc.	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Pre transaction	Post transaction	From	To			Buy		Sell		
												Value	Number of units (contracts * lot size)	Value	Number of units (contracts * lot size)	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

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

Signature:

Designation:

Date:

Place:

Form D (Indicative format)

Securities and Exchange Board of India (Prohibition of Insider Trading)

Regulations, 2015 Regulation 7(3) – Transactions by Other connected persons as

identified by the company

Name, PAN No., CIN/DIN & address of connected persons, as identified by the company with contact nos.	Connection with company)	Securities held prior to acquisition/disposal		Securities acquired/Disposed		% of shareholding		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition (market purchase/public/ rights/ preferential offer / off market/ Inter-se transfer etc.)	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Pre transaction	Post transaction	From	To			Buy		Sell		
												Value	Number of units (contracts * lot size)	Value	Number of units (contracts * lot size)	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

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

Name:

Signature:

Date:

Place:

ANNEXURE X

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

Date:

To,
The Compliance Officer,
Trescon Limited

Dear Sir/Madam,

STATEMENT OF SHAREHOLDINGS IN TRESCON LIMITED

As on _____, I along with my Immediate relatives hold the securities (including derivatives) of the Company, details whereof are as under:

Name of holder	PAN	Nature of security	Physical holding		Electronic holding		
			Folio No	Total holding	DP ID	Client ID	Total holding

(Details in the above table to be filled for self as well as immediate relatives even if no shares may be held)

Signature: Name: