

DAI - ICHI KARKARIA LTD.

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSONS

(Revised by the Board of Directors at its meeting held on 30th January, 2019, Effective from 1st April, 2019)

INTRODUCTION:

Securities and Exchange Board of India (hereinafter referred to as "SEBI" has promulgated the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and SEBI Prohibition of Insider Trading Amendment Regulations, 2018 and SEBI Prohibition of Insider Trading Amendment Regulations, 2019.

The objective of the Regulations is to prevent Insider Trading by prohibiting trading, communicating, counselling or procuring Unpublished Price Sensitive Information. Insider Trading is an unethical practice resorted to by those in power and privy to certain unpublished price sensitive information relating to a company to profit at the expense of the general investors who do not have access to such information.

Dai – ichi Karkaria Ltd. (hereinafter referred to as the "Company") has framed Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons (hereinafter referred to as Code). This code shall be effective w.e.f. 1.4.2019 and is binding on the Designated Persons and their immediate relatives during the course of performance of their duties.

The provisions of this Code have to be read along with the Regulations and if there is any inconsistency / contradiction between the two, the provisions of the Regulations shall prevail.

The following terms and phrases as used anywhere in this Code of Conduct shall be interpreted to convey the meaning ascribed to them hereunder:

- a) **"Applicability"** The Code is applicable to the designated persons and immediate relatives of designated persons of the Company as defined in the Code from time to time.
- b) **"Board"** means Board of Directors of the Company.
- c) **"Company"** means Dai - ichi Karkaria Ltd.
- d) **"Compliance Officer"** means the Company Secretary of the Company or any other senior level employee, designated so and reporting to the board of directors under the Regulations.
- e) **"Connected Person"** shall mean
 - 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. persons falling within the following categories, unless the contrary is established:

- (a) an immediate relative of Connected Persons specified in clause i. above; or
- (b) a holding company or associate company or subsidiary company; or
- (c) an intermediary as specified in Section 12 of the SEBI Act, 1992 or an employee or director thereof; or
- (d) an investment company, trustee company, asset management company or an employee or director thereof; or
- (e) an official of a stock exchange or of clearing house or corporation; or
- (f) a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
- (g) a member of the board of directors or an employee, of a public financial institution as defined in Section 2(72) of the Companies Act, 2013; or
- (h) an official or an employee of a self-regulatory organization recognised or authorized by the Board; or
- (i) a banker of the company; or
- (j) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten per cent of the holding or interest;

f) **“Designated Persons”** means:

- i. Every Promoter of the Company
- ii. Every Director of the Company;
- iii. Every KMP of the Company as defined under the Companies Act, 2013;
- iii. All Employees upto two level below the Executive Directors irrespective of their role in the Company or ability to access to unpublished price sensitive information;
- iv. Executive Assistant/Secretaries to Executive Directors;
- iv. Senior Management in the finance, accounts and secretarial department at the Head Office;
- vii. Any other employee /person as may be determined by the Board from time to time in consultation with the Compliance Officer of the Company and
- viii. Immediate Relatives of all the above persons.

g) **“Director”** means a member of the Board of Directors of the Company.

h) **“Generally Available Information”** means information that is accessible to the public on a non-discriminatory basis, such as information published on websites of stock exchanges.

i) **“Immediate Relative”** means the spouse of the Designated Person, and also includes parent, sibling and child of such Designated Person or of the spouse, who are either financially dependent on the Designated Person or consults the Designated Person in taking decisions relating to trading in securities.

j) **"Insider"** means any person who is a Connected Person or in possession of or having access to unpublished price sensitive information, which includes Designated Person.

k) **"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.

l) **"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.

m) **"Securities"** shall mean to include shares, scrips, stocks, bonds, debentures, debenture stock or other marketable securities of like nature in or of any incorporated company or other body corporate and include derivatives.

n) **"Trading Day"** means a day on which the recognized stock exchanges are open for trading.

o) **"Trading" or "Trading in Securities"** means and includes an act of subscribing to, buying, selling, dealing or agreeing to subscribe to, buy, sell or deal in any Securities of the Company and "trade" shall be construed accordingly.

p) **"Unpublished Price Sensitive Information ("UPS")"** means any information, relating to the Company or its Securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of Securities of the Company and shall ordinarily include but not be restricted to, information relating to the following:

- i) financial results;
- ii) dividends;
- iii) change in capital structure;
- iv) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions; and
- v) changes in key managerial personnel.

Words and phrases used in the Code and not defined hereinabove shall have the same meaning as defined under the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made there under shall have the meanings respectively assigned to them in those legislation.

DUTIES OF THE COMPLIANCE OFFICER

The Compliance Officer shall be responsible for:

- Setting forth policies in relation to the implementation of the Code of Conduct and the Regulations in consultation with the Board of Directors.

- Prescribing procedures for various activities referred to in the Code of Conduct and the Regulations in consultation with the Board of Directors.
- Compliance with the policies and procedures referred hereinabove.
- Monitoring adherence to the Regulations for the preservation of UPSI.
- Grant of pre-trading approvals to the Designated Persons for trading in the Company's Securities by them / their Immediate Relatives and monitoring of such trading.
- Implementation of Code of Conduct under the overall supervision of the Board of Directors / Audit Committee of the Company.
- The Compliance Officer shall assist all the Designated Persons in addressing any clarifications regarding the Regulations and this Code of Conduct.
- The Compliance Officer shall close the trading window for such periods as he/she may deem fit in compliance with the provisions of this code.
- The Compliance officer shall maintain a record of designated persons as identified by the Board and their immediate relatives and changes thereto from time to time. He will also assist the designated persons in addressing any clarifications regarding the Regulations and this Policy/Code.
- The Compliance Officer will on quarterly basis, report to the Audit Committee Chairman, any trading of securities by the designated persons.

HANDLING OF UPSI

Preservation of UPSI:

Designated Persons shall maintain the confidentiality of all UPSI coming into their possession or control.

To comply with this confidentiality obligation, the Designated Persons shall not:

- (i) communicate, provide or allow access of UPSI to any person directly or indirectly, including by way of making a recommendation for the purchase or sale of Securities of the Company unless such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations; or
- (ii) discuss UPSI in public places, or
- (iii) disclose UPSI to any Employee who does not *need to know* the information for discharging his or her duties, or
- (iv) recommend to anyone that they may undertake trading in Securities of the Company while being in possession, control or knowledge of UPSI, or
- (v) be seen or perceived to be trading in securities of the Company while in possession of UPSI.

Need to know:

The Designated Persons and / or insiders who are privy to UPSI, shall handle the same strictly on a —*Need to Know* basis. This means the UPSI shall be disclosed only to those persons who need to know the same in furtherance of a legitimate purpose, the course of performance or discharge of their duty and whose possession of UPSI will not in any manner give rise to a conflict of interest or likelihood of misuse of the information.

Limited access to confidential information:

Designated Persons privy to confidential information shall, in preserving the confidentiality of information, and to prevent its wrongful dissemination, adopt among others, the following safeguards:

- a) files containing confidential information shall be kept secure.
- b) computer files must have adequate security of login through a password.
- c) follow the guidelines for maintenance of electronic records and systems as may be prescribed by the Compliance Officer from time-to-time in consultation with the person in charge of the information technology function.

Chinese Wall Procedures

1. To prevent the misuse of UPSI, the Company shall separate those areas of the Company which routinely have access to UPSI, considered “inside areas” from other areas including operations or other departments providing support services, considered “public areas”.
2. In exceptional circumstances employees from the public areas may be brought “over the wall” and given UPSI on the basis of “need to know” criteria. In such an event, such employees will be bound by the same restrictions and obligations as the employees in the “inside areas” till the UPSI becomes generally available.

REGULATED TRANSACTIONS AND RESTRICTIONS

Trading Plans

The Regulations gives an option to Designated persons / Insiders who may be perpetually in possession of UPSI and enabling them to trade in securities in a compliant manner. This enables to formulate a Trading Plan by a Designated Person / Insider to enable him/her to plan for trades to be executed in future. By doing so, the Insider who is in possession of UPSI and who has formulated a Trading Plan approved by the Compliance Officer subsequently would not be prohibited from execution of such trades as per the trading plan approved by the Compliance Officer on such stand that he/she had pre-decided the trade even before such UPSI available to them. In view of the same, the Designated persons / Insiders are required to adhere to following terms and conditions w.r.t. Trading Plan:

- a) An Insider shall be entitled to formulate a trading plan and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.
- b) Such Trading Plan shall:
- (i) not entail commencement of trading on behalf of the Insider earlier than 6 months from the public disclosure of the plan;
 - (ii) not entail trading for the period between the 20th trading day prior to the last day of any financial period for which results are required to be announced by the issuer of the securities and the 2nd trading day after the disclosure of such financial results;
 - (iii) entail trading for a period of not less than 12 months;
 - (iv) not entail overlap of any period for which another trading plan is already in existence;
 - (v) set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
 - (vi) not entail trading in securities for market abuse.
- c) The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of these regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.
- d) The trading plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.
- e) Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.
- f) Trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

Trading Window

Designated Persons and the Immediate Relatives shall not trade in the Securities of the Company when 'Trading Window' is closed. The exact dates of each closure of the Trading Window shall be intimated to each Designated Person, who is an employee of the Company, and it is the responsibility of each Designated Person to ensure compliance with this Code and by each of his/her Immediate Relatives.

Trading Window shall be closed, *inter alia*, at the time of:

1. Declaration of financial results (quarterly, half-yearly and annually)
2. Declaration of dividend (interim or final)
3. Issue of securities by way of rights/ bonus/etc.
4. Any major expansion plan or execution of new projects

5. Amalgamation, merger, takeover, buy-back, etc
6. Disposal of whole or substantially whole of the undertaking.

Designated persons and their immediate relatives may execute trades subject to compliance with these Regulations. The trading window closure shall also be advised by the Compliance Officer when Designated Person or class of Designated Persons can reasonably be expected to have possession of UPSI. Such closure shall be imposed in relation to such securities to which such UPSI relates.

The Compliance Officer shall ensure that the gap between clearance of accounts by audit committee and board meeting should be as narrow as possible and preferably on the same day to avoid leakage of material information. 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 forty-eight hours after the information becomes generally available.

Pre-clearance of trades and other restrictions

1. When the trading window is open, trading by Designated Persons shall be subject to pre-clearance by the Compliance Officer, if proposed trade(s) is/ are above a minimum threshold of 5000 shares or Rs. 5,00,000 (Rupees Five Lakh Only) in value, whichever is lower, over any calendar quarter, or such other limits as the Board may stipulate.
2. Designated Persons and their dependents shall not take position in derivative transactions in the Securities of the Company.
3. Prior to approving any trades, the Compliance Officer shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any UPSI. He shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.
4. Trades that have been pre-cleared shall be executed within seven (7) trading days after approval is granted by the Compliance Officer, failing which fresh preclearance would be needed for the trades to be executed.
5. Pre-clearance of trades shall not be required for a trade executed as per an approved trading plan.

A Designated Person who is permitted to trade shall not execute a contra trade within a period of six (6) months following the prior transaction. Relaxation may be given from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate these Regulations. In the event, any such contra trade is executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be remitted to SEBI for credit to the Investor Protection and Education Fund administered under the Companies Act, 2013.

DISCLOSURE RESPONSIBILITIES & FORMATS

A. Initial Disclosures of holdings

Every person on appointment as key managerial personnel or a director of the Company or upon becoming a promoter or member of promoter group 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.

B. Continual Disclosures of trades

Every Designated Person shall disclose to the Company the number of such securities acquired or disposed of within two (2) trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 10,00,000 (Rupees Ten Lakh only) or such other value as may be specified;

The Company shall within a period of two (2) working days from the date of receipt of such disclosures, inform the Stock Exchanges particulars of such trading.

C. Formats / disclosures, to monitor compliance with these Regulations would be as under:

- Application-cum-undertaking for pre-clearance in Form A;
- Confirmation of Deal executed based on pre-clearance in Form B.
- Application for relaxation of holding period in Form C.
- Initial Disclosure on becoming KMP, Director or Promoter or member of the promoter group in Form D.
- Annual Disclosure to be furnished by Designated Employees by 30th April of each year in Form E to the Compliance Officer.
- Securities traded, in aggregate, in a calendar quarter, exceeds traded value of Rs. 10 Lakhs in Form F.

DATABASE OF DESIGNATED PERSON

Designated persons shall be required to disclose names and Permanent Account Number or any other identifier authorized by law of the following persons to the company on an annual basis and as and when the information changes:

- a) immediate relatives
- b) persons with whom such designated person(s) shares a material financial relationship
- c) Phone, mobile and cell numbers which are used by them

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.

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

INQUIRY IN CASE OF CONTRAVENTION OF THIS CODE WHICH INCLUDES LEAK OR SUSPECTED LEAK OF UPSI

- (i) The Compliance Officer shall have the power to inquire suspected contraventions of this Code.
- (ii) The Compliance Officer shall submit a report of his findings to the Managing Director within seven days of commencement of investigation or such extended time period as the Managing Director may approve.
- (iii) Based on the report of the Compliance Officer, the Managing Director shall be entitled to appoint any person to investigate a suspected contravention of this Code.
- (iv) The Managing Director shall have the power to delegate to a person so appointed, all the powers including powers to call for information, examination, interrogation, recording evidence, etc.
- (v) **In any investigation of suspected contravention of this Code the onus to prove that there is no violation of this Code, shall be on the concerned Designated Person or their Immediate Relative(s).**

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.

- (vii) The Managing Director after consideration of the investigation report shall communicate the findings to the person being investigated and accord him an opportunity of being heard before taking any action as contemplated in this Code.
- (viii) The Managing Director shall promptly inform the Board about such leaks/ suspected leaks of UPSI, inquiries conducted in this regard and results of such inquiries.

PENALTY FOR CONTRAVENTION OF THE CODE

- (i) Every designated employee shall be individually responsible for compliance with the provisions of this Code (including to the extent the provisions hereof are applicable to his/her immediate relatives).
- (ii) Any Director/Designated Persons who trades in securities or communicates any information for trading in securities in contravention of the Code may be penalised and appropriate action may be taken by the Company.
- (iii) Directors/Designated Persons of the Company who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, recovery, claw back, etc.
- (iv) The action by the Company does not preclude SEBI from taking any action in case of violation of the Regulations.

- (v) The Managing Director shall upon receipt of the report as above and based on the finding contained therein be entitled to take action against the person found guilty for violation of this Code as he may in his absolute discretion deem fit including but not restricted to:
 - a) Issue letter of warning stating that consequence of contravention / nonadherence would result in dismissal from services.
 - b) Any other suitable action, to facilitate the implementation of the spirit of the Code.
- (vi) Under Section 15G of the SEBI Act, any Insider who indulges in insider trading is liable to a maximum penalty which shall not be less than ten lakh rupees but which may extend to twenty five crore rupees or three times the amount of profits made out of insider trading, whichever is higher. Under Section 24 of the SEBI Act, anyone who contravenes the Regulations is punishable with imprisonment for a maximum period of ten years or with fine which may extend to twenty five crore rupees or with both.
- (vii) Without prejudice to its rights under Section 24 of the SEBI Act, SEBI can also pass any or all of the following orders to an Insider found indulging in insider trading –
 - Directing him / her not to deal in the Company's Securities in any particular manner.
 - Prohibiting him/her from disposing of any of the Securities acquired in violation of the Regulations.
 - Restraining him/her from communicating or counselling any other person to deal in Company's Securities.
 - Declaring the transactions in Securities as null and void.
 - Directing the person who acquired Securities in violation of the Regulations, to deliver the Securities back to the seller or alternatively pay the Seller the price as provided.
 - Directing him/her to transfer specified amount to Investor Protection and Education Fund administered by it.

Information to SEBI in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015 including any amendments thereof

In case it is observed by the Company/Compliance Officer that there has been a violation of the Regulations, SEBI shall be informed by the Company.

Amendments to this code

The Board reserves the right to amend this Code as and when it deems appropriate.

Form A
Pre-clearance for trading of shares

To,
The Compliance officer,
Dai-ichi Karkaria Limited,
Liberty Building, S.V.T. Marg
New Marine Lines,
Mumbai – 400020

Dear Sir / Madam,

Sub: Application Cum Undertaking for Pre-clearance for trading of shares in the Company

I, _____ (name), _____ of the Company (mention category of the Designated Person), hereby apply for permission to trade in the Shares of the Company as per details hereunder:

OR

I, _____, Director/ Employee hereby apply for permission on behalf of my Immediate Relative _____ to trade in the Shares of the Company as per details hereunder:

Number of Shares held in the Company	Number of Shares of the Company proposed to be Sold	Number of Shares of the Company proposed to be acquired	Balance holding

Name of Depository participant & DP ID No. through whom Shares are proposed to be Debited/Credited	
Client ID No.:	

I confirm on my own behalf and on behalf of my Dependents that:

- i. I do not have access to any price sensitive information and have complied with the Code of Conduct for Insider Trading as specified by the Company from time to time.
- ii. I shall execute the trade of shares within 7 days of your approval failing which I shall apply again to you for your approval.
- iii. I shall hold shares of the Company for a minimum period of six months from the date of acquisition.

I further confirm that the aforesaid facts are true and correct and shall be fully responsible for any wrongful acts of my Dependents including such penalties as may be imposed by the Company.

Signature: _____

Name:
Designation:
Date:
Place:

Form B
Confirmation of deal

To,
The Compliance Officer,
Dai-ichi Karkaria Limited,
Liberty Building, S.V.T. Marg
New Marine Lines,
Mumbai – 400020

Dear Sir / Madam,

I confirm that the transaction for trading in shares for which approval was granted on _____ was completed on _____ by acquiring/ selling/ dealing in equity shares of the Company amounting to Rs. _____.

Signature: _____

Name:

Designation:

Date:

Place:

Form C
Application for waiver of minimum holding period

To,
The Compliance Officer,
Dai-ichi Karkaria Limited,
Liberty Building, S.V.T. Marg,
New Marine Lines,
Mumbai – 400020

Dear Sir / Madam,

I request you to grant me waiver of the minimum holding period of 6 months as required under the Code of Conduct for Prevention of Insider Trading with respect to _____ shares of the Company by me/ _____ (Name of the Immediate relative) singly/ jointly acquired by me on _____ (Date).

I _____ desire to sell the said shares on account of _____ (provide reasons).

Thanking you,
Yours faithfully,

Signature: _____

Name:
Designation:
Date:
Place:

FORM D

Initial Disclosure on becoming KMP, Director or Promoter or member of the promoter group

Name of the company: Dai-ichi Karkaria Limited

ISIN of the company: INE928C01010

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

Name, PAN No., CIN/ DIN & addresses with contact nos	Category of Person (Promoter s/ KMP / Directors/ immediate relatives/ 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	No.		Number of units (contracts* lot size)	Notional value in Rupee terms	Number of units (contract* lot size)	Notional value in Rupee Terms

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

Signature: _____

Name:

Designation:

Date:

Place:

Form E
Annual Disclosure of Shareholding

Date:

To,
The Compliance officer,
Dai-ichi Karkaria Limited,
Liberty Building, S.V.T. Marg,
New Marine Lines,
Mumbai – 400020

Dear Sir / Madam,

Sub: Annual Disclosure of Shareholding

I, _____, along with my immediate relatives hold the following shares in the Company as on 31st March, 2019,

I. Statement of my shareholding:

Name & Designation	Department	Number of shares at the beginning of the financial year	Number of shares at the end of the financial year	Folio No./ DP Id/ Client Id.

II. Statement of shareholding of Immediate Relatives (includes spouse, parent, sibling and child of a person and such relatives of spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities);

Name of the Immediate Relative & PAN	Number of shares at the beginning of the financial year	Number of shares at the end of the financial year	Folio No./ DP Id/ Client Id. & Mobile no.	Whether financially dependent / consults you in taking decisions relating to trading in securities. (Y/N)

III. Details persons with whom such designated person(s) shares a material financial relationship: (means relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding twelve months, equivalent to at least 25% of such payer's annual income but shall exclude relationships in which the payment is based on arm's length transactions.)

Name of the Person	PAN	Number of shares at the beginning of the financial year	Number of shares at the end of the financial year	Folio No./ DP Id/ Client Id. & Mobile no.

Signature: _____

Name:

Designation:

Date:

Place:

FORM F
Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (2) read with Regulation 6 (2)]

Name of the company: Dai-ichi Karkaria Limited
ISIN of the company: INE928C01010

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

Name, PAN, CIN/DIN & addresses and contact nos.	Category of Person (Promoters/ KMP / Directors/ immediate relative to/ others etc)	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal	
		Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (e.g. – Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/Sale/ Pledge/ Revoke/ Invoke)	Type of security (e.g. – Shares, Warrants, Convertible Debentures, etc.)	No. and % of shareholding
1	2	3	4	5	6	7	8	9	10

Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation To company	Mode of acquisition/disposal (on market/ Public/ rights/preferential offer/off market/Inter-se transfer, ESOPs, etc.)
From	To		
11	12	13	14

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

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

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts* lot size)	Notional Value	Number of units (contracts* lot size)	
15	16	17	18	19	20	21

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