INDO-MIM LIMITED
Regd office: 45(P), KIADB Industrial Area, Hoskote, Bangalore 562114

INSIDER TRADING POLICY
(v3/14-10-2026)

INDO-MIM Limited (the "**Company**") is a public listed company whose equity shares are listed on BSE Limited and National Stock Exchange of India Limited and are subject to the rules and regulations issued by the Securities and Exchange Board of India ("**SEBI**").

The Board of Directors of the Company has adopted this Insider Trading Policy (the "**Policy**") to comply with the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time ("**SEBI Regulations**") and for regulating, monitoring and reporting of trading by Insiders (as defined below). This policy shall be known as the "Code of Conduct for regulating, monitoring and reporting of trading in securities by Insiders" (the "**Code**").

The SEBI Regulations prohibit an Insider (as defined below) from trading in the securities of a company listed on any stock exchange on the basis of any unpublished price sensitive information (as defined below).

Unpublished Price Sensitive Information ("**UPSI**") means any information, which relates directly or indirectly, to the Company or its securities, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities of the Company.

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

UPSI includes, without limitation, information relating to the following:

I. Financial results;
II. Dividends (both interim and final);
III. Change in capital structure;
IV. Mergers, de-mergers, acquisitions, de-listings, 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 ends of term, and resignation of a Statutory Auditor or Secretarial Auditor;

For INDO-MIM Limited
Company Secretary

VI. Change in rating(s), other than ESG rating(s);
VII. Fund raising proposed to be undertaken;
VIII. Agreement, by whatever name called, which may impact the management or control of the company;
IX. Fraud or default 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; and
XVI. Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.

The SEBI Regulations prohibit communication of UPSI to any person except as required under law. Further, procuring any person to Trade in the securities of any company on the basis of UPSI is also prohibited under the SEBI Regulations. Violations of the SEBI Regulations attract severe penalties including fines and imprisonment.

1. Definitions

1) Compliance Officer

"Compliance Officer" means any senior officer, designated so and reporting to the board of directors or head of the organization in case board is not there, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for

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

Explanation –For the purpose of this regulation, "financially literate" shall mean a person who has the ability to read and understand basic financial statements i.e. balance sheet, profit and loss account, and statement of cash flows

2) Connected Person

"Connected Person," means–

any person who is or has during the six months prior to the concerned act been associated with the 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.

The persons enumerated below shall be **deemed** to be 'Connected Persons' unless the contrary is established:-

a A Relative of Connected Persons;
b A holding company or associate company or subsidiary company;
c An intermediary as specified in section 12 of the SEBI Act or an employee or director thereof;
d An investment company, trustee company, asset management company or an employee or director thereof;
e An official of a stock exchange or of clearing house or corporation;
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;
g A member of the board of directors or an employee, of a public financial institutionas defined in section 2 (72) of the Companies Act, 2013;
h An official or an employee of a self-regulatory organization recognised or authorizedby the SEBI;
i A banker of the Company;
j A concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of the Company or his Relative or banker of the Company, has more than ten percent of the holding or interest.
k a firm or its partner or its employee in which a connected person specified in

sub-clause (i) of clause (d) is also a partner; or

- a person sharing household or residence with a connected person specified in sub-clause (i) of clause (d);

It is intended that a connected person is one who has a connection with the company that is expected to put him in possession of unpublished price sensitive information. Relatives and other categories of persons specified above are also presumed to be connected persons but such a presumption is a deeming legal fiction and is rebuttable. This definition is also intended to bring into its ambit persons who may seemingly not occupy any position in a company but are in regular touch with the company and its officers and are involved in the know of the company's operations. It is intended to bring within its ambit those who would have access to or could access unpublished price sensitive information about any company or class of companies by virtue of any connection that would put them in possession of unpublished price sensitive information.

3) Designated Person

The term "designated person" shall consist of, Connected Persons who are:

I. Promoters of the Company;
II. Directors of the Company and its subsidiaries;
III. Chief Executive Officer (CEO) and two levels below CEO of the Company and its material subsidiaries.
IV. Executive President and Vice Presidents of the Company;
V. All employees in the Finance and Accounts Department, Company Secretary Department, Legal Department, Information Technology Department, who have access to the UPSI.
VI. Executive Secretaries of Directors, President and Vice President of the Company;
VII. Any other Person designated by the Compliance Officer of the Company on the basis of their functional role;
VIII. Immediate Relatives of I to VII above;

4) Director

"Director" shall have the meaning assigned to it under the Companies Act, 2013.

5) Immediate Relative

"Immediate Relative" of a person means spouse, parent, sibling or child of that person or his or her spouse, if they are either dependent financially on such person

or consult such person in taking decisions relating to trading in securities.

6) Insider

An insider means any person who is:

(i) a Connected Person or

(ii) in possession of or having access to UPSI.

7) "Insider Trading Regulations" means the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended.

8) Key Managerial Personnel

"Key Managerial Personnel" shall have the meaning assigned to it under the Companies Act.

9) Officer

"Officer" shall have the meaning assigned to it under the Companies Act, 2013.

10) Promoter

"Promoter" shall have the meaning assigned to it under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.

11) Promoter Group

"Promoter Group" shall have the meaning assigned to it under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018.

12) Relative

"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)

13) Securities

"Securities" shall have the meaning assigned to it under the Securities Contracts (Regulations) Act,1956 or any modification thereof except units of a mutual fund.

14)Senior Management

"Senior Management" shall mean the officers and personnel of the issuer who are members of its core management team, excluding the Board of Directors, and shall also comprise all the members of the management one level below the Chief Executive Officer or Managing Director or Whole Time Director or Manager (including Chief Executive Officer and Manager, in case they are not part of the Board of Directors) and shall specifically include the functional heads, by whatever name called and the Company Secretary and the Chief Financial Officer.

15)Trading

"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.

Words and expressions used and not defined in these Code but defined 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 rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislations.

2. Prohibition on communicating or procuring Unpublished Price Sensitive Information

An Insider shall not –

i. communicate, provide, or allow access to any UPSI, relating to the Company or its securities, to any person including other insiders, except to the extent allowed by these Rules;

ii. procure from or cause the communication by an Insider of UPSI, relating to the Company or its securities;

Provided that nothing contained above shall be applicable when an UPSI is communicated,provided, allowed access to or procured:

(i) in furtherance of legitimate purposes, performance of duties or discharge of legal obligations pursuant to appropriate confidentiality and non-disclosure agreements being executed; or

in the event the Board of Directors direct or cause the public disclosure of UPSI in the best interest of the Company.

The board of directors of a company shall make a policy for determination of

"legitimate purposes" as a part of "Codes of Fair Disclosure and Conduct" formulated under regulation 8 Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

The term "legitimate purpose" shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider 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 these regulations

(ii) within a group of persons if such persons have been identified and secluded within a "chinese wall" or information barrier by the Compliance Officer from the rest of the Company for a particular purpose or for a specified period of time in furtherance of legitimate purposes, performance of duties or discharge of legal obligations, and are subjected to, among other conditions, additional confidentiality obligations, information barriers designed to prevent exchanges of UPSI outside the "chinese wall", and the execution of an undertaking by such persons to abstain and / or forego Trading during such seclusion or till the UPSI no longer constitutes UPSI.

(iii) Any person in receipt of UPSI pursuant to a "legitimate purpose" shall be considered an Insider for purposes of the Insider Trading Regulations and due notice shall be given to such persons to maintain confidentiality of such Unpublished Price Sensitive Information in compliance with the Insider Trading Regulations.

For the purposes of clause (iii) above, 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 purpose provided in clause (iii) above and shall not otherwise trade in Securities of the Company when in possession of UPSI.

(iv) Notwithstanding anything contained herein, UPSI may be communicated, provided, allowed access to or procured, in connection with a transaction which would entail:

a) an obligation to make an open offer under the Takeover Regulations where the Board of directors of the company is of informed opinion that sharing of such information is in the best interests of the Company; or

b) not attracting the obligation to make an open offer under the Takeover Regulations but where the Board of directors of the company is of informed opinion that sharing such information is in the best interests of the

Company and the information that constitutes Unpublished Price Sensitive Information is disseminated to be made Generally Available at least two trading days prior to the proposed transaction being affected in such form as the Board may determine to be adequate and fair to cover all relevant and material facts.

c) The board of directors or head(s) of the organisation of every person required to handle unpublished price sensitive information shall ensure that a structured digital database is maintained containing the nature of unpublished price sensitive information and the names of such persons who have shared the information and also the names of such persons with whom information is shared under this regulation along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. 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.

d) The board of directors or head(s) of the organisation of every person required to handle unpublished price sensitive information shall ensure that the structured digital database is 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 Board regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.

3. Prohibition on Insider Trading

An Insider shall not, directly or indirectly, –

i. Trade in securities that are listed or proposed to be listed when in possession of UPSI;

ii. Trade in securities of the Company except when the Trading Window is open and the Insider is not in possession of UPSI.

Provided the restriction as above shall not apply to:

(a) a transaction that is an off-market inter-se transfer between Insiders who were in possession of the same UPSI without being in breach of these Rules and both parties had made a conscious and informed trade decision, provided such off-market trades shall be reported by the Insiders to the Company within two working days and Company shall notify the particulars of such trades to the stock exchange on which the securities are traded or in any other manner as

may be specified by the Board within two trading days from receipt of the disclosures or from becoming aware of such information; and

(b) Trades pursuant to a Trading Plan set up in accordance with these Rules.

4. Role of Compliance Officer

(i). The Compliance Officer shall at quarterly intervals prepare a report on insider trading to the Chairman of the Audit Committee or the Chairman of the Board.

(ii). The Compliance Officer shall maintain a database of the violations of Code of Conduct by Designated Persons and immediate relatives of Designated Persons.

(iii). The Compliance Officer shall assist all Employees in addressing any clarifications regarding the Insider Trading Regulations and the Code.

(iv). To assist the Board in identifying the Designated Persons to be covered by the code of conduct on the basis of their role and function in the organisation and the access that such role and function would provide to unpublished price sensitive information in addition to seniority and professional designation.

5. Trading Window

1) The Compliance Officer shall notify a 'trading window' during which the Designated Persons may Trade in the Company's securities after securing pre-clearance from the Compliance Officer in accordance with these Rules.

2) Designated Persons shall not Trade in the Company's securities when the trading windowis closed.

3) The trading window shall generally be closed for all Insiders from the end of every quarter till 48 hours after the declaration of financial results.

4) Additionally, the trading window shall be closed in particular for a Designated Person or class of Designated Persons when the Compliance Officer determines that a DesignatedPerson or class of Designated Persons can reasonably be expected to have possessionof UPSI, for such periods as determined by the Compliance Officer.

5) All Designated Persons and their Immediate Relatives shall conduct their dealings in the securities of the Company only in a valid trading window and shall not deal in any transaction involving the purchase or sale of the Company's Securities during the periods when the trading window is closed

6) The Compliance Officer shall intimate the closure of trading window to all the Designated Persons of the Company.

7) The trading window may be re-opened after closure, not earlier than 48 hours after the UPSI in question becomes generally available.

6. Pre-clearance of Trading

1) Designated Persons may Trade in the securities of the Company when the trading window is open, after obtaining approval of the Compliance Officer, if the value of the proposed trades is equals to or above Rs. 10,00,000/- (Rupees Ten Lakhs) or such other threshold as the board of directors may stipulate, by submitting an application as per Annexure 1 and an undertaking as per Annexure 2.

   In case the Compliance Officer needs to take pre-clearance for his/her trading or for his/her immediate relatives, then he has to take prior consent of the Managing Director or to the Chief Financial Officer or to the Chief Executive Officer or to the Chairperson of the Audit Committee before approving his own pre clearance application.

2) The Compliance Officer shall not approve any proposed Trade by Designated Person if the Compliance Officer determines that such Designated Person is in possession of UPSI even though the trading window is open.

3) The Compliance Officer may, after being satisfied that the application and undertaking are true and accurate, approve Trading by a Designated Person, on the condition that the Trade so approved shall be executed within seven trading days following the date of approval.

4) The Designated Person shall, within two days of the execution of the Trade, submit the details of such Trade to the Compliance Officer as per Annexure 3. In case the transaction is not undertaken, a report to that effect shall be filed in the said form.

5) If the pre-cleared Trade is not executed within seven trading days after the approval is given, the Designated Person must secure pre-clearance of the transaction again.

6) A Designated Person who Trades in securities without complying with the pre-clearance procedure as envisaged in these Rules or gives false undertakings and/or makes misrepresentations in the undertakings executed by him/her while complying with the pre-clearance procedure shall be subject to the penalties as envisaged in these Rules.

7. Additional trading restrictions on Designated Persons

1) The restriction and disclosure of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account for purpose of these Rules, provided that trading in derivatives of securities is permitted by any law for the time being in force.

2) All Designated Persons who Trade in the securities of the company shall not enter into an opposite transaction during the next six months following the prior transaction. The compliance officer shall be empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate the SEBI (PIT) Regulations. In case of any contra trade being 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 SEBI.

8. Trading Plan

1) An Insider shall be entitled to formulate a Trading Plan that complies with the SEBI Regulations (a "Trading Plan") and present it to the Compliance Officer for approval and public disclosure pursuant to which Trades may be carried out in his behalf in accordance with such plan. Such trading plan shall not entail commencement of trading on behalf of the insider earlier than one hundred and twenty calendar days from the public disclosure of the plan.

2) The Compliance Officer shall review and approve the Trading Plan if it complies with theSEBI Regulations and shall disclose the Trading Plan to the stock exchanges.

3) 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. However, the implementation of the Trading Plan shall not be commenced, if at the time of formulation of the plan, the Insider is in possession of UPSI and the said information has not become generally available at the time of the commencement of implementation. Further, the Insider shall also not be allowed to Trade in securities of the Company, if the date of Trading in securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.

9. Penalty for Insider Trading

1) An Insider who acts in contravention of these Rules shall be penalized in accordance with the Penalty Matrix set out in the Annexure to this Policy..

2) Directors, Officers and employees of the Company who violate these rules shall be subject to fines as mentioned in Penalty Matrix. In case repeated offences, further disciplinary action can be taken by the Company, which may include wage freeze, suspension, ineligibility for future participation in the Company's stock option plans or termination.

3) The SEBI or any other appropriate regulatory authority would also be informed of the violation of these Rules so that appropriate action may be taken.

10. Disclosure requirements

1) Initial Disclosure:

   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 / her and Immediate Relatives' holding of securities of the Company as on the date of appointment or becoming a promoter, to the Company within seven days of such appointment or becoming a promoter, as per Form set out in Annexure 5.

2) Continual Disclosure:

   a. Every Promoter, member of the promoter group, Designated Person, director of the Company shall disclose as per Form set out in Annexure 6 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 which is equals to or in excess of Rs. Ten lakhs.

   b. The disclosure shall be made within two trading days of:

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

3) Disclosure to the Stock Exchange:
   The Compliance Officer shall notify the stock exchanges, particulars of the Trades, within two trading days of the receipt of the Continual Disclosure or

from becoming aware of such information.

4) Disclosures by other Connected Persons.

The Compliance Officer may, require any other Connected Person to disclose the holdings and trading in securities of the Company as per Form set out in Annexure 7 at such frequency as he may determine.

11. Miscellaneous

1) The Board of Directors shall be empowered to amend, modify, interpret these Rules and such Rules shall be effective from such date that the Board may notify in this behalf.

2) The Compliance Officer shall provide the Audit Committee of the Board, on a quarterly basis, all the details of Trading in securities by the Designated Persons including any violations of the Rules.

3) The Compliance Officer shall maintain (a) updated list of Designated Persons, (b) records of disclosures and pre-clearance applications and undertakings for a period of five years and (c) a confidential list of any 'restricted securities' to which the Compliance Officer may require Designated Persons to seek pre-clearance before Trading in such 'restricted securities'.

4) The Company shall require all Connected Persons to formulate and adhere to a code of conduct to achieve compliance with these Rules. In case such persons observe that there has been a violation of these Rules, then they shall inform the Board of Directors of the Company promptly.

5) The Company has adopted 'Corporate Policy Statement on Investor Relations' available at www.indo-mim.com to regulate the Company's practices and procedures for fair disclosure of UPSI and comply with SEBI Regulations of Fair Disclosure.

6) This Policy shall be read and interpreted in accordance with the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended, modified, supplemented, or replaced from time to time. In the event of any matter not being expressly provided for in this Policy, the provisions and requirements of the applicable SEBI (Prohibition of Insider Trading) Regulations, together with the applicable circulars, notifications, and clarifications issued by SEBI, shall prevail and shall be referred to for guidance and compliance.

Annexure

PENALTY MATRIX
For breach of PIT Regulations and Code

S. No.	Nature of Default	First Default	Second & subsequent Default
1	Trading on the basis of UPSI	100% of profits made/ loss avoided subject to a maximum of Rs. 10,00,000/-.	100% of profits made/ loss avoided subject to a maximum of Rs. 10,00,000/-.
2	Contra Trade in violation of the Code	100% of profits made/ loss avoided Provided that the minimum penalty will be Rs. 5,000/-	100% of profits made/ loss avoided Provided that the minimum penalty will be Rs. 10,000/-
3	Trading during "Black Out" / "Window Closure" period	Rs. 10,000/- per instance.	Rs. 20,000/- per instance.
4	Pre-clearance approval not obtained approval not obtained, irrespective of whether disclosure of purchase/sale of shares in violation of the Code	Rs. 5,000/- per instance.	Rs. 10,000/- per instance.
5	Non-reporting of trade within 2 trading days	Rs. 5,000/- per instance.	Rs. 10,000/- per instance.
6	Violation by any member of Board of Director	Penalty as decided by the Board of Directors	Penalty as decided by the Board of Directors

Other Points:

1. Calculation of profit for the purpose of arriving at penalty shall be net of taxes.

2. Violation during trading window closure period:

   a) To arrive at profits in case of violation involving Sale, the price as on the preceding 31 March would be considered irrespective of actual cost of original purchase of the shares. For period till 31 March 2027, the cost of each share shall be considered Rs. 485/- per share, being offer price of shares in IPO.

b) To arrive at profits in case of violation involving Purchase, the difference between the purchase price and the price as on the date when the violation is noticed, would be considered.

3. The aforesaid penalty matrix shall be applicable for all kinds of transactions including Portfolio Management Services undertaken by Designated Person and/or their immediate relatives.

4. If the transaction falls under more than one category of offence, then highest applicable penalty will be levied.

5. In case of offences not covered above, the Compliance Officer in discussion with Chairman of the Board/ Chairman of the Audit Committee/ Chief Executive Officer and Chief Financial Officer shall decide the penalty to be imposes on a case-to-case basis, considering the facts and other necessary details.

6. Employees will have to pay the penalty to the Investor Protection and Education Fund (IPEF) of SEBI.

Annexure 1

APPLICATION FOR PRE-TRADING APPROVAL

To,

The Compliance Officer,
INDO-MIM Limited.

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Insider Trading Policy, I seek approval to purchase / sell / subscribe _____ equity shares of the Company as per details given below:

1	Name of the applicant	
2	Designation	
3	Number of securities held as on date	
4	Folio No. / DP ID / Client ID No.	
5	The proposal is for	(a) Purchase of securities (b) Subscription to securities (c)Sale of securities
6	Proposed date of trading in securities	
7	Estimated number of securities proposed to bepurchased/subscribed/sold	
8	Current market price (as on date of application)	
9	Whether the proposed transaction will be through stockexchange or off-market trade	
10	Folio No. / DP ID / Client ID No. where the securities willbe credited / debited	

I enclose herewith the Undertaking signed by me.

Signature :
Name:
Date :

Annexure 2

UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-CLEARANCE

To,
The Compliance Officer,
INDO-MIM Limited

I,_____, _____ of the Company residing at _____, am desirous of trading in _____ shares 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 any unpublished price sensitive information upto the time of signing this Undertaking.

In the event that I have access to or receive any unpublished price sensitive information after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from trading in the securities of the Company until such information becomes public.

I declare that I have not contravened the provisions of the Rules as notified by the Companyfrom time to time.

In the event of this transaction being in violation of the Rules or the applicable laws, (a) I will,unconditionally, release, hold harmless and indemnify to the fullest extent, the Company and its directors and officers, (the `indemnified persons') for all losses, damages, fines, expenses,suffered by the indemnified persons, (b) I will compensate the indemnified persons for all expenses incurred in any investigation, defense, crisis management or public relations activityin relation to this transaction and (c) I authorize the Company to recover from me, the profitsarising from this transaction and remit the same to the SEBI for credit of the Investor Protection and Education Fund administered by the SEBI.

I undertake to submit the necessary report within two days of execution of the transaction / a`Nil' report if the transaction is not undertaken.

If approval is granted, I shall execute the trade within seven days of the receipt of approvalfailing which I shall seek pre-clearance afresh.

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

Signature :
Name:
Date :

Annexure 3

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

To,

The Compliance Officer,
INDO-MIM Limited.

I hereby inform that I

- have not bought / sold/ subscribed any securities of the Company
- have bought/sold/subscribed to____securities as mentioned below on _____ (date)

(strike out whichever is not applicable)

Name of holder	No. of securities traded	Bought / sold / subscribed	DP ID/Client ID/Folio No.	Price (Rs.)

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

Signature : _____
Name:
Date :

Annexure 4

FORM A

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

Name of the company: _____

ISIN of the company: _____

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

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

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

Details of Open Interest (OI) in derivatives of the company held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation6(2)

Open Interest of the Future contracts held as on thedate of regulation coming into force			Open Interest of the Option Contracts held as on thedate of regulation coming into force		
Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms

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

Name & *Signature:*
Designation:
Date:
Place:

Annexure 5

FORM B

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

Name of the company: _____

ISIN of the company: _____

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a company and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN & Address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relative to/others etc.)	Date of appointment of Director /KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP		% of Shareholding
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	

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

Details of Open Interest (OI) in derivatives of the company held on appointment of Key Managerial personnel (KMP) or Director or upon becoming a Promoter of a company and other such persons as mentioned in Regulation 6(2).

Open Interest of the Future contracts held at the timeof becoming Promoter/appointment of Director/KMP			Open Interest of the Option Contracts held at the timeof becoming Promoter/appointment of Director/KMP		
Contract specifications	Number of units (contracts	Notional value in Rupee terms	Contract specifications	Number of units (contracts * lot	Notional value in Rupee terms

	* lot size)			size)	

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

Name & Signature:
Designation:
Date:
Place:

Annexure 6

FORM C

SEBI (Prohibition of Insider Trading) Regulations, 2015 (Regulation 7 (2) read with Regulation 6(2) – Continual disclosure)Name of the company: _____

ISIN of the company: _____

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

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

		tures etc.)		Debe nt ures etc.)				tures etc.)					

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 company and other suchpersons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the tradewas executed
Type of contract	Contract specificatio ns	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.*

Name & Signature:
Designation:
Date:
Place:

Annexure 7

FORM D (Indicative format)

SEBI (Prohibition of Insider Trading) Regulations, 2015 Regulation 7(3) –Transactions by Other connected persons as identified by the company

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

Name, PAN, CIN/DIN, & address with contact nos. of other connected persons as identified by the company	Connect ion with company	Securities held prior to acquisition/ dispsal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition/disposal (on market/public/ rights/ Preferential offer / off market/Inter se transfer, ESOPsetc.)
		Type of security (For eg. – Shares, Warrants, Convertible Deben	No. and %of share holding	Type of security(For eg. – Shares, Warrants, Convertible	No.	Value	Transaction Type (Buy/ Sale/ Pledge / Revoke /Invoke	Type of security (For eg. – Shares, Warrants, Convertible Debentu resetc.)	No. and % of shareholding	From	To		

		tures etc.)		Debe nt ure s etc .)			)						

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 by other connected persons as identified by the company

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which thetrade was executed
Type of Contra ct	Contract specificati ons	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.*

Name:
Signature:
Place: