

TRINITY TRADELINK LIMITED

(Formerly Omnitech Petroleum Limited)

CIN No. L11103MH1985PLC035826

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Mumbai – 400 062

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**CODE OF CONDUCT FOR
TRADING BY INSIDERS IN SECURITIES
OF THE COMPANY**

INTRODUCTION

Insider Trading means dealing in securities of a company listed/traded on any stock exchange in India based on, when in possession of, unpublished price sensitive information.

With a view to govern the conduct of insiders on matters relating to insider trading, the Securities Exchange Board of India (SEBI) had formulated Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as 'The Regulations') to be effective from 15th day of May, 2015. The code, as detailed below, will be known as **"Code of Conduct for Trading by Insiders in Securities of the Company"** (hereinafter called "the Code").

OBJECTIVE

The objective of the Code is to formulate a framework to regulate, monitor and report trading by its employees and other connected persons towards achieving compliance with these Regulations.

APPLICABILITY

This code will be applicable to any person considered to be an insider as defined in the Regulations and this Code. This code has been duly approved by the Board of Directors at their meeting held on 27th day of May, 2015.

DEFINITIONS

In these regulations, unless the contexts otherwise requires, the following words, expression and derivations there from shall have the meaning assigned to them as under:-

1. **"Act"** means the Securities and Exchange Board of India, Act 1992 (15 of 1992).
2. **"Board"** means the Board of Directors of the Company.
3. **"Code"** or **"Code of Conduct"** shall mean the Code of Internal Procedures and Conduct for regulating, Monitoring and Reporting of trading by insiders of Trinity Tradelink Limited as amended from time to time.
4. **"Company"** means Trinity Tradelink Limited.
5. **"Compliance Officer"** means Company Secretary or such other senior officer, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations designated so and reporting to the Board of Directors and who shall be responsible for compliance of policies, procedures and maintenance of records, monitoring adherence to the rules for the prevention of Unpublished Price Sensitive Information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board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.
6. **"Connected Person"** means
 - i. 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 and 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 the 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 authorised by the Board; or
 - 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 immediate relative or banker of the Company, has more than ten percent of the holding or interest.
7. **“Dealing in Securities”** means an act of subscribing to buying, selling, or agreeing to subscribe to, buy, sell or deal in the securities of the Company either as principal or agent.
 8. **“Designated Employee(s)”** shall include:
 - i. Every employee in the grade of Assistant General Managers and Above;
 - ii. Every employee in the finance, accounts, secretarial and legal department as may be determined and informed by the Compliance Officer; and
 - iii. Any other employees as may be determined and informed by the Compliance Officer from time to time.
 9. **“Director”** means a member of the Board of Directors of the Company.
 10. **“Employee”** means every employee of the Company including including the Directors in the employment of the Company.
 11. **“Generally Available Information”** means information that is accessible to the public on a non-discriminatory basis.
 12. **“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.
 13. **“Insider”** means any person who is:
 - i. A connected person; or
 - ii. In possession of or having access to unpublished price sensitive information;
 14. **“Promoter”** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof.
 15. **“Securities”** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund.
 16. **“Key Managerial Personnel”** means a person as defined in Section 2(51) of the Companies Act, 2013.
 17. **“Specified”** means specified by the Board in writing.
 18. **“Takeover Regulations”** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.
 19. **“Trading”** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and “trade” shall be construed accordingly.
 20. **“Trading Day”** means a day on which the recognized stock exchanges are open for trading.
 21. **“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:
 - i. Financial results;
 - ii. Dividends;
 - iii. Change in capital structure;
 - iv. Mergers, demergers, acquisitions, delisting, disposals, and expansion of business and such other transactions;
 - v. Changes in Key Managerial Personnel
 - vi. Material events in accordance with the Listing Agreement;

Words and expressions used and not defined in these regulations but defined in 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.

ROLE OF COMPLIANCE OFFICER

- i. The Compliance Officer shall maintain a record of designated employees and any changes made to the list of designated employees.
- ii. The Compliance Officer may in consultation with the Chairman & Managing Director and shall as directed by the Board, specify Prohibited Period from time to time and immediately make an announcement thereof.
- iii. The Compliance Officer shall maintain a record of Prohibited Period specified from time to time.
- iv. The Compliance Officer shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of 'Price Sensitive Information', 'pre-clearing of Designated Employees' and Officers and their dependents' trades, monitoring of trades and the implementation of the Code of Conduct under the overall supervision of the Board of the Company.
- v. The Compliance Officer shall maintain records of all the declarations submitted in the appropriate form given by the Directors, Officers and Designated Employees for a minimum period of three years. The declarations may be taken and preserved in either physical form or electronic form.
- vi. The Compliance Officer shall place before the Chairman / Managing Director, at regular intervals, all the details of the dealing in the securities by Designated Employees, Directors and Officers of the company and the accompanying documents that such persons had executed under the pre-clearing procedure as envisaged in these rules.
- vii. The Compliance Officer shall assist all the employees/directors in addressing any clarifications regarding SEBI (Prohibition of Insider Trading) Regulation, 1992 and the Company's code of conduct.
- viii. The Compliance Officer shall be responsible for overseeing and co-ordinate disclosure of price sensitive information to Stock Exchanges, analysts, shareholders and media and educating staff on disclosure policies and procedure and report to the Chairman/ Managing Director.
- ix. The Compliance Officer shall ensure that prohibited period is intimated to all concerned at least 48 hours before the commencement of the said period.
- x. If the Company /compliance officer observes that there has been a violation of the Regulations, SEBI must be informed by the Compliance Officer.

PRESERVATION OF "PRICE SENSITIVE INFORMATION"

- i. No insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- ii. All Price Sensitive Information is to be handled on a "need to know" basis. It 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 the information.
- iii. There shall be LIMITED access to confidential information and Price Sensitive Information. Files containing confidential and Price Sensitive Information can be kept secured and computer files containing these information should be protected with the help of login id and passwords, etc.
- iv. Unpublished Price Sensitive Information directly received by any director/officer/designated employee and other connected person should immediately be reported to the Compliance Officer.
- v. "Chinese Wall" policy needs to be perused by the Company which demarcates "inside areas" from "public areas". Those areas having access to confidential information are considered as "inside areas" and areas which deal with sales / marketing / investment are considered as "public areas". The employees in the inside area shall not communicate any unpublished price sensitive information to anyone in public area. In exceptional circumstances employees from the public areas may be brought "over the wall" and given confidential information on the basis of "need to know" criteria, under intimation to the Compliance Officer.

PROHIBITION ON DEALING, COMMUNICATING OR COUNSELING ON MATTERS RELATING TO INSIDER TRADING

No insider shall

- i. Communicate, provide, or allow access to any unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, to any person including other insiders

except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

- ii. Procure from or cause the communication by any insider of unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- iii. Notwithstanding anything contained in this regulation, an unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction that would:-

Entail an obligation to make an open offer under the takeover regulations where the board of directors of the company is of informed opinion that the proposed transaction is in the best interests of the company;

- iv. not attract 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 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 of directors may determine.

TRADING RESTRICTION & PREVENTION OF MISUSE OF "UNPUBLISHED PRICE SENSITIVE INFORMATION"

Employees and connected persons designated on the basis of their functional role ("designated persons") in the Company shall be governed by an internal code of conduct governing dealing in securities.

- i. Trading Plan

An insider shall be entitled to formulate a trading plan for dealing in securities of the Company and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.

- ii. Trading Plan shall:

- a. not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
- b. not entail trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced by the issuer of the securities and the second trading day after the disclosure of such financial results;
- c. entail trading for a period of not less than twelve months;
- d. not entail overlap of any period for which another trading plan is already in existence;
- e. 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

- iii. The Compliance Officer shall consider the Trading Plan made as above and shall approve it forthwith. However, he shall be entitled to take express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per provisions of the Regulations.

- iv. 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.

Provided that, 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 any unpublished price sensitive information and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Plan shall be deferred until such unpublished price sensitive information becomes generally available information. Further, the Insider shall also not be allowed to deal 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.

- v. Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

Trading Window and Window Disclosure

- i. The trading period, i.e. the trading period of the stock exchanges, called 'trading window', is available for trading in the Company's securities.
- ii. The trading window shall be, inter alia, closed 7 days prior to and during the time the unpublished price sensitive information is published.
- iii. When the trading window is closed, the Specified Persons shall not trade in the Company's securities in such period.
- iv. All Specified Persons shall conduct all 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, as referred to in Point No. (ii) above or during any other period as may be specified by the Company from time to time.
- v. In case of ESOPs, exercise of option may be allowed in the period when the trading window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when trading is closed.

The Compliance Officer shall intimate the closure of trading window to all the designated employees of the Company when he determines that a designated person or class of designated persons can reasonably be expected to have possession of unpublished price sensitive information. Such closure shall be imposed in relation to such securities to which such unpublished price sensitive information relates.

The Compliance Officer after taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, shall decide the timing for re-opening of the trading window, however in any event it shall not be earlier than forty-eight hours after the information becomes generally available.

The trading window shall also be applicable to any person having contractual or fiduciary relation with the Company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the Company.

PRE-CLEARANCE OF TRADES

- i. All Specified Persons, who intend to deal in the securities of the Company when the trading window is opened and if the value of the proposed trades is above 50,000 shares or up to Rs. 10 Lakhs (market value) or 1% of total shareholding, whichever is less, should pre-clear the transaction. However, no designated person shall be entitled to apply for pre-clearance of any proposed trade if such designated 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. The pre-dealing procedure shall be hereunder:
 - ii. An application may be made in the prescribed Form (Annexure 1) to the Compliance officer indicating the estimated number of securities that the Specified Employee intends to deal in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the company in this behalf.
 - iii. An undertaking (Annexure 2) shall be executed in favour of the Company by such Specified Employee incorporating, *inter alia*, the following clauses, as may be applicable:
 - a. That the employee/director/officer does not have any access or has not received "Price Sensitive Information" up to the time of signing the undertaking.
 - b. That in case the Specified Employee 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.
 - c. That he/she has not contravened the code of conduct for prevention of insider trading as notified by the Company from time to time.
 - d. That he/she has made a full and true disclosure in the matter.

- iv. All Specified Persons and there shall execute their order in respect of securities of the Company within one week after the approval of pre-clearance is given. The Specified 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 not undertaken, a report to that effect shall be filed. (Annexure 4).
- v. If the order is not executed within seven days after the approval is given, the employee/director must pre-clear the transaction again.
- vi. All Specified Persons 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 Specified Persons shall also not take positions in derivative transactions in the shares of the Company at any time. In case of any contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund administered by SEBI under the Act.
- vii. In case of subscription in the primary market (initial public offers), the above mentioned entities shall hold their investments for a minimum period of 30 days. The holding period would commence when the securities are actually allotted.
- viii. The Compliance Officer may waive off the holding period in case of sale of securities in personal emergency after recording reasons for the same. However, no such sale will be permitted when the Trading window is closed.

OTHER RESTRICTIONS

- i. Every public disclosure under this chapter shall be made in such form as may be specified.
- ii. The disclosures to be made by any person under this chapter shall include those relating to trading by such person's immediate relatives, and by any other person from whom such persons takes trading decisions.
- iii. The disclosures 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 purposes of this chapter:
- iv. Provided that trading in derivatives of securities is permitted by any law for the time being in force.
- v. The disclosures made under this chapter shall be maintained by the Company for a minimum period of five years, in such form as may be specified.

REPORTING REQUIREMENTS FOR TRANSACTION IN SECURITIES

Initial Disclosure

- i. Every promoter/ Key Managerial Personnel / Director / Officers / Designated Employees of the Company, within thirty days of these regulations taking effect, shall forward to the Company the details of all holdings in securities of the Company presently held by them including the statement of holdings of dependent family members in the prescribed Form (Annexure 5).
- ii. 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 days of such appointment or becoming a promoter.

Continual Disclosure

- i. Every promoter, employee and director of the Company shall disclose to the Company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar

- quarter, aggregates to a traded value in excess of ten lakhs rupees or such other value as may be specified; (Annexure – 6);
- ii. The Company shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.
 - iii. Quarterly statement of transactions in securities of the Company (Annexure-7). [If there is no transaction in a particular quarter no statement is required to be submitted];
 - iv. Annual statement of holdings in the securities of the Company within 30 days of the close of financial year (Annexure – 8).

DISCLOSURE BY THE COMPANY TO THE STOCK EXCHANGE(S)

- i. Within 2 days of the receipt of intimation, the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received.
- ii. The Compliance officer shall maintain records of all the declarations in the appropriate form given by the directors / officers / designated employees for a minimum period of five years.

DISSEMINATION OF PRICE SENSITIVE INFORMATION

- i. No information shall be passed by Specified Persons by way of making a recommendation for the purchase or sale of securities of the Company.
- ii. Disclosure/dissemination of Price Sensitive Information with special reference to analysts, media persons and institutional investors:

The following guidelines shall be followed while dealing with analysts and institutional investors

- Only public information to be provided.
- At least two Company representatives be present at meetings with analysts, media persons and institutional investors.
- Unanticipated questions may be taken on notice and a considered response given later. If the answer includes price sensitive information, a public announcement should be made before responding.
- Simultaneous release of information after every such meet.

PENALTY FOR CONTRAVENTION OF THE CODE OF CONDUCT

- i. Every Specified 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).
- ii. Any Specified Person who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalised and appropriate action may be taken by the Company.
- iii. Specified Persons who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligibility for future participation in employee stock option plans, etc.
- iv. The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

AMENDMENTS TO THE CODE

- i. The Board of Directors of the Company shall have power to modify or replace this Code in part or full, as may be thought fit from time to time in their absolute discretion. The decision of the Board of Directors with regard to all matters relating to this Code will be final and binding on all concerned.
- ii. Words or phrases not defined here will have their respective meanings as per the SEBI Act and the Regulations.
- iii. Any subsequent amendment(s) formulated by SEBI in this context, in so far as it is applicable, will be binding on the Company.

ANNEXURE 1
SPECIMEN OF APPLICATION FOR PRE-DEALING APPROVAL

Date:

To,
The Compliance Officer,
Trinity Tradelink Limited,
16 & 17, Washington Plaza,
Dispensary Road,
Goregaon (W)
Mumbai – 400 062

Dear Sir/Madam,

Application for Pre-dealing approval in securities of the Company

Pursuant to the SEBI (prohibition of Insider Trading) Regulations, 2015 and the Company's **Code of Conduct for Prevention of Insider Trading**, I seek approval to purchase / sale / subscription of _____ equity shares of the Company as per details given below:

1.	Name of the applicant	
2.	Designation	
3.	No. of Securities held as on date	
4.	Folio No. / DP ID / Client ID No.)	
5.	The proposal is so for	(a) Purchase of Securities (b) Subscription of Securities (c) Sale of Securities
6.	Proposed date of dealing in Securities	
7.	Estimated number of securities proposed to be acquired/ subscribed / sold	
8.	Price at which the transaction is proposed	
9.	Current market price (as on date of application)	
10.	Whether the proposed transaction will be through stock exchange or off-market deal	
11.	Folio No. / DP ID / Client ID No. where the securities will be credited / debited	

I enclose herewith the form of undertaking signed by me.

Yours faithfully
(Signature of the Employee)

ANNEXURE 2
FORMAT OF UNDERTAKING TO BE ACCOMPANIED WITH THE
APPLICATION FOR PRE-CLEARANCE

UNDERTAKING

To,
The Compliance Officer
Trinity Tradelink Limited,
16 & 17, Washington Plaza,
Dispensary Road,
Goregaon (W)
Mumbai – 400 062

I, _____, _____ of the Company residing at _____, am desirous of dealing 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 or otherwise privy to any unpublished Price Sensitive Information (as defined in the Company's Code of Conduct for prevention of Insider Trading (the Code) up to the time of signing 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, 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 dealing in the securities of the Company until such information becomes public.

I declare that I have not contravened the provisions of the Code as notified by the Company from time to time.

I undertake to submit the necessary report within four 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 approval failing which I shall seek pre-clearance.

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

Date:

Signature:

* Indicate number of shares

ANNEXURE 3
FORMAT FOR PRE- CLEARANCE ORDER

To,
Name: _____
Designation: _____
Place: _____

This is to inform you that your request for dealing in _____ (nos) shares of the Company as mentioned in your application dated _____ is approved. Please note that the said transaction must be completed on or before _____ (date) that is within 7 days from today.

In case you do not execute the approved transaction /deal on or before the aforesaid date 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.

Yours faithfully,
For, **TRINITY TRADELINK LIMITED**

COMPLIANCE OFFICER

Date : _____

Enclosure: Format for submission of details of transaction

ANNEXURE 4
FORMAT FOR DISCLOSURE OF TRANSACTIONS

(To be submitted within 2 days of transaction / dealing in securities of the Company)

To,
The Compliance Officer,
Trinity Tradelink Limited,
16 & 17, Washington Plaza,
Dispensary Road,
Goregaon (W)
Mumbai – 400 062

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)

Name of holder	No. of Securities dealt with	Bought/ Sold / Subscribed	DP ID/ Client ID/ Folio No.	Price (Rs.)

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 3 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 for a minimum period of six months. In case there is any urgent need to sell these securities within the said period, I shall approach the Compliance Officer for necessary approval. *(applicable in case of purchase / subscription).*

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

Date:

Signature:

Name:

Designation:

ANNEXURE 5
FORMAT FOR INITIAL DISCLOSURE OF SECURITIES

To,
The Compliance Officer,
Trinity Tradelink Limited,
16 & 17, Washington Plaza,
Dispensary Road,
Goregaon (W)
Mumbai – 400 062

I, _____, in my capacity as _____ of the Company hereby submit the following details of securities held in the Company as on _____ (date of becoming Specified Person).

i. Details of Securities (held by me) :

Types of Securities	No. of Securities held	Folio No.	Beneficiary A/c Client ID

ii. Details of dependent(s) :

Sr. No.	Name of the Independent	Relation with Director / Officer / Designated Employee

iii. Details of Securities held by dependent(s) :

Name of Relative	Relationship	Type of Securities	No. of Securities held	Folio No.	Beneficiary A/c Client ID

Date:

Signature:

ANNEXURE 6
DISCLOSURE OF CHANGE IN SHAREHOLDING

To,
The Compliance Officer,
Trinity Tradelink Limited,
16 &17, Washington Plaza,
Dispensary Road,
Goregaon (W)
Mumbai – 400 062

I, _____, in my capacity as _____ of the Company hereby submit the following details of change in holding of securities of the Company:

Name, PAN No. & address of shareholder	No. of Securities held before the transaction	Receipt of allotment advice/ acquisition of/ sale of securities	Nature of transaction & quantity			Trading member through whom the trade was executed with SEBI registration No. of the TM	Exchange on which the trade was executed
			Purchase	Sale	Others		

Details of change in securities held by dependent family members:

Name, PAN No. & address of shareholder and relationship	No. of Securities held before the transaction	Receipt of allotment advice/ acquisition of/ sale of securities	Nature of transaction & quantity			Trading member through whom the trade was executed with SEBI registration No. of the TM	Exchange on which the trade was executed
			Purchase	Sale	Others		

I/We declare that I/We have complied with the requirement of the minimum holding period of six months with respect to the securities purchased/sold.

I hereby declare that the above details are true, correct and complete in all respects.

Date:

Signature:

ANNEXURE 7
QUARTERLY STATEMENT OF TRANSACTIONS IN SECURITIES

To,
The Compliance Officer
Trinity Tradelink Limited
16 & 17, Washington Plaza,
Dispensary Road,
Goregaon (W),
Mumbai – 400 062

I. Quarterly Statement of transactions in securities by director/officer/designated employee held in his/her own name

Name	Designation	No. of shares held on 1 st day of quarter	No. of shares bought during the quarter	No. of shares sold during the quarter	No. of shares sold during the quarter	No. of shares held on last day of quarter	Folio No./ DP ID / Client ID

II. Details of transactions by dependent family members

Name of relative	Relationship	No. of Shares held on 1 st day of quarter	No. of shares bought during the quarter	No. of shares sold during the quarter	No. of shares held on last day of quarter	Folio No. / DP ID / Client ID

I/We declare that I/We have complied with the requirement of the minimum holding period of 30 days with respect to the shares sold.

Date:

Signature:

**ANNEXURE 8
ANNUAL DISCLOSURE**

To,
The Compliance Officer
Trinity Tradelink Limited
16 & 17, Washington Plaza,
Dispensary Road,
Goregaon (W),
Mumbai – 400 062

I. Statement of security holding of director/ officer/ designated employee held in his / her own name

Name	Designation	Department	No. of shares held on 1 st April	No. of shares bought during the year	No. of shares sold during the year	No. of shares held on 31 st March	Folio No / DP ID / Client ID

II. Details of securities held by dependent family members

Name of relative	Relationship	No. of shares held on 1 st April	No. of shares bought during the year	No. of shares sold during the year	No. of shares held on 31 st March	Folio No / DP ID / Client ID

I/We declare that the shares have been sold to me / us for 30 days.

I/We further declare that the above disclosure is true and correct and is in accordance with the previous disclosures given to the Company.

Date:

Signature: