

AKUMS DRUGS & PHARMACEUTICALS
LTD.

**Code of Conduct to Regulate, Monitor and
Report for Trading by Designated Person and
Their Immediate Relatives**



AKUMS DRUGS & PHARMACEUTICALS LTD.

Regd. Office : 304, Mohan Place, L.S.C., Block – C, Saraswati Vihar, Delhi – 110034

Corporate Office : Akums House, Plot no. 131 to 133, Block –C,
Mangolpuri Industrial Area, Phase – 1, Delhi – 110083

1. Background and objective of the Code

The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“**SEBI PIT Regulations**”) came into force on 15th May, 2015 and provides the legal and regulatory framework for prohibiting the communication and procurement of Unpublished Price Sensitive Information (“**UPSI**”) related to companies listed in India and also prohibiting insider trading in their securities based on UPSI. The Board of directors of the company has adopted this Code of Conduct to regulate, monitor and report trading in securities by its designated persons and immediate relatives of designated persons (the “**Code**”), and to handle of UPSI related to the Company or its securities, pursuant to the SEBI PIT Regulations.

The objective of the Code is to lay down guidance for Designated Persons and their Immediate Relatives, to understand their obligations under the SEBI PIT Regulations, including the procedures to be followed at the time of trading in the securities of and dealing with UPSI related to the Company or its securities. The Code read with the SEBI PIT Regulations also cast the responsibilities upon the compliance officer and audit committee, Board and on other stakeholders of the company for ensuring compliance with the SEBI PIT Regulations.

This Code is in addition to the SEBI PIT Regulations, and the Designated Persons and their Immediate Relatives should be aware of and comply with the provisions of the SEBI PIT Regulations and this Code.

2. Important definitions

For the purpose of this Code:

- a) “**Board**” refers to the board of directors of the Company.
- b) “**Company**” refers to ‘Akums Drugs and Pharmaceuticals Limited’.
- c) “**Compliance Officer**” in this Code, refers to the Company Secretary appointed by the Company and designated for the purpose of this Code, by the Board.
- d) “**Designated Person**” shall mean persons specified in Clause 3 of this Code.
- e) “**Immediate Relative**” means a spouse of a person, and includes parents, 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. For the purpose of the Code, the term ‘Immediate Relative’ shall include Hindu Undivided Family (HUF) of



which the Designated Person is a member, unless stated otherwise.

- f) **“Material Subsidiary”** means a subsidiary, whose income or net worth exceeds ten percent of the consolidated income or net worth respectively, of the Company and its subsidiaries in the immediately preceding accounting year.
- g) **“Unpublished Price Sensitive Information (UPSI)”** means any information, directly or indirectly related to the Company or its securities, that is not generally available to the public, and which upon becoming generally available, is likely to materially affect the price of the securities. The term UPSI 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, delisting, disposals, business transfers, expansion of business and such other transactions
 - v. changes in key managerial personnel.

In this Code:

- i. *Words and expressions used but not defined in the Code, shall have the meaning ascribed to such terms in the Securities and Exchange Board of India Act, 1992, Securities Contracts (Regulation) Act, 1956, the SEBI PIT Regulations, Companies Act, 2013 and the rules and regulations made thereunder (as amended from time to time).*
- ii. *The singular includes the plural and vice-versa; and*
- iii. *References to any gender, includes masculine, feminine and other gender.*

3. Applicability of the Code

The Code is applicable to all Designated Persons and their Immediate Relatives. The term **Designated Persons** include:

- a) Promoters and Members of the Promoter Group of the Company;
- b) Directors and Key Managerial Personal (KMPs) of the Company;
- c) CEO of the Company or CEO of the Material Subsidiary of the company and employees up to two levels below the Chief Executive Officer of the company or of its material subsidiary, irrespective of their functional role in the Company and possession of or the ability to have access to UPSI;
- d) Employees of the Company and its material subsidiaries, who due to their functional role/ position in the Company or material subsidiaries, can be reasonably expected to have access to UPSI;

- e) Any support staff of the company such as IT staff or secretarial staff who have or who can reasonably, be expected to have access to UPSI.

In addition to the above, the compliance officer is authorized to identify or classify other categories of persons or employees as Designated Persons to be covered under this Code, based on their role and function in the Company or in the material subsidiaries of the company.

4. Structured Digital Database for handling and capturing of UPSI

- a) The Company shall maintain a structured digital database providing the nature of UPSI, the names of Designated Persons who are in receipt of UPSI, the names of such persons who have shared such information and names of such persons with whom such information is shared, along with permanent account number (PAN) or any other identifier where PAN is not available and such other necessary details to be maintained in the database.
- b) The UPSI recipient, who disseminates the information to any person for a legitimate purpose or on a need-to-know basis will be responsible for updating the details of dissemination in the digital database maintained for such UPSI.
- c) Every UPSI recipient, who disseminates the information to any person for a legitimate purpose or on a need-to-know basis will also be responsible to sensitize the recipient that such information is UPSI and needs to be maintain with utmost care and under strict confidentiality.
- d) The database shall be maintained internally with adequate internal controls, time stamping and audit trails to ensure non-tampering of the data. Such digital database shall be preserved for such period as stated in the SEBI PIT Regulations.
- e) Any leak or suspected leak of UPSI shall be dealt in accordance with the Policy on Inquiry in case of Leak / Suspected Leak of UPSI and the Whistle Blower Policy. These policies entail the process and enable employees to report leak of UPSI.

5. Trading Window Closure

- a) During the trading window closure period the Designated Persons and their Immediate Relatives are not allowed to trade in securities of the Company. The Company has the following Trading Window Closure periods:

- b) For the declaration of financial results, the trading window shall be closed from the end of every calendar quarter and shall re-open 48 (forty-eight) hours after the declaration of the financial results.
- c) Additionally, the trading window may be closed for other UPSIs, as identified by the Compliance Officer. The trading in securities can be closed for all or select Designated Persons and their Immediate Relatives, who are expected to be in possession of UPSI, for such period(s) as may be determined by the Compliance officer. The trading window shall be re-opened, 48 (forty-eight) hours after the relevant UPSI becomes generally available or becomes irrelevant.
- d) The restrictions under trading window closure will not be applicable in respect of the transactions exempted by the SEBI PIT Regulations from time to time exceptions to restrictions on trading when in possession of UPSI.
- e) The restrictions under trading window closure apply to trades done by the Designated Persons directly, or indirectly through Immediate Relatives or under any other arrangement. It will be the responsibility of the Designated Persons to communicate the trading window closure period to their Immediate Relatives, to that other person with whom designate person entered into arrangement to avoid non-compliance. In the event, a trade is undertaken by or on behalf of a Designated Person, the Designated Person will be held responsible for any non-compliance under the provisions of the Code and/or the SEBI PIT Regulations.

6. Prohibition on Dealing with Company's Securities

- a) Designated Persons and their Immediate Relatives shall not:
 - i. trade in securities of the Company when the trading window is closed.
 - ii. trade in securities, directly or indirectly, either on his behalf, or on behalf of any other person, while in possession of UPSI, except in compliance with the provisions of this Code and SEBI PIT Regulations.
 - iii. enter into trade for short term consideration, (e.g. intra-day trading) including contra-trade in the securities.
 - iv. advise any person to trade or not to trade in the securities when in possession of any UPSI.
- b) Prohibition on contra trades: Securities shall not be sold within 6 months of their last purchase and securities shall not be purchased within 6 months of their last sale except as permitted by the SEBI PIT Regulations.

Provided further that the Compliance Officer may, in his discretion, waive the restriction of contra- trade, in case of extreme urgency and on receiving a written undertaking from the Designated Person or his Immediate Relative that

he is not in possession of any UPSI, provided such relaxation does not violate this Code or SEBI PIT Regulations.

7. Permitted Dealing of Company's Securities

Designated Persons and their Immediate Relatives are permitted to trade in securities, through either of the following ways, after complying with the other conditions of this Code and the SEBI PIT Regulations.

- a) Designated Persons can enter into one transaction or a series of transactions in the securities of the Company for an aggregated traded value of up to Rs. 10 Lakhs in a calendar quarter or 800 no. of securities (subject to adherence of the monetary threshold of INR 10.00 lakh), without obtaining any pre-clearance for the transactions, trading window is open and Designated Persons are not in possession of any UPSI.
- b) If a Designated Person intends to trade in the securities of the Company, whether in one transaction or a series of transactions over and above the value or number prescribe in clause 7(1), the Designated Person shall obtain **pre-clearance approval** from the compliance officer before undertaking the proposed trades in the securities of the Company.
 - i. An application for pre-clearance along with an undertaking, shall be made by the Designated Person in the prescribed format, to the Compliance Officer or through an online software implemented by the Company in this regard or any other mode as may be permitted.
 - ii. While submitting the application for pre-clearance, the Designated Person should not be in possession of any UPSI.
 - iii. The approved pre-clearance of trades will be valid maximum for 7 (seven) trading days or such lesser period as may be approved by the compliance officer. If trade(s) are not executed within the approval period after the receipt of pre-clearance, the Designated Person must obtain the fresh pre-clearance for that transaction(s).
 - iv. In case the Designated Person procures or comes in possession of UPSI before execution of the trade during the subsistence of the pre-clearance sought, shall refrain from executing the trades.
 - v. The Designated Person shall submit the details of the transaction(s) undertaken by him or his Immediate Relative, in Form – I or through an online software or in any other format as may be prescribed by SEBI / the Company in this regard, within 2 trading days, from the date of trading.
 - vi. In case the Designated Person does not trade after securing pre-clearance, the Designated Person is required to inform the Compliance Officer in Form-II or through an online software or in any other format as may be prescribed by SEBI / the Company, regarding non-execution of trade, within two trading days of the expiry of validity of the pre-clearance.
 - vii. If in a calendar quarter, pre-clearance has been taken twice but the trade

has not been executed, then such Designated Person will not be allowed to trade in the securities of the Company during the entire calendar quarter.

It is to be noted that the procedure laid down in this clause permitted trades in securities of the Company shall apply mutatis mutandis to trades proposed to be carried out by Immediate Relatives of Designated Persons and the obligations requiring communication with the Compliance Officer or through online software implemented by the Company shall continue to be upon the Designated Person.

c) Trade Pursuant to Trading Plan

- i. The trading plan is intended to give an option to a Designated Person, who may perpetually be in possession of UPSI, and enable him and/or his Immediate Relatives to trade in securities, in a compliant manner. This route enables formulation of a trading plan by a Designated Person, to enable trades to be executed in future, so that such trades, which he had pre-decided before the UPSI came into being, are not prohibited.
- ii. Designated Person shall be entitled to formulate a trading plan and present it to the Compliance Officer, for approval. Such Designated Person, who opts for trading plan route, shall not be allowed to trade through the Pre-clearance route during the pendency of a trading plan.
- iii. The Compliance Officer shall review the trading plan of the Designated Person to assess whether the plan would have any potential for violation of the SEBI PIT Regulations and this Code and can seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the trading plan.
- iv. The approved trading plan shall be notified to the stock exchanges, by the Company.
- v. Pre-clearance of trade, is not required for a trade, executed as per an approved trading plan.

Mandatory conditions to be followed with respect to trading plan:

- No multiple / overlapping trading plans are permitted.
- Under the trading plan route, trading is permitted after one hundred and twenty calendar days from the date of submission of the trading plan to the stock exchanges, or disclosure in any other manner of public disclosure permitted by SEBI, for such trading plans.
- The trading plan once approved will be irrevocable and has to be mandatorily implemented. Any deviation from the trading plan or trading outside the scope of the trading plan, is not permitted.
- The trading plan shall not be used as a tool for market abuse.
- The trading plan must 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 specific date or time period, and price limit and other details as required under SEBI PIT Regulations.

- In case the Designated Person is in possession of UPSI at the time of formulation of the trading plan, and such UPSI is not made generally available or does not cease to be UPSI in accordance with the Code and SEBI PIT Regulations, the Compliance Officer shall confirm to the Designated Person, the implementation of his trading plan, shall be deferred until such UPSI becomes generally available and ceases to be UPSI.
- The Designated Person shall be required to make requisite disclosures of the trade(s) executed pursuant to the trading plan as per the provisions of the Code and Regulations.

8. Disclosure & Reporting

The following disclosures & reporting shall be made to the Compliance Officer, in such manner, as would be notified from time to time:

- a) Every person on appointment as a Director or KMPs of the company or upon becoming a Promoter or member of the promoter group shall disclose their holding of securities in 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 in the Form – B.
- b) A Designated Person is required to submit the following details in the format prescribed by the Company:
 - i. Name and PAN and in the absence of Permanent Account Number any other identifier permitted by law.
 - ii. Name of educational institution, from which the Designated Person graduated,
 - iii. Name of all his past employers,
- c) The details (as mentioned in 2 a. and 2 b.) shall also be submitted by Designated Person also for his Immediate Relatives and Persons with whom such Designated Person shares a material financial relationship.

'Material Financial Relationship' refers to 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 12 (twelve) months, equivalent to at least 25% of such payer's annual income, but excludes relationships in which the payment is based on arm's length transactions.

- d) Designated Person shall, on an annual basis, confirm the details submitted under sub clause 2 and 3 above, and re-submit the latest information, in the event of any change in any detail. The annual confirmation as of 31st March,

shall be provided by 30th April of each year.

- e) In case of any Designated Persons and/or their Immediate Relatives who are not covered under the System Driven Disclosure and who have obtained pre-clearance, the Designated Person must file with the Compliance Officer the details of the transactions in the format provided in Form C or any format specified by SEBI within 2 trading days from the date of trading where the traded value whether in one transaction or a series of transactions, exceeds the threshold of Rs. 10 (ten) Lakhs in a calendar quarter.
- f) The responsibility for disclosure and other obligations of the Designated Person, including those relating to trades by his Immediate Relatives, is upon the concerned Designated Person.

9. Roles and Responsibilities under this Code

a) Designated Persons: Designated Person shall not

- Communicate, provide, or allow access to any UPSI related to the Company or its securities, to any person (including other Designated Persons), except in furtherance of legitimate purpose, performance of duties, or discharge of legal obligation(s) as defined under the SEBI PIT Regulations.
- Procure from, or cause communication, by any Designated Person, of UPSI related to the Company or its securities, except in furtherance of legitimate purpose, performance of duties or discharge of legal obligation(s) as defined under the SEBI PIT Regulations.
- Provided that the Designated Person may communicate, provide, or allow access to any UPSI only on need-to-know basis, in furtherance of legitimate purposes, performance of duties or discharge of legal obligations, as permitted under the SEBI PIT Regulations.
- Determination of legitimate purposes forms part of the Company's Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information. The decision of the Company on what constitutes 'legitimate purpose' / 'fair disclosure' shall be final and binding.

b) Compliance Officer

- i. Implement this Code under the guidance and directions of the Audit Committee.
- ii. Review, approve or reject (with reason) pre-clearance request for trade and trading plan under the Code.
- iii. Maintain and preserve the records under this Code as per SEBI PIT



Regulations.

- iv. Clarify issues regarding the Code and redress the grievances of the Designated Persons.
- v. Close the trading window as per clause 5 of this Code and SEBI PIT Regulation.
- vi. Send periodic reports on Insider Trading compliances under this Code to the Audit Committee. The Report shall cover compliance status, coverage of Designated Persons, violations of the Code, if any, action taken in such violation cases, details of trades undertaken by a Designated Person and/or his/ her Immediate Relative(s).
- vii. The Compliance Officer is authorized under this Code to seek any information / document from a Designated Person, and/or his/ her Immediate Relatives, for the purpose of enforcing the provisions of the Code and SEBI PIT Regulations. It shall be a mandatory obligation of a Designated Person, to provide the same forthwith. Failure or refusal to co-operate in such enquiries shall be deemed to be a serious violation under this Code and would entail penal consequences.

c) Audit Committee

The Audit Committee shall monitor and periodically review the reports, compliance report and if necessary the code, to recommend necessary changes to the Board for its review and approval.

d) Human Resource Department

The Human Resource Department Officer shall be responsible to provide the updated list of Designated Persons as per the Code to the Compliance Officer, from time to time and make aware to the new joiners with their obligations and responsibilities under the Code and SEBI's regulations and the liabilities attached to misuse/ unwarranted use of UPSI and insider trading.

10. Penal Consequences

Any Designated Person who violates any provision of the Code or the Regulation, may face disciplinary action, penalties, suspension, wage freeze, recovery, or may get declare ineligibility for future participation in the company's Employee Stock Option Schemes, if any. Amount collected as a penalty hereunder shall be remitted to the SEBI Investor Protection and Education Fund or to any other fund / account that may be specified by SEBI.

In addition, if any Designated Person or his Immediate Relatives contravenes any of the provisions of the Code and/or SEBI PIT Regulations, such Designated Person and / or his Immediate Relatives may also be liable for appropriate penal



actions in accordance with the provisions of the relevant act and / or regulations of the SEBI.

Intimation to stock exchanges: In the event that a Designated Person and/ or Immediate Relatives, contravenes the provisions of this Code or SEBI PIT Regulations, the Company will report such contravention and action taken by the Company in this regard to the stock exchanges, as may be required under the SEBI PIT Regulations.

11. Modification and Amendments

Any amendments or modification The Compliance Officer is authorized to amend the Code and to give effect to any changes/amendments, notified by the regulatory authorities. The amended policy shall be placed before the Audit Committee or the Board as the case may be for noting and ratification.

12. Miscellaneous

Employees who are not Designated Persons and who do not have access to UPSI, can be given access to UPSI or brought 'inside' on sensitive transactions, strictly on a need-to-know basis and in furtherance of legitimate purposes. Every UPSI recipient, who further disseminates such UPSI information will be responsible to sensitize the recipient that such information is UPSI and needs to be maintained under strict confidentiality and also the liability that attaches on misuse or unwarranted use of such information. Information related to such persons will be updated in the structured digital database of the Company. Such persons, with whom UPSI is shared, shall not deal in the securities of the Company until such information becomes generally available.

All queries, matters and issues in relation to the Code, should be directed to the Compliance Officer. All communications under, and in relation to, the Code, should be addressed to the Compliance Officer and sent to the designated e-mail ID: dharamvir.malik@akums.net

Appendix

Requisite forms/Applications are enclosed

FORM B

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (1) (b) read with Regulation 6(2) – Disclosure on becoming a Key Managerial Personnel/Director/Promoter/Member of the promoter group]

Name of the Company: AKUMS DRUGS AND PHARMACEUTICALS LIMITED ISIN of the Company: INE09XN01023

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

Name, PAN, CIN / DIN & address with contact nos.	Category of Person (KMP / Director or Promoter or member of the promoter group/ Immediate relative to/others, etc.)	Date of appointment of KMP/Director / OR Date of becoming Promoter/ member of the promoter group	Securities held at the time of appointment of KMP/ Director or upon becoming Promoter or member of the promoter group		% of share holding
			Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements, etc.)	No.	
(1)	(2)	(3)	(4)	(5)	(6)

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

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

Open Interest of the Future contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group			Open Interest of the Option Contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group		
Contract specifications	No. of units (contracts * lot size)	Notional value in Rupee terms	Contract specifications	No. of units (contracts* lot size)	Notional value in Rupee terms
(7)	(8)	(9)	(10)	(11)	(12)

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

Signature:
Name & Designation:

Date
Place:

FORM C**Continual Disclosure****SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7(2) read with Regulation 6(2)]**

Name of the Company: AKUMS DRUGS AND PHARMACEUTICALS LIMITED ISIN of the Company: INE09XN01023

Details of change in holding of Securities of Promoter, Member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2)

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoter/member of the promoter group/designated person/Director s/immediate relative to/others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice /acquisition of shares/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.)	Exchange on which the trade was executed
		Type of securities (For eg. - Shares, Warrants, Convertible debentures , Rights entitlements etc.)	No. and % of shareholding	Type of securities (For eg. - Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No.	Value	Transaction Type (Purchase/sale Pledge / Revocation / Invocation/ Others-please specify}	Type of securities (For eg. - Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of shareholding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

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

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

Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or Director of the listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc.)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
16	17	18	19	20	21	22
-	-	-	-	-	-	-

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

Signature:
Name & Designation:

Date:
Place:

APPLICATION CUM UNDERTAKING FOR PRE-CLEARANCE OF TRADE

To
The Compliance Officer,
Akums Drugs and Pharmaceuticals Limited

I, the undersigned, hereby seek your approval to Trade in the Securities of the company as per details given below

Sl.N.	Particulars	Remarks
1.	Name of the person proposing to trade	
2.	PAN of the person proposing to trade	
3.	Relationship with Designated Person (<i>in case the person executing the trade is not the designated person</i>)	
4.	Total No. of Securities held	
5.	Nature of Transaction (sale, purchase, or other, specify if other)	
6.	Number & Value of Securities to be purchased / sold (approx.)	
7.	Tel. No. / Mob. No.	
8.	Email	
9.	DP ID / Client ID	
10.	Nature of last trade executed (Buy, Sell, other or NA)	
11.	Value of last trade executed	

I hereby confirm and undertake to not execute any opposite transaction for 6 (six) months from the date of last transaction as per the Code.

I hereby further declare and undertake that:

- a. I do not have any access nor have I received "Unpublished Price Sensitive Information" (UPSI) upto the date of this application.
- b. In the event of me having access to or receiving UPSI after the date of signing this application but before the execution of the transaction, I undertake to inform the Compliance Officer and shall completely refrain from Trading in the company's securities till the time such information becomes public or irrelevant.

Sign:

Name:

Employee Code:

Date:

Particulars	Remarks
Approval / Rejection (Reason)	
Ref No. / Validity	
Name	
Sign	

REPORTING / CONFIRMATION OF EXECUTION OF PRE-CLEARED TRADE

To
The Compliance Officer,
Akums Drugs and Pharmaceuticals Limited

I, have executed the following
transaction pursuant to approval numberdated.....

Number of shares purchased / sold	
Price per Share	Rs.
Amount	Rs.
Date of Trade	
Off Market / On Market (name of Stock Exchange)	

Sign:
Name:
Employee Code:
Date

REPORTING OF NON-EXECUTION OF PRE-CLEARED TRADE

To
The Compliance Officer,
Akums Drugs and Pharmaceuticals Limited

Please note that I have not used the approval number dated
.....

Sign:
Name:
Employee Code:
Date