



Swan Energy Limited

Insider Trading - Code of Conduct

(Effective from 01-04-2019)

This Policy is framed in terms of Regulation 9 (1) of SEBI (PIT) Regulations, 2015 ("Regulations") to regulate, monitor and report trading by its designated persons and immediate relatives of designated persons towards achieving compliance with these Regulations, adopting the minimum standards set out in Schedule B to these Regulations, without diluting the provisions of these Regulations in any manner.

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Chapter 1- Preliminary and Restrictions on Insider Trading

1.1 Preface

In accordance with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“Regulations”), the Board, has adopted this Code of Conduct (“Code”) for regulating, monitoring and reporting of trading in the securities of the Company by Designated Persons and their Immediate Relatives.

The Company is committed to preserving the confidentiality and preventing the misuse of any Un-Published Price Sensitive Information (“UPSI”).

This Code aims to define and establish Rules & process of the Company with respect to:

- i. Prevention of insider trading of securities;
- ii. Maintenance of confidentiality of UPSI; and
- iii. Adherence to SEBI’s applicable guidelines by all Connected/Designated Persons or deemed Connected/Designated Persons and their Immediate Relatives, and includes any person in the possession of UPSI.

1.2 Definitions

- (a) **“Board”** means the board of directors of the Company;
- (b) **“Company”** means Swan Energy Limited (“SEL”);
- (c) **“Designated Person”** means:
- (i) Promoters of SEL;
 - (ii) Directors of SEL;
 - (iii) Chief Executive Officer (CEO) and employees up to two levels below CEO of SEL, its material subsidiaries and Associates;
 - (iv) Company Secretary (CS), Chief Financial Officer (CFO) of SEL, its Subsidiaries and Associates;
 - (v) Functional or departmental heads of SEL, its Subsidiaries and Associates, by whatever name called, who are not covered above and who have access to UPSI;
 - (vi) All employees of the Company in accounts, investor relations, MIS and secretarial departments;
 - (vii) Secretaries /Executive Assistants, reporting to the Chairman or the Managing Directors/CEO/Executive Directors/CFO/CS;
 - (viii) Any other person, as may be designated or notified by the Company from time to time for meeting the objectives of the Code.
 - (ix) Immediate relatives of all above;
- (d) **“Generally available information”** means information that is accessible to the public on a non-discriminatory basis.
- (e) **“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.
- (f) **“Key Managerial Personnel”**, in relation to a company, means—
- i. the Chief Executive Officer or the managing director or the manager;

- ii. the Company Secretary;
 - iii. the whole-time director;
 - iv. the Chief Financial Officer;
 - v. such other officer, not more than one level below the directors who is in whole-time employment, designated as key managerial personnel by the Board; and
 - vi. such other officer as may be prescribed.
- (g) **"Material Financial Relationship"** shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift from a designated person during the immediately preceding twelve months, equivalent to at least 25% of annual income of such designated person, but shall exclude relationships in which the payment is based on arm's length transactions.
- (h) **"Promoter"** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.
- (i) **"Promoter Group"** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.
- (j) **"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.
- (k) **"Trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly.
- (l) **"Trading day"** means a day on which the recognized stock exchanges are open for trading;
- (m) **"Unpublished price sensitive information" ("UPSI")** 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) Consolidated or Standalone quarterly/half yearly/ annual audited or unaudited financial results, financial condition, projections or forecasts of the Company;
 - (ii) Dividends;
 - (iii) Change in capital structure;
 - (iv) Mergers, de-mergers, acquisitions, de-listings, disposals and expansion of business and such other transactions;
 - (v) Changes in key managerial personnel.

1.3 Compliance Officer

SEL has appointed the Company Secretary, as the Compliance Officer for the purposes of the Regulation, who shall work subject to guidance of the Chairman and the Board of Directors.

DUTIES OF THE COMPLIANCE OFFICER

The Compliance Officer shall be responsible for

- i. Setting forth policies in relation to the implementation of the Code of Conduct and the Regulations in consultation with the Board/Audit Committee.
- ii. Prescribing procedures for various activities referred to in the Code of Conduct and the Regulations.
- iii. Compliance with the policies and procedures referred hereinabove.
- iv. Monitoring adherence to the regulations for the preservation of UPSI.
- v. Grant of pre-trading approvals to the Designated Persons for trading in the Company's Securities by them / their Immediate Relatives and monitoring of such trading.
- vi. Implementation of Code of Conduct under the general supervision of the Audit Committee and the overall supervision of the Board of the Company.
- vii. The Compliance Officer shall assist all the Designated Persons in addressing any clarifications regarding the Regulations and this Code of Conduct.
- viii. The Compliance Officer shall close the trading window for such periods as he/she may deem fit in compliance with the provisions of this code and inform the Designated Persons of the same.
- ix. The Compliance Officer shall give due notice to the Insider whom UPSI has been provided for legitimate purpose to maintain confidentiality of UPSI.
- x. The Compliance Officer shall provide to the Chairman of the Audit Committee and/or to the Chairperson of the Board, on such interval as may be required, the details of the trading in securities by the Designated Persons including any violations of the Code of Conduct and SEBI (Prohibition of Insider trading) regulations, 2015.
- xi. The Compliance Officer shall maintain
 - a) Updated list of Designated Persons,
 - b) record of disclosures and pre-clearance applications and undertakings for a period of five years.
- xii. The Compliance officer shall assist the designated persons in addressing any clarifications regarding the Regulations and this policy/code.

1.4 Prohibition on communication or procurement of UPSI and trading when in possession of UPSI

According to the Regulation, in respect of securities listed or proposed to be listed, no insider shall –

- I. either on his own behalf or on behalf of any other person, trade in securities of a company when in possession of any UPSI; or

- II. Communicate, provide or allow access to UPSI to any person including other insiders and no person shall procure any UPSI from an insider.

Provided that nothing contained in II above shall be applicable if

- (i) The same is done in furtherance of legitimate purposes, as set out in the policy for determination of “legitimate purposes” included in “Codes of Fair Disclosure and Conduct”.
- (ii) The same is done in connection with a transaction that would:–
 - (a) entail an obligation to make an open offer under the takeover regulations where the Board of directors of SEL is of informed opinion that sharing of such information is in the best interests of the Company;
 - (b) not attract the obligation to make an open offer under the takeover regulations but where the board of directors of SEL is of informed opinion that sharing of such information is in the best interests of the company and the information is that constitute UPSI 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 of SEL may determine to be adequate and fair to cover all relevant and material facts.

For point i and ii (a) and (b) mentioned above, the board of directors of SEL 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 of point (ii) (a) and (b) above and shall not otherwise trade in securities of SEL when in possession of UPSI.

A Structured Digital Database (“SDD”) will be maintained containing the following information:

- Nature of UPSI;
- Names of such persons who have shared such UPSI;
- Names of such persons or entities as the case may be with whom UPSI is shared along with the Permanent Account Number (PAN) or similar identification where PAN is not available.

The SDD shall be maintained internally with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database. The SDD shall be 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 SEBI regarding any investigation or enforcement proceedings, the relevant information in the SDD shall be preserved till the completion of such proceedings.

1.5 Chinese Wall

To prevent the misuse of confidential information, SEL has laid down Chinese Walls procedures which separates those areas of SEL which routinely have access to confidential information, considered "inside areas" from those areas which deal with sale/marketing/investment advice or other departments providing support services, considered "public areas".

- (i) The employees in the inside area shall not communicate any UPSI to anyone in public area.
- (ii) The Company shall have process of maintaining securely, computer files containing confidential information and physical storage of documents relating to UPSI.
- (iii) All the UPSI is to be handled on “need to know basis”, i.e., UPSI should be disclosed only to those within SEL 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. All the non-public information directly received by any employee should immediately be reported to the head of the department. 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.

1.6 Dealings by SEL/Swan Group Employees

- (i) Any Designated persons shall not trade in securities of SEL while in possession of UPSI. When a person, who has traded in securities has been in possession of UPSI, his trades would be presumed to have been motivated by the knowledge and awareness of such information in his possession.
- (ii) All the Designated persons shall maintain confidentiality of all UPSI. They shall not pass on such information to any person directly or indirectly by way of making a recommendation for trade in the securities of the Company.
- (iii) The above restrictions will equally apply to employees of other group companies who have access to UPSI about SEL.

1.7 Pre clearance of trades

- (i) Any Designated person who intend to trade in the securities of SEL (either in their own name or in any immediate relatives' name) and if the value of the securities likely to be traded, whether in one transaction or a series of transactions, over any calendar quarter, aggregates to a traded value in excess of Ten Lakh rupees, should pre-clear the transactions by making an application in the format set out in **Annexure A**, to the Compliance officer and also declare that the applicant is not in possession of any UPSI.
- (ii) The Compliance Officer shall also determine whether any such declaration is reasonably capable of being rendered inaccurate.
- (iii) Pre-clearance of trades shall not be required for a trade executed as per an approved trading plan.
- (iv) Trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.
- (v) All designated persons of SEL and their immediate relatives shall execute their order in respect of securities of SEL within seven trading days after the approval of pre-clearance is given. If the order is not executed within seven trading days after the approval is given, the designated person must obtain the pre-clearance for the transaction again.

- (vi) The Designated Persons may, if required under applicable laws, have to obtain pre-clearance for the following transactions undertaken during the closure of Trading Window as per Clause 1.9 below, irrespective of the value of the proposed trade:
- a) Off-market Inter-se transfer between insiders
 - b) Transaction through Block deal window mechanism between insiders
 - c) Transaction arising out of statutory or regulatory obligations
 - d) Exercise of Stock Options / Stock Grants
 - e) Pledge of shares for a bonafide purpose like raising of funds

1.8 No Trading Period

- (i) The trading period during which the SEL's securities can not be traded is called trading window. The trading window shall be closed during the time the price sensitive information is un-published.
- (ii) When the trading window is closed, the Designated Persons (including their immediate relatives) shall not trade in SEL's securities for such period.
- (iii) The trading window shall be, *inter-alia* closed at the time of:-
 - (a) Declaration of Financial results
 - (b) Declaration of dividends (interim and final)
 - (c) Change in capital structure
 - (d) mergers, de-mergers, acquisitions, de-listings, disposals and expansion of business
 - (e) changes in key managerial personnel
 - (f) Such other time as the compliance officer determines that a designated person or class of designated person is reasonably expected to have possession of unpublished price sensitive information.
- (iv) The Compliance Officer shall also close the trading window when he determines that a designated person or class of designated persons can reasonably be expected to have possession of UPSI. Such closure shall be imposed in relation to such securities to which such UPSI relates.
- (v) The trading window shall be opened 48 hours after the UPSI becomes generally available.

1.9 Holding Period

- (i) The designated persons who are permitted to trade as above shall not enter into a contra trade i.e. sell or buy any number of securities during the next six months following the prior transaction. The designated persons shall also not take positions in derivative transactions in the securities of SEL at any time. This restriction shall not be applicable for trades pursuant to exercise of stock options.
- (ii) The Compliance officer may waive off the holding period after recording reasons for the same, provided such relaxation does not violate SEBI (Prohibition of Insider

Trading) Regulations, 2015, as amended. However, no such relaxation will be permitted when the Trading window is closed.

- (iii) In case a contra trade is executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the applicable law.

Chapter 2- Disclosures & Reporting

Apart from the restrictions mentioned in Chapter 1, SEL is required to obtain certain disclosures and levy penalties as and when deemed fit.

The disclosures to be made by any persons under this Chapter shall also include those relating to such person's immediate relative and any other person who takes trading decisions.

The disclosures of trading in securities shall also include trading in derivations of securities and the traded value of the derivations shall be taken into account for purposes of this Chapter:

Provided that trading in derivations of securities is permitted by any law for the time being in force.

2.1 Initial Disclosure

Every promoter, or member of the promoter group, designated person shall disclose to the company their holding of securities of the company as on the date of appointment or becoming a promoter, designated person or to the company **within seven days** of such appointment or becoming a promoter or member of the promoter group or designated person, in **Annexure B**.

2.2 Continual Disclosure

- i. Every promoter, or member of the promoter group, designated person and director of SEL 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 lakh rupees or such other value as may be specified in the format set out in **Annexure C** or in such form and such manner as may be specified by SEBI from time to time.
- ii. SEL shall notify the particulars of such trading to the stock exchange on which the securities are listed within 2 trading days of receipt of the disclosure or from becoming aware of such information.

2.3 Annual Disclosure

Designated Persons shall disclose the annual statement of all Securities of the Company held as on March 31 every year, in the format set out in **Annexure D** within 30 (thirty) days of the end of Financial Year

The names of educational institutions from which designated persons have graduated and names of their past employers shall also be disclosed on a one time basis.

2.4 Disclosure by other connected persons

The Compliance officer at his discretion may require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of SEL as and when he deems fit in order to monitor compliance with these regulations in the format set out in **Annexure E**.

2.5 Reporting to the Board and Maintenance of Disclosures

- (i) The Compliance Officer shall place before the Chairman of the Audit Committee on such interval as may be required, details of trading in SEL Securities by the Designated Persons and the accompanying documents that such persons had executed under the pre-clearance procedure as envisaged under this code.
- (ii) The Compliance Officer shall maintain records of all the declarations in appropriate forms given by the Designated Persons for a minimum period of five years.
- (iii) The Secretarial Section shall acknowledge receipt of the declaration form received.

Chapter 3- Penalties

3.1 Penalty for non-compliance

Any Designated person / Director /Insider who trades in securities or communicates any information for trading in securities, in contravention of the provisions of this Code or the Regulations, shall be guilty of insider trading and shall be *inter-alia* liable for punishment and penalty as mentioned in this Code and the Securities & Exchange Board of India Act, 1992, etc., as mentioned below.

3.2 Penalty for non- compliance with the Code of Conduct

Categories of Non-Compliances	Penal/disciplinary actions proposed
I. Procedural Non-Compliances	
i) Executing transaction after expiry of 7 days from date of pre-clearance.	a) Written warning notice for first violation of non- compliance;
ii) Non reporting of completion of transaction after pre-clearance.	b) For second violation - minimum Rs.10,000/-;
iii)Non reporting of transactions aggregating to Rs.10 lac per calendar quarter (such transaction should not be based on UPSI and should not be undertaken during trading window closure periods).	c) for third violation up to Rs.25,000 /-;
	c) Beyond third violation of non-compliance, it would be treated as substantive non-compliance, resulting in such action the Board may deem fit, which may include suspension, freeze on increment /promotion, demotion, employment termination, reducing annual rating, non-eligibility for variable pay/bonus for that year, ineligibility for future participation in the Company's stock option as deemed appropriate.
II. Substantive Non-Compliances	
i) Trading in SEL Securities during trading window closure period	Any of the following or combination thereof depending on the severity of the case:

Categories of Non-Compliances	Penal/disciplinary actions proposed
ii) Dealing in SEL Securities without obtaining pre-clearance	a) If the gain or loss avoided is less than Rs.10,000/-, the penalty is Rs.10,000/-.
iii) Undertaking opposite transactions/ derivative transactions	b) If the gain or loss avoided is more than Rs.10,000/-, twice the actual gain made or loss avoided
iv) Passing on price sensitive information or making recommendations directly or indirectly for dealing in securities on the basis of such information	c) Such action by the Board, as may be deemed fit which may include suspension, freeze on increment/promotion, demotion, employment termination reducing annual rating, non-eligibility for variable pay/bonus for that year, ineligibility for future participation in the Company's stock option.

- III. The Board or the Compliance Officer may decide the penalty within the above framework by taking into consideration the factors such as knowledge of price sensitive information, level of management responsibility of the individual concerned, number of securities transacted, whether the breach occurred as a result of deliberate intent or not, etc.
- IV. The Company, upon observing any violations of the SEBI (Prohibition of Insider Trading) Regulations, 2015, shall inform such violations to the Stock Exchanges, in such manner as may be prescribed by SEBI from time to time.
- V. Any amount collected by the Company for the non-compliance with the Code of Conduct shall be remitted to SEBI for credit to the Investor Protection and Education Fund administered by SEBI.

3.3 In accordance with the Securities & Exchange Board of India Act, 1992.

Chapter VI A provides for various penalties, extracts of which are:

- 15A. *If any person, who is required under this Act or any rules or regulations made thereunder,-*
- to furnish any document, return or report to the Board, fails to furnish the same, he shall be liable to a penalty of one lakh rupees for each day during which such failure continues or one crore rupees, whichever is less;*
 - to file any return or furnish any information, books or other documents within the time specified therefore in the regulations, fails to file return or furnish the same within the time specified therefore in the regulations, he shall be liable to a penalty of one lakh rupees for each day during which such failure continues or one crore rupees, whichever is less;*
 - to maintain books of accounts or records, fails to maintain the same, he shall be liable to a penalty of one lakh rupees for each day during which such failure continues or one crore rupees, whichever is less.*
- 15G. *If any insider who,-*
- either on his own behalf or on behalf of any other person, deals in securities of a body corporate listed on any stock exchange on the basis of any unpublished price sensitive information; or*

- (ii) *communicates any unpublished price sensitive information to any person, with or without his request for such information except as required in the ordinary course of business or under any law; or*
- (iii) *counsels, or procures for any other person to deal in any securities of anybody corporate on the basis of unpublished price sensitive information, shall be liable to a penalty of twenty-five crore rupees or three times the amount of profits made out of insider trading, whichever is higher.*

24. *(1) Without prejudice to any award of penalty by the adjudicating officer under this Act, if any person contravenes or attempts to contravene or abets the contravention of the provisions of this Act or of any rules or regulations made thereunder, he shall be punishable with imprisonment for a term which may extend to ten years, or with fine, which may extend to twenty-five crore rupees or with both*

(2) If any person fails to pay the penalty imposed by the Adjudicating Officer or fails to comply with any of his directions or orders, he shall be punishable with imprisonment for a term which shall not be less than one month, but which may extend to ten years or with fine, which may extend to twenty-five crore rupees or with both.

Without prejudice to the directions under regulation 11, if any person violates provisions of these regulations, he shall be liable for appropriate action under Sections 11, 11 B, 11D, Chapter VIA and Section 24 of the Act.

MISCELLANEOUS

1. The Company has adopted the amended 'Code of practice and procedures for fair disclosure of UPSI', available at www.swan.co.in, to regulate the Company's practices and procedures for fair disclosure of UPSI.
2. The Board of Directors of the Committee or Committee constituted by the Board, is authorised to change/amend/interpret this Code from time to time at its sole discretion and/or in pursuance of any amendments made in the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Chapter 4- SEBI Informant Mechanism

4.1 Informant Mechanism Scheme

Any employee can voluntarily submit original information relating to alleged violation of this Insider Trading Code, that has occurred / is occurring / has a reasonable belief that it is about to occur, to the Office of Informant Protection of SEBI in the format and manner set out in Schedule D to SEBI (Prohibition of Insider Trading) (Third Amendment) Regulations, 2019.

4.2 Protection against retaliation and victimisation

all / any employee will be protected against any adverse action and/ or discrimination as a result of a reporting to SEBI under this Scheme, provided it is justified and made in good faith. The organisation is forbidden from taking any adverse action against any employee for exercising their right as above.

Adverse action is defined as

- Discharging the employee/s;
- Terminating the employee/s services;
- Demoting the employee/s;
- Suspending the employee/s;
- Threatening the employee/s;
- Harassing the employee/s;
- Discriminating against the employee/s's employment.

ANNEXURE A

Application - Cum Undertaking for Pre Clearance of Trades

Date:

The Compliance Officer
 Swan Energy Limited
 6, Feltham House, 10 J N Heredia Marg
 Ballard Estate, Mumbai 400 001

With reference to the Code of Conduct of SEL for Prevention of Insider Trading, I hereby give notice that I propose to carry out the following transaction in SEL securities for Myself / As Joint Holder / My immediate relative.

Transaction (Sale/Purchase)	Type of Security	Number of Security

I hereby declare that:

- I do not have any access nor have I received or possess any "Unpublished Price Sensitive Information" upto the time of signing the undertaking.
- That in case I have access to or receive "Unpublished Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction I shall inform the Compliance officer of the change in my position and that I would completely refrain from trading in the securities of SEL till the time such information becomes public.
- That I have not contravened the code of conduct for prevention of insider trading as notified by SEL from time to time.
- That I have made a full and true disclosure in the matter

Signature of the Employee/Director: _____

Name of the Employee/Director:

Designation:

Authorization to Trade

The above transaction has been authorised. Your dealing must be completed within 7 trading days from _____

Please confirm by completing section below and returning this Form to us within 7 days of completion of transaction.

Date:

Compliance Officer

Confirmation of Trades

The Compliance Officer
Swan Energy Limited

I confirm the dealing in the aforesaid securities was completed on_____

Date:

Signature of the Employee/Director

ANNEXURE C

DISCLOSURE UNDER PARA 2.2 OF THE INSIDER TRADING CODE OF CONDUCT [Refer Form C as per the Regulations]

Name of the company: _____

ISIN of the company: _____

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/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/disposal 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 entitlements, 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.)-1	No. and % of shareholding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	

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

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 a 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	Notional Value	Number of units	

			(contracts * lot size)		(contracts * lot size)	
15	16	17	18	19	20	21

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

Name & Signature:

Designation:

Date:

Place:

ANNEXURE D

DISCLOSURE UNDER PARA 2.3 OF THE INSIDER TRADING CODE OF CONDUCT

DISCLOSURE OF HOLDINGS IN SECURITIES OF 'SWAN ENERGY LIMITED' BY DIRECTORS/DESIGNATED PERSONS

Date:

To: Compliance Officer
Swan Energy Limited

From: Name of the Director/Employee :
Designation :
Employee Number :

I. DETAILS OF HOLDINGS BY DIRECTOR/DESIGNATED PERSON IN HIS OWN NAME (WHETHER SINGLY OR JOINTLY)

All holdings in Securities of Swan Energy Limited as on March 31, _____

Securities held at March 31, _____	PAN	Folio No./DP ID/ Client ID

II. DETAILS OF DEALINGS & HOLDINGS BY IMMEDIATE RELATIVE(S) (WHETHER SINGLY OR JOINTLY)

Securities held at March 31, _____	PAN	Folio No./DP ID/ Client ID

I declare that I have complied with the provisions of the Regulations and/or the Code. Further, I also declare that above details are true, correct and complete in all respect.

Signature

Name:

Designation:

Please sign and return even if you have nothing to declare

ANNEXURE E
DISCLOSURE UNDER PARA 2.3 OF THE INSIDER TRADING CODE OF CONDUCT [Refer Form D as per the Regulations]

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	Connection with company	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 entitlement, 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 security (For eg. – Shares, Warrants , Convertible Debentures etc.)	No. and % of shareholding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	

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

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

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

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

Name:

Signature:

Place: