

A Global IT Transformation Architect.™



ALLIED DIGITAL SERVICES LIMITED

CODE OF CONDUCT

FOR

REGULATING, MONITORING & REPORTING TRADING IN RESPECT OF SECURITIES
OF THE COMPANY

Under

The SEBI (Prohibition of Insider Trading) Regulations, 2015

Page 1 of 21

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CODE OF CONDUCT FOR REGULATING & REPORTING TRADING BY INSIDERS AND FOR FAIR DISCLOSURE, 2015

(As approved by the Board of Directors of the Company at its Meeting
held on 14th November, 2017)

CHAPTER I

1. Introduction

Pursuant to the commencement of the Companies Act, 2013 and SEBI (Prohibition of Insider Trading) Regulations, 2015, the following Code of Conduct for Regulating, Monitoring & Reporting Trading in respect of securities of the Company (hereinafter referred to as the "Code") has been adopted by the Board of Directors of the Company at its meeting held on 14th November, 2017 and shall be effective from 14th November, 2017. This Code replaces the existing Code of Conduct for Prevention of Insider Trading.

2. The Policy and Obligations

The Company endeavours to preserve the confidentiality of unpublished price sensitive information and to prevent misuse of such information. The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations.

Every Promoter (s) Director(s), Officer(s), Insider(s) and other Connected Person(s) of the Company has a duty to safeguard the confidentiality of all such information obtained in the course of his or her work at the Company. None of the above referred persons shall use his or her position or knowledge to gain personal benefit or to provide benefit to any third party. Such persons are prohibited from communicating or counselling others with respect to the securities of the Company. Such persons should also refrain from profiteering by misusing the unpublished price sensitive information and thereby enabling the Company to retain investor confidence.

3. Objective of the Code

The objective of the Code is to regulate, monitor and report trading by Designated Employees and other Connected Persons in compliance with SEBI (Prohibition of Insider Trading) Regulations, 2015. The Code shall also provide for practices and procedures for fair disclosure of unpublished price sensitive information.

4. Applicability

This Code shall apply to all Designated Employees and other Connected Persons as mentioned in this Code.

5. Definitions

In this Code, unless the context otherwise requires:

(i) "Board" means the Board of Directors of the Company;

- (ii) **"Code" or "Code of Conduct"** means this 'ADSL' Code of Conduct for regulating & reporting trading by insiders and for fair disclosure, as modified from time to time;
- (iii) **"Compliance Officer"** means the 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 Chairman and Managing Director of the Company and who shall be responsible for compliance for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board of Directors of the Company;
- (iv) **"Connected Person"** means-
- (i) any person who is or has during the six months prior to the concerned act been associated with a Company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, KMP, officer or an employee of the Company or holds any position including a professional or business relationship between himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.
 - (ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be 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 exchanges or of clearing house or corporation; or
 - f. a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
 - g. a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
 - h. an official or an employee of a self-regulatory organization recognised or authorized by SEBI; or
 - i. a banker of the Company; or
 - j. a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the Company, has more than ten per cent of the holding or interest;
- (v) **"Designated Employees"** means a person occupying any of the following position in the Company:
- a. All Directors;

- b. All Key Managerial Personnel;
 - c. All Executive Directors including Chief Vigilance Officer;
 - d. All General Managers;
 - e. All Heads of Finance of Units/Divisions/Regions;
 - f. All Employees working in Books, Budget, Financial Service and Direct Taxation;
 - g. Sections of Corporate Finance;
 - h. All employees working in Company Secretariat & Legal Department;
 - i. All employees working in office of CMD/Functional Directors; and
 - j. Any other key person, who in the opinion of Compliance Officer be covered in the "designated employee";
- (vi) "Director" means a member of the Board of Directors of the Company;
- (vii) "Generally Available Information" means information that is accessible to the public on a non-discriminatory basis;
- (viii) "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 insecurities;
- (ix) "Insider" means any person who is:
- i) A connected person; or
 - ii) In possession of or having access to unpublished price sensitive information;
- (x) "Key Managerial Personnel" or "KMP" shall have the same meaning as defined under Section 2(51) of the Companies Act, 2013;
- (xi) "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.
- (xii) "Regulations" means the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time
- (xiii) "SEBI Act" or "Act" means the Securities and Exchange Board of India Act, 1992;
- (xiv) "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;
- (xv) "Stock Exchange" means:
- (a) BSE Limited;
 - (b) NSE Limited
 - (c) Any other Stock Exchange on which Securities of the Company Listed.
- (xvi) "The Company" means Allied Digital Services Limited ("ADSL");

- (xvii) "Trading" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;
- (xviii) "Trading Day" means a day on which the recognized stock exchanges are open for trading where securities of the Company are listed;
- (xix) "Unpublished Price Sensitive Information" or "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: -
- a) financial results;
 - b) dividends;
 - c) change in capital structure;
 - d) mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
 - e) changes in Key Managerial Personnel; and
 - f) material events in accordance with the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
 - g) any other matters as may be specified by the compliance officer as Price Sensitive Information;

All other words and phrases will have the same meaning as defined under the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time.

Words and expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules & regulations made there under shall have the meanings respectively assigned to them in those legislation;

CHAPTER II

CONFIDENTIALITY & COMMUNICATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION

6. Compliance Officer

- 6.1 The Compliance Officer will ensure compliance with SEBI Regulations for prevention of Insider Trading. The Compliance Officer shall report on Insider Trading to the Board of Directors of the Company and in particular, shall provide reports to the Chairman of the Audit Committee and Chairman of the Board of Directors at such frequency as may be stipulated by the Board of Directors.
- 6.2 The Compliance Officer shall administer this Code and also undertake actions as are prescribed to it under the Regulations (such as approval and disclosure of the trading plan of Insiders to the stock exchanges on which the securities of the Company are listed.
- 6.3 The Compliance Officer shall assist all employees in addressing any clarifications regarding the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the Code of Conduct.

7. Preservation of "Unpublished Price Sensitive Information"

- 7.1 All Designated Employees and Connected Persons shall maintain the confidentiality of unpublished price sensitive information. All information shall be handled within the organisation on a need-to-know basis and no unpublished price sensitive information shall be communicated to any person including other insiders except in furtherance of the insider's legitimate purposes, performance of duties or discharge of his legal obligations.
- 7.2 Notwithstanding anything contained in the Code, an unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction that would:-
- i. 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;
 - ii. 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.
- 7.3 For the purpose of the above clause, the parties shall be required 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 Clause 7.2 and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information.

7.4 Need to Know:

- a. "need to know" basis means that Unpublished Price Sensitive Information 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.
- b. All non-public information directly received by any employee should immediately be reported to the head of the department.

CHAPTER III
TRADING RESTRICTIONS

No insider shall trade in securities that are listed or proposed to be listed on a Stock Exchange when in possession of unpublished price sensitive information.

8. Prohibition on forward dealings in securities by Director or KMP

No Director/ Key Managerial Personnel of the Company shall buy in the Company or in its Subsidiary or Associate Company-

- a) a right to call for delivery or a right to make delivery at a specified price and within a specified time, of a specified number of relevant shares or a specified amount of relevant debentures; or
- b) a right, as he/ she may elect, to call for delivery or to make delivery at a specified price and within a specified time, of a specified number of relevant shares or a specified amount of relevant debentures.

Explanation— For the purposes of this clause, “relevant shares” and “relevant debentures” means shares and debentures of the Company in which the concerned person is a Managing Director, Whole-time Director or other Key Managerial Personnel or shares and debentures of the subsidiary companies.

9. Trading Window

- 9.1 The Compliance Officer may in consultation with the Board, specify a trading period (hereinafter referred to as “the Trading Window”) for Dealing in the Securities of the Company.
- 9.2 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.
- 9.3 The trading window shall be closed during the time the information referred to in Clause 5 (xviii) becomes generally available.
- 9.4 The Trading Window shall be *inter-alia* closed:
 - (a) Minimum seven days prior to Board Meeting for declaration of Quarterly/half yearly/Annual Financial Results;
 - (b) Minimum seven days prior to Board meeting for declaration dividend (Interim or Final);

(c) Minimum seven days prior to Board meeting for change in capital structure like issue of securities by way of public/right/bonus, buy-back etc;

(d) Minimum seven days prior to the Board Meeting held to approve any mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other Transactions;

(e) For such period and for any such other material event (in accordance with the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015) as may be deemed fit by the Compliance Officer;

However if the circumstances so warrants the time for closing the window may be increased or decreased with the approval of Compliance Officer.

9.5 The trading window shall be opened 48 hours after information referred to in clause 9.4 become generally available.

9.6 All Designated Employees and their immediate relatives shall conduct all their trading in the securities of the Company only in a valid trading window and shall not trade in Company's securities during the periods when trading window is closed, as referred to in clause 9.4 or during any other period as may be specified by the company from time to time.

9.7 The trading window restrictions 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.

9.8 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 window is closed.

10. Pre-clearance of Trades

10.1 All Designated Employees and their immediate relatives, who intend to deal in the securities of the Company above a minimum of 2,000 shares of the Company per transaction should pre-clear the transactions as per the pre-trading procedure as described hereunder.

10.2 An application shall be made in Form 'Pre-Clearance' (Annexure 'A') to the Compliance Officer indicating the estimated number of securities that the Designated Employees or their immediate relatives intends to deal in securities, **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.**

10.3 All Designated Employees and their immediate relatives shall execute their order in respect of securities of the Company within seven trading days after the approval of pre-

clearance is given. If the order is not executed within the aforementioned specified period, the Designated Employee must pre-clear the transaction again.

- 10.4 The Compliance Officer, after verifying the Pre-clearance tendered by the Designated Employees, shall provide an order approving the Pre-clearance. The Format of the Order as required to be passed by the Compliance Officer approving the Pre-clearance shall be in Form 'Pre-clearance Order' (Annexure 'B').
- 10.5 In case the Designated Employee or his/ her immediate relative decides not to execute the trade after securing pre-clearance, he/ she shall inform the Compliance Officer of such decision along with reasons thereof immediately.
- 10.6 In case the Designated Employee or his/ her immediate relative decides to execute the trade after securing pre-clearance, he/ she shall provide the Disclosure of Transactions within two days from the date of transaction/deal to the Compliance Officer. The format for providing such disclosure shall be in Form 'Disclosure of Transactions' (Annexure 'C').
- 10.7 No Designated Employee or his/ her immediate relative shall apply for pre-clearance of any proposed trade when the trading window is closed or if he/ she is in possession of unpublished price sensitive information.
- 10.8 Prior to approving any trades, the Compliance Officer shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any unpublished price sensitive information. He shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.
- 10.9 It shall be the responsibility of Designated Employees to ensure compliance of clauses 10.1 to 10.8 above in case of their immediate relatives also.
- 10.10 All Designated Employees who buy or sell any number of shares of the Company shall not execute a contra trade i.e. sell or buy any number of shares during the next six months following the prior transaction.
- 10.11 The Compliance Officer may grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate the regulations.
- 10.12 If a contra trade 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 Act.

11. Trading Plans

- 11.1 An Perpetual Insider shall be entitled to formulate a trading plan and present it to the Compliance Officer for approval and public disclosure pursuant to which trades maybe carried out on his behalf in accordance with such plan.

11.2 Such trading plan shall:-

- i. not entail commencement of trading on behalf of the perpetual insider earlier than six months from the public disclosure of the plan;
- ii. 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 Company and the second trading day after the disclosure of such financial results;
- iii. entail trading for a period of not less than twelve months;
- iv. not entail overlap of any period for which another trading plan is already in existence;
- v. set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
- vi. not entail trading in securities for market abuse.

11.3 The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of the Regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.

11.4 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 any unpublished price sensitive information in possession of the insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation and in such event the Compliance Officer shall confirm that the commencement ought to be deferred until such unpublished price sensitive information becomes generally available information.

11.5 Upon approval of the trading plan, the Compliance Officer shall notify the plan to the stock exchanges on which the securities are listed.

CHAPTER IV
REPORTING AND DISCLOSURE REQUIREMENTS

12.1. Disclosure Requirement

Initial Disclosures

Every promoter / Key Managerial Personnel / Director / Officer / Designated Employees of the Company shall disclose his holding of securities in Company within **thirty days** of these regulations taking effect, shall forward 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 (**Form B – Annexure 'D'**);

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 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 prescribed form (**Form B – Annexure 'D'**).

Continual Disclosure

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 10,00,000/- (Rupees Ten Lakh only).

Compliance Officer of 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.

Disclosure by other connected person

The Company may, at its discretion require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the company in such form and at such frequency as may be determined by the company in order to monitor compliance with these regulations.

- 12.2. The disclosures to be made by any person under clause 12.1 shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.
- 12.3. 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 purpose of clause 12.1.

- 12.4. The Compliance Officer shall maintain records of all the disclosures/declarations/undertakings/ forms as mentioned in this Code, as received from time to time, for a period of five years.
- 12.5. The Compliance Officer shall report to the Board of Directors for the purpose of the Code and in particular, shall provide reports to the Chairman of the Audit Committee and to the Chairman of the Board annually.

**CHAPTER V
MISCELLANEOUS**

13. Penalty for Contravention of Code

- 13.1. All Designated Employees and Connected Persons who trades in securities or communicates any information for trading in securities in contravention of the code of conduct may be penalized and appropriate action may be taken by the Company.
- 13.2. All Designated Employees who violate this Code of Conduct shall also be subject to disciplinary action by the Company, which may include wage/salary freeze, suspension, withholding of promotions, ineligibility for future participation in employee stock option plans, etc.
- 13.3. The action by the Company shall not preclude SEBI from taking any action in case of violation of the Regulations.
- 13.4. In case it is observed by the Company and/or Compliance Officer that there has been violation of the Regulations, SEBI shall be informed by the Company.

14 Uploading of Code on Company's Website

This Code and any amendments thereto shall be available on the website of the Company

15 Amendments

The Board may, at any time, modify, alter and amend the provisions of this Code by giving notice of such modification, alteration and amendment to the Promoters, Directors, Officers and Designated Persons.

16 Disclaimer

This Code is the internal policy of the Company to prevent the Insiders from Trading in the Securities of the Company. However, it is primarily the responsibility of every Insider to ensure compliance with the provisions of the Regulations and other related laws. The Company or Compliance Officer shall not in any way be responsible or liable and the concerned Insider alone shall be responsible and liable for any violation or contravention of the Regulations or any laws in this regard.


Nitin Shah
Chairman & Managing Director



Date: 14th November, 2017
Place: Mumbai

**Form Pre-Clearance
Application for Pre-clearance**

To,
The Compliance Officer,
Allied Digital Services Limited
[Registered Office Address]

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 Regulating, Monitoring & Reporting Trading in respect of securities of the Company, I, [Name of the Person], [Designation] of the Company residing at [Residential Address], am desirous of dealing in _____ of Eq. shares of the Company and seek approval to purchase / sale / subscription as per details given below:

1.	Name of the applicant	:	
2.	Designation	:	
3.	Number of securities held as on date	:	
4.	Folio No. / DP ID / Client ID No.	:	
5.	The proposal is for	:	(a) Purchase of securities (b) Subscription to securities (c) Sale of securities
6.	Proposed date of 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	:	

In relation to the above, I undertake that:

- a) I have no access to nor am I in possession of any unpublished price sensitive information at the time of signing this undertaking.
- b) In case, I get access to or receive any "Price Sensitive Information" after signing this application but before the execution of the transaction, I shall inform you of the change in position and shall refrain from trading in shares till such information is made public.
- c) I have not contravened the Company's Code of Conduct for Regulating & Reporting Trading by Insiders and for Fair Disclosure, 2015 as notified by the Company from time to time.
- d) If approval is granted, I shall execute the deal within 7 days of the receipt of approval failing which I shall seek pre-clearance.
- e) I undertake to submit the necessary report within two days of execution of the transaction as may be specified, disclosures required under the Code of Conduct.
- f) In case the traded value exceeds Rs. 10 lakh or any such other value as may be specified, disclosures required under the Code of Conduct will be immediately furnished by me.
- g) I have made full and true disclosure in this application.

Sign: _____

Name: _____

Designation: _____

Department: _____

Place:

Date:

PRE- CLEARANCE ORDER

To,
Name : _____
Designation : _____

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

In case you do not execute the approved transaction /deal on or before the aforesaid date you are required 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 prescribed format within two days from the date of transaction/deal.

Yours faithfully,

For Allied Digital Services Limited

[Name of the Compliance Officer]

Compliance Officer

Membership No.:

Date: _____

Place: _____

DISCLOSURE OF TRANSACTIONS

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

To,
The Compliance Officer,
Allied Digital Services Limited

Dear Sir/Madam,

Pursuant to Pre-Clearance Order dated _____ I, _____ of the Company residing at _____ hereby declare that have bought/sold/subscribed _____ securities as mentioned below on _____.

Type of Security	No. of Securities	Market Price	Mode of Acquisition	Date by which trade is proposed to be executed	Folio No./ DP ID No./Client ID No. along with the name of Depository	Present Holding (No. of Shares)	
						Physical	Demat

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).

Sign: _____

Name: _____

Designation: _____

Department: _____

Place: _____

Date: _____

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

Name of the company: Allied Digital Services Limited
 ISIN of the company: INE102I01027

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

Name, PAN,CIN/DIN & Address with contact nos.	Category of Person (Promoters/ KMP / Directors / immediate relative to / others etc.)	Date of appointment of Director /KMP OR Date of becoming Promoter	Securities held at the time of Becoming Promoter/appointment of Director/KMP		% of Shareh olding
			Type of security (For Eg.-Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5	6
Name: PAN: Address: Contact No.:					

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

Open Interest of the Future contracts held at the time of becoming Promoter/appointment of Director/KMP			Open Interest of the Option Contracts held at the time of becoming Promoter / Appointment of Director/KMP		
Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
7	8	9	10	11	12

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

Name:

Signature:

Designation:

Date:

Place: