



**CODE OF CONDUCT
TO REGULATE MONITOR AND
REPORT TRADING BY INSIDERS**

CODE OF CONDUCT TO REGULATE MONITOR AND REPORT TRADING BY INSIDERS

CHAPTER -I

PRELIMINARY

1. PREAMBLE

- i. This Code shall be called as **CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS**.
- ii. This Code is made pursuant to the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as notified by SEBI vide notification number No.LAD-NRO/GN/2014-15/21/85 dated 15th January 2015 and amended by the Board on pursuant to SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018.
- iii. This Code is prepared pursuant to Schedule B of the amended regulations in order to regulate, monitor and report trading by its Designated Persons including their Immediate Relatives.
- iv. The Board of Directors of the Company shall be empowered to amend, modify and interpret the code within the framework as prescribed by SEBI and such change shall be effective from such date the Board may notify in this behalf. Matters relating to interpretation of the code shall be referred to and adjudicated by the CIRO.

2. DEFINITIONS

In this Code unless the context otherwise requires the following words, expressions and derivations there from shall have the meanings assigned to them as under:-

- i. **“Act”** means the Securities and Exchange Board of India Act, 1992 (15 of 1992).
- ii. **“Chief Investor Relations Officer (CIRO)”** shall be such person as designated under Code of Practices and Procedures for Fair Disclosure of UPSI.
- iii. **“Code”** means this Code of Conduct to regulate, monitor and report trading by its Insiders.
- iv. **“Company”** means Craftsman Automation Limited.
- v. **“Compliance Officer”** - the Company Secretary of the Company shall be the Compliance Officer for the purpose of the Code. In his absence, any other person as designated by the Managing Director shall be the Compliance Officer for the purpose of this Code.

The Compliance Officer shall be responsible for compliance of policies, procedures, maintaining of records, monitoring adherence to code for the preservation of “Unpublished Price-Sensitive Information (UPSI)”, monitoring of trades and the implementation of codes under the overall supervision of the Audit Committee of the Board or the Board of Directors of the Company, as the case may be.

- vi. The Compliance Officer shall maintain a record of the Designated employees and any changes made in such list.

- vii. **“Connected Person”** means:
- a. any person who is or has during the six months prior to the concerned act been associated with the Company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the Company or holds any position including a professional or business relationship between himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.
 - b. 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 (a); or
 - b) a holding company or associate company or subsidiary company, if any; or
 - c) an intermediary as specified in Section 12 of the Act or an employee or director thereof; or
 - d) an investment company, trustee company, asset management company or an employee or director thereof; or
 - e) an official of a stock exchange or of clearing house or corporation; or
 - f) a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
 - g) a member of the Board of directors of the Company 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 the Board; or
 - i) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of the Company or his immediate relative has more than ten per cent, of the holding or interest.
- viii. **“Dealing in Securities / Trading”** means an act of subscribing buying, selling or agreeing to subscribe, buy, sell or deal in any securities by any person either as principal or agent and ‘trade’ shall be construed accordingly.
- ix. **“Designated Person”** means and includes Connected persons who are:-
- a.
 - i. All Directors of the Company
 - ii. All heads of business / departments
 - iii. Employees in Secretarial, Finance & Accounts, Treasury, Taxation, Risk Management and Computer Systems department having access to UPSI as may be identified by the Compliance Officer.
 - b. Employees in other department(s) as may be identified by the Compliance Officer having access to UPSI.
 - c. Any other connected persons designated by the Company on the basis of their functional role.
 - d. Immediate Relatives of ‘a’ and ‘b’ above.

- x. **“Director”** means a Director of the Company under the provisions of the Companies Act 2013.
- xi. **“Employee”** means employee of the Company.
- xii. **“Financially literate”** shall mean a person who has the ability to read and understand basic financial statements i.e, balance sheet, profit and loss account and statement of cash flows.
- xiii. **“Generally available information”** means information that is accessible to the public on a non-discriminatory basis.
- xiv. **“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.
- xv. **“Insider”** means Designated Person(s) and their immediate relative or any person who is a connected person or who is in possession of unpublished price sensitive information.
- xvi. **“Legitimate Purpose”** shall mean as defined under Code for Fair Disclosure of Unpublished Price Sensitive Information of the Company.
- xvii. **“Non Trading Period”** means the period before and after the meeting of the Board or shareholders of the Company where UPSI is to be considered as provided under this code.
- xviii. **“Officer”** means any person as defined in Section 2(59) of the Companies Act, 2013 including an auditor of the Company.
- xix. **“Regulation”** means Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time.
- xx. **“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.
- xxi. **“Specified”** means specified by the Board in writing.
- xxii. **“Takeover Regulations”** means the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.
- xxiii. **“Trading day”** means a day on which the recognized stock exchanges are open for trading.
- xxiv. **“Trading Window”** is the notional window referred for trading in the securities of the Company.

xxv. **“Unpublished Price-Sensitive Information (UPSII)”** means any information, which relates directly or indirectly to the Company or its securities and that is not generally available which upon becoming generally available, is likely to materially affect the price of securities of the Company and shall, ordinarily including but not restricted to, information relating to the following;

- a. Periodical financial results of the Company;
- b. Intended declaration of dividends (both interim and final);
- c. Change in capital structure;
- d. Mergers, demergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
- e. Changes in Key Managerial Personnel;

The words and expressions not defined in this code but defined in SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time or any other legislations viz. SEBI Act, 1992 (15 of 1992), the securities contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1956) or the Companies Act 2013 or listing agreement shall have the meanings respectively assigned to them there under.

CHAPTER – II

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS

1. ROLE OF COMPLIANCE OFFICER

- i. The Compliance Officer on a quarterly basis shall report details on insider trading to the Board of Directors of the Company and in particular, shall provide reports to the Chairman of the Audit Committee, if any, or to the Chairman of the Board of Directors or the Managing Director, as the case may be.
- ii. The Compliance Officer shall assist all employees in addressing any clarifications regarding trading in the Securities of the Company pursuant to SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 and the Company's Code of Conduct.

2. PROHIBITION ON COMMUNICATING OR PROCURING UPSI OR TRADING WHILE IN POSSESSION OF UPSI

- i. All information's shall be handled in-house on need-to-know basis and no UPSI shall be communicated to any person except to the extent allowed under this code.
- ii. The Insider shall not communicate, provide or allow access to any UPSI, relating to the Company or its securities to any person including other insiders except where such communication is in furtherance of legitimate purpose, performance of duties or discharge of legal obligations.
- iii. Where it is intended to communicate UPSI by virtue of certain substantial transactions (transactions that do not attract an open offer under the takeover regulations) viz., takeovers and acquisitions etc., the directors can enter into a confidentiality and Non-disclosure obligations with such parties.
- iv. No Insider shall trade while in possession of UPSI, provided the Insider may prove his innocence by demonstrating the circumstances including the following:
 - a. The transaction is an off-market inter-se transfer between Insiders who were in possession of same UPSI without being in breach of restrictions imposed on communication and Trading by insiders and both parties has made a conscious and informed trade decision.
 - b. The insiders make prompt reporting of trade to the Compliance Officer under this Code in prescribed format.

3. NEED TO KNOW:

- i. The UPSI shall be disclosed only to those within the Company who need the information to discharge their duty and who possession of such information will not give rise to any conflict of interest or misuse of such information.
- ii. All non-public information received by the employees should immediately be reported to the Compliance Officer.
- iii. No information shall be passed by the designated persons for effecting trading of Company's securities.

4. PROCEDURE FOR INQUIRY IN CASE OF LEAK OF UPSI:

- i. Leak of any UPSI in contravention of SEBI regulations / this Code shall be viewed seriously by the Compliance Officer and any suspected leak shall be brought to the notice of the Compliance Officer.
- ii. The Compliance Officer shall initiate a preliminary inquiry.
- iii. Based on the findings, information's provided he shall constitute an Inquiry Committee (IC) to conduct investigation / enquiry process.
- iv. The IC shall conduct detailed inquiry after collecting requisite evidence, documents and summoning of such individuals for personal appearance.
- v. The IC shall submit its report to the CISO. The report shall contain detailed findings supported by evidence, consequences of leak and quantum of punishment awarded.
- vi. The CISO shall promptly on receipt of preliminary enquiry report pointing to any leak/suspected leak of UPSI, cause information to be given to SEBI including the profits made out of the transaction.
- vii. The report of the IC shall be considered by CISO in consultation with the Managing Director of the Company and he shall determine the quantum of punishment.
- viii. All the documents and other records relating to inquiry shall be handed over to the Compliance Officer for safe custody.

5. DIGITAL DATABASE:

Company Secretary of the Company shall be responsible to maintain a structured database of such persons or entities as the case may be with whom UPSI is shared for legitimate purposes along with PAN or any other relevant Identity authorised by law and ensure such internal controls and checks viz., time stamping / audit trails to ensure non-tampering of the same.

6. NON TRADING PERIOD:

- i. The Company shall specify a period to be called as non-trading period for trading in Company's securities. Any other period shall be trading period for the purpose of this code unless specifically restricted by due intimation to the stock exchanges.
- ii. During the Non-trading window, the Designated Persons or their Immediate Relatives shall not trade either directly or through Portfolio Manager(s), if any.

- iii. The Compliance Officer shall by way of an e-mail / Notices / letter correspondence intimate the date of Board meeting and commencement of non-trading period to the Designated Persons. It shall be the onus of the Designated Persons to communicate the non-trading period to their Immediate Relatives.
- iv. The non-trading period shall generally occur during the following events:
 - a. Declaration of Financial results (quarterly, half-yearly and annual)
 - b. Declaration of dividends (interim and final)
 - c. Issue of securities by way of public/rights/bonus etc.
 - d. Any major expansion plans or execution of new projects
 - e. Amalgamation, mergers, takeovers and buy-back
 - f. Disposal of whole or substantially whole of the undertaking
 - g. Any changes in policies plans or operations of the Company.
- v. The Trading Window shall normally be opened not earlier than 48 hours after the information referred above becomes generally available and capable of assimilation by the market.
- vi. The time of re-opening of the Trading Window shall be determined by the Compliance Officer after taking into account various factors including UPSI in question which shall not be earlier than 48 hours after the information becomes generally available.
- vii. In case of ESOP, the exercise of options 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.

7. TRADING PLAN:

- i. Trading Plan shall:
 - a. not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
 - b. not entail trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced by the issuer of the securities and the second trading day after the disclosure of such financial results;
 - c. entail trading for a period of not less than twelve months;
 - d. not entail overlap of any period for which another Trading Plan is already in existence;
 - e. set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
 - f. not entail trading in securities for market abuse.

- ii. The Compliance Officer shall consider the Trading Plan made as above and shall approve it forthwith. However, he shall be entitled to take express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per provisions of the Regulations.
- iii. 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.
- iv. However, the implementation of the Trading Plan shall not be commenced, if at the time of formulation of the plan, the Insider is in possession of any Unpublished Price Sensitive Information and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Plan shall be deferred until such Unpublished Price Sensitive Information becomes Generally Available Information.
- v. The pre-clearance of trades shall not be required for a trade executed as per approved Trading Plan.
- vi. The Trading Window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved Trading Plan.
- vii. Upon approval of the Trading Plan, the Compliance Officer shall notify the plan to the stock exchanges on which the securities are listed.

8. PRE-CLEARANCE OF TRADES:

- i. All Designated Persons of the Company who intend to deal in the securities of the Company, when the trading window is open and the value of trade is above 10,000 shares or Rs 10 lakh in value (market value) whichever is less, should get the transaction pre-cleared by Compliance Officer by submitting an application as per **Annexure I to this chapter** and an undertaking as per **Annexure 2**. The order of pre-clearance shall be as per **Annexure 3**.
- ii. The designated person shall not be entitled to apply for pre-clearance while in possession of UPSI.
- iii. The Compliance Officer shall not approve any proposed Trade by Designated Person if the Compliance Officer determines that such person is in possession of UPSI.
- iv. The pre-clearance approval obtained shall be valid for a period of seven days within which the trade has to be executed after which the Designated Person must secure fresh pre-clearance of transaction.
- v. The Designated Person must report the details of trade within two days of execution in the format as per **Annexure 4**. In case the transaction is not undertaken, a nil report to that effect shall be filed in said form.

- vi. All Designated Persons who trade in securities of the Company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction. All such persons shall also not take positions in derivative transactions in the shares of the Company at any time. In case of any contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund administered by SEBI under the Act.
- vii. In case of subscription in the primary market (initial public offers), the above mentioned entities shall hold their investments for a minimum period of 30 days. The holding period would commence when the securities are actually allotted.
- viii. The Compliance Officer may waive off the holding period in case of sale of securities in personal emergency after recording reasons for the same. However, no such sale will be permitted when the Trading Window is closed.
- ix. Any trade by an Insider / Designated Person in contravention to pre-clearance procedure as laid above shall attract penalties as envisaged in this Code.

9. REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES OF THE COMPANY:

i. Initial Disclosure

- a. Every Key Managerial Personnel, Director and each of their Immediate Relatives shall disclose their holdings of securities of the Company within thirty days of these regulations taking effect as per **Form A** set out in **Annexure 5**.
- b. Every person on appointment as a Key Managerial Personnel or a director of the Company shall disclose his/ her holdings along with the holdings of his/ her immediate relatives as on the date of appointment, to the Company within seven days of such appointment, as per **Form B** set out in **Annexure 6**.

ii. Continual Disclosure

Every Director, designated employee of the Company and their Immediate Relatives shall within two trading days disclose such transaction(s) as per **Form C** set out in **Annexure 7** to the Company, the value of the securities traded, whether in one single transaction or a series of transactions over any calendar quarter, aggregates to a total traded value in excess of Rs.10 Lakhs.

iii. Disclosure to Stock Exchange

The Compliance Officer shall notify the stock exchanges, particulars of trades within two trading days of receipt of disclosure or from becoming aware of such information.

iv. **Disclosure by other Connected Persons**

The Compliance Officer may require any other Connected Person to disclose the holdings and trading in securities of the Company as per Form D set out in Annexure 8 at such frequency as he may determine.

v. **Disclosure by Designated Persons:**

The following information shall be disclosed by the Designated Persons on one-time basis to the Company and thereafter, any changes to be intimated as applicable.

- a. His/ her mobile number
- b. Permanent Account Number or Aadhar

10. MISCELLANEOUS

- i. The Compliance Officer on a quarterly basis, shall, report trading by Insiders, if any, to the board of directors and in particular to the Chairman of the Audit Committee, if any, or to the Chairman of the Board or Managing Director and that the trading have been executed in accordance with the pre-clearance procedure as envisaged in this code.
- ii. The Compliance Officer shall maintain an updated list of Designated Persons, records of disclosures, pre-clearance applications and undertakings for a period of five years.
- iii. The Audit Committee shall review compliance with this regulation on a yearly basis and verify the effectiveness and adequacy of systems for ensuring internal control.

11. PENALTY FOR CONTRAVENTION OF CODE OF CONDUCT

- i. All Designated Persons shall be individually responsible for complying with the provisions of the Regulations and the Code to the extent applicable.
- ii. Any Designated Person who trades in securities of the Company or communicates any information for trading in securities of the Company in contravention of the Code of Conduct may be penalized and the Company may take appropriate action.
- iii. The Designated Persons who violate the Code of Conduct shall also be subject to disciplinary action by the Company which may include freeze of wages/emoluments, suspension/termination of service/contract, ineligibility for future participation in Employee Stock Option Plans or any other action as may be deemed fit by the Company.
- iv. The action by the Company shall not preclude SEBI from taking any action in case of violation of the Regulation.

12. APPEAL TO THE SECURITIES APPELLATE TRIBUNAL

Any person aggrieved by an order of the Board of the Company under the directions in this code may prefer an appeal to the Securities Appellate Tribunal (SAT).

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APPLICATION FOR PRE-TRADING APPROVAL

To,
The Compliance Officer
Craftsman Automation Limited.

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations 2015 and the Company's Code Of Conduct To Regulate, Monitor and Report Trading By Insiders. I seek approval to purchase / sell / subscribe _____ equity shares of the Company as per details given below:

Sl.No.	Particulars	Remarks
1.	Name of 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 b. Subscription c. Sale	
6.	Proposed date of trading in securities	
7.	Estimated number of securities proposed to be purchased/subscribed/sold	
8.	Current market price (as on application date)	
9.	Whether the proposed transaction will be through stock exchange or off-market trade.	
10.	Folio No. / DP ID / Client ID No. where the securities will be credited / debited.	

I enclose herewith the Undertaking signed by me.

Signature :
Name :
Date:

**UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR
PRE-CLEARANCE**

To,

The Compliance Officer
Craftsman Automation Limited

I, _____, _____ of the
Company _____, r/o
_____ am
desirous of dealing in _____ shares of the Company as mentioned in my application
dated _____ for pre-clearance of the transaction.

I further declare that I am not in possession of or otherwise privy to any Unpublished Price Sensitive Information (as defined in the Company's Code of Conduct To Regulate, Monitor and Report Trading By Insiders (the Code) up to the time of signing this Undertaking.

In the event that I have access to or received any information that could be construed as "Price Sensitive Information" as defined in the Code, after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public.

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

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

If approval is granted, I shall execute the deal within 7 days of the receipt of approval failing which I shall seek pre-clearance.

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

Signature :

Name :

Date:

FORMAT FOR PRE- CLEARANCE ORDER

Date:

To,

Employee Name & ID :

Designation :

Place :

Dear Sir,

Your application for dealing in _____ of equity shares of the Company is hereby approved and the same is valid for 7 days from this letter date i.e., the transaction must be completed on or before _____.

Please ensure to report the details of executed transactions in a manner as prescribed under the code within 2 days from the date of transaction/deal. In case the transaction is not undertaken a 'Nil' report shall be necessary in the said format as per the code.

Thanking you

Yours faithfully,
for **Craftsman Automation Limited.**

.....
COMPLIANCE OFFICER

Note: *The approval shall lapse after the said date.

DISCLOSURE OF TRANSACTIONS

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

To,
The Compliance Officer,
Craftsman Automation Limited.

I hereby inform that I

- Have not bought / sold / subscribed any securities of the Company.
- Have bought / sold / subscribed to _____ securities as mentioned below on _____ (date).

(strike our whichever is not applicable)

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

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

Signature :

Name :

Date :

FORM A

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

Name of the company: _____

ISIN of the company: _____

Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and 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)	Securities held as on the date of regulation coming into force		% of Shareholding
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5

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 by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

Open Interest of the Future contracts held as on the date of regulation coming into force			Open Interest of the Option Contracts held as on the date of regulation coming into force		
Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
6	7	8	9	10	11

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

Name & Signature:

Designation:

Date:

Place:

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

Name of the company: _____

ISIN of the company: _____

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a 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 Shareholding
			Type of security (For eg. – Shares, Warrants, Convertible Debentures 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 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:

FORM C

SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]

Name of the company: _____

ISIN of the company: _____

Details of change in holding of Securities of Promoter, Employee or Director of a 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.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition / disposal (on market/public/rights/ preferential offer / off market/Inter-se transfer, ESOPs etc.)
		Type of security (For eg. –Shares, Warrants, Convertible, Debentures etc.)	No. and % of shareholding	Type of security (For eg. – Shares, Warrants, Convertible, Debentures etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge / Revoke/ Invoke)	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 of the company by Promoter, Employee or Director of a listed company 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)	
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:



ENGINEERING ADVANTAGE

Craftsman Automation Limited

Registered Office: 123/4, Sangothipalayam Road
Arasur Post, Coimbatore – 641 018, Tamilnadu.

Web: www.craftsmanautomation.com

Email: investor@craftsmanautomation.com

CIN NO: L28991TZ1986PLC001816