



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

Vascon Engineers Limited (the “Company”) is a public company whose equity shares are listed on National Stock Exchange of India Limited (NSE) and BSE Limited (BSE) and subject to the rules and regulations issued by the Securities and Exchange Board of India (SEBI).

Insider trading refers to trading in the securities of a company by its directors, employees or other persons so as to make a profit or avoid any loss, on the basis of unpublished price sensitive information known only to them and not to the general body of shareholders. This kind of profiteering by an insider, taking unfair advantage of unpublished price sensitive information available to him/her by virtue of his/her position or connection with the company, erodes investors' confidence in the integrity of the management of the company.

The Board of Directors of the Company has adopted this Insider Trading Policy (the “Policy”) to comply with the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“SEBI Regulations”).

This policy shall be applicable to all Insiders (as defined herein) of the Company including designated persons and immediate relatives of designated persons as defined in this policy. The SEBI Regulations prohibit an Insider from Trading in the securities of a company listed on any stock exchange when in possession of any unpublished price sensitive information.

Unpublished Price Sensitive Information (“UPSI”) means means any information, relating to a company or its securities, directly or indirectly, that is not generally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: –

“Generally available” information means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: –

VASCON ENGINEERS LTD.

Registered & Corporate Office: Vascon Weikfield Chambers, Behind Hotel Novotel, Opposite Hyatt Hotel, Pune-Nagar Road, Pune - 14.
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- Financial results;
- Dividends (both interim and final);
- Change in capital structure;
- Mergers, de-mergers, acquisitions, de-listings, disposals and expansion of business and such other transactions;
- Any changes to the Company's Board of Directors or the Company's key managerial personnel and key agreements with them;
- Material Events in accordance with Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015

1. Rules

The rules shall be called 'Rules for Trading in the securities of Vascon Engineers Limited by an Insider' ("Rules"). These Rules shall come into force with effect from April 1, 2019.

2. APPLICABILITY

This Code applies to Promoters, Directors, Designated Persons of the Company and their immediate relatives, Material Subsidiary Company/ (ies) and Insiders of the Company.

3. DEFINITIONS

- "Act"** means the Securities and Exchange Board of India
- "Board"** means the Board of directors of the Company
- "Chinese Wall"** means a barrier especially to the passage of information or communication.
- "Company"** means Vascon Engineers Limited and includes Indian and Overseas subsidiaries of the Company.
- "Connected Person"** means
 - 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, officer or an employee

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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 exchange or of clearing house or corporation; or
 - (f) a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
 - (g) a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
 - (h) an official or an employee of a self-regulatory organization recognised or authorized by the Board; 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;
- f. **“Contra Trade” means** a trade or transaction which involves buying or selling any number of shares of the Company and within 6 months trading or transacting in an opposite transaction involving sell or buy following the prior transaction.”

g. **“Designated Persons”**

The term “Designated Person” shall consist of:

- I. Promoters of the Company
- II. Directors of the Company and its subsidiaries;
- III. All employees in the Finance and Accounts Department, Legal Department, Sales Strategy, Corporate Strategy, Information Security and any other departments of the company and its material subsidiaries, if any on the basis of their functional role or access to unpublished price sensitive information

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- IV. Chief Executive Officer and employees up to two levels below Chief Executive Officer of the Company and material subsidiaries.
 - V. Executive Secretaries of Directors and Executive Officers of the Company, any support staff of the company, such as IT staff or secretarial staff who have access to unpublished price sensitive information;
 - VI. Immediate Relatives of persons specified in (I) to (V) above
 - VII. Any other Person designated by the Company on the basis of their functional role and such function would provide access to UPSI;
-
- h. **“Immediate Relative”** of a person means a spouse or the parent, sibling or child of that person or his or her spouse, if they are either dependent financially on such person or consult such person in taking decisions relating to Trading in securities.
 - i. **“Insider” means** any person who is
 - a. A connected Person or
 - b. In possession of or having access to UPSI.
 - j. **“Key Managerial Personnel”** shall have the meaning assigned to it under the Companies Act, 2013.
 - k. **“Promoter and Promoter Group”** shall have the meaning assigned to it under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.

“Promoter Group” shall have the meaning assigned to it under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.
 - l. **“Securities”** means Equity Shares of the Company and Derivatives on shares of the Company.
 - m. **“Legitimate Purpose”** shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.

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Words and expressions used and not defined in these Rules 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 and regulations made thereunder shall have the meanings respectively assigned to them in those legislations.

- n. **“Trading day”** means a day on which the recognized stock exchanges are open for trading.
- o. **“Trading Window”** means a trading period for trading in the Company's Securities as specified by the Company from time to time. All days shall be the Trading Period except when the Trading Window is closed.
- p. **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: –
 - Financial results;
 - Dividends (both interim and final);
 - Change in capital structure;
 - Mergers, de-mergers, acquisitions, de-listings, disposals and expansion of business and such other transactions;
 - Any changes to the Company's Board of Directors or the Company's key managerial personnel and key agreements with them;
 - Material Events in accordance with Regulation 30 of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirement) Regulations, 2015

Words and expressions used and not defined in these Rules 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 and regulations made thereunder shall have the meanings respectively assigned to them in those legislations.

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4. PROHIBITION TO TRADE IN SECURITIES OF THE COMPANY BY DESIGNATED PERSONS.

An Insider shall not-

- (a) communicate, provide, or allow access to any UPSI, relating to the Company or its securities, to any person including other Insiders, except to the extent allowed by these Rules or SEBI Regulations;
- (b) procure from or cause the communication by an Insider of UPSI, relating to the Company or its securities.

Provided that nothing contained above shall be applicable when an UPSI is communicated, provided, allowed access to or procured:

- i. in furtherance of legitimate purposes, performance of duties or discharge of legal obligations pursuant to appropriate notice, confidentiality and non-disclosure agreements being executed; or
- ii. in the event the Board of Directors directs or causes the public disclosure of UPSI in the best interest of the Company; or
- iii. within a group of persons if such persons have been identified and secluded within a “chinese wall” or information barrier by the Compliance Officer from the rest of the Company for a particular purpose or for a specified period of time in furtherance of legitimate purposes, performance of duties or discharge of legal obligations, and are subjected to, among other conditions, additional confidentiality obligations, information barriers designed to prevent exchanges of UPSI outside the “Chinese wall”, and the execution of an undertaking by such persons to abstain and / or forego Trading during such seclusion or till the UPSI no longer constitutes UPSI and has become generally available.

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5. PROHIBITION ON INSIDER TRADING

An Insider shall not, directly or indirectly, –

- a. Trade in securities of the Company that are listed or proposed to be listed when in possession of UPSI;
- b. Trade in securities of the Company except when the Trading Window is open and the Insider is not in possession of UPSI.
- c. provide advise/ tips to any third party on trading in Company's securities while in possession of UPSI and

An insider who has ceased to be associated with the Company shall not, for a period of six months from date of such cessation, directly or indirectly trade in the Company's Securities while in possession of UPSI.

Trading in Securities of other companies: No Insider may, while in possession of unpublished price sensitive information about any other public company gained in the course of employment with the Company, (a) trade in the securities of the other public company, (b) "tip" or disclose such material non-public information concerning that company to anyone, or (c) give trading advice of any kind to anyone concerning the other public company.

No Insider may take positions in derivative transactions in the securities of the Company at any time.

The restriction in 4 (i) above may not apply to:

- (a) a transaction that is an off-market inter-se transfer between Insiders who were in possession of the same UPSI without being in breach of these Rules and both parties had made a conscious and informed trade decision; and
- (b) Trades pursuant to a Trading Plan set up in accordance with these Rules and SEBI Regulations.

When a person has traded in securities while in possession of unpublished price sensitive information, his trades would be presumed to have been motivated by the knowledge and awareness of such information in his possession.

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6. TRADING WINDOW AND TRADING RESTRICTION

1. The Compliance Officer shall notify a 'trading window' during which the Designated Persons may Trade in the Company's securities after securing pre-clearance from the Compliance Officer in accordance with these Rules. The competent authority for pre-clearing the Trade of Compliance Officer shall be Managing Director.
2. Designated Persons shall not Trade in the Company's securities when the trading window is closed.
3. The trading window shall generally be closed for all Insiders from the last day of end of Quarter till 48 hours of declaration of published financial results.
4. Additionally, the trading window shall be closed in particular for a Designated Person or class of Designated Persons when the Compliance Officer determines that a Designated Person or class of Designated Persons can reasonably be expected to have possession of UPSI, for such periods as determined by the Compliance Officer. Designated Person or class of Designated Persons will receive a notification on such special blackout periods.
5. The trading window may be re-opened after closure, not earlier than 48 hours after the UPSI in question becomes generally available.

7. PROCEDURE OF PRE-CLEARANCE

- (1) Designated Persons must take from the Compliance Officer in respect of purchase or sale of securities of the Company, if the quantity of securities exceeds 10,000 in a month (either in one transaction or in a series of transactions) in the prescribed Form. Any purchase or sale of securities by the Compliance Officer must take pre-clearance from the Managing Director.
- (2) Purchase or sale transactions, for which pre-clearance has been obtained, must be executed within seven days after the pre-clearance is given, failing which a fresh pre-clearance must be obtained.
- (3) Designated Persons having obtained pre-clearance must file with the Compliance Officer the details of the transactions in prescribed Form within 07 (Seven) days of the exercise of the trade, even if the transaction has not been undertaken.

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- (4) Designated Persons before approving any trade, the Compliance Officer may seek a declaration to the effect that the applicant for pre-clearance is not in possession of any UPSI.
- (5) The Compliance Officer shall confidentially maintain a list of such securities as a “restricted list” which shall be used as the basis for approving or rejecting applications for preclearance of trades.

8. MINIMUM HOLDING PERIOD (Additional Trading Restrictions)

- (1) Designated Persons who buy or sell any number of securities of the Company must not enter into an opposite transaction i.e. sell or buy any number of securities during the next six months from the date of the prior transaction, except when the reasons are recorded by the Designated Persons in writing with the Compliance Officer and provided that such relaxation to enter into opposite transaction does not violate the Regulations.
- (2) If any opposite transaction 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 the Securities and Exchange Board of India for credit to the Investor Protection and Education Fund administered by SEBI under the SEBI Act, 1992.

9. TRADING PLAN

1. A Designated Person shall be entitled to formulate a Trading Plan that complies with the SEBI Regulations (a “Trading Plan”) and present it to the Compliance Officer for approval and public disclosure. The trading plan may be executed only after the plan is approved by the Compliance officer and disclosed to the stock exchanges on which the securities of the Company are listed.
2. Designated person shall not exercise any influence over the amount of securities to be traded, the price at which they are to be traded, or the date of the trade. Designated person may delegate discretionary authority to his/her broker, but in no event Designated person may consult with the broker regarding executing transactions, or otherwise disclose information to the broker concerning the Company that might influence the execution of transactions, under the Trading Plan after it commences.

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3. The Trading Plan once approved shall be irrevocable and the Designated Person 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. However, the implementation of the Trading Plan shall not be commenced, if at the time of formulation of the plan, the Designated Person is in possession of UPSI and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Trading Plan shall be deferred until such UPSI becomes generally available information.

10. DISCLOSURE REQUIREMENTS

A. INITIAL DISCLOSURE:

- I. Every Promoter, member of the promoter group, Key Managerial Personnel, director of the Company and each of their Immediate Relatives shall disclose his holding of securities of the Company within thirty days of these Rules taking effect as per Format
- II. Every person, on appointment as a Key Managerial Personnel or a director of the Company or upon becoming a Promoter or member of the promoter group, shall disclose his / her and Immediate Relatives' holding of securities of the Company as on the date of appointment or becoming a promoter, to the Company within seven days of such appointment or becoming a promoter, as per Format
- III. Every Designated person shall disclose details like Permanent Account Number, names of educational institutions from which they have graduated and names of their past employers.

B. CONTINUAL DISCLOSURE

1. Every Designated person shall disclose names and Permanent Account Number or any other identifier authorized by law of the following persons to the company on an annual basis and as and when the information changes:
 - Immediate relatives
 - persons with whom such designated person(s) shares a material financial relationship
 - Phone and mobile numbers which are used by them

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2. Every Promoter, member of the promoter group, designated person, director of the Company and each of their Immediate Relatives shall disclose as per Form C set out in Annexure 6 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 Rs. Ten lakhs.
3. The disclosure shall be made within two working days of:
 - I. the receipt of intimation of allotment of shares, or
 - II. the acquisition or sale of shares or voting rights, as the case may be.

C. DISCLOSURE TO STOCK EXCHANGE

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

- D. All Designated Persons must make an annual disclosure of the number of Securities of the company held as on 31st March each year by them including details of purchase / sale of Securities of the Company during the financial year to the Compliance Officer. This disclosure must be made within 30 (thirty) days from the close of each financial year

11. RECORDS

- (1) The Compliance Officer must maintain record of all the disclosures and declarations made in the appropriate form for a minimum period of five years.
- (2) The Compliance Officer shall also maintain record of the Designated Persons and any changes therein.

12. PENALTIES FOR CONTRAVENTION

- 1) An Insider who acts in contravention of these Rules shall be liable to have his services or relationship with the Company, as the case may be, terminated.
- 2) Directors, Officers and employees of the Company who violate these rules shall be subject to disciplinary action by the Company, which may include wage freeze,

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suspension, recovery, clawback etc and ineligibility for future participation in the Company's stock option plans or termination.

- 3) The SEBI or any other appropriate regulatory authority may also be informed of the violation of these Rules so that appropriate action may be taken.

13. MISCELLANEOUS

- 1) The Board of Directors shall be empowered to amend, modify, and interpret these Rules and such Rules shall be effective from such date that the Board may notify in this behalf.
- 2) The Compliance Officer shall provide the Audit Committee of the Board, on a quarterly basis, all the details of Trading in securities by the Designated Persons including any violations of the Rules.
- 3) The Compliance Officer shall maintain (a) an updated list of Designated Persons, (b) records of disclosures and pre-clearance applications and undertakings for a period of five years and (c) a confidential list of any 'restricted securities' to which the Compliance Officer may require Designated Persons to seek pre-clearance before Trading in such 'restricted securities'.
- 4) The Company shall require all Connected Persons to formulate and adhere to a code of conduct to achieve compliance with these Rules. In case such persons observe that there has been a violation of these Rules, then they shall inform the Board of Directors of the Company promptly.
- 5) The Company has adopted the amended 'Corporate Policy Statement on Investor Relations' available at www.vascon.com to regulate the Company's practices and procedures for fair disclosure of UPSI and comply with the SEC's Regulation Fair Disclosure.
- 6) Any suspected violation of leak of unpublished price sensitive information or violation of this policy can be reported under whistle blower policy.

14. AUTHORITY TO MAKE ALTERATIONS

- (1) The Board of Directors are authorized to make such alterations to this Code as considered appropriate, subject, however, to the condition that such alterations shall not be inconsistent with the provisions of the Regulations.

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FORM -I: PRE-CLEARANCE OF TRADE

(To be submitted in Duplicate)

Date:

**To,
The Compliance Officer
Vascon Engineers Limited
Pune**

With reference to above, I wish to inform you that I want to purchase/ sale _____ Equity shares of the Company from, details of the same are as mentioned below:

1	Name of the Director/Designated Employee	
2	Designated Employee	
3	DIN/Employee Code	
4	PAN	
5	Address	
6	Number of Securities held in the Company as on date	
7	DP ID Client ID	
8	Mode in which Securities are held: Physical or Demat	
9	The proposal is for ----- (Tick the proper option)	a. Acquisition in the open market b. subscription to the securities c. sale of securities
10	Proposed Date of the Deal	
11	Estimated number of Securities proposed to be acquired/sold/subscribed	
12	Price at which the transaction is proposed	
13	Current Market Price (as on the date of making application)	
14	Whether the proposed transaction will be through stock exchange or off market deal?	
15	Exchange on which Trade will be	

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	executed?	
16	Name of the Depository	
17	Name and address of the Broker (if the deal is to be in the open market) and his SEBI Regn. No.	

In relation to the above Dealing, I undertake that:

- I. I have no access to nor do I have any information that could be construed as "Price Sensitive Information" as defined in the Code upto the time of signing this undertaking;
- II. 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;
- III. I have not contravened the provisions of the code of conduct for prevention of insider Trading as notified by the Company from time to time.
- IV. I have made full and true disclosure in the matter.
- V. I hereby declare that I shall execute my order in respect of securities of the Company within one week after the approval of pre-clearance is given. If the order is not executed within one week after the approval is given, I undertake to obtain pre-clearance for the transaction again.

Place:

Date:

Signature

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PRE CLEARANCE ORDER

This is to inform you that your request for dealing in _____ (numbers) shares of the Company as mentioned in your above mentioned application is approved.

Please note that the said transaction must be completed on or before (_____), that is within one week from today.

For Vascon Engineers Limited

Compliance Officer
Date:

CONFIRMATION

To,
The Compliance Officer
Vascon Engineers Limited

I confirm that the share dealing for which approval was granted on _____ was completed on _____ for purchasing/selling _____ (numbers) equity shares of the Company.

Employee Name:
Designation:
Pay Roll No.:

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FORM-A

Name of the company: **Vascon Engineers Limited**

ISIN of the company: **INE893I01013**

DETAILS OF SECURITIES HELD BY PROMOTERS, KEY MANAGERIAL PERSONNEL (KMP), DIRECTOR AND OTHER PERSONS AS MENTIONED IN REGULATION 7(2)

Name, PAN No., CIN/DIN & addresses with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relatives/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding	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	
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	6		7	

Name & Signature:

Date:

Designation:

Place:

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FORM-B

Name of the company: **Vascon Engineers Limited**
 ISIN of the company: **INE893I01013**

DETAILS OF SECURITIES HELD BY PROMOTERS, KEY MANAGERIAL PERSONNEL (KMP), DIRECTOR AND OTHER PERSONS AS MENTIONED IN REGULATION 7(2)

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters / KMP / Directors/immediate relatives/others etc)	Date of Appointment of Director/KMP or date of becoming Promoter	Securities held as the time of becoming Director/KMP or Promoter		% of Shareholding	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	
			Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	5	6		7	
	KMP		Equity						

Name & Signature:

Date:

Designation:

Place:

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FORM C

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

Name of the company: **Vascon Engineers Limited**
ISIN of the company: **INE893I01013**

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, & address with contact nos.	Category of Person (Promoters/ KMP / Directors / immediate relative/ Employee etc.)	Securities held prior to acquisition/ disposal		Securities acquired/Disposed				Securities held post disposal			Date of Sale/purchase of shares		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	No. and % of shareholding	Type of security	No.	Value	Transaction Type (Buy/ Sale/ Pledge / Revoke/ Invoke)	Type of security	No. and % of shareholding	%	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	
	Employee	Equity		Equity			Sale	Equity						On Market
Total														

Name & Signature:

Date:

Designation:

Place:

VASCON ENGINEERS LTD.

Registered & Corporate Office: Vascon Weikfield Chambers, Behind Hotel Novotel, Opposite Hyatt Hotel, Pune-Nagar Road, Pune - 14.
Tel.: +91 20 3056 2100/200/300, Fax: +91 20 3056 2600, Web: www.vascon.com CIN: L70100PN1986PLC175750

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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) N.A.

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
						NSE

Name & Signature:

Date:

Designation:

Place:

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