



**CODE OF CONDUCT TO REGULATE,
MONITOR AND REPORT TRADING BY
DESIGNATED PERSONS**

aarvee engineering consultants limited



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**CODE OF CONDUCT TO REGULATE,
MONITOR AND REPORT TRADING BY DESIGNATED PERSONS**

1. PREAMBLE

This Code has been prepared pursuant to the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time and shall be known as “Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons” (hereinafter referred to as “Code”).

2. SCOPE AND APPLICABILITY

All designated persons and their immediate relatives shall be governed by this Code.

3. OBJECTIVE

3.1. As per Regulation 9(1) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time (“Regulations”), the Board of Directors of every listed company and market intermediary is required to formulate a code of conduct by adopting the minimum standards set out in **Schedule B of the Regulations**, to regulate, monitor and report trading by its designated persons and their immediate relatives.

3.2. In compliance with the Regulations, this ‘Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons’ has been formulated by the Board of Directors of the Company. The Company endeavours to preserve the confidentiality of Unpublished Price Sensitive Information (“UPSI”) and to prevent misuse of such information.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.

4. DEFINITIONS

4.1. “**Act**” means the Securities and Exchange Board of India Act, 1992.

4.2. “**Board**” means the Securities and Exchange Board of India.

4.3. “**Company**” means Aarvee Engineering Consultants Limited.

4.4. “**Code**” or “**Code of Conduct**” shall mean the Code of Conduct to Regulate, Monitor and Report trading by insiders of the Company as amended from time to time.

4.5. “**Compliance Officer**” means Company Secretary or such other senior officer, who shall be responsible 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board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.

4.6. “**Connected Person**” shall have the meaning given to it under Regulation 2(d) of the Regulations.



- 4.7. “**Contra Trade**” means a trade or transaction which involves buying or selling any number of Securities of the Company and within 6 (six) months of trading or transacting in an opposite transaction involving such sell or buy following the prior transaction.
- 4.8. “**Designated Person**” means:
- (i) All Directors of the Company;
 - (ii) All Promoters of the Company;
 - (iii) Key Managerial personnel as defined in Companies Act, 2013;
 - (iv) All employees in the grade of Executive Director and above of the Company and its material subsidiaries;
 - (v) Employees in the grade of Senior Manager and above in the Company and its material subsidiaries;
 - (vi) Such employees of the Company and its Material Subsidiaries in finance, secretarial, investor relations and any other department as may be determined by the Compliance Officer from time to time;
 - (vii) The Chief Executive Officer and employees up to two levels below Chief Executive Officer of the Company and its Material Subsidiaries irrespective of their functional role in the Company or the Material Subsidiary, as the case may be or their ability to have access to UPSI;
 - (viii) Any support staff of the Company and its Material Subsidiaries who have access to UPSI as may be determined by the Compliance Officer from time to time; and
 - (ix) Immediate relatives of the persons mentioned above.
- 4.9. “**Generally available information**” means information that is accessible to the public on a non-discriminatory basis.
- 4.10. “**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.
- 4.11. “**Insider**” means any person who is:
- (i) a connected person; or
 - (ii) in possession of or having access to unpublished price sensitive information.
- 4.12. “**Promoter**” shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.
- 4.13. “**Promoter Group**” shall have the meaning assigned to it under the Securities Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modifications thereof.
- 4.14. “**Securities**” shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 or any modification thereof.
- 4.15. “**Trading**” means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and “trade” shall be construed accordingly.



- 4.16. **“Trading Day”** means a day on which the recognized stock exchanges are open for trading.
- 4.17. **“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 include but is not restricted to, information relating to the following:
- (i) financial results;
 - (ii) dividends;
 - (iii) change in capital structure;
 - (iv) mergers, de-mergers, acquisitions, de-listings, disposals and expansion of business and such other transactions;
 - (v) changes in key managerial personnel.
- 4.18. Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013 and Rules, the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, the Securities and Exchange Board of India Act, 1992 or any other applicable law or regulation and as amended from time to time.

5. ROLE OF COMPLIANCE OFFICER

- 5.1. The Board of the Company shall appoint the Company Secretary as the Compliance Officer to ensure compliance and for effective implementation of the Regulations and also this Code across the Company.
- 5.2. The Compliance Officer shall report to the Board of the Company and shall be responsible for:
- 5.2.1. Setting forth policies in relation to the implementation of the Code of Conduct and the Regulations in consultation with the Board/Audit Committee;
 - 5.2.2. The omission of an event or information is likely to result in significant market reaction if the said omission came to light at a later date;
 - 5.2.3. Prescribing procedures for various activities referred to in the Code of Conduct and the Regulations;
 - 5.2.4. Compliance with the policies and procedures referred hereinabove;
 - 5.2.5. Monitoring adherence to the regulations for the preservation of UPSI;
 - 5.2.6. Grant of pre-clearance approvals to the Designated Persons for trading in the Company’s Securities by them/ their Immediate Relatives and monitoring of such trading;
 - 5.2.7. Implementation of Code of Conduct under the general supervision of the Audit Committee and the overall supervision of the Board of the Company;



- 5.2.8. The Compliance Officer shall assist all the Designated Persons in addressing any clarifications regarding the Regulations and this Code of Conduct;
- 5.2.9. Educate individuals and make them aware of the duties and responsibilities attached to the receipt of UPSI, and the liability in case of misuse or unwarranted use of such information or communication;
- 5.2.10. The Compliance Officer shall close the trading window for such periods as he/she may deem fit in compliance with the provisions of this code;
- 5.2.11. Maintenance of records as required under this Code of Conduct;
- 5.2.12. Report all details of trading in securities by the Designated Persons including any violations of the Code of Conduct to the Audit Committee and the Board on quarterly basis.

6. PROHIBITION ON COMMUNICATING OR PROCURING UPSI

- 6.1. All information shall be handled within the Company on a need-to-know basis and no Unpublished Price Sensitive Information shall be communicated to any person except in furtherance of the insider's legitimate purposes, performance of duties or discharge of his/her legal and other official duties and obligations. An Insider shall not communicate, provide, or allow access to any UPSI, relating to the Company or its securities, to any person including other Insiders.
- 6.2. No person shall 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:

- 6.2.1. in furtherance of legitimate purposes, performance of duties or discharge of legal obligations pursuant to appropriate confidentiality and non-disclosure agreements being executed; or
- 6.2.2. in the event the Board of Directors direct or cause the public disclosure of UPSI in the best interest of the Company; or
- 6.2.3. 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.



6.3. Any person in receipt of UPSI pursuant to a “legitimate purpose” shall be considered as an “Insider” for the purpose and provision of this Code of Conduct shall be applicable to such Insider. The Compliance officer shall give due notice to an Insider to maintain confidentiality of UPSI obtained.

6.4. The Board of Directors of the Company, shall ensure that a Structured Digital Database is maintained containing the nature of UPSI and the names of such persons who have shared the information and also the names of such persons with whom information is shared under this regulation along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such database shall not be outsourced and shall be maintained internally with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.

6.5. The Board of Directors of the Company shall ensure that the Structured Digital Database is preserved for a period of not less than 8 (eight) years after completion of the relevant transactions and in the event of receipt of any information from the SEBI regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.

7. TRADING WHEN IN POSSESSION OF UNPUBLISHED PRICE SENSITIVE INFORMATION (“UPSI”)

7.1. No insider shall trade in securities of the Company that are listed or proposed to be listed on the Stock Exchange when in possession of UPSI.

7.2. An Insider trading in securities of the Company that are listed or proposed to be listed on a Stock Exchange when in possession of UPSI may prove his/her innocence by demonstrating the circumstances including the situations laid down in the proviso to Regulation 4(1) of the SEBI Regulations.

7.3. In the case of connected persons, the onus of establishing that they were not in possession of UPSI shall be on such connected persons and, in other cases, the onus would be on SEBI.

8. TRADING WINDOW

8.1. 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 this Code of Conduct;

8.2. Designated Persons and their immediate relatives are prohibited from trading in the Company’s securities when the trading window is closed.

8.3. The trading window shall remain closed for all Designated Persons from the first day immediately following the end of each calendar quarter until 48 hours after the company discloses its quarterly or annual financial results to the stock exchanges;



- 8.4. Additionally, the trading window may be closed for a specific Designated Person or group of Designated Persons, if the Compliance Officer determines that they are likely to possess Unpublished Price Sensitive Information (UPSI), for such periods as the Compliance Officer deems necessary;
- 8.5. The trading window may be re-opened after closure, not earlier than 48 hours after the UPSI in question becomes generally available.
- 8.6. The trading window restrictions will not be applicable
- 8.6.1. for exercise of stock options under Company's Share Based Employee Benefit Schemes; or
 - 8.6.2. in respect of any other transactions as specified in the SEBI Regulations from time to time, as exceptions to restrictions on trading when in possession of UPSI.

9. PRE-CLEARANCE OF TRADE

- 9.1. Designated Persons and /or their immediate relatives who intend to deal in the securities of the company, when the trading window is open and if the proposed trade is in excess of Rs.10 lakhs or such other value as may be specified (market value) or 1% of total issued shares – whichever is less (in one or more lots) over any calendar quarter, should get their proposed transaction pre-cleared as per the pre-clearance procedure.
- 9.2. Designated Persons shall not trade in Securities of the Company and shall not apply for pre-clearance, if such Designated Person is in possession of UPSI, even if the trading window is open.
- 9.3. An application for pre-clearance of trade shall be made to the Compliance Officer along with an undertaking in favour of the Company that the designated person is not in possession of any UPSI, has not contravened the Code and has made full and true disclosure in the matter. The application above should be accompanied by an undertaking, executed in favour of the company as provided as an *Annexure-I*.
- 9.4. In case a designated person receives UPSI after signing of the undertaking but before the execution of the trade, he/she shall inform the Compliance Officer of the change in his position, and he/she shall restrain from dealing in the securities till such information becomes public.
- 9.5. The Compliance Officer shall approve or reject the pre-clearance application within 2 days from the date of acknowledgment and issue Pre-clearance Approval. There shall be no obligation to give reasons for rejection of any application.
- 9.6. The designated persons shall execute their trades within 7 trading days of pre-clearance, failing which fresh pre-clearance would be needed for the trades to be executed. However, such approval shall automatically deemed to be withdrawn if such period is superseded by closure of trading Window.



- 9.7. The Designated Persons shall not enter into a Contra-Trade i.e. an opposite trade/transaction (sell or buy) any number of Securities during the next 6 (six) months following the previous transaction. Provided that this shall not be applicable for trades pursuant to exercise of stock options.
- 9.8. In case a Contra Trade is executed, inadvertently or otherwise, in violation of the aforesaid 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.

10. TRADING PLAN

- 10.1. An insider shall be entitled to formulate a trading plan for dealing in securities of the Company and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his/her behalf in accordance with such plan.
- 10.2. Such trading plan shall
- 10.2.1. not entail commencement of trading on behalf of the insider earlier than six months from public disclosure of the plan.
 - 10.2.2. 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 and the second trading day after the disclosure of such financial results.
 - 10.2.3. entail trading for a period of not less than twelve months.
 - 10.2.4. not entail overlap of any period for which another trading plan is already in existence.
 - 10.2.5. set out either the value of trades to be affected 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 affected.
 - 10.2.6. not entail trading in securities for market abuse.
- 10.3. The Compliance Officer shall review the Trading Plan as above and shall, if in compliance with the requirements, approve the same. However, the Compliance Officer 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.

Provided that pre-clearance of trades shall not be required for a trade executed as per an approved trading plan.



Provided further that trading window norms and restrictions on Contra Trade shall not be applicable for trades carried out in accordance with an approved trading plan.

- 10.4. 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 UPSI 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 UPSI becomes generally available information.

- 10.5. Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

11. REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES

- 11.1. Designated Persons shall be required to provide following details of Securities transactions including the details of their immediate relatives to the Compliance officer.

11.2. *Initial Disclosure:*

- 11.2.1. Every promoter, member of the promoter group, key managerial personnel and director of the Company shall disclose his/her holding of securities of the Company as on the date of these regulations taking effect, to the company within thirty days of these regulations taking effect in prescribed form as provided under ***Annexure-II***.

- 11.2.2. 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 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 in the prescribed form – ***Annexure-III***.

11.3. *Continual Disclosure:*

- 11.3.1. Every promoter, member of the promoter group, designated person and director of every company shall disclose in ***Annexure-IV*** to the company the number of such securities acquired or disposed of if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of ten lakh rupees or such other value as may be specified of within two trading 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.



11.4. *Disclosure by the Company to the Stock Exchange(s):*

11.4.1. Upon receipt of disclosure or becoming aware of information under sub-clause of 11.3 for Continual Disclosure, the Company shall notify the particulars of such trading to the stock exchanges on which the securities of the Company are listed within two trading days.

11.4.2. The Compliance officer shall maintain records of all the declarations in the appropriate form given by the directors / officers / designated person for a minimum period of five years.

11.5. *Annual Disclosure:*

Designated Persons shall furnish to the Compliance Officer in *Annexure-V* an annual statement of their holdings in securities of the Company as on 31st March, within 30 days of the close of each financial year.

12. MECHANISM FOR PREVENTION OF INSIDER TRADING

The Managing Director of the Company has put in place adequate and effective system of Code of Conduct to Regulate, Monitor and Report Trading by Insiders of internal controls to ensure compliance with the requirements to prevent insider trading. The internal Control shall include all the provisions which are mentioned in the Regulations. A list of all employees and other persons with whom UPSI is shared shall be maintained and if necessary, agreements shall be signed, and due Notice shall be served to such persons. The Board shall review and evaluate the effectiveness and internal controls.

13. PENALTIES

13.1. Every Designated Person shall be individually responsible for complying with the provisions of the Code including to the extent the provisions hereof are applicable to his/her immediate relatives.

13.2. Any Designated Person who trades in securities or communicates any information for trading in securities in contravention of the code of conduct may be penalised and appropriate action shall be taken by the company.

13.3. Designated person or their immediate relatives who violates the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, recovery, clawback, ineligibility for future participation in Employee Stock Option Plans, etc.

13.4. The action by the company shall not preclude SEBI from taking any action in case of violation of the Regulations.



14. REVIEW, AMENDMENTS AND DISCLOSURES

- 14.1. Company's Board will monitor the effectiveness and review the implementation of this Code, considering its suitability, adequacy and effectiveness or ensure it meets the requirements of legislation.
- 14.2. Company reserves the right to vary and/or amend the terms of this Code from time to time.
- 14.3. This Code and any subsequent amendment(s) thereto, shall be promptly intimated to the Stock Exchanges, if required under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and/or SEBI (Prohibition of Insider Trading) Regulations, 2015 and any amendment(s) or re-enactment thereto.
- 14.4. The company shall disclose this code on the website of the Company at www.aarvee.com and a web link in the Annual report.

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Annexure-I

APPLICATION CUM UNDERTAKING FOR PRE-CLEARANCE OF TRADE

(In terms of the Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons)

To,

The Compliance Officer

Aarvee Engineering Consultants Limited

Sri Nagar Colony, Hyderabad.

Dear Sir,

I seek approval to purchase/sale _____ equity shares/other securities of the Company as per the details given below.

1.	Name of Designated Person	
2.	Name of person (in case of immediate relative) in whose name the transaction will take place.	
3.	Designation, Department and Employee Id	
4.	PAN	
5.	Existing holding of shares/securities	
6.	Folio No./DP ID/Client ID	
7.	Nature of transaction: Purchase/Sale	
8.	Proposed Quantity	
9.	Approx price at which transaction is proposed	
10.	Mode of transaction: Private/Open Market	
11.	Purpose of purchase/sale	

In this relation, I undertake that:

- I have no access to nor am I in possession of any unpublished price sensitive information at the time of making this application.
- I have read and understood the provisions of the Company's Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons and the SEBI (Prohibition of Insider Trading) Regulations, 2015 and will abide by the same.
- I will make necessary disclosures under the above said provisions from time to time.
- I will execute the trade within 7 trading days of pre-clearance.
- I have made full and true disclosure in this application.

Date:

Place:

Signature:

(For Office use only)

Date of receipt of application: Date of communication of pre-clearance or otherwise:

Reason for not giving pre-clearance: Signature of Compliance Officer



Annexure-II

FORM A

(Initial Disclosure to be given by every promoter, member of the promoter group, key managerial personnel and director of 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 No., CIN/DIN & address 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	

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

Signature:

Designation:

Date:

Place:



**Annexure-III
FORM B**

(Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015)

[Regulation 7 (1) (b) read with Regulation 6(2)]

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 No., CIN/DIN & Address with contact nos.	Category of Person (Promoters/ KMP / Director s/immediate relatives /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	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	
			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	

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

Signature:

Designation:

Date:

Place:

Annexure-IV

FORM C

[Regulation 7 (2) read with Regulation 6(2)]

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 No., CIN/ DIN, & addresses of Promoter/ Employee/ Director or with contact nos.	Category of Person (Promoter/ KMP/ Directors/ immediate relatives/ others etc.)	Securities held prior to acquisition/ disposal		Securities acquired/ Disposed		% of shareholding		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition (market purchase/ public rights/ preferential offer / off market/ Inter-se transfer etc.	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Pre transaction	Post transaction	From	To			Buy		Sell		
												Value	Number of units (contracts * lot size)	Value	Number of units (contracts * lot size)	
1	2	3	4	5	6	7	8	9		11	12	13		15	16	17

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

Signature:

Designation:

Date:

Place:



Annexure – V

ANNUAL DISCLOSURE BY DESIGNATED PERSONS

(In terms of the Code of Conduct to Regulate, Monitor and Report
Trading by Designated Persons)

To,
The Compliance Officer
Aarvee Engineering Consultants Limited
Sri Nagar Colony, Hyderabad.

Dear Sir,

I wish to inform you that I along with my immediate relatives are holding equity shares/other securities of the Company as follows:

Name	Relation	Address	Pan	Folio no./DP ID/Client ID	No of securities held on 01.04_____	No. of securities bought during the year	No. of securities sold during the year	No. of securities held on 31.03____

Date:
Place:

Signature:
Name:

Note:

- Annual Disclosure in the above format is to be given within 30 days of close of each financial year.*
- Immediate relative means a spouse of a person, and includes parent, siblings 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.*

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