

## **Mercantile Ventures Limited**

Registered Office: SPIC House, 88, Mount Road, Guindy, Chennai – 600 032

### **MVL Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information**

*(Pursuant to Regulation 8 of the SEBI (Prevention of Insider Trading) Regulations, 2015, as approved by the Board of Directors of the Company on 28/03/2019)*

The following is the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“Code”) adopted by Mercantile Ventures Limited (MVL). This Code is consistent with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (the Regulations) and the terms used therein shall have the same meaning as given in the said Regulations:

#### **A. PARAMETERS FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

The following are the principles of Fair Disclosure adopted by MVL:

1. Unpublished Price Sensitive Information (UPSI) that would impact price discovery will be intimated to the Stock Exchanges immediately on any such credible and concrete information crystalizing or coming into the knowledge of the Company.
2. MVL will ensure that there is no selective disclosure of any UPSI
3. The Whole Time Director of the Company has been designated as the Chief Investor Relations Officer (CIRO) for the purpose of determining the information and timing of dissemination of any UPSI.
4. In case any UPSI gets disclosed inadvertently to any select persons or group of persons in the ordinary course, the CIRO will immediately take steps for disclosing such information to the Stock Exchanges and also the website of the Company.
5. MVL will provide prompt and appropriate response to queries on news reports and verification of market rumours by regulatory authorities.
6. All the functional heads and other senior executives of the Company will ensure that:
  - a. The information shared with analysts and research personnel are not UPSI. They will seek guidance from the CIRO and the Company Secretary in case it is not clear to them if any of the proposed disclosure to such analysts and research personnel would be a UPSI.
  - b. The proceedings are captured aptly and the details of disclosures made are uploaded in the website of the Company.
  - c. Share all the UPSI with the concerned personnel strictly on a need to know basis.
  - d. Keep all internal presentations and other documents relating to business plans and other related activities as classified documents and not discuss such information in public or with persons not concerned with the proposal.
  - e. Appropriate non-disclosure agreements are signed by the advisors, consultants, etc. who are engaged for advising on major business plans and similar proposals, which have not otherwise been made public.
  - f. UPSI is communicated only for legitimate purposes as per the for performance of duties and/or legal obligations

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**B. POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES**

Pursuant to Regulation 3 (1) and (2) of the Regulations, UPSI relating to the Company shall be communicated, provided or access allowed only for legitimate purposes for performance of the duties or discharge of legal obligations of the discloser and also the recipient of the information and subject to compliance with the provisions of this Code and also the Regulations.

Similarly no person shall procure UPSI except for legitimate purposes for performance of the duties or discharge of legal obligations and he shall comply with the requirements of this Code and also the Regulations

The Policy for Legitimate Purpose pursuant to Regulation 3 (2A) of the Regulations shall be the following:

- i. Legitimate Purposes of Disclosure shall be:
  - a. Disclosure for discharge of contractual or legal obligations or discharge of duties in relation to the Company by the person disclosing as well as receiving the information.
  - b. To illustrate, sharing of information in the ordinary course of business with the following persons, viz., Joint Venture partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, rating agencies, potential lenders, registrar and transfer agents, insolvency professionals or other advisors or consultants (collectively referred to as outsiders) with whom the Company is having business relationship and for the purpose of such adviser to discharge his contractual obligations arising out of such relationship.
- ii. Sharing of information with a view to evade or circumvent the prohibitions of the Regulations shall not be deemed to be a legitimate purpose and any such improper disclosure shall be dealt with in accordance with the provisions of the Regulations.
- iii. Any person in receipt of UPSI pursuant to a “legitimate purpose” shall be considered as an “insider” for the purposes of Regulations and the Code and due notice shall be given to such persons by the persons making the disclosure to maintain confidentiality of such UPSI in compliance with the Regulations.
- iv. Any person who receives UPSI knowing it to be an UPSI shall be deemed to have received notice from the Company of the requirement to maintain confidentiality and he shall be deemed to have agreed to such confidentiality requirements if he receives such UPSI.
- v. The Company shall maintain structured digital database containing the names of such persons or entities as the case may be with whom UPSI is shared under this Code read with the Regulations along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available or as may be specified under the PIT Regulations from time to time.

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**C. PROCEDURE FOR INQUIRY IN CASE OF LEAK OF UPSI**

Leak of any UPSI in contravention of the provisions of the PIT Regulations and/or the confidentiality requirements shall be viewed very seriously and shall be dealt with as follows:

- i. When any leak is suspected the same shall be brought to the notice of the Compliance Officer (CO) who shall inform the MD/CIRO immediately. He shall initiate actions for a preliminary inquiry into the matter to determine if a more detailed inquiry is warranted. For this purpose the Compliance officer shall take the guidance of the MD/CIRO.
- ii. The CO based on the findings shall submit the findings of the preliminary assessment to the CIRO. If such findings point to a prima facie case for further actions the CIRO shall constitute an Inquiry Committee (IC) to conduct the investigation / enquiry process.
- iii. The IC shall conduct a detailed inquiry after collecting requisite evidence, documents and summoning such of the individuals for personal appearance as deemed necessary.
- iv. The inquiry shall be conducted in confidence and the IC shall submit the inquiry report to the CIRO. The Report shall contain detailed findings supported by evidence, the consequences of the leak and the quantum of punishment to be awarded. The CIRO may call for such further information as may be required, if he is of the view that the information contained in the report is inadequate and the IC shall provide the same.
- v. The CIRO shall, promptly on receipt of the preliminary enquiry report pointing to any leak /suspected leak of UPSI, cause information to be given to SEBI about such leakage/suspected leakage and followed by intimation about initiation of detailed inquiry, if any. Post inquiry, the details of violations, person involved, undue profit made out of it and such any other significant findings are to be furnished to SEBI.
- vi. The Report of the IC shall be considered by the MD/CIRO in consultation with the Chairman of the Company he shall determine the quantum of punishment.
- vii. All the documents and other records relating to the inquiry shall be handed over to the Compliance Officer for safe custody which shall be maintained in tact as per the archival policy of the Company.

**D. WHISTLE BLOWER POLICY FOR UPSI**

Any employee who becomes aware of leak of any UPSI by any person in breach of the provisions of this Code and the Regulations, may bring the same to the notice of the concerned internal authority as per the process laid down in the Whistle Blower Policy of the Company laid down under S. 177 of the Companies Act, 2013. He will be deemed as a Whistle Blower and shall be entitled to protection under the said Policy.

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**E. VALIDITY, AMENDMENTS AND REPEAL**

- i. This Code shall be effective from 1st April 2019 and shall remain in force until abrogated or withdrawn or replaced by the Board and consequently the Code approved by the Board on 11<sup>th</sup> May 2015 shall stand repealed.
- ii. This Code can be amended or abrogated at any time by the Board of Directors of the Company.

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**Annexure D**

**Draft**

**Code of Internal Procedures and Conduct for Regulation, Monitoring and Reporting of Trading in the Securities of Mercantile Ventures Limited by the Designated Persons and their Immediate Relatives (Internal Procedures and Conduct)**

WHEREAS under Regulation 9 of the Regulations, the Company is required to formulate a code of conduct to regulate, monitor and report trading by the Designated Persons and their immediate relatives towards achieving compliance with the said Regulations adopting the minimum standards set out in Schedule B thereto.

AND

WHEREAS, the Board of Directors of the Company has approved the following Code at the meeting held on \_\_\_\_\_.

NOW THEREFORE, this Code of conduct for regulation, monitoring and reporting of trading in the securities of Mercantile Ventures Limited (MVL) by the Designated Persons and their immediate relatives is hereby published for strict compliance by all concerned.

**1. Title and Applicability**

- a. This Code shall be called “The Code of Internal Procedures and Conduct for Regulation, Monitoring and Reporting of trading in the securities of Mercantile Ventures Limited by the Designated Persons and their Immediate Relatives.
- b. It shall come into force with effect from 1<sup>st</sup> April 2019
- c. This Code shall apply to all the Designated Persons and their ‘Immediate Relatives’ as defined under this Code.

**2. Definitions**

- a. “Act” means the Securities and Exchange Board of India Act, 1991
- b. “Board” means the Board of Directors of Mercantile Ventures Limited
- c. “Chief Investor Relations Officer” shall mean the Whole Time Director of the Company
- d. “Company” or “MVL” means Mercantile Ventures Limited
- e. “Code” means the Code of Internal Procedures and Conduct for Regulation, Monitoring and Reporting of Trading in the Securities of Mercantile Ventures Limited
- f. “Compliance Officer” means the officer performing the duties of the Company Secretary, for the time being and he shall report to the Board. He shall provide report on the compliance with the Regulations for review by the Chairman on an annual basis or at such other frequency as may be decided by the Board from time to time.
- g. “Connected person” means any person who is covered under Regulation 2 (d) of the Regulations
- h. “Designated Persons” shall include the following:
  - i. All the Executive Directors of the Company
  - ii. All the employees upto two levels below the Board level of the Company and also its material subsidiaries, irrespective of their functional role or the ability to have access to Unpublished Price Sensitive Information in the Company or as the case may be in the subsidiary.
  - iii. All the other employees of the Company and of the material subsidiaries who on the basis of their functional roles in the Company or as the case may be in the subsidiary, have access to the Unpublished Price Sensitive Information
  - iv. All the Promoters for the time being of the Company

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- v. All the employees in the Secretarial, Finance and Information Technology Department of the Company and not covered under the above and
- vi. Such other persons as may be specified by the Board from time to time.
- i. “Director” means a person occupying the position of a Director or an Additional Director or an Alternate Director in the Company.
- j. “Immediate Relative” means the spouse, parents, sibling and children of the 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.
- k. “Insider” shall have the meaning as contained in the Regulations as amended, and shall include Designated Persons.
- l. “Need to know” basis means that unpublished Price Sensitive Information should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.
- m. “Regulations” means the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as in force.
- n. “Securities” shall mean the equity shares and other securities, if any, of the Company listed on the stock exchanges
- o. “Trading” shall have the meaning as defined under Regulation 2 (l) of the Regulations.
- p. “Trading Day” means a day on which the recognized stock exchanges are open for trading;
- q. “Trading Window” means the period during which a designated person may buy/sell the securities of the Company, subject to this Code and applicable SEBI regulations and excluding the period(s) of book closure duly so notified in terms of Section 91 of the Companies Act, 2013.
- r. “Unpublished Price Sensitive Information” shall have the meaning as provided in Regulation 2(n) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.  
Without prejudice to the generality of the foregoing, the term shall include any information which relates directly or indirectly to the Company and which if published is likely to materially affect the price of Securities of the Company.
- s. Words and expressions used and not defined herein but defined in the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 shall have the meanings respectively assigned to them in that Regulation.

***The term “Designated Person” in this Code shall include their Immediate Relatives, wherever the context so warrants.***

### **3. Prohibition on trading of the securities of the Company by Designated Person and Immediate Relatives**

No Designated Person when in possession of any Unpublished Price Sensitive Information (UPSI) pertaining to the Company, as defined in the Regulations, shall trade in the Securities. This restriction shall apply also to the Immediate Relative of a Designated Person.

### **4. Prohibition on communication or procurement of unpublished information by Designated Person**

- a. No Designated Person shall communicate, provide, or allow access to any UPSI, relating to the Company or the securities to any person including other Designated Persons or Insiders except where such communication is in furtherance of legitimate

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- purposes, performance of duties or discharge of legal obligations and except in the manner provided under the Regulations, this Code and the Code for Fair Disclosures.
- b. The Designated Person shall maintain confidentiality of all UPSI and disclose the same only to those within the Company and outside who need the information to discharge their duties and obligations.
  - c. No Designated Person shall pass on such information to any person, directly or indirectly, by way of making a recommendation for the purchase or sale or otherwise deal in the Securities of the Company.
  - d. All non-public price sensitive information directly received by any employee should immediately be reported to the Head of the Department.
  - e. In case of doubts on whether information is unpublished and price sensitive, clarification may be sought from the Chief Investor Relations Officer or the Compliance Officer.
  - f. Chinese Wall:
    - (i) To prevent the misuse of unpublished price sensitive information, the Company adopts a “Chinese Wall” policy separating those areas of the Company which routinely have access to such confidential information, considered “core areas” and other departments providing support services, considered “other areas”.
    - (ii) The employees and other persons operating in the core area shall not communicate any Price-Sensitive Information to anyone in other area.
    - (iii) In exceptional circumstances employees from the other areas could be allowed to “cross the wall” and given confidential information on the basis of “need- to-know” criteria and with the concurrence of the immediate supervisor.

### **5. Trades by Designated Persons and their Immediate Relatives**

Trading in the securities of the Company by a Designated Person or the Immediate Relatives covered under this Code shall be subject to the following provisions:

- a. A Designated Person who intends to trade in the securities may execute a trade when the Trading Window is not closed subject to pre-clearance by the Compliance Officer.

*Provided that no pre-clearance shall be required if the gross value of trades by an individual during a calendar quarter is not more than Rs.50,000 in a month.*
- b. The Application shall be made in **Form I** annexed to this Code
- c. No Application for pre-clearance shall be made by a Designated Person when he is in possession of any UPSI, even if the Trading Window is not closed.
- d. Prior to granting approval for pre-clearance the Compliance Officer may seek a declaration to the effect that the applicant is not in possession of any UPSI.
- e. The Compliance Officer shall scrutiny the application with specific focus on the timing of the application and the veracity of the information and declarations by the applicant before approving the same.
- f. Granting of preclearance shall be done with the consent of the competent authority as stated below for the Designated Persons:

<b>Sl. No</b>	<b>Description</b>	<b>Competent Authority</b>
01	Chairman	Board of Directors
02	Other Directors	Chairman
03	Compliance Officer and other Designated Persons	Whole Time Director

- g. Once the pre-clearance for any trade is granted, the applicant shall execute the trade within 7 trading days of such approval failing which he shall make a fresh application

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for pre-clearance duly explaining the reasons for failing to execute the trade as per the previous approval.

- h. All pre-clearance accorded shall be placed before the Board on a quarterly basis and recorded.

### **Other Conditions**

- i. No trades shall be made by the Designated Persons during the closure of Trading Window
- j. The Designated Persons shall execute the Trade subject to complying with the Code, the Regulations and other applicable laws.
- k. The Designated Person who has been permitted to execute any Trade under this Code shall not be permitted to enter into a contra trade within six months of execution of the permitted trade, other than trades pursuant to exercise of employee stock options.
- l. The Compliance Officer may grant relaxation to a Designated Person from the above for reasons to be recorded in writing provided that such relaxation does not violate the Code and the Regulations.
- m. In the event of any contra trade taking place, inadvertently or otherwise, the profits, if any, from such contra trade shall be liable to be disgorged from the Designated Person and remitted to the Investor Protection and Education Fund administered by the Securities and Exchange Board of India (SEBI)
- n. All the trades shall be executed only in dematerialized form unless otherwise approved specifically by the Compliance Officer in writing.
- o. Notwithstanding anything contained under this Code, execution of trades by the Directors and Promoters shall be subject to compliance with the other provisions of the Act, Companies Act, 2013 and other securities laws for the time being in force.

### **6. Trading Restrictions and closure of Trading Window**

- a. No Designated Person shall trade in the Securities of the Company during the period(s) when the Trading Window is closed.
- b. Unless otherwise notified by the Compliance Officer, the Trading Window shall remain closed from the end of every calendar quarter until 48 hours after disclosure of the financial results for the relevant quarter.
- c. The Trading Window shall remain closed in connection with the following for periods as may be specified by the Compliance Officer/Chief Investor Relations Officer:
- ✓ Issue of Securities by way of public/rights/bonus etc.
  - ✓ Buyback of shares/Debentures;
  - ✓ Proposal for Dividends [both interim and final];
  - ✓ Significant expansion plans or new projects;
  - ✓ Acquisition/amalgamation/merger/takeover ;
  - ✓ Disposal of whole or substantially the whole of the undertaking;
  - ✓ Significant changes in plans or operations of the Company;
  - ✓ Any other event as may be decided by the Chief Investor Relations Officer.
- d. In case of Employees Stock Option/Purchase Schemes, exercise of option may be allowed in the period when the Trading Window is closed. However, sale of shares allotted on exercise of the Schemes shall not be allowed when Trading Window is closed.
- e. No Designated Person shall trade in the securities of the Company for a period of six months after ceasing to be a Designated Person.



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- f. No employee of the Company, not being a Designated Person or his Immediate Relatives shall execute any trade in the securities of the Company for a period of 30 trading days after cessation of employment by superannuation or otherwise. He shall give an undertaking to this effect at the time of ceasing to be an employee of the Company.

**For the purpose of Clause (5) and (6), the term Designated Person shall be deemed to include his respective Immediate Relatives**

### **7. Prohibition of Speculative Transactions**

- a. No employee whether or not a Designated Person and his Immediate Relatives shall engage in speculative transactions with respect to the securities of the Company.
- b. For a transaction to qualify as being for investment purpose and not as speculative, the person investing in the shares shall be required to hold the investment for a minimum period of 30 days. This restriction shall also apply to subscription to an issue of shares by the Company (public, rights or otherwise), in which case the holding period would be reckoned from the date the Securities are actually allotted in favour of the concerned employee;

Provided that where sale of Securities of the Company is necessitated due to personal emergency, the Compliance Officer may, after obtaining consent of the Competent Authority mentioned in Clause 5 (o) above and for valid and justifiable reasons to be recorded in writing, waive the minimum holding period.

### **8. Disclosures and Reporting**

- a. All the persons covered under the Regulations shall make disclosures as stipulated in Chapter III of the Regulations in the Form and in the manner prescribed therein.
- b. The Designated Persons who are covered under this Code shall make the following disclosures with respect to themselves as well as their Immediate Relatives in relation to their holding/transactions in the Securities of the Company:
- i. Initial Disclosure
    - a. The number of shares or voting rights held by him/her and his/her Immediate Relatives in **Form II**, within 30 days of this Code coming into force.
    - b. All the Designated Persons shall disclose the names and PAN of their Immediate Relatives and Persons with whom they share a material financial relationship and also the details of the educational institutions from which they have graduated and also the details of their past employments in **Form IIA**.
    - c. Disclosure shall be made in **Form III**, within 7 (seven) working days on becoming covered under this Code at any point of time.
  - ii. Continual Disclosure

Any transaction in securities of the Company by a Designated Person and/or his Immediate Relatives shall be disclosed within 2 trading days of such transaction and where pre-clearance has been accorded but not executed shall also be reported within 2 trading days of expiry of the period for executing the trade as per the pre-clearance in **Form IV**.



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disciplinary action including but not limited to wage freeze, suspension, recover, claw back, withholding of promotions and so on.

- b. The provisions contained in this Code shall be in addition to and not in derogation or substitution of any duty, obligation or requirement on the part of an Designated Person including the Immediate Relative of such Designated Person under the Standing Orders or code of conduct for the employees of MVL or the Agreement/Contract entered into with MVL as the case may be.

### **12. General**

A copy of the Regulations is available with the Secretarial Department and is also available in the website of SEBI [www.sebi.gov.in](http://www.sebi.gov.in) . Employees are required to acquaint themselves with the Regulations and the Code and comply with the same without any default.

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**FORM I**

Application for pre-clearance for dealing in Securities

(Refer Clause 5 of The Code of Internal Procedures and Conduct for Regulation, Monitoring and Reporting of trading in the securities of Mercantile Ventures Limited)

1.	Employee No.	
2.	Name	
3.	PAN	
4.	Designation & Location	
5.	Pre-clearance sought for (strike off whichever is not applicable)	Purchase/ Sale /Others
6.	If the transaction is proposed to be effected other than in the name the Applicant please mention the name of such person and the nature of relationship.	
7.	No. of shares proposed to be bought / sold	
8.	No. of shares held as on date (Give Folio/Demat A/c ) by the Applicant and Immediate Relatives	Refer Annexure A
10.	Is the trade proposed to be done through the stock market or through an off-market trade	
11.	Any other relevant information	

I hereby confirm and declare that

- a. I do not have any access or have not received up to the time of signing the undertaking any “Price Sensitive Information” which has remained unpublished and not in the public domain (UPSI).
- b. In case I get access to or receive UPSI after the signing of the undertaking but before the execution of the transaction, I shall inform the Compliance Officer of the Company and not execute the trade till the time such information becomes public.
- c. I have made a full and true disclosure while applying for clearance to trade.
- d. I undertake to execute the trade within seven trading days from the date of approval failing which I agree to obtain fresh approval.
- e. I agree to hold any securities purchased pursuant to this pre clearance for a minimum period of 30 days from the date of purchase.
- f. I have not contravened this code.
- g. Reasons for not executing Trade as per the previous approval (If applicable)

Date:

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**Signature**



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**FORM – II**

**(Refer Clause 8 of The Code of Internal Procedures and Conduct for Regulation, Monitoring and Reporting of trading in the securities of Mercantile Ventures Limited)**

**INITIAL DISCLOSURE OF SECURITIES HELD AS ON 1<sup>st</sup> APRIL 2019**

1.	Employee No.	
2.	Name and Address	
3.	PAN	
4.	Designation & Location	

**A. BY THE EMPLOYEE**

Nature of security	Quantity (nos.)	Face value Rs.	If in physical form		If in Demat form	
			Folio No.	Distinctive Nos.	DP ID	Client ID
1	2	3	4	5	6	7
Equity shares		Rs. 5				

**B. BY IMMEDIATE RELATIVES**

Name & Address	Nature of Relationship	PAN	Quantity (nos.)	If in material form		If in Demat form	
				Folio No.	Distinctive Nos.	DP ID	Client ID
1	2	3	4	5	6	7	8

**CERTIFICATE**

**I hereby declare that the above disclosure is true and correct to the best of my knowledge and belief.**

Date:

Signature

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**FORM – IIA**

(Refer Clause 8 of The Code of Internal Procedures and Conduct for Regulation, Monitoring and Reporting of trading in the securities of Mercantile Ventures Limited)

DETAILS OF IMMEDIATE RELATIVES AND OTHER INFORMATION

**I PERSONAL INFORMATION**

1.	Employee No.	
2.	PAN	
3.	Designation & Location	

**II DETAILS OF IMMEDIATE RELATIVES/ PERSONS WITH WHOM MATERIAL FINANCIAL RELATIONSHIP IS MAINTAINED**

Sl. No	Name of the Person	Nature of Relationship	Phone, Cell and Mobile Nos. used by the person

“Material Financial Relationship” shall mean a relationship in which one person is recipient of any kind of payment such as by way of loan or gift during immediately preceding twelve months, equivalent to at least 25% of such payer’s annual income other than payments based on arm’s length transactions.

**III DETAILS OF EDUCATION INSTITUTIONS**

Sl. No	Name of the Institution and place	Course	Period of Study (From/To)

**IV DETAILS OF PAST EMPLOYMENT**

Sl. No	Name of the employer and place	Designation on leaving	Period of service (From/To)

**CERTIFICATE**

I hereby declare that the above disclosure is true and correct to the best of my knowledge and belief.

Date:

Signature

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**FORM – III**

(Refer Clause 8 of The Code of Internal Procedures and Conduct for Regulation, Monitoring and Reporting of trading in the securities of Mercantile Ventures Limited)

**DISCLOSURE OF DETAILS OF SECURITIES OF MERCANTILE VENTURES LIMITED HELD AS ON THE DATE OF BECOMING A DESIGNATED PERSON**

1.	Employee No.	
2.	PAN	
3.	Designation & Location	
4.	Date of becoming a Designated Person under the Code	

**SHAREHOLDING DETAILS**

**A. BY THE EMPLOYEE**

Nature of security	Quantity (nos.)	Face value Rs.	If in physical form		If in Demat form	
			Folio No.	Distinctive Nos.	DP ID	Client ID
1	2	3	4	5	6	7
Equity shares		Rs. 5				

**B. BY IMMEDIATE RELATIVES**

Name & Address	Nature of Relationship	PAN	Quantity (nos.)	If in material form		If in Demat form	
				Folio No.	Distinctive Nos.	DP ID	Client ID
1		2	3	4	5	6	7

**CERTIFICATE**

I hereby declare that the above disclosure is true and correct to the best of my knowledge and belief.

Date:

Signature



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**FORM IV**

**MERCANTILE VENTURES LIMITED**

Intimation of dealing in Securities

(Refer Clause 8 of the Code of Internal Procedures and Conduct for Regulation, Monitoring and Reporting of trading in the securities of Mercantile Ventures Limited)

1.	Employee No.	
2.	PAN	
3.	Designation & Location	

To

The Compliance Officer, Mercantile Ventures Limited

I wish to inform you that the following are the details of dealings in the Securities of the Company by me/Immediate Relatives:

Name, PAN and address of the person	Nature of Relationship	Nature of transaction	No. of shares	Price per share	Total value	Mode of transaction	Total Holding after the transaction	Remarks (Preclearance or other relevant information)
1	2	3	4	5	6	7	8	9

**REPORT ON TRANSACTIONS IN SECURITIES OF MERCANTILE VENTURES LIMITED NOT EXECUTED AFTER SECURING PRE-CLEARANCE.**

<b>DETAILS OF PRE-CLEARANCE OBTAINED</b>	
<b>REASON FOR NOT EXECUTING THE TRANSACTION</b>	

**CERTIFICATE**

I hereby declare that the above disclosure is true and correct to the best of my knowledge and belief and that I have not contravened the Code.

Place:

Date:

Signature

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**FORM – V**

(Refer Clause 8 of the Code of Internal Procedures and Conduct for Regulation, Monitoring and Reporting of trading in the securities of Mercantile Ventures Limited)

***(To be disclosed within two trading days by an Employee who is not a Designated Person if the value of securities traded whether in one transaction or series of transactions during a calendar month aggregates to a traded value in excess of Rs. 50,000)***

To  
Compliance Officer  
Mercantile Ventures Limited

1.	Employee No.	
2.	PAN	
3.	Designation & Location	

I wish to inform you that the following are the details of dealings in the Securities of the Company by me/Immediate Relatives in excess of Rs. 50,000/- during the month of \_\_\_\_\_

Name, PAN and address of the person	Nature of Relationship	Nature of transaction	No. of shares	Price per share	Total value	Mode of transaction	Total Holding after the transaction	Remarks
1	2	3	4	5	6	7	8	9

**CERTIFICATE**

I hereby declare that the above disclosure is true and correct to the best of my knowledge and belief and that I have not contravened the Code.

Date:

Signature

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Registered Office: SPIC House, 88, Mount Road, Guindy, Chennai – 600 032

**FORM – VI**

(Refer Clause 8 of the Code of Internal Procedures and Conduct for Regulation, Monitoring and Reporting of trading in the securities of Mercantile Ventures Limited)

**ANNUAL STATEMENT OF HOLDING OF SECURITIES IN MERCANTILE VENTURES LIMITED AS ON 31<sup>ST</sup> MARCH**

To  
Compliance Officer  
Mercantile Ventures Limited

1.	Employee No.	
2.	PAN	
3.	Designation & Location	

**DETAILS OF SECURITIES HELD AS ON**

Name of the Holder, Address and PAN	Nature of Relationship	Quantity held on 01-04-__	Transactions during the year		Quantity held as on 31-03-__	Folio/ DP/CL ID
			Acquisition	Sale		
1	2	3	4	5	6	7

**CERTIFICATE**

I hereby declare that the above disclosure is true and correct to the best of my knowledge and belief and that I have not contravened the Code.

Date:

Signature