

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

# MEDICO REMEDIES LIMITED

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## 1. INTRODUCTION:

The Board of Directors of the Company have adopted this Code of Conduct to Regulate, Monitor and Report Trading by Insiders to comply with the SEBI (Prohibition of Insider Trading) Regulations, 2015.

The Code of Conduct to Regulate, Monitor and Report Trading by Insiders provides guidelines to directors, officers, employees, consultants and other stakeholders of Medico Remedies Limited (the “Company”) with respect to trading in Company’s securities.

The Company reserves the right to amend or rescind this Policy or any portion of it at anytime and to adopt different policies and procedures as and when required.

## 2. OBJECTIVE:

The objective of this policy is to preserve the confidentiality of un-published 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.

To achieve these objectives, Medico Remedies Limited hereby notifies that this Code of Conduct is to be followed by all directors, officers, designated employees and connected persons.

## 3. APPLICABILITY:

This policy is applicable with effect from 25<sup>th</sup> May, 2018 to the insiders including designated persons and their immediate relatives.

## 4. DEFINITIONS:

**4.1 “Regulation”** means The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation, 2015.

**4.2 “Companies Act”** means The Companies Act, 2013 and rules made thereunder.

**4.3 “Board”** means the Board of Directors of the Company.

**4.4 “Company”** means “**Medico Remedies Limited**”.

**4.5 “The Code” or “This Code”** shall mean the Code of Conduct to Regulate, Monitor and Report Trading by Insiders of the Company as amended from time to

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time.

- 4.6** “SEBI” means Securities Exchange Board of India.
- 4.7** “SEBI Act or Act” means Securities and Exchange Board of India Act, 1992.
- 4.8** “Committee” means the Audit Committee of the Board or such other committee as may be nominated by the Board for the purpose of this Policy.
- 4.9** “Key Managerial Personnel” or “KMP” means person as defined in Section 2(51) of the Companies Act, 2013.
- 4.10** “Compliance Officer” means any senior officer, designated so and reporting to the board of directors or head of the organization in case board is not there, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and 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 implementation of the codes specified in these regulations under the overall supervision of the board of directors of the listed company or the head of an organization, as the case may be.

(Explanation - For the purpose of this regulation, “financially literate” shall mean a person who has the ability to read and understand basic financial statements i.e. balance sheet, profit and loss account, and statement of cash flows;

- 4.11** “Designated Person(s)” means and include:
- a. All Promoters and Directors of the company;
  - b. Key managerial Personnel (KMP) of the Company;
  - c. All Vice Presidents / General Managers of the Company;
  - d. An officer or employee of the company who has an access to the Unpublished Price Sensitive Information (UPSI) relating to the company;
  - e. 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 and has directly or indirectly, access to unpublished price sensitive information;
  - f. Any person who in the opinion of the Board of Directors of the Company has access to or likely to have access to unpublished price sensitive information relating (UPSI) to the Company;
  - g. An immediate relative of the persons stated in a to f above;
  - h. any person having contractual or fiduciary relation with the company, such

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as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the company and having access to unpublished price sensitive information

- i. Such other person as may be notified from time to time by the SEBI or any other competent authority.

**4.12 “senior management”** means personnel of the company who are members of its core management team excluding Board of Directors.

**4.13 "generally available information"** means information that is accessible to the public on a non-discriminatory basis;

**4.14 “immediate relative”** means a spouse of a person, and includes parent(s), sibling(s), 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;

**4.15 "insider"** means any person who is either:

- a. a connected person; or
- b. in possession of; or
- c. has access to unpublished price sensitive information.

**"Connected person"** means - (i) any person who is or has during the six months prior to the concerned act been associated with the company, directly or indirectly, in any capacity including the following, 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

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- (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 recognized 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;

**“Deemed to be connected person”** means any person(s) falling within the following categories shall be deemed to be connected person(s) unless the contrary is established:

- a) an immediate relative of connected persons specified in clause 4.16.1; 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 recognized 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.

**4.16 "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.

**4.17 “Promoter group”** shall have the same meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure

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Requirements) Regulations, 2018 or any modification thereof.

**4.18 "securities"** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof;

**4.19 "specified"** means specified by the SEBI in writing.

**4.20 "takeover regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;

**4.21 "trading"** means and includes an act of subscribing, redeeming, switching buying, selling, dealing, or agreeing to subscribe, redeem, switch, buy, sell, deal in any securities, and "trade" shall be construed accordingly;

**4.22 "trading day"** means a day on which the recognized stock exchanges are open for trading;

**4.23 "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:

- (i) financial results;
- (ii) dividends;
- (iii) change in capital structure;
- (iv) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
- (v) changes in key managerial personnel;

Unless the context otherwise requires, words and expressions used in this policy and not defined herein but defined in the Regulation, Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation as may be amended from time to time, shall have the meaning respectively assigned to them therein.

## 5. PRESERVATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION

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All Designated persons shall maintain confidentiality of all Unpublished Price Sensitive Information. Designated persons shall not pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sale of securities. Following practices should be followed in this regard.

## **5.1 NEED TO KNOW BASIS**

Unpublished Price Sensitive Information is to be handled on a "need to know" basis, i.e. 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 information.

## **5.2 CONFIDENTIALITY OF UPSI**

All Unpublished Price Sensitive Information shall not be disclosed to any person except on need to know basis. If an Insider/Designated Person receives any query from outside the company for information that may be material, the inquiry should be referred to the Compliance Officer of the Company, who is responsible for coordinating and overseeing the release of that information to the investing public, securities analysts and others in compliance with applicable laws and regulations.

## **5.3 MAINTENANCE OF STRUCTURED DIGITAL DATABASE**

The Board of Directors shall ensure that a Structured Digital Database is maintained containing the names of such persons or entities as the case may be with whom UPSI is shared along with the Permanent Account Number ("PAN") or any other identifier authorized by law where Permanent Account Number is not available. Such databases shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.

The Board of Directors or any person, authorised by the Board of Directors, required to handle UPSI shall ensure that the structured digital database is preserved for a period of not less than eight years after completion of the relevant transactions and in the event of receipt of any information from the Board regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.

## **6. RESTRICTIONS ON COMMUNICATION OR PROCUREMENT OF UPSI**

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**6.1** An Insider/Designated Person shall not communicate, provide, or allow access to any UPSI, relating to the Company or its securities, to any person including other insiders, except as provided in the proviso.

**6.2** No person shall procure from or cause the communication by any Insider/Designated Person 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, in connection with a transaction that would:

- a. require an obligation to make an open offer under takeover regulations where Board of Directors are of opinion that the proposed transaction is in the best interests of the Company.
- b. not attract the aforesaid obligation to make an open offer under takeover regulations but the Board of Directors are of the opinion that proposed transaction is in the best interests of the Company and UPSI is disseminated to be made generally available at least 2 working days prior to the proposed transaction.

However, pursuant to appropriate confidentiality, the board shall require the parties to execute non-disclosure agreement in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

## **7. RESTRICTIONS ON INSIDER TRADING**

An insider/designated person shall not, directly or indirectly, trade in securities that are listed or proposed to be listed on a stock exchange when in possession of UPSI.

(Explanation - When a person who has traded in securities has been 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.)

Provided that the restrictions mentioned above shall not apply when:

- a. The transaction is an off-market inter-se transfer between insiders who were in possession of the same unpublished price sensitive information without being in breach of regulation 3 and both parties had made a conscious and informed trade decision.



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- b. The transaction was carried out through the block deal window mechanism between persons who were in possession of the unpublished price sensitive information without being in breach of regulation 3 and both parties had made a conscious and informed trade decision;

Provided that such unpublished price sensitive information was not obtained by either person under sub regulation (3) of regulation 3 of these regulations.

- c. The transaction in question was carried out pursuant to a statutory or regulatory obligation to carry out a bonafide transaction.
- d. The transaction in question was undertaken pursuant to the exercise of stock options in respect of which the exercise price was pre-determined in compliance with applicable regulations.
- e. In case of non-individual insiders:
  - i. The individuals in possession of such unpublished price sensitive information were different from the individuals taking trading decisions and such decision-making individuals were not in possession of such unpublished price sensitive information when they took the decision to trade; and
  - ii. appropriate and adequate arrangements are in place to ensure that the regulations are not violated and no unpublished price sensitive information is communicated by the Insider to the individuals taking trading decisions and there is no evidence of such arrangements having been breached;

## **8. TRADING PLANS**

An insider/designated person who is perpetually in possession of the information shall be expected to trade in accordance with the approved trading plan.

The trading plan formulated by insider/designated person shall be presented to the compliance officer for approval.

The compliance officer shall review and approve the trading plan if it complies with the SEBI regulations and shall disclose the trading plan to the stock exchanges.

The provision intends to give an option to persons who may be perpetually in possession of unpublished price sensitive information and enabling them to trade in securities in a compliant manner.

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Insiders desiring to formulate trading plan(s) may do so in accordance with the provisions of the SEBI Insider Regulations.

## 9. TRADING WINDOW:

- 9.1** Trading window shall be used as an instrument of monitoring trading by the designated persons. 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 policy.
- 9.2** All designated persons and connected persons shall conduct all their dealings in the securities of the company only when the trading window is open and no insider/designated person shall deal in the securities of the company during such period when the trading window is closed or during any other period as may be specified by the compliance officer from time to time. The period during which the trading window is closed shall be termed as prohibited period.
- 9.3** The trading window shall be closed 3 days prior to UPSI becoming generally available and the same shall be opened 48 hours after the information becomes generally available.

## 10. PRECLEARANCE OF TRADES

- 10.1** Every Designated Person (including his immediate relative) who intends to trade in the securities of the Company, when trading window is open, shall seek pre-clearance of transactions(s) before entering into such transaction(s) as per the pre-clearance procedure described hereafter, 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. 10 Lacs.
- 10.2** No Designated Person shall apply for pre-clearance of any proposed trade if such person is in possession of unpublished price sensitive information.
- 10.3** The authority for pre-clearance of trades shall be as under:

<b>Trading by following designated persons (Including their immediate relatives)</b>	<b>Authority for Pre-clearance</b>
Directors & Promoters	The Committee
Compliance Officer	MD

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Other Designated Employees	Compliance Officer
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- 10.4** Prior to approving any trades, the compliance officer or the concerned authority shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any unpublished price sensitive information. The authority shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.
- 10.5** The approval shall be granted within five trading days or such further time from the date of acknowledgement. In exceptional circumstances approval may not be given if there are reasons to believe that the proposed transaction is on the basis of possession of any unpublished price sensitive information. There shall be no obligation to give reasons for any withholding of approval.
- 10.6** Designated persons who seek pre-clearance shall execute the trade(s) in respect of securities of the company within 7 (seven) trading days from the date of the approval for pre-clearance or such shorter period as may be specified in the pre-clearance approval. If the transaction is not executed within the time specified in the pre-clearance approval, the person shall pre-clear the transaction again.
- 10.7** Designated persons who have dealt in securities of the company after obtaining pre-clearance as aforesaid shall within 2 (two) trading days of such trading inform the actual details of their transaction(s) to the compliance officer.
- 10.8** The period, in any event, shall not be less than six months, within which the designated person who is permitted to trade shall not execute a contra trade. The compliance officer in consultation with and as per advice of Managing Director and Compliance Officer may be empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate these regulations. Should a contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Board for credit to the Investor Protection and Education Fund administered by the Board under the Act.

## 11. DISCLOSURE REQUIREMENTS

### 11.1 INITIAL DISCLOSURES

Every person on appointment as Key Managerial Personnel or a director of the company

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or upon becoming a promoter or member of the promoter group shall disclose to the Compliance Officer in Form A as per Annexure - I to this policy, details of 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.

## **11.2 CONTINUAL DISCLOSURES**

Every designated person and every employee of the company shall disclose to the company in Form B as per Annexure – II to this policy, the number of such securities acquired or disposed of within two (2) 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. 10 Lacs, in the format prescribed under the SEBI Insider Regulations.

In addition, every director, key managerial personnel, vice president or any such equivalent position, general manager or any such equivalent position, assistant manager and above in the finance and accounts department and legal and secretarial department shall disclose to the Company in Form as annexed in the APPENDIX to this policy, their shareholding as on the last day of the financial year within 30 days from the end of the financial year.

For avoidance of doubt, it is clarified that the disclosure obligation under clause 11.2 is in addition to the pre-clearance obligation set out in clause 10.1.

## **11.3 DISCLOSURES BY OTHER CONNECTED PERSONS**

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

Every disclosure shall be made in such form as specified under the regulation. Disclosures shall be made by the persons, their immediate relatives and by any other person for whom such person takes trading decision. Disclosures of trading in securities shall also include trading in derivatives of securities and traded value of derivatives shall be taken into account provided that trading in derivatives of securities is permitted by any law for the time being in force.

## **12. CODE OF FAIR DISCLOSURE AND CONDUCT**

### **12.1 DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

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- 12.1.1 Disclosure/dissemination of any unpublished price sensitive information shall be done by the Compliance Officer after consultation with the Managing Director & Whole-time Director and in their absence with the Chairman of the board, by intimating to the stock exchanges and posting of the said information on the website of the company and/or otherwise making it generally available.
- 12.1.2 The Compliance Officer disseminating any unpublished price sensitive information under clause 12.1.1 shall ensure uniform and universal dissemination / disclosure to avoid selective disclosure.
- 12.1.3 No unpublished price sensitive information shall be shared with any person unless the information is made generally available i.e. only public information can be shared.

## **12.2 PROCEDURE FOR RESPONDING TO ANY QUERIES / REQUESTS FOR VERIFICATION OF MARKET RUMOURS BY STOCK EXCHANGES**

- 12.2.1 The Compliance Officer shall immediately consult the Chairman for:
- a. verification of any market rumours or queries forwarded by regulatory authorities.
  - b. appropriate public announcement with respect to market rumours.
  - c. prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information Generally Available.

## **12.3 DEALING WITH ANALYSTS/ INSTITUTIONAL INVESTORS / MEDIA**

- 12.3.1 Only following persons are severally/jointly authorized to attend a meeting or interact with analysts/researchers, institutional and other investors or the media or any investor relations conference:
- a. Chairman
  - b. Managing Director
  - c. Whole-time Directors
  - d. Compliance Officer of the company

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- 12.3.2 No unpublished price sensitive information shall be disclosed to Analysts/ Researchers or Institutional and other large investors unless prior confirmation from the Compliance Officer is obtained confirming that the said unpublished price sensitive information has been made generally available.
- 12.3.3 If any UPSI is accidentally disclosed without prior approval, the person responsible may inform the same immediately to the Compliance Officer.
- 12.3.4 The Compliance Officer shall issue a press release/transcript or post relevant information on the Company's website immediately after every analyst meet. Simultaneously, such information shall also be sent to the stock exchanges where any unpublished price sensitive information is disclosed. Alternatively, holding a live web casting of analysts meets may be considered.

**12.4** All Unpublished Price Sensitive Information shall be handled as per clause 5 of this Policy.

## **13. PENALTY(IES) AND DISCLOSURE TO SEBI**

The designated persons who violate the clauses of this policy or provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 and The Companies Act, 2013 shall be subject to disciplinary actions taken by the company which may include wage freeze, suspension, termination and ineligibility for future participation in the trading of securities of the company.

The action by the Company shall not restrict SEBI from taking any action in case of violation of any provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Any contravention of provisions of this policy, will also be subject to provisions laid down under The Companies Act, 2013 which inter alia provide that such an offence shall be punishable with imprisonment for a term which may extend to five years or with fine which shall not be less than five lakhs rupees or which may extend to twenty five crores rupees or three times the amount of profits made out of insider trading, whichever is high, or both.

### **Intimation to SEBI in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015**

In case it is observed by the Compliance Officer that there has been a violation of SEBI

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(Prohibition of Insider Trading) Regulations, 2015, by the designated person or insider then, on behalf of the Company, the Compliance Officer shall intimate the SEBI at the earliest.

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Annexure - I

## FORM A

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

{Pursuant to Regulation 7(1) (b) read with Regulation (6) (2) – Disclosure on becoming a Director/KMP/Promoter}

Name of the company : Medico Remedies Limited

ISIN of the company : INE630Y01024

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

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoter / KMP / Director / Designated Employee / 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
			Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	No. of Securities	

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

### Details of Open Interest (OI) in derivatives of the Company held by Promoter, Designated Persons including Key Managerial Persons and Director

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

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

Name:



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**Designation:**

**Date:**

**Place:**

# MEDICO REMEDIES LIMITED

Annexure - II

## FORM B

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

{ Pursuant to Regulation 7 (2) read with Regulation (6) (2) – Continual disclosure }

Name of the company : Medico Remedies Limited

ISIN of the company : INE630Y01024

#### Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6 (2)

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoter / KMP / Director / Designated Employee / immediate relatives / others etc.)	Securities held prior to acquisition/disposal		Securities acquired/disposed				Securities held post acquisition/disposal		Date of allotment advice/acquisition of shares/sale of shares specify		Date of intimation to company	Mode of acquisition/disposal (on market/public /rights/preferential offer/off market/inter-se transfer, ESOPs etc.)
		Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/Sale/Pledge/Revoked/Invoke)	Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To		

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

### Details of trading in derivatives of the Company by Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2)

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts* lot size)	Notional Value	Number of units (contracts* lot size)	

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

\_\_\_\_\_  
**Name & Signature:**

**Designation:**

**Date:**

**Place:**

# MEDICO REMEDIES LIMITED

## FORM FOR APPLICATION FOR PRE CLEARANCE OF TRADES

To  
The Compliance Officer / MD / Committee  
Medico Remedies Limited,  
1105/1106, Hubtown Solaris,  
N.S. Phadke Marg, Opp. Teligali,  
Andheri East, Mumbai - 400069

Date:

Dear Sir/ Madam,

I Mr./Ms. \_\_\_\_\_, hereby give a notice pursuant to Insider Trading Policy of your company, that I wish to trade in Securities of the Company as under:

### 1. Details of proposed transaction:

<i>Nature of Transaction (Whether "Buy" or "Sell")</i>	<i>Name of Proposed Buyer/Seller</i>	<i>No. of Equity Shares to be Bought/Sold</i>	<i>*Date of Purchase/ allotment</i>

### 2. Person executing the trade (please tick box)

Self

HUF

Immediate Relative

(specify name and relationship)

\_\_\_\_\_

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### 3. Details of Intended trade:

Name of the Depository Participant (DP)	
DP ID/Client ID / Folio Number:	
PAN	
Type of Transaction: (Open Market Purchase/ Open Market Sale/ ESOP Sale/ Off Market)	

In relation to the above trade(s), I declare that:

(a) The securities in respect of which the approval is sought, will be held/have been held by the above named for a minimum period of six months

(b) Neither me nor my dependents are in possession of or otherwise privy to unpublished Price Sensitive Information (as defined in the Company's Insider Trading Policy).

(c) I have not contravened the Policy or the SEBI (Prohibition of Insider Trading) Regulations, 2015.

(d) I have made a full and true disclosure in the matter.

(e) If approval is granted, I shall execute the trade within 7 trading days of the receipt of approval or such shorter period permitted in the approval, failing which I shall again seek pre clearance.

I am aware that I shall be liable to face penal consequences as set forth in the Company's Insider Trading Policy, in case the above declarations are found to be false or incorrect at any time. I hereby indemnify the Company and its Directors from and against any penalties imposed on them by the Securities and Exchange Board of India and/or any other statutory authorities as a result of violation of the SEBI (Prohibition of Insider Trading) Regulations 2015 and the Company's Insider Trading Policy.

Yours faithfully,

(\_\_\_\_\_)

Name & Designation:

Department:

Location:

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## FORM FOR INTIMATION OF ACTUAL TRADE AFTER OBTAINING PRE CLEARANCE OF TRADES

To  
The Compliance Officer / MD / Committee  
Medico Remedies Limited,  
1105/1106, Hubtown Solaris,  
N.S. Phadke Marg, Opp. Teligali,  
Andheri East, Mumbai - 400069

Date:

Dear Sir/ Madam,

I Mr./Ms. \_\_\_\_\_ hereby give a notice pursuant to Insider Trading Policy of your company, that I have traded in Securities of the Company as under:

### 2. Details of actual transaction:

<i>Nature of Transaction (Whether "Buy" or "Sell")</i>	<i>Name of Proposed Buyer/Seller</i>	<i>No. of Equity Shares to be Bought/Sold</i>	<i>*Date of Purchase/ allotment</i>

2. Person executing the trade (please tick  box)

Self

HUF

Immediate Relative

(specify name and relationship)

\_\_\_\_\_

### 3. Date of application of Pre - Clearance:

# MEDICO REMEDIES LIMITED

## 4. Date of Pre - Clearance obtained:

## 5. Details of actual trade:

Name of the Depository Participant (DP)	
DP ID/Client ID / Folio Number:	
PAN	
Type of Transaction: (Open Market Purchase/ Open Market Sale/ ESOP Sale/ Off Market)	

## 6. In relation to the above trade(s), I declare that:

- (a) The securities in respect of which the approval is sought, will be held/have been held by the above named for a minimum period of six months
- (b) Neither me nor my dependents are in possession of or otherwise privy to unpublished Price Sensitive Information (as defined in the Company's Insider Trading Policy).
- (c) I have not contravened the Policy or the SEBI (Prohibition of Insider Trading) Regulations, 2015.
- (e) I have made a full and true disclosure in the matter.
- (f) If approval is granted, I shall execute the trade within 7 trading days of the receipt of approval or such shorter period permitted in the approval, failing which I shall again seek pre clearance.

I am aware that I shall be liable to face penal consequences as set forth in the Company's Insider Trading Policy, in case the above declarations are found to be false or incorrect at any time. I hereby indemnify the Company and its Directors from and against any penalties imposed on them by the Securities and Exchange Board of India and/or any other statutory authorities as a result of violation of the SEBI (Prohibition of Insider Trading) Regulations 2015 and the Company's Insider Trading Policy.

Yours faithfully,

(\_\_\_\_\_)

Name & Designation:

Department: Location: