



FRAMEWORK ON INSIDER TRADING

SEVEN ISLANDS SHIPPING LIMITED

(CIN: U61100MH2002PLC135732)

**Regd. Office: Suite 4, Level 8, B Wing, Times Square,
Andheri - Kurla Road, Andheri (East), Mumbai 400059.**

Ph : +91-22-4225 4225 ♦ Fax : +91-22-4225 4226

E-mail : sevenislands@sishipping.com

Website : www.sishipping.com



SEVEN ISLANDS SHIPPING LIMITED

FRAMEWORK ON INSIDER TRADING

INTRODUCTION

The purpose of this Framework on Insider Trading is to promote compliance with applicable securities laws by Seven Islands Shipping Limited, and all directors, officers and employees thereof, in order to preserve the reputation and integrity of the Company as well as that of persons affiliated therewith.

The Company endeavours to preserve the confidentiality of unpublished price sensitive information and to prevent misuse of such information.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. Every director, officer, designated employee of the Company has a duty to safeguard the confidentiality of all such information obtained in the course of his or her work at the Company. No director, officer, designated employee may use his or her position or knowledge of the Company to gain personal benefit or to provide benefit to any third party.

The Board of Directors of the Company have adopted this Framework on Insider Trading to comply with the SEBI (Prohibition of Insider Trading) Regulations, 2015.

PURPOSE

The purpose of this Framework is s follows:

1. To preserve the confidentiality of unpublished price sensitive information and to prevent misuse of such information.
2. To prohibit trading in the securities of the Company on the basis of unpublished price sensitive information by Insiders.
3. To enable disclosure of trading by Insider.

EFFECTIVE DATE

This Framework on Insider Trading would take effect upon listing of the securities of the Company on the Stock Exchange(s).

APPLICABILITY

“Trading” extend to a broad range of transactions including conventional cash-for-stock transactions, conversions, the grant and exercise of stock options and acquisitions and exercises



of warrants or puts, calls or other options related to a security. It is generally understood that insider trading includes the following:

1. Trading by insiders, connected persons while in possession of unpublished price sensitive information.
2. Trading by persons other than insiders and connected persons while in possession of unpublished price sensitive information where the information either was given in breach of an insider's fiduciary duty to keep it confidential or was misappropriated or
3. Communicating or tipping material, unpublished price sensitive information to others, including recommending the purchase or sale of a security while in possession of such information.

Therefore, this framework applies to all Directors, officers, designated employees and connected persons of the Company.

DEFINITIONS

"Act" means the Securities and Exchange Board of India Act, 1992.

"Board" means Securities Exchange Board of India (SEBI).

"Company" means Seven Islands Shipping Limited.

"Compliance Officer" means the Company Secretary for the purpose of administration of the Framework who shall work under the guidance of Managing Director and the Chief Financial Officer and report to the Board of Directors.

"Director" shall mean Directors as defined under the Companies Act, 2013.

"Promoter" shall mean Promoter as defined under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof.

"Immediate Relative" means a spouse or the parent, sibling or child of that person if they are either dependent financially on such person or consult such person in taking decisions relating to trading in securities.

"Securities" shall mean Securities as defined under the Securities Contracts (Regulations) Act, 1956 or modification thereof except units of a mutual fund.

"Connected person" means and includes –

1. A director of the Company
2. A Key Managerial Personnel of the Company
3. An Officer of the Company



4. A person who is or has been in a contractual or fiduciary or employment relationship at any time in the six months period prior to the date of determining whether that person, as a result of such relationship, was directly or indirectly allowed access or is reasonable expected to have access to the Unpublished Price Sensitive Information .
5. An employee of the Company who has access or is reasonably expected to have access to the Unpublished Price Sensitive Information.
6. Any person who has a professional or business relationship and that relationship whether direct or indirect allows access or is reasonably expected to allow access to the Unpublished Price Sensitive Information.

The persons enumerated below shall be deemed to be Connected Persons unless the contrary is established –

- a) An immediate relative of Connected Person.
- b) A holding company or Associate Company or Subsidiary Company.
- c) An intermediary as specified in Section 12 of the SEBI Act or an employee or a Director thereof.
- d) An investment Company, trustee company, asset management company or an employee or director thereof.
- e) An official of a stock exchange or of clearing house or corporation.
- f) A member of the 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 an employee thereof.
- 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.
- h) An official or employee of a self-regulatory organisation recognised or authorised by the SEBI.
- i) A banker of the Company.
- j) A concern, firm, trust, Hindu Undivided Family, company or association of persons wherein a director of the Company or his immediate relative or banker of the Company has more than ten percent of the holding or interest.

"Designated Persons" shall include -

1. Promoters of the Company
2. All Directors
3. All Key Managerial Personnel
4. Employees in the Grade of G-4 and above
5. All employees in Finance and Secretarial Departments
6. Secretaries to all whole time Directors including Chairman & Managing Director
7. Any other connected person designated by the Company on the basis of their functional role from time to time.
8. Immediate relatives of 1 to 6 above.

"Insider" means any person who is:

1. a connected person; or
2. in possession of or having access to unpublished price sensitive information.



"Regulations" means Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

"Generally available information" means information that is accessible to the public on a non-discriminatory basis.

"Reporting Officer" means the Chairman and Managing Director of the Company (CMD).

"Trading in securities" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities.

"Trading day" means a day on which the recognized stock exchanges are open for trading.

"Unpublished Price Sensitive Information or UPSI" means any information, relating to the 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 :-

1. Financial results, financial condition, projections or forecasts of the Company.
2. Dividends.
3. Change in capital structure.
4. Mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions.
5. Change in key managerial personnel and
6. Material events in accordance with the listing agreement.

Words and expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made there under shall have the meanings respectively assigned to them in those legislation.

ROLE OF COMPLIANCE OFFICER

The Compliance Officer shall report on insider trading to the Board of Directors of the Company and in particular, to the Chairman of the Audit Committee. The Compliance Officer shall assist all employees in addressing any clarifications regarding the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and this framework.

PROHIBITION ON COMMUNICATING OR PROCURING UPSI

An insider shall not-

1. Communicate, provide or allow access to any UPSI, relating to the company or its securities to any person including other insiders, except to the extent allowed by this framework.



2. 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 UPSI is communicated, provided, allowed access to or procured:

1. In furtherance of legitimate purpose, performance of duties or discharge of legal obligations pursuant to appropriate confidentiality and non-disclosure agreements being executed or
2. In the event of Board of Directors direct or cause the public disclosure of UPSI in the best interest of the company or
3. Within a group of persons if such persons have been identified by the Compliance officer from the rest of the company for a particular propose 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 and the execution of an undertaking by such person to abstain and/or forego trading during such seclusion or till the UPSI no longer constitutes UPSI.

PROHIBITION ON INSIDER TRADING

An insider shall not, directly or indirectly:

1. Trade in securities that are listed or proposed to be listed when in possession of UPSI.
2. Trade in securities of the Company except when the Trading Window is open and the insider is not in possession of UPSI.

Provided the restriction in 1 above shall not apply to:

1. A transaction that is as off-market inter-se transfer between promoters who were in possession of the same UPSI without being in breach of this framework and both parties had made a conscious and informed trade decision and
2. Trades pursuant to a trading Plan set up in accordance with this framework.

TRADING WINDOW

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 framework.
2. Designated persons shall not trade in the company's securities when the trading window is closed.



3. The trading window shall generally be closed for all insiders between the sixteenth day prior to the last day of any financial period for which results are required to be announced by the Company and the second trading day after disclosure of such financial results.
4. Additionally, the trading window shall be closed in particular for a Designated Person or class of Designated Persons when the Compliance Officer determines that a Designated Person or class of Designated Persons can reasonably be expected to have possession of UPSI, for such periods as determined by the compliance Officer.
5. The trading window may be re-opened after closure, not earlier than 48 hours after the UPSI in question becomes generally available.
6. The trading window shall also be applicable to any person having contractual or fiduciary relation with the Company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the Company.

PRE-CLEARANCE OF TRADING

1. Designated Persons may trade in the securities of the Company when the trading window is open, after obtaining approval of the Compliance Officer by submitting an application as per Annexure 1 and an undertaking as per Annexure 2.
2. The Compliance Officer shall not approve any proposed trade by Designated Person if the Compliance Officer determines that such Designated Person is in possession of UPSI even though the trading window is open.
3. The Compliance Officer may, after being satisfied that the application and undertaking are true and accurate, approve trading by a Designated Person, on the condition that the trade so approved shall be executed within seven trading days following the date of approval. The Compliance Officer shall furnish such approval in the format as given in Annexure 3.
4. The Designated Person shall, within two days of the execution of the trade, submit the details of such trade to the Compliance Officer as per Annexure 4. In case the transaction is not undertaken, a report to that effect shall be filed in the said form.
5. If the pre-cleared trade is not executed within seven trading days after the approval is given, the Designated Person must secure pre-clearance of the transaction again.
6. A Designated Person who trades in securities without complying with the pre-clearance procedure as envisaged in this framework or gives false undertakings and/or makes misrepresentations in the undertakings executed by him/her while complying with the pre-clearance procedure shall be subjected to the penalties as envisaged in this framework.



7. The Compliance Officer may waive off the holding period in case of sale of securities in personal emergency after recording reasons for the same. However, no such sale will be permitted when the Trading Window is closed.

TRADING PLAN

A Designated Person shall be entitled to formulate a Trading Plan that complies with the SEBI Regulations (a "Trading Plan") and present it to the Compliance Officer for approval in the format stated in Annexure 5 and public disclosure pursuant to which trades may be carried out in his behalf in accordance with such Trading Plan shall :

1. Not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan.

***Note:** It is intended that to get the benefit of a trading plan, a cool-off period of six months is necessary. Such a period is considered reasonably long for UPSI that is in possession of the insider when formulating the trading plan, to become generally available. It is also considered to be a reasonable period for a time lag in which new unpublished price sensitive information may come into being without adversely affecting the trading plan formulated earlier. In any case, it should be remembered that this is only a statutory cool-off period and would not grant immunity from action if the insider were to be in possession of the same UPSI both at the time of formulation of the plan and implementation of the same.*

2. Not entail trading for the period between the sixteenth trading day prior to the last day of any financial period for which quarterly results and annual result are required to be announced by the company and the second trading day after the disclosure of such financial results.

***Note:** Since the trading plan envisaged to be an exception to the general rule prohibiting trading by insiders when in possession of UPSI, it is important that the trading plan does not entail for a reasonable period around the declaration of financial results as that would generate UPSI.*

3. Trading plan shall entail trading for a period of not less than twelve months.

***Note:** It is intended that it would be undesirable to have frequent announcements of trading plans for short periods of time rendering meaningless the defence of a reasonable time gap between the decision of trade and the actual trade. Hence it is felt that a reasonable time would be twelve months.*

4. Not entail overlap of any period for which another trading plan is already in existence.

***Note:** It is intended that it would be undesirable to have multiple trading plans operating during the same time period. Since it would be possible for an insider to time the publication of*



the UPSI to make it generally available instead of timing and trades, it is important not to have the ability to initiate more than one plan covering the same time period.

5. Trading not entail trading in securities for market abuse.

Note: *Trading on the basis of such a trading plan would not grant absolute immunity from bringing proceedings from market abuse. For instance, in the event of manipulative timing of the release of the UPSI to ensure that trading under a trading plan becomes lucrative in circumvention of regulation 4 being detected, it would be open to initiate proceedings for alleged breach of SEBI (Prohibition of Fraudulent and Unfair Trade Practices Relating to the Securities Market) Regulation, 2003.*

6. The compliance officer shall review the trading plan to assess whether the plan would have any potential for violation of these regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.

Note: *It is intended that the compliance officer would have to review and approve the plan. For doing so, he may need the insider to declare that he is not in possession of UPSI or that he would ensure that any UPSI in his possession becomes generally available before he commences executing his trades. Once satisfied, he may approve the trading plan, which would then have to be implemented in accordance with this framework.*

7. The trading plan once approved in the format in Annexure 3 shall be irrevocable and it shall be mandatorily have to be implemented and without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.

Provided, the implementation of the trading plan shall not be commenced, if at the time of formulation of the plan, the Insider is in possession of any UPSI and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Plan shall be deferred until such UPSI becomes generally available information.

Note: *It is intended that since the trading plan is an exception to the general rule that an insider should not trade when in possession of UPSI, changing the plan or trading outside the same would negate the intent behind the exception. Other investors in the market too, would factor the impact of the trading plan on their own trading decisions and in price discovery. Therefore, it is not fair or desirable to permit the insider to deviate from the trading plan based on which others in the market have assessed their views on the securities.*

The proviso is intended to address the prospect the six-month gap between the formulation of the trading plan and its commencement, the UPSI in possession of the insider is still not generally available. In such a situation, commencement of the plan would conflict with the over-riding principle that trades should not be executed when in possession of such



information. If the very same UPSI is still in the insider's possession, the commencement of execution of the trading plan ought to be deferred.

8. Upon approval of the trading plan, the Compliance Officer shall notify the plan to the stock exchanges on which the securities are listed.

Note: It is intended that given the material exception to the prohibitory rule in regulation 4, a trading plan is required to be publicly disseminated. Investors in the market at large would also factor the potential pointers in the trading plan in their own assessment of the securities and price discovery for them on the premise of how the insiders perceive the prospects or approach the securities in their trading plan.

DISCLOSURE REQUIREMENTS

1. Initial Disclosure:

- a) Every Promoter, Key Managerial Personnel, Director of the Company and each of their Immediate Relatives shall disclose their holding of securities of the Company within thirty days of this Framework taking effect as per Form A set out in Annexure 6.
- b) Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter shall disclose his/her and Immediate Relatives holding of securities of the Company as on the date of appointment or becoming a promoter, to the Company within seven days of such appointment or becoming a promoter, as per Form B set out in Annexure 7.

2. Continual Disclosure:

- a) Every Promoter, Key Managerial Personnel, Director of the Company and each of their Immediate Relatives shall disclose as per Form C set out in Annexure 8 to the Company the number of such securities acquired or disposed off within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. Ten lakhs.
- b) The disclosure shall be made within two working days of:
 - i) The receipt of intimation of allotment of shares or
 - ii) The acquisition or sale of shares or voting rights, as the case may be.

3. Disclosure to the Stock Exchange:

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



4. Disclosures by other Connected Persons:

The Compliance Officer may, require any other Connected Person to disclose the holdings and trading in securities of the Company as per Form D set out in Annexure 9 at such frequency as he may determine.

DISSEMINATION OF PRICE SENSITIVE INFORMATION

1. No information shall be passed by Designated Persons by way of making a recommendation for the purchase or sale of securities of the Company.
2. The following guidelines shall be followed while disclosing/disseminating Price Sensitive Information to analysts, media persons and institutional investors:
 - a) Only public information to be provided.
 - b) At least two Company representatives be present at meetings with analysts, media persons and institutional investors.
 - c) Unanticipated questions may be taken on notice and a considered response given later. If the answer includes price sensitive information, a public announcement should be made before responding.
 - d) Simultaneous release of information after every such meet.

PENALTY FOR INSIDER TRADING

1. An Insider who acts in contravention of this framework shall be liable to have his services or relationship with the Company, as the case may be, terminated.
2. Directors, Officers and Key Managerial Personnel of the Company who violate this framework shall be subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligibility for future participation in the Company's stock option plans or termination.
3. The SEBI or any other appropriate regulatory authority would also be informed of the violation of the Regulations so that appropriate action may be taken.

PRESERVATION OF PRICE SENSITIVE INFORMATION

1. All information shall be handled within the Company on a need-to-know basis and no UPSI shall be communicated to any person except in furtherance of the insider's legitimate purposes, performance of duties or discharge of his legal obligations.



2. UPSI may be communicated, provided, allowed access to or procured, in connection with a transaction which entails:
 - a) An obligation to make an open offer under the takeover regulations where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the Company or
 - b) Not attracting the obligation to make an open offer under the takeover regulations but where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the Company and the information that constitute UPSI is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the Board of Directors may determine.

However, the Board of Directors shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the limited purpose and shall not otherwise trade in securities of the Company when in possession of UPSI.

3. Need to Know:
 - a) “Need to know” basis means that UPSI 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.
 - b) All non-public information directly received by any employee should immediately be reported to the head of the department.

4. Limited access to confidential information:

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password, etc.

AMENDMENT TO THE FRAMEWORK

The Board shall have the power to amend this framework on insider trading so as to bring it in line with the amended/existing laws as and when required.



Annexure 1
Format of Application for Pre-Clearance Approval

Date:

To,
Compliance Officer,
Seven Islands Shipping Limited,
Suite 4, Level 8, B Wing, Times Square,
Andheri-Kurla Road, Andheri (East),
Mumbai 400 059.

Sear Sir/Madam,

Sub: Application for Pre-Dealing Approval in securities of the Company

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Framework on Insider Trading, I seek approval to purchase/sale/subscription of _____ equity shares of the Company as per details given below:

Name of the Applicant	
Designation	
DIN, if any	
Number of securities held as on date	
Folio No./DP ID/Client ID	
The proposal is for: a) Purchase of securities b) Sale of securities c) Subscription to securities	
Proposed date of dealing in securities	
Estimated number of securities proposed to be purchased/subscribed/sold	
Price at which the transaction is proposed	
Current market price (as on date of application)	
Whether the proposed transaction will be through stock exchange or off-market deal	
Folio No./DP ID/Client ID where the securities will be credited/debited	

I enclose herewith the form of undertaking signed by me.

Yours faithfully,

Signature:
Name of the Applicant"
Designation:



Annexure 2

Format of undertaking to be accompanied with the application for pre-clearance

To,
Compliance Officer,
Seven Islands Shipping Limited,
Suite 4, Level 8, B Wing, Times Square,
Andheri-Kurla Road, Andheri (East),
Mumbai 400 059.

I, _____ holding the post of _____ of the Company residing at _____, am desirous of dealing in _____ no of shares of the Company as mentioned in my application dated _____ for pre-clearance of the transaction.

I further declare that I am not in possession of or otherwise privy to any Unpublished Price Sensitive Information (as defined in the Company's Framework on Insider Trading (the Framework) up to the time of signing this Undertaking.

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

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

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

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

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

Signature:

Name of the Applicant:

Designation:

DIN, if any :

Date:

Place:



Annexure 3
Format for approval of Trading Plan

To,
Name:
Designation:
Address:

Dear Sir/Madam,

This is to inform you that your request/immediate relative's request for approval of trading plan in relation to shares of the Company as mentioned in your/their application dated _____ is approved.

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.

You acknowledge that in order to comply with the principles of Framework on Insider Trading and SEBI (Prohibition of Insider Trading) Regulations, 2015 you may be required to further furnish information in relation to the trading plan.

The approval is based on your express declarations, representations and warranties made in the said application that you will not contravene any provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Framework on Insider Trading and the Trading Plan is not for the purposes of market abuse.

This approval letter is valid till _____ (for 7 days). If you/your immediate relative do(es) not execute the approved transaction/deal on or before this date you would have to seek fresh pre-dealing approval before executing any transaction/deal in the securities of the Company. Further, you are required to file the details of the executed transactions in the attached format within two (2) working days from the date of transaction/deal. In case the transaction is not undertaken a "Nil" report shall be necessary.

Yours faithfully,
For Seven Islands Shipping Limited,

Name:
Compliance Officer

Date:

Encl: Format for submission of details of transaction.



Annexure 4
Format of Disclosure of Transactions
(To be submitted within 2 days of transaction/dealing in securities of the Company)

To,
Compliance Officer,
Seven Islands Shipping Limited,
Suite 4, Level 8, B Wing, Times Square,
Andheri-Kurla Road, Andheri (East),
Mumbai 400 059.

I hereby inform that I,

1. Have not bought/sold/subscribed any securities in the Company or
2. Have bought/sold/subscribed to _____ no of securities as mentioned below on _____ (date).

Name of the Holder	No. of securities dealt with	Bought/sold/ subscribed	DP ID/Client ID/Folio No	Price (Rs.)

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 3 years and produce to the Compliance Officer/SEBI any of the following documents:

1. Broker's contract note.
2. Proof of payment to/from brokers.
3. Extract of bank passbook/statement (to be submitted in case of demat transactions).
4. Copy of Delivery Instruction Slip (Applicable in case of sale transaction).

I agree to hold the above securities for a minimum period of six months. In case there is any urgent need to sell these securities within the said period, I shall approach the Compliance Officer for necessary approval.

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

Signature:

Name:

Designation:

Date:

Place:



Annexure 4
Format for confirmation on completion of transaction
(To be submitted within 2 days of transaction/trading in securities of the Company)

To,
The Compliance Officer,
Seven Islands Shipping Limited,
Suite 4, Level 8, B Wing, Times Square,
Andheri-Kurla Road, Andheri (East),
Mumbai 400 059.

Dear Sir,

Sub: Date of completion of transaction

I hereby confirm that the transaction for dealing in the shares of the Company for which pre-clearance was granted on _____ was completed on _____ by purchasing*/selling* _____ (nos.) equity shares*/preference shares*/debentures*/securities* of the Company at an aggregate value of Rs. _____.

Thanking you.

Yours faithfully,

(Signature)

DP ID

Name of Designated Employee:

Employee Code No.:

Department:

Place:

Date:

* Strike out whichever is not applicable



Annexure 5
Format for request of Trading Plan

To,
Compliance Officer,
Seven Islands Shipping Limited,
Suite 4, Level 8, B Wing, Times Square,
Andheri-Kurla Road, Andheri (East),
Mumbai 400 059.

I, _____, in my capacity as _____ of the Company hereby submit the following plan for your review and approval in terms of the Framework for Insider Trading and the Insider Trading Regulations.

Trading Plan Date/Intervals of trade execution	No. of securities to be traded	Nature of transaction & quantity			Trading account details	Trading member details
		Purchase	Sale	Others		

Details of securities held by my Immediate Relatives:

Name of the person and relationship with the Designated Employee	Date of trading in securities	No. of securities traded	Nature of transaction & quantity			Trading account details	Trading member details
			Purchase	Sale	Others		

I hereby undertake that I am not in violation of Company's Framework on Insider Trading or SEBI Insider Trading Regulations while formulating the aforesaid trading plan.

I undertake to furnish such information as required by the Compliance Officer with regard to the Trading Plan.

Signature:

Name:

Designation:

Date:

Place:



Annexure 6

Form A

**Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7(1)(a) read with Regulation 6(2)]**

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 as on date of regulation coming into force	Open interest of the Option Contracts held as on date of regulation coming into force
		Type of security (For e.g. - Shares, Warrants, Convertible Debentures, etc)	No. of securities	Number of units (Contracts * lot size)	Notional value in Rupee terms	Number of units (Contracts * lot size)	Notional value in Rupee terms

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

Signature:

Name:

Designation:

Date:

Place:

Annexure 7
Form B
Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7(1)(a) read with Regulation 6(2)]

To,
 Compliance Officer,
 Seven Islands Shipping Limited (ISIN:_____)

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/ Directors/ Immediate Relatives/ Others, etc)	Date of appointment of Director/ KMP or date of becoming a Promoter	Securities held at the time of becoming a 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 e.g. - Shares, Warrants, Convertible Debentures, etc)	No. of securities		Number of units (Contracts * lot size)	Notional value in Rupee terms	Number of units (Contracts * lot size)	Notional value in Rupee terms

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

Signature:
 Name:
 Designation:

 Date:
 Place:

Annexure 8
FORM C
Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7(2) read with Regulation 6(2)]

To,
Compliance Officer,
Seven Islands Shipping Limited (ISIN: _____)

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):

Exchange on which the trade was executed		Trading in derivatives (Specify type of contract, Future or Options, etc.)	
		Sell	Buy
Mode of acquisition (market purchase/ public rights/ preferential offer/off market/ inter-se transfer, etc)	No. of Units (Contracts * Lot Size)	Value	No. of Units (Contracts * Lot Size)
		Value	Value
Date of intimation to Company			
Date of Allotment advice/ acquisition of shares/ sale of shares (specify)	From	To	
		Post Transaction	
% of shareholding	Pre Transaction	Post Transaction	
		Pre Transaction	
Securities acquired/ disposed	No. of securities	Type of security (For e.g. - Shares, Warrants, Convertible Debentures, etc)	
		Type of security (For e.g. - Shares, Warrants, Convertible Debentures, etc)	
Securities held prior to acquisition/ disposal	No. of securities	Type of security (For e.g. - Shares, Warrants, Convertible Debentures, etc)	
		Type of security (For e.g. - Shares, Warrants, Convertible Debentures, etc)	
Category of Person (Promoter/Director/ Employee/ Immediate Relatives/ Others)			
Name, PAN No., CIN/DIN & Address of Promoter/ KMP/ Director with Contact Nos.			



--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Signature:

Name:

Designation:

Date:

Place:



Annexure 9
FORM D
Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7(3) - Transactions by Other Connected Persons as identified by the Company]

To,
Compliance Officer,
Seven Islands Shipping Limited (ISIN: _____)

Exchange on which the trade was executed		Trading in derivatives (Specify type of contract, Future or Options, etc.)	
		Sell	Buy
Mode of acquisition (market purchase/ public rights/ preferential offer/ off market/ inter-se transfer, etc)	No. of Units (Contracts * Lot Size)	Value	No. of Units (Contracts * Lot Size)
		Value	Value
Date of intimation to Company			
Date of Allotment advice/ acquisition of shares/ sale of shares specify	To		
	From		
% of shareholding	Post Transaction		
	Pre Transaction		
Securities acquired/ disposed	No. of securities		
	Type of security (For e.g. - Shares, Warrants, Convertible Debentures, etc)		
Securities held prior to acquisition/ disposal	No. of securities		
	Type of security (For e.g. - Shares, Warrants, Convertible Debentures, etc)		
No. of securities			
Type of security (For e.g. - Shares, Warrants, Convertible Debentures, etc)			



--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Signature:

Name:

Designation:

Date:

Place: