

InfoBeans

CREATING **WOW!**

CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

1. Introduction:

Pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time, the Board of Directors in their meeting held on 25th May, 2017 approved and adopted the Code of Conduct for InfoBeans Technologies Limited (hereinafter referred to as InfoBeans) for Prevention of Insider Trading which came into force with immediate effect.

2. Applicability:

This Code is applicable to the Designated Persons of InfoBeans and other Connected Persons as mentioned in this Code.

The provisions of this Code are also applicable to all the subsidiary companies of InfoBeans.

3. Definitions:

In this Code, unless the context otherwise requires,

- A. **“Act”** shall mean the Securities and Exchange Board of India Act, 1992 (15 of 1992);
- B. **“Board”** shall mean the board of directors of InfoBeans;
- C. **“Code”** means this Code of Conduct for Prevention of Insider Trading, 2015, as modified from time to time.
- D. **“Compliance Officer”** means any senior officer, designated so and reporting to the board of directors or head of the organisation 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board of Directors of the Company or the head of the organisation, as the case may be.
- E. **“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 by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the Company or holds any position including a professional or business relationship between himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such

access.

ii. Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established,

- a. an immediate relative of connected persons specified in clause (i); or
- b. a holding company or associate company or subsidiary company; or
- c. an intermediary as specified in Section 12 of the Act or an employee or director thereof; or
- d. an investment company, trustee company, asset management company or an employee or director thereof; or
- e. an official of a stock exchange or of clearing house or corporation; or
- f. a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
- g. a member of the Board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
- h. an official or an employee of a self-regulatory organization recognised or authorized by the Board; or
- i. a banker of the Company; or
- j. a concern, firm, trust, Hindu Undivided family, company or association of persons wherein a director of the Company or his immediate relative or banker of the Company, has more than ten percent, of the holding or interest;

F. "Dealing in Securities" means an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in the Securities of the Company either as a principal or as an agent.

G. "Designated Person (s)" shall include:

- i. All Directors of InfoBeans;
- ii. Key Managerial Personnel;
- iii. Every employee in the Category of "President" and above;
- iv. Every employee in the accounts, finance, secretarial and legal department of the Company;
- v. Any other employee as may be determined and informed by the Compliance Officer from time to time.
- vi. Immediate Relatives of (i) to (v).

- H. "Director"** shall mean the member of the Board of Directors of the Company;
- I. "Employee"** means every employee of the Company including the Directors in the employment of the Company.
- J. "Generally available information"** means information that is accessible to the public on a non-discriminatory basis.
- K. "Immediate Relative"** means a spouse of a person, and includes parent, sibling and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities.
- L. "Insider"** means any person, who is,
- i. a connected person; or
 - ii. in possession of or having access to unpublished price sensitive information.
- M. "Key Managerial Person"** means person as defined in Section 2(51) of the Companies Act, 2013.
- N. "Promoter"** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof.
- O. "Regulations"** shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.
- P. "SEBI"** means Securities and Exchange Board of India.
- Q. "Securities"** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund.
- R. "Specified"** means specified by the Board in writing.
- S. "Specified Persons"** means the Directors, connected persons, the insiders, the Designated Persons and the promoters and immediate relatives are collectively referred to as Specified Persons.
- T. "Stock Exchange"** shall mean a stock exchange in which the shares of InfoBeans are listed.
- U. "Takeover regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.
- V. "Trading"** means and includes subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell, deal in any securities and "trade" shall be construed accordingly.
- W. "Trading Day"** means a day on which the recognized stock exchanges are open for trading.
- X. "Unpublished Price Sensitive Information"** means any information, relating to a

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

- i. financial results;
- ii. dividends;
- iii. change in capital structure;
- iv. mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions.
- v. changes in key managerial personnel;
- vi. 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 (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 there under shall have the meanings respectively assigned to them in those legislations.

4. Compliance Officer:

- A.** The Company Secretary of InfoBeans shall be the Compliance Officer for the purpose of this Code and will report to the Managing Director/Whole-time Director. In the absence of the Company Secretary, any other person as may be designated by the Managing Director/Whole-time Director shall be the Compliance Officer for the purpose of this Code.
- B.** The Compliance Officer shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of Price Sensitive Information, pre-clearing of all Designated Persons proposed Dealings, addressing any clarifications/difficulties regarding the Regulations and/or the Code and the implementation of the Code, under the overall supervision of the Managing Director/Whole-time Director.
- C.** Unless the context otherwise requires, the term "Compliance Officer" wherever used in the Code in connection with InfoBeans shall mean "Compliance Officer for InfoBeans".
- D.** The Compliance Officer shall assist all the employees in addressing any clarifications regarding the regulations of this code.

5. Preservation of "Unpublished Price Sensitive Information":

- A.** All Designated Persons and Connected Persons shall maintain the confidentiality of price sensitive information. All information shall be handled within the organisation on a need-to-know basis and no unpublished price sensitive information shall be communicated to any person except in furtherance of the insider's legitimate purposes, performance of duties or discharge of his legal obligations. The Company shall have appropriate Chinese wall procedures, and processes for permitting any designated person to "Cross the wall".

- B. No insider shall communicate, provide or allow access to any unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- C. No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties of discharge of legal obligation.
- D. Notwithstanding anything contained in the Code, unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction that would:
 - i entail 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.
 - ii not attract 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 unpublished price sensitive information 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.
- E. For purposes of above clause, the parties shall be required 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 purpose of Clause 5 (D) and shall not otherwise trade in securities of the company when in possession of unpublished price sensitive information.
- F. For the purpose of prompt public disclosure of Unpublished Price Sensitive Information, the Company also adopts the Code regarding practice & procedure for Fair Disclosure.

6. Limited access to Unpublished Price Sensitive Information:

- A. All files, papers and records containing Unpublished Price Sensitive Information shall be kept secured.
- B. In case of Unpublished Price Sensitive Information being available in the computer files, the same shall be secured in the manner stipulated by InfoBeans.

7. Trading Restrictions:

No insider shall trade in securities of the Company that are listed or proposed to be listed on a stock exchange when in possession of unpublished price sensitive information.

8. Trading Plans:

- A.** An Insider may be entitled to formulate a trading plan and present it to the compliance officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.
- B.** Such trading plan shall:
- i. not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
 - ii. not entail trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced by the issuer of the securities and the second trading day after the disclosure of such financial results;
 - iii. entail trading for a period of not less than twelve months;
 - iv. not entail overlap of any period for which another trading plan is already in existence;
 - v. set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
 - vi. not entail trading in securities for market abuse.
- C.** 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.
- D.** The trading plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.

Provided that the implementation of the trading plan shall not be commenced if any unpublished price sensitive information in possession of the insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation and in such event the compliance officer shall confirm that the commencement ought to be deferred until such unpublished price sensitive information becomes generally available information.

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

9. Trading Window:

- A.** Trading window means the period when trading in the Company's securities is permitted. The trading window shall remain closed during the period commencing from 7 days prior to the last day of each quarter and ending 2 trading days after the announcement of Financials Results for the respective quarter, as the case may be or such period as may be determined and notified by the Compliance Officer. Designated Persons and the connected

persons shall not trade in Securities of the Company when the trading window is closed.

- B. The Compliance Officer shall intimate the closure of trading window to all the designated employees of the Company and put the same on website of the Company when Designated Persons can reasonably be expected to have possession of Unpublished Price Sensitive Information. Such closure shall be imposed in relation to such securities to which such unpublished price sensitive information relates.
- C. The Compliance Officer after taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, shall decide the timing for reopening of the trading window, however in any event it shall not be earlier than forty-eight hours after the information becomes generally available.
- D. 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.
- E. The Compliance Officer shall confidentially maintain a list of securities of the Company as a "restricted list" which shall be used as the basis for approving or rejecting applications for pre-clearance of trades
- F. Unless otherwise specified by the Compliance Officer, the Trading Window shall be, inter alia, closed 7 days prior to the following:
 - i. Declaration of financial results (quarterly, half-yearly and annually).
 - ii. Declaration of dividends (interim and final).
 - iii. Issue of Securities by way of public / rights / bonus etc.
 - iv. Any major expansion plans or execution of new projects.
 - v. Amalgamation, mergers, takeovers and buy-back.
 - vi. Disposal of whole or substantially whole of the undertaking.
 - vii. Any significant changes in policies, plans or operations.

10. Pre-Clearance of trades:

- A. When the trading window is open, trading by Designated Persons shall be subject to pre-clearance by the Compliance Officer, if the value of the proposed trades, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 10,00,000/- (Rupees Ten lakh only). No Designated Person shall apply for pre-clearance of any proposed trade if they are in possession of unpublished price sensitive information even if the trading window is not closed.
- B. An application shall be made in Form I to the Compliance Officer indicating the estimated number of securities that the Designated Persons intends to trade in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the Company in this behalf.
- C. Along with Form I, an undertaking in Form II shall be executed in favour of the Company

by such Designated Persons incorporating, inter alia, the following clauses, as may be applicable:

- i. That the Designated Persons does not have any access or has not received “Price Sensitive Information” up to the time of signing the undertaking.
- ii. That in case the Designated Persons have access to or receives “Price Sensitive Information” after the signing of the undertaking but before the execution of the transaction he/she shall inform the Compliance Officer of the change in his position and that he/she would completely refrain from dealing in the securities of the company till the time such information becomes public.
- iii. That he/she has not contravened the code of conduct for prevention of insider trading as notified by the Company from time to time.
- iv. That he/she has made a full and true disclosure in the matter.

D. The Compliance Officer shall consider the application made as above, inter alia, having regard to the Trading Window, and may clear/refuse to clear the same, without assigning any reason(s) for refusal to clear the same in Form III.

E. In the event, the clearance in terms of clause 11 (C) above has been given, the concerned Designated Persons shall carry out the Dealing in Securities of InfoBeans within seven trading days after pre-clearance is given. The Designated Person shall file within 2 trading days of the execution of the deal, the details of such deal with the Compliance Officer in Form IV. If the proposed Dealing in Securities of the Company is not completed within seven trading days after approval is given, the concerned Designated Person must pre-clear the proposed Dealing in Securities again by following the procedure mentioned herein above.

F. In case the Designated Person decides not to execute the trade after securing pre-clearance, he/she shall inform the Compliance Officer of such decision along with reasons thereof within 2 trading days after completion of the 7 trading days in Form IV.

G. All Designated Persons who buy or sell any number of shares of the company shall not execute a contra trade i.e. sell or buy any number of shares during the next six months following the prior transaction.

H. 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.

I. 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 SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the act.

11. Other Restrictions:

- A. The disclosures to be made by any person under this Code shall also include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.
- B. The disclosures of trading in securities of the Company shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account for purposes of this Code.
- C. The disclosures made under this code shall be maintained for a period of five years.

12. Disclosure Requirements:

A. Initial Disclosure:

- i Every promoter/ Key Managerial Personnel/Director of the Company including immediate relatives, within thirty days of listing of securities of the Company, shall forward to the Company the details of all holdings in securities of the Company held by them on the date of listing including the statement of holdings in the prescribed Form V.
- ii Every person on appointment as key managerial personnel or a director of the Company or upon becoming a promoter including their immediate relatives shall disclose his holding of securities of the Company as on the date of appointment or becoming a promoter, to the Company within seven days of such appointment or becoming a promoter in Form VI.

B. Continual Disclosure:

Every Promoter, Employee and Director of the Company including their immediate relatives shall disclose to the Company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 10, 00,000/- (Rupees Ten Lakh only) in Form VII.

The disclosure shall be made within 2 trading days of:

- (a) the receipt of intimation of allotment of shares,
- or
- (b) the acquisition or sale of shares or voting rights, as the case may be.

C. Disclosure by Company:

Within 2 trading days of the receipt of intimation under Clause 13 (B) or becoming aware of the information specified in Clause 13 (B), the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received.

The Compliance Officer shall maintain records of all the disclosures/declarations/

undertakings/forms as mentioned in this Code, as received from time to time, for a period of five years.

D. Disclosures by other connected persons

Every Connected Persons shall make disclosures of holdings and trading in securities of the Company in Form VIII and at such frequency as may be determined by the Company in order to monitor compliances with these regulations.

E. The Compliance Officer shall report to the Board of Directors for the purpose of the Code and in particular, shall provide reports to the Chairman of the Audit Committee and to the Chairman of the Board annually.

13. Penalty for Contravention of the Code:

- A. All Designated Persons and Connected Persons shall be individually responsible for complying with the provisions of the Regulations and the Code to the extent applicable.
- B. Any Designated Persons and Connected Persons who violates the Code shall be subject to disciplinary action, as may be deemed fit by the Board of Directors of InfoBeans. Any Employee who violates the Code shall be subject to disciplinary action, which may include freeze on emoluments, ineligibility for future participation in the stock option plans or suspension/termination of service/contract, or any other action as may be deemed fit by Managing Directors /Whole-time Director/Compliance Officer.
- C. The action by InfoBeans shall not preclude SEBI from taking any action for violation of the Regulation.
- D. In case any violation of the Regulation or the Code is observed, SEBI may be informed of the same by the Company.

* This Code and any amendment thereto shall be available on the website of the Company.

FORM I

FORMAT OF APPLICATION FOR SEEKING PRE-CLEARANCE FOR DEALING IN SECURITIES

Date:

To,
The Compliance Officer,
InfoBeans Technologies Limited,
Indore

Dear Sir/Madam,

Application for seeking Pre-clearance for dealing in securities of the Company

Pursuant to the SEBI (Prohibition of Insider Trading), Regulations, 2015 and the Company' Code of Conduct for Prevention of Insider Trading, 2015, I seek approval to purchase/sale/ subscription of Securities of the Company as per the details given below:

Sr. No.	Particulars	Remarks
1	Name of the applicant	
2	Designation	
3	Number of securities held as on date	
4	Folio No. / DP ID / Client ID No.	
5	The proposal is for	(a) Purchase of securities (b) Subscription of securities (c) Sale of securities
6	Proposed date of dealing in securities	
7	Estimated number of securities proposed to be	
8	Price at which transaction is proposed	
9	Current market price (as on date of application)	
10	Whether the proposed transaction will be through stock exchange or off-market deal	
11	Folio No./DP ID/Client ID No. where the securities will be credited/debited	

I enclose herewith the form of Undertaking signed by me.

Yours faithfully

(Signature of Designated Person)

FORM II

**FORMAT OF UNDERTAKING TO BE ACCOMPANIED WITH APPLICATION FOR SEEKING
PRE-CLEARANCE**

Date:

To,
The Compliance Officer,
InfoBeans Technologies Limited,
Indore

I, _____, _____ of the Company residing
at _____, am
desirous of dealing in _____# securities 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 Code) 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 Code, after the signing of this undertaking but before
executing the transaction for which approval is sought, I shall inform the Compliance Officer of
the same and shall completely refrain from dealing in the securities of the Company until such
information becomes public.

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

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

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

Indicate number of shares

Yours
faithfully

(Signature of Designated Person)

FORM III
FORMAT FOR PRE- CLEARANCE APPROVAL

Date:

To,
Name:
Address:

This is to inform you that your request for dealing in _____ (no's) securities of the Company as mentioned in your application dated _____ is approved. Please note that the said transaction must be completed on or before _____ (date) that is within 7 trading days from today.

In case you do not execute the approved transaction / deal on or before the aforesaid date you would have to seek fresh pre-clearance 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 2 trading days from the date of transaction / deal. In case the transaction is not undertaken a 'Nil' report shall be necessary in the same format.

Thanking you,
Yours faithfully,

For InfoBeans Technologies Limited

Name:
Company Secretary & Compliance
Membership

No.: Place:

FORM IV
Format for Disclosure of Transactions
(To be submitted within 2 days of transaction / dealing in securities of the Company)

Date: _____

To,
The Compliance Officer,
InfoBeans Technologies Limited,
Indore

I hereby inform that I

- have not bought / sold / subscribed any securities of the Company
- have bought/sold/subscribed to _____ Securities as mentioned below on _____ (date)

Name of holder	No. of securities traded	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 not take a contra position in 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. (Applicable in case of purchase / subscription).

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

Yours faithfully,

(Signature of Designated Person)

FORM - V
Securities and Exchange Board of India (Prohibition of Insider Trading)
Regulations, 2015 [Regulation 7 (1) (a) read with Regulation 6(2)]

Date: _____

To,
The Compliance Officer,
InfoBeans Technologies Limited,

Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

Name, PAN/CIN/DIN, & address with contact nos.	Category of person (Promoter / KMP / Directors / Immediate Relatives /	Securities held as on the date of regulation coming into force (Equity)	% of shareholding	Open Interest of the Future contracts held as on date of regulation		Open Interest of the Future contracts held as on date of regulation coming into force	
				Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	6	7	8

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

Yours faithfully,

FORM VI

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

To,
The Compliance Officer,
InfoBeans Technologies Limited

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).

Date of appointment of Director /KMP OR Date of becoming Promoter:

Name, PAN/CIN/DIN, & address with contact nos.	Category of person (Promoter / KMP / Directors / Immediate Relatives / others, etc.)	Securities held as on the date of regulation coming into force (Equity)	% of shareholding	Open Interest of the Future contracts held as on date of regulation coming into force		Open Interest of the Future contracts held as on date of regulation coming into force	
				Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	6	7	8

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

Yours faithfully

FORM VII
Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (2) read with Regulation 6(2)]

Date: _____

To,
The Compliance Officer,
InfoBeans Technologies Limited,

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

Name, PAN No., CIN/DIN, & address of Promoter/ Employee / Director with contact nos.	Category of Person (Promoters/ KMP / Directors / immediate relatives / others etc.)	Securities held prior to acquisition/di disposal		Securities acquired/Dis posed		% of sharehold ing		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition (market purchase/ public rights/ preferential offer / off market/ Inter-se transfer etc.	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
		Type of security (For eg. - Shares, Warrants, Convertible	No.	Type of security (For eg. - Shares, Warrants, Convertible	No.	Pre-transact ion	Post transact ion	From	To			Buy		Sell		
												Value	of units (contracts *lot size)	Value	No. of units (contracts *lot size)	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

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

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

Yours faithfully,

(Signature of Designated Person)

Place:

Form VIII
SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (1) (b) read with Regulation 6(2)]

To,
The Compliance Officer,
InfoBeans Technologies Limited,

Name, PAN No., CIN / DIN & address of connected persons, as identified	Connection with company)	Securities held prior to acquisition/disposal		S e c u r i t i e s	% o f s h a r e s	Date of allotment advice/acquisition of shares/sale of shares specif		Date of intimation to company	Mode of acquisition (market purchase/public rights/preferential offer / off market/ Inter-se transfer etc.		Trading in derivatives (Specify type of contract, Futures or Options etc)	Exchange on which the trade was executed				
		Type of security (For eg. - Shares, Warrants, Convertible Debenture etc.)	No.			Type of security (For eg. - Shares, Warrants, Convertible Debenture etc.)	No.		Pre-trans action	Post trans action		From	To	Buy		Sell
											Value	of units (contracts * lot size)	Value	No. of units (contracts * lot size)		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

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

Yours faithfully,
(Signature)

