

Code of Conduct for Prohibition of Insider Trading under SEBI (Prohibition of Insider Trading) Regulations, 2015

1. Objective

Code of Conduct for Prohibition of Insider Trading applies to the designated persons, connected persons and the immediate relatives of such persons to ensure that information is handled within the organization on a need-to-know basis and no unpublished price sensitive information is communicated to any person except on a need to know basis and for performance of duties of the insider and / or discharge of his legal obligations.

2. Designated Person

“Designated Persons” shall mean the persons designated by the Board who shall in consultation with the Compliance Officer, to be covered under the Code of Conduct on the basis of their role and function in the Company (and the access to that role and function provides UPSI), in addition to seniority and professional designation and shall include : -

- (i) Employees of the Company, designated on the basis of their functional role or access to UPSI;
- (ii) All promoters of the Company;
- (iii) Any other person irrespective of their functional role in the Company who may have the ability to access to UPSI;
- (iv) all Directors;

3. Compliance Officer

The Company Secretary shall act as the **Compliance Officer** who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board of Directors of the Company.

4. Important Definitions

a) **"connected person"** means –

(i) 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 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himself and the company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.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 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;
- b) **“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;
- c) **“insider”** means any person who is:
- i) a connected person; or
 - ii) in possession of unpublished price sensitive information;
- (d) **“trading”** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;
- (e) **“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

5. Communication or procurement of unpublished price sensitive information.

5.1 No insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to the 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.

5.2 No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to the Company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

5.3 An 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 sharing of such information 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 sharing of such information 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 affected in such form as the board of directors may determine to be adequate and fair to cover all relevant and material facts.

5.4 For purposes of sub-clause (3) above, 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 purpose of sub-regulation (3), and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information.

5.5 Any person in receipt of unpublished price sensitive information pursuant to a “legitimate purpose” shall be considered an “insider” for purposes of these regulations and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with these regulations.

The term “legitimate purpose” shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.

5.6 Such “insider” will be required to execute “Confidentiality Agreement” and keep the information confidential and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information.

5.7 Compliance Officer shall maintain a structured digital database of Designated Persons along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such database shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.

6. Trading when in possession of unpublished price sensitive information.

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

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 insider may prove his innocence by demonstrating the circumstances including the following:

(i) 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 of SEBI Regulations and both parties had made a conscious and informed trade decision;

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

Provided further that such off-market trades shall be reported by the insiders to the company within two working days and the Company shall notify this to Stock Exchanges within two trading days from receipt of the disclosure or from becoming aware of such information.

(ii) 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 decision;

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

(iii) The transaction in question was carried out pursuant to a statutory or regulatory obligation to carry out a bonafide transaction.

(iv) 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.

(v) in the case of non-individual insiders: –

(a) the individuals who were 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

(b) appropriate and adequate arrangements were in place to ensure that SEBI Regulations are not violated and no unpublished price sensitive information was communicated by the individuals possessing the information to the individuals taking trading decisions and there is no evidence of such arrangements having been breached;

(c) the trades were pursuant to a trading plan set up in accordance with regulation 5 of SEBI Regulations.

6.2 In the case of connected persons, the onus of establishing, that they were not in possession of unpublished price sensitive information, shall be on such connected persons and in other cases, the onus would be on the Board.

6.3 The Board may specify such standards and requirements, from time to time, as it may deem necessary for the purpose of SEBI Regulations.

7. Trading Plans

7.1 An insider shall 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.

7.2 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; and

(v) set out either the value of trades to be affected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be affected

(vi) not entail trading in securities for market abuse.

7.3 The Compliance officer shall review the trading plan to assess whether the plan would have any potential for violation of SEBI 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.

Provided that pre-clearance of trades shall not be required for a trade executed as per an approved trading plan. Provided further that trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan. **Further, Contra trading restrictions shall not apply in case of pre clearance of trades duly approved by the Compliance Officer of the Company.**

7.4 The trading plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.

Provided that the implementation of the trading plan shall not be commenced if any

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 so as to avoid a violation of sub-regulation (1) of regulation 4 of SEBI Regulations.

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

8. Disclosures

8.1 Every public disclosure shall be made in the prescribed form.

8.2 The disclosures to be made by any person under this clause shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.

8.3 The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account for purposes of this Chapter:

Provided that trading in derivatives of securities is permitted by any law for the time being in force.

8.4 The disclosures made under this clause shall be maintained by the Company, for a minimum period of five years, in such form as may be specified.

Disclosures by certain persons.

9.1 Initial Disclosures.

(a) Every promoter, key managerial person, director and designated employee of the Company shall disclose his holdings of securities of the Company as on the date of SEBI Regulations taking effect, to the Company within thirty days of SEBI Regulations taking effect.

(b) Every person on appointment as a key managerial person or a director of the Company or a designated employee or upon becoming a promoter 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.

9.2 Continual Disclosures

(a) Every promoter, member of the promoter group, designated person and director of the Company 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 Rupees Ten Lakhs (Rs.10,00,000/-) ("Prescribed Threshold").

(b) The Company shall notify the particulars of such trading to the stock exchange on which

the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.

Explanation. — It is clarified for the avoidance of doubts that the disclosure of the incremental transactions under this sub-clause, shall be made when the transactions effected after the prior disclosure cross the threshold specified in clause (a) above.

Disclosures by other connected persons

9.3 The Company may, at its discretion require any other connected person or class of 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 SEBI Regulations.

10. Trading Restrictions and Trading Window

10.1 Trading Restrictions

All Designated persons and their immediate relatives shall be subject to trading restrictions as enumerated in this clause.

10.2 Trading window

10.2.1 The Company shall specify a trading period, to be called "Trading Window", for trading in the Company's securities. The trading window shall be closed during the time the information referred to in clause 10.2.3 is un-published.

10.2.2 When the trading window is closed, the Designated Persons and their immediate relatives shall not trade in the Company's securities during such period.

10.2.3 The trading window shall be, *inter- alia*, closed at the time of :

- a) Declaration of Financial results (quarterly, half-yearly and annual)
- b) Declaration of dividends (interim and final)
- c) Issue of securities by way of public/ rights/ bonus etc.
- d) Any major expansion plans or execution of new projects
- e) Amalgamation, mergers, takeovers and buy-back
- f) Disposal of whole or substantially whole of the undertaking
- g) Any changes in policies, plans or operations of the Company which is price sensitive.

10.2.4 The trading window shall be closed from the end of every quarter till forty-eight hours after the declaration of financial results. The gap between the clearance of accounts by Audit Committee and Board Meeting shall be as narrow as possible and preferably on the same day to avoid leakage of material information.

10.2.5 All Designated Persons shall conduct all their trading in the securities of the Company only during a valid trading window and shall not deal in any transaction involving the purchase or sale of the Company's securities during the periods when trading window is closed, as referred to in clause 10.2.3 or during any other period as may be specified by the Company from time to time.

10.3 Pre -clearance of trades

10.3.1 All Designated Person and their immediate relatives who intend to trade in the securities of the Company (above a minimum threshold limit of Rupees Ten Lakh **(Rs. 10,00,000)**) whether in one transaction or a series of transactions over a calendar quarter) should pre-clear the transactions as per the pre-clearance procedure as described hereunder.

10.3.2 An application shall be made in the prescribed form to the Compliance officer indicating the estimated number of securities that Designated Persons and / or their immediate relatives intend to trade in, the details as to the depository with which the Designated Persons and their immediate relatives 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.

10.3.3 An undertaking shall be executed in favour of the Company by the concerned Designated Persons and / or their immediate relatives incorporating, *inter- alia*, the following clauses, as may be applicable:

- a) That the Designated Person and / or his immediate relatives does not have any access or has not received Unpublished Price Sensitive Information up to the time of signing the undertaking.
- b) That in case the Designated Person and / or his immediate relatives has access to or receives Unpublished 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 trading in the securities of the Company till the time such information becomes public.
- c) That he/ she has not contravened the code of conduct for prevention of insider trading as notified by the Company from time to time.
- d) That he/ she has made a full and true disclosure in the matter.

10.3.4 No Designated Person or his immediate relatives shall apply for pre-clearance of any proposed trade if such Designated Persons and / or his immediate relatives is in possession of Unpublished Price Sensitive Information even if the trading window is not closed.

10.3.5 The concerned Designated Person shall intimate to the Compliance Officer in the prescribed form of the details of trades executed by him and / or his immediate relatives in the securities of the Company (above a minimum threshold limit of **Rs. 10,00,000** whether in one transaction or a series of transactions over any calendar quarter) within two trading days of such execution.

10.3.6 The concerned Designated Person shall intimate to the Compliance Officer in the prescribed form, of his or his immediate relative(s)' decision of not trading in the securities of the Company after securing pre-clearance. Such intimation shall be given within two trading days after the expiry of seven trading days after the approval of pre-clearance is given.

11. Other restrictions

11.1 All Designated Persons and their immediate relatives shall execute their order in respect of securities of the company within seven trading days after the approval of pre-clearance is given. If the order is not executed within seven trading days after the approval is given, the concerned Designated Person and / or his immediate relatives must again apply for pre-clearance of the transaction.

11.2 All Designated Persons and their immediate relatives who buy or sell any number of shares of the Company shall not execute a contra trade during the next six months following the prior transaction. 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 Education and Protection Fund administered by SEBI under the SEBI Act. Provided that this shall not be applicable for trades pursuant to exercise of stock options.

11.3 In case the sale of securities is necessitated by personal emergency, the holding period may be waived by the Compliance Officer after recording in writing his/ her reasons in this regard.

12. Chinese Wall

12.1 To prevent the misuse of confidential information the Company shall adopt a "Chinese Wall" policy which separates those areas of the Company which routinely have access to confidential information, considered "inside areas" from those areas which deal with sales/ marketing or other departments providing support services, considered "public areas".

12.2 The employees in the inside area shall not communicate any Price Sensitive Information to anyone in public area.

12.3 The employees in inside area may be physically segregated from employees in public area.

12.4 Demarcation of the various departments as inside area may be implemented by the Company.

12.5 In exceptional circumstances employees from the public areas may be brought "over the wall" and given confidential information strictly on the basis of "need to know" criteria, under intimation to the Compliance Officer.

13. Institutional Mechanism for Prevention of Insider Trading

- The Compliance Officer shall put in place adequate and effective system of internal controls to ensure compliance with the requirements given in these regulations to prevent insider trading.

The Internal Controls shall include the following:

- all person who have access to unpublished price sensitive information are identified as designated person;
- all the unpublished price sensitive information shall be identified and its confidentiality shall be maintained as per the requirements of these regulations;
- Adequate restrictions shall be placed on communication or procurement of unpublished price sensitive information as required by these regulations;
- lists of all employees and other persons with whom unpublished price sensitive information is shared shall be maintained and confidentiality agreements shall be signed or notice shall be served to all such employees and persons;
- periodic process review to evaluate effectiveness of such internal controls.

The Board of Directors shall ensure compliance with Regulation 9 (1) and (2) of SEBI (Prohibition of Insider Trading) Regulations, 2015. The Compliance Officer shall promptly inform the Board if there has been a violation of these regulations.

The Audit Committee shall review compliance with the provisions of these regulations atleast once in a financial year and shall verify that the systems for internal control are adequate and are operating effectively.

The investigation will be carried out as laid down in Whistle Blower Policy.

14. Protection against retaliation and victimization

An employee who files a voluntary information disclosure form in terms of Chapter IIIA of the PIT Regulations (“Voluntary Information Disclosure Form”), irrespective of whether the information is considered or rejected by SEBI and irrespective of whether the employee is eligible for a reward in terms of Chapter IIIA of the PIT Regulations, shall not be discriminated, discharged, terminated, demoted, suspended, threatened, or harassed, for any of the following reasons:

- (i) Filing a Voluntary Information Disclosure Form under PIT Regulations;
- (ii) Testifying, participating, or otherwise assisting or aiding SEBI in any investigation, inquiry, audit, examination or proceeding instituted or about to be instituted for an alleged violation of insider trading laws or in any manner aiding the enforcement action taken by SEBI; or
- (iii) Breaching any confidentiality agreement or provisions of any terms and conditions of employment or engagement which are solely for preventing such employee from cooperating with SEBI in any manner.

Explanation 1- For the purpose of this clause, “Employee” means an individual who during employment may become privy to information relating to violation of insider trading laws and files a Voluntary Information Disclosure Form under the PIT Regulations and is a director, regular or contractual employee, but does not include an advocate.

Explanation 2 - Nothing in this regulation shall require the employee to establish that -

- (i) The Board has taken up any enforcement action in furtherance of information provided by such person; or

(ii) The information provided fulfils the criteria of being considered as an Original Information under these regulations.

14. Amendments in Law

Any subsequent amendment / modification in the SEBI Regulations, Companies Act, 2013 and/or the Listing Regulations and/or other applicable laws in this regard shall automatically apply to this Policy.

Declaration of Shareholding

Date: _____

The Compliance Officer,
Selan Exploration Technology Limited
J-47/1, Shyam Vihar, Dindarpur
Najafgarh, New Delhi - 110043

Dear Sir / Madam,

Sub – Intimation regarding shareholding

I, the undersigned, hereby state that as on date I / my immediate relatives / we hold _____ equity shares of the Company, the details of which are given below:

Name of the holder	_____
No. of shares held	(In words _____)
Nature of Security	Equity Shares
DP ID / Client ID	_____

I confirm that:

- i) I and my relatives (We) will not trade in the Shares of the Company whenever we have access to any price sensitive information. Further we shall promptly inform you upon obtaining price sensitive information.
- ii) We shall comply with the code of conduct for insider trading as specified by the Company from time to time.
- iii) We shall not trade in Shares of the Company during closure of Trading Window as specified by the Company from time to time and when we have access to price sensitive information.
- iv) In case the value of proposed transaction in the Shares of the Company exceeds Rs. 1 Lakh, I shall obtain prior approval of the Compliance Officer.
- v) I shall not disclose any price sensitive information to any of my relatives or any outsider or any Employee of the Company. I further confirm that the aforesaid facts are true and correct and shall abide with the Code of Conduct for Prevention of Insider Trading of the Company.

Kindly take the same on record.

Thanking you,
.....

Form for Reporting of Trades Executed in Excess of the Prescribed Threshold

Date: _____

The Compliance Offer,
Selan Exploration Technology Limited
J-47/1, Shyam Vihar, Dindarpur
Najafgarh, New Delhi - 110043

Dear Sir /Madam,

Sub – Form for Reporting of Trades Executed In Excess of the Prescribed Threshold

I / We, the undersigned, hereby state that I / my immediate relative(s) / we have sold / purchased shares of the Company in excess of the value of Rs. 1,000,000 during the quarter from 1st _____ to _____, 20_____, details of which are given below:

Name of Seller / Purchaser	Relationship with the employee	No. of Shares Sold / Purchased	Date of Trade	Sale / Purchase Price (Rs.)	Sale / Purchase Value (Rs.)	DP ID & Client ID	DP Name

Kindly take the same on record.

Thanking you,

Pre-Clearance Form

Date: _____

The Compliance Officer,
Selan Exploration Technology Limited
J-47/1, Shyam Vihar, Dindarpur
Najafgarh, New Delhi - 110043

Dear Sir /Madam,

Sub – Pre-clearance for trading in securities of the Company

I / we, the undersigned, hereby state that I / my immediate relative(s) intend to sell / purchase shares of the Company within 7 trading days of pre-clearance. The details are:

Name	_____
Relationship with the employer	_____
No. of shares held	_____ (In words _____)
Nature of Security	Equity Shares

I, the undersigned, hereby undertake –

- a) That I / my immediate relative(s) do not have any access or have not received "Price Sensitive Information" up to the time of signing the undertaking.
- b) That in case I / my immediate relative(s) have access to or receive "Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction, I shall inform the Compliance officer of the change in my position and that I / my immediate relative(s) would completely refrain from trading in the securities of the Company till the time such information becomes public.
- c) That I / my immediate relative(s) have not contravened the Code of Conduct for Prevention of Insider Trading as notified by the Company from time to time.
- d) That I have made a full and true disclosure in the matter.

Kindly grant your permission for the intended dealing in shares.

Thanking you,

PRE- CLEARANCE ORDER

Date: _____

To,

Name: _____

Designation: _____

Place: _____

This is to inform you that your request for dealing in _____
(nos) shares of the Company as mentioned in your application dated _____
is approved. Please note that the said transaction must be completed on or before
_____ (date) i.e. within _____ 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.

Yours Faithfully,

For Selan Exploration Technology Limited

Compliance Officer

Encl: Format for submission of details of transaction.

Form for Reporting of Trades Executed

Date: _____

The Compliance Officer,
Selan Exploration Technology Limited
J-47/1, Shyam Vihar, Dindarpur
Najafgarh, New Delhi - 110043

Dear Sir /Madam,

Sub – Intimation of Execution of Trades in securities of the Company

I / we, the undersigned, hereby state that I / my immediate relative(s) / we have sold / purchased shares of the Company, details of which are given below:

Name of Seller / Purchaser	_____
Relationship with the employee	_____
No. of Shares Sold / Purchased	_____ (In words _____)
Nature of Security	Equity Shares
Date of Trade	_____
Sale / Purchase Price (Rs.)	_____
Sale / Purchase Value (Rs.)	_____
DP ID	_____
Client ID	_____
DP Name	_____

Kindly take the same on record.

Thanking you,

Form for Reporting of Decision Not to Trade After Securing Pre-Clearance

Date: _____

The Compliance Officer,
Selan Exploration Technology Limited
J-47/1, Shyam Vihar, Dindarpur
Najafgarh, New Delhi - 110043

Dear Sir /Madam,

Sub – Reporting of Decision Not to Trade After Securing Pre-Clearance

I / we, the undersigned, hereby state that I / my immediate relative(s) / we have taken a decision of not to sell / purchase shares of the Company after obtaining pre-clearance onfor.....shares.

Kindly take the same on record.

Thanking you,

To,
The Compliance officer,
Selan Exploration Technology Ltd.

Sub : Declaration by Designated Person

In compliance with Schedule B of SEBI (Prohibition of Insider Trading) Regulations, 2015 and Company's Code of Conduct for Prohibition of Insider Trading Regulations, I declare the following details :

Name			
PAN			
Immediate Relatives*	Name	PAN	Mobile No.
Persons with whom I share material financial relations #			
Phone No.			
Name of the Institute from which I have graduated			
Past Employer			

*The term '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 consult such person in taking decisions relating to trading in securities.

#The term "material financial relationship" shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding twelve months, equivalent to at least 25% of such payer's annual income but shall exclude relationships in which the payment is based on arm's length transactions.

Signature :

Date :

Application for execution of Contra Trade

To,

The Compliance Officer,
Selan Exploration Technology Limited.

Date :

I request you to grant me approval for execution of contra trade as required under the Code of Conduct to regulate, monitor and report share trading by insiders with respect to ----- shares of the Company held by me / -----
----- (name of relative) singly / jointly acquired by me on -----
(Date). I desire to deal in the said share on account of ----- (give reasons).

Thanking you,

Yours Faithfully

Name : _____

Designation : _____

Department : _____

CONTRA TRADE APPROVAL

Date: _____

To,

Name: _____

Designation: _____

Place: _____

This is to inform you that your request for execution of contra trade as required under the Code of Conduct to regulate dealing in _____ (nos) shares of the Company as mentioned in your application dated _____ is approved.

Yours Faithfully,

For Selan Exploration Technology Limited

Compliance Officer

FORMAT FOR TRADING PLAN

Date:
To,
The Compliance Officer,
Selan Exploration Technology Limited,
J-47/1, Shyam Vihar, Dindarpur,
Najafgarh, New Delhi – 110 043

Dear Sir/Madam,
I, _____, in my capacity as _____ of the Company hereby submit the trading plan with respect to dealing in securities of the Company for a total period of 12 months from _____ to _____.

DP ID/Client ID / Folio No	Type of security	Nature of Trade (Buy/Sell)	Proposed Date/time period of trade	No. /total amount of securities proposed to be traded

With respect to the above trading plan, I hereby undertake that I shall:

- I. Not entail commencement of trading on behalf of the insider earlier than 06 months from the public disclosure of the plan.
- II. Not entail trading for the period between the 20th trading 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 the disclosure of financial results for the said period;
- III. Not commence the trading as per above plan if the Unpublished Price Sensitive Information which is in my possession at present, do not comes into public domain till the time of commencement of trading plan & shall defer the commencement of trading plan till such information becomes generally available.
- IV. Not tender any other trading plan for the period for which the above trading plan is already in force; and
- V. Not entail trading in securities for market abuse.

Signature: _____