



**PACE DIGITEK LIMITED**

**CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF  
UNPUBLISHED PRICE SENSITIVE INFORMATION**

**Under Regulation 8 and 3(2) of the SEBI (Prohibition of Insider Trading Regulations, 2015)**

<b>Document version</b>	<b>Approved By</b>	<b>Date of approval</b>	<b>Date of Amendment</b>
1.0	Board of Directors	01 <sup>st</sup> February, 2025	

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## 1. Introduction

- 1.1. Regulation 8 of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“SEBI PIT Regulations”), as amended, requires every listed company to formulate a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“Fair Disclosure Code/Code”) inter alia containing the principles of fair disclosure as stipulated in the SEBI PIT Regulations. In the event of any conflict between the terms of this Policy and any provision in an applicable law including the Act or SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015 (“SEBI Listing Regulations”), the provisions in such applicable law shall prevail.
- 1.2. Accordingly, Pace Digitek Limited (“the Company”) has formulated this Fair Disclosure Code as a framework to ensure timely and adequate disclosure of Unpublished Price Sensitive Information as defined in Regulation 2(n) of the SEBI PIT Regulations (“Unpublished Price Sensitive Information” or “UPSI”). This Fair Disclosure Code shall apply to disclosure of UPSI by the Company, its subsidiaries, associates, and the companies under the same management.

## 2. Objective of the Code of Fair Disclosures

Fair Disclosure Code has been prepared by adopting the standard sets out in Schedule B of the SEBI PIT Regulations, to ensure adequate and timely disclosure of UPSI which would impact the price of the securities of the Company and to maintain the uniformity, transparency, and fairness in dealing with all stakeholders, to determine legitimate purpose for which UPSI may be shared, to preserve the confidentiality of UPSI and prevent its misuse, and in ensuring adherence to SEBI PIT Regulations and SEBI Listing Regulations..

## 3. Definitions

- 3.1 “Act” means the Companies Act, 2013 read with rules made thereunder, as amended from time to time.
- 3.2 “Board of Directors” or “Board”, means the board of directors of Pace Digitek Limited.
- 3.3 “Code of Fair Disclosure” or “Code” means this code of practices and procedures for fair disclosure of Unpublished Price Sensitive Information formulated by the Company and as amended from time to time.
- 3.4 “Company” means **Pace Digitek Limited**.
- 3.5 “Compliance Officer” means any Chief Financial Officer of the Company or any other senior officer designated by Board, who is financially literate and is capable of appreciating

requirements for legal and regulatory compliance under the SEBI PIT 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 (UPSI), monitoring of trades and the implementation of the codes specified in these SEBI PIT under the overall supervision of the Board the Company. The term 'financially literate' shall bear the meaning as defined under the SEBI PIT Regulations.

3.6 **“Dealing in securities”** means and includes subscribing, buying, selling or agreeing to subscribe, buy, sell, deal in any securities, and **“trade”** shall be construed accordingly. It also includes creation/ invocation/ revocation of pledge.

3.7 **“Designated Persons”** shall include:

- Promoter & Promoter Group of the Company
- Members of the Board of the Company
- Key Managerial Personnel and Senior Management who shall have the same meaning as defined under Regulation 16(1)(d) of SEBI Listing Regulations.
- Employees of the Company and its material subsidiaries based on their functional role including but not limited to corporate finance, controllership, human resource, legal, treasury, marketing, sales, secretarial department, information technology department and any other departments, as deemed necessary in the opinion of the Compliance Officer;
- Employees of material subsidiaries of the Company designated based on their functional role or access to UPSI in the organization by their Board of Directors;
- Any support staff of the Company, such as information technology staff or secretarial staff, legal staff, finance staff or strategy staff who have access to UPSI;
- Such other persons as may be identified by the Compliance Officer on a case to case basis; who could be reasonably expected to have access to UPSI relating to the Company.

3.8 **“Generally available information”** means information that is accessible to the public on a non-discriminatory basis is intended to define what constitutes generally available information so that it is easier to crystallize and appreciate what unpublished price sensitive information is. Information published on the website of a stock exchange, would ordinarily be considered generally available. Information relating to the Company published on the website of stock exchanges or the Company’s website shall ordinarily be considered as generally available information.

3.9 **“Legitimate Purpose”** shall include sharing of the UPSI 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 in relation to the following:

- Performance of duty
- Discharge of legal obligation
- Under direction or order of a court or tribunal of competent jurisdiction;
- Ordinary course of business;
- Under any requirement of legal process, regulation or governmental order, decree in compliance with applicable laws, rules or regulations;
- For any audit or for obtaining any certifications;
- On a need-to-know basis for entering into contracts or other business prospects or obtaining any legal opinion or advisory services which necessitates the same;

- any other purpose as the Board may determine for sharing of information on need-to know basis depending upon the transaction.
- 3.10 “**Securities**” shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 or any modification thereof, except units of a mutual fund.
  - 3.11 “**SEBI PIT Regulations**” means Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.
  - 3.12 “**SEBI Listing Regulations**” means SEBI (Listing Obligations and Disclosure Requirements) Regulations 2015.
  - 3.13 “**Stock Exchanges**” shall mean the stock exchanges on which the Securities of the Company are listed.
  - 3.14 “**Trading day**” means a day on which the recognised stock exchanges are open for trading.
  - 3.15 “**Takeover Regulations**” means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments, thereto.
  - 3.16 “**Whole Time Director**” means who is recognized as a Key Managerial personnel in clause (51) of Section 2 of the Act.
  - 3.17 “**Unpublished Price Sensitive Information**” (UPSI) means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following:
    - i. financial results,
    - ii. dividends;
    - iii. change in capital structure;
    - iv. mergers, de-mergers, acquisitions, delisting, disposals, expansion of business;
    - v. Changes in key managerial personnel and such other transactions; and
    - vi. It is clarified that UPSI is not restricted to information regarding the events mentioned above and may include direct or indirect information relating to the Company or its securities.

Unless the context otherwise requires, the words/terms and phrases not specifically defined in the aforesaid Code shall have the meaning as assigned to them under SEBI PIT Regulations, SEBI Listing Regulations, the Securities 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 other rules and regulations made thereunder as amended from time to time.

#### **4. Compliance Officer**

The Company has appointed the ‘Chief Finance officer’, as the ‘Compliance Officer’ for the purposes of the SEBI PIT Regulations, who shall work subject to the guidance of the Board and report to the Board for the purpose of this Code and SEBI PIT Regulations.

#### **5. Prompt public disclosure of Unpublished Price Sensitive Information**

The Company will make timely and adequate disclosure of UPSI to the Stock Exchanges on a continuous, immediate, uniform, and prompt basis and also made generally available for Investors/ Shareholders of the Company by uploading the same on the Company’s website at <https://pacedigitek.com/> after the information is furnished to the Stock Exchanges.

The following is an indicative list of information to be made generally available:

- Declaration of Financial Results (quarterly, half-yearly and annual)
- Declaration of Dividends (Interim/ Final)
- Issue of securities by way of Public/ Rights/ Bonus Issues etc.
- Mergers, de-mergers, acquisitions, de-listings, disposals and expansion of business and such other transactions;
- Change in Key Managerial Personnel
- Any information which, if disclosed, in the opinion of the person disclosing the same is likely to materially affect the prices of the securities of the Company.

However, if any information gets disclosed selectively or inadvertently or otherwise, such information should be made generally available through dissemination of the same to Stock Exchanges and/or by posting the same on the official website of the Company as soon as practicable.

**6. Responding to Market Rumours:**

- 6.1. The employees, officers and Directors of the Company shall promptly direct any queries or requests for verification of market rumours received from Stock Exchanges or any regulatory authorities or from the press or media or from any other source to the Compliance Officer.
- 6.2. The Compliance Officer shall, on receipt of requests as aforesaid, consult the Whole-time Director and respond to the same without any delay.
- 6.3. The Compliance Officer shall be responsible for deciding, in consultation with the Whole-time Director, as to the necessity of a public announcement for verifying or denying rumors and thereafter making appropriate disclosures. Provided that no disclosure in response to the queries/request shall be made by the Compliance Officer when the Whole-time Director does not approve the same.

**7. Disclosure/dissemination of Unpublished Price Sensitive Information with special reference to analysts and institutional investors:**

- 7.1. No person, except those authorised by the Compliance Officer or the Whole-time Director, shall disclose any information relating to the business activities of the Company to analysts and institutional investors.
- 7.2. All Directors, officers and employees of the Company shall follow the guidelines given hereunder while dealing with analysts and institutional investors: -
  - 7.2.1. Sharing of information: The Directors, officers and employees of the Company, shall provide only public information to analysts and institutional investors. In case nonpublic information is proposed to be provided, the person proposing to provide such information shall consult the Compliance Officer in advance. The Compliance Officer shall, in such cases, ensure that that the information provided to the analyst or institutional investor as above is made public simultaneously with such disclosure.

7.2.2. The Company shall take extreme care and caution when dealing with analysts' questions that raise issues outside the intended scope of discussion.

7.2.3. Unanticipated questions may be noted, and a considered response given later. If the answer to any question requires dissemination of Unpublished Price Sensitive Information, a public announcement should be made before responding to the same.

7.3. Recording of discussion: All analyst or institutional investor meetings shall be attended by the Compliance Officer, and another senior employee of the Company. The Compliance Officer shall, in order to avoid misquoting or misrepresentation, arrange for recording the discussions at the meeting.

7.4. Simultaneous release of information:

7.4.1. Whenever the Company proposes to organize meetings with analysts, the Company shall issue a press release or post relevant information on its web site after every such meeting. The Company may also consider live web casting of analyst meets.

7.4.2. The Compliance Officer shall be responsible for drafting of the press release or the text of the information to be posted on the Company's web-site, in consultation with the Whole-time Director.

7.5. Medium of disclosure/dissemination:

7.5.1. The Company shall disclose / disseminate all UPSI on a continuous and in a timely manner to Stock Exchanges where its Securities are listed and thereafter to the press.

7.5.2. As a good corporate practice, the UPSI disclosed to the Stock Exchanges and to the press may also be supplemented by prompt updates on the Company's website.

7.5.3. The Company may also consider other modes of public disclosure of UPSI so as to improve investor access to the same.

## 8. Determination of Legitimate Purpose

The term "legitimate purpose" shall include sharing of UPSI in the ordinary course of business by an insider with Directors, employees, partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants or statutory authorities or other entities, provided that if such sharing has not been carried out to evade or circumvent the prohibitions of the SEBI PIT Regulations.

Any person in receipt of UPSI 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 UPSI in compliance with these SEBI PIT regulations and not to trade in securities of the Company when in possession of UPSI and for the said purpose the Company shall execute agreement with such insider(s).

The Insider sharing the UPSI to others in furtherance of legitimate purposes, performance of duties or discharge of legal obligation and in ordinary course of business shall enter the following information on the digital database maintained by the Company pursuant to provisions of Regulation 3(5) of the SEBI PIT Regulations as amended:

- Name of the Person sharing the information along with employee number.
- Brief description of the nature of information shared.
- Purpose of sharing the information.
- Name, designation and organization of the Person to whom the information is shared.
- PAN or any other identifier authorized by law of the Person to whom the information is shared.
- Date and time of sharing the information.

This digital database should be preserved for a period of not less than eight years after completion of the relevant transactions.

Legitimate Purpose shall include sharing of the UPSI in relation to the following:

- sharing of information in the ordinary course of business;
- sharing of information in performance of duty(ies);
- sharing of information in discharge of legal obligation(s);
- sharing of information upon, direction or order of a court or tribunal of competent jurisdiction;
- sharing of information pursuant to any requirement of legal process, regulation or governmental order, decree in compliance with applicable laws, rules or regulations;
- sharing of information with auditors viz. internal auditors, statutory auditors, cost auditors, tax auditors or secretarial auditors in relation to audit or for obtaining any certifications or any other services ;
- sharing of information with partners, customers, collaborators and suppliers on a need to know basis for entering into contracts or other business prospects which necessitates the same;
- sharing of information for the purposes of obtaining regulatory licenses and approvals
- sharing of information for the purpose of obtaining various credit facilities or loans, giving guarantees or providing security from/to banks, financial institutions or other lenders;
- sharing of information with merchant bankers including their counsel and advisors in relation to issue of any securities, debentures, American Depository Receipts/Global Depository Receipts, convertible instruments, or Qualified Institutional Placements;
- sharing of information with legal advisors or counsels in relation to any litigations, representations or registering of any intellectual property rights or in relation to obtaining any opinion or advisory services;
- sharing of information with consultants on a need to know basis in relation
- to obtaining any opinion or advisory services
- sharing of information with insolvency professionals or other advisors or consultants on a need-to-know basis in any other important matters of the Company; and
- sharing of information arising out of business requirements such as acquisitions, mergers, divestments, rights issue or any other transaction(s)/ corporate action(s)
- where an insider (s) needs to share information with the promoters / controlling shareholders or other persons for the implementation of transaction.
- possible investment/disinvestment in a new venture/existing undertaking
- any event or information as prescribed under Part A of Schedule III under Regulation 30 of SEBI Listing Regulations as amended from time to time; and



- any other purpose as the Board may determine for sharing the information on a need to know basis depending upon the transaction into question.

Provided that, such sharing of UPSI as aforesaid shall not be carried out to evade or circumvent the prohibitions laid down under the SEBI PIT Regulations.

#### 9. **Restriction on Communication or procurement of UPSI**

- 9.1. No insider shall communicate, provide, or allow access to any UPSI, 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.
- 9.2. Any person in receipt of UPSI in furtherance of a legitimate purpose shall be considered as an insider for the purpose of this Code and the SEBI PIT Regulations.
- 9.3. Insiders shall maintain confidentiality of UPSI and should handle it with care and deal with the UPSI when transacting their business on a "need to know" basis.
- 9.4. No person shall procure from or cause the communication by any insider of UPSI, relating to the Company or its securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations
- 9.5. The Designated Persons and employees, sharing UPSI in furtherance of legitimate purposes, shall enter into an agreement to contract confidentiality and non-disclosure obligations to maintain confidentiality of the UPSI in compliance with SEBI PIT Regulations and shall not otherwise trade in securities of the Company when in possession of UPSI.
- 9.6. The Board of Directors or head(s) of the organization of every person required to handle UPSI shall ensure that the structured digital database is preserved for a period of not less than eight years after completion of the relevant transactions and in the event of receipt of any information from the Board regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.

#### 10. **Restriction on trading in Securities when in possession of UPSI**

- 10.1. No insider shall trade in securities that are listed or proposed to be listed on a stock exchange when in possession of UPSI.
- 10.2. Such insider shall also maintain the confidentiality of all UPSI and shall not pass on such information to any person directly or indirectly by way of making recommendation for the purchase or sale of the Company's Securities.

#### 11. **Chinese Wall**

- 11.1. To prevent the misuse of confidential information, the Company has adopted "Chinese Walls Policy" which separate those areas of the Company that routinely have access to confidential information, considered "inside areas" from those which deal with sale/

marketing/ investment advice or other departments providing support services, considered "public areas".

- 11.2. The employees in the inside area shall not communicate any UPSI to anyone in public area.
- 11.3. The Company shall have process of maintaining securely, computer files containing confidential information and physical storage of documents relating to UPSI.
- 11.4. However, in exceptional circumstances employees from the public areas may be brought "over the walls" and given confidential information on the basis of "need to know" criteria, under intimation to the compliance officer.

## 12. Pre-clearance of trades

12.1. All Designated Persons who intend to trade in the securities of the Company (either in their own name or in any immediate relative's name) i.e. buy or sell securities and if value of the securities likely to be traded, whether in one transaction or a series of transactions in calendar quarter, aggregates to a traded value in excess of Rs. 10,00,000 (Rupees Ten Lakhs Only) should pre-clear the transaction. However, no designated person shall be entitled to apply for pre-clearance of any proposed trade if such designated person is in possession of UPSI even if the trading window is not closed and hence, he shall not be allowed to trade.

12.2. The pre-dealing procedure shall be hereunder:

12.2.1. An application for pre-clearance may be made in the prescribed Form (**Annexure A**) to the Compliance Officer indicating the estimated number of securities that the designated person or immediate relative(s) intends to deal, 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 specified in the form and details as may be required by any rule made by the company in this behalf.

12.2.2. An undertaking (**Annexure B**) shall be executed in favour of the Company stating that there is no contravention of the code of conduct for prevention of insider trading as notified by the Company from time to time.

12.2.3. The Compliance Officer of the Company will approve the Pre-Clearance Application (**Annexure C**) and shall also determine whether any such declaration is reasonably capable of being rendered inaccurate.

12.2.4. All Designated Persons of the Company and their immediate relatives shall execute their order in respect of securities of the Company within 7 (seven) trading days after the approval of pre-clearance is given. Failing which fresh pre-clearance would be needed for the trades to be executed. In case the transaction is not undertaken, a report to that effect shall be filed (**Annexure D**).

12.2.5. Every promoter/ Key Managerial Personnel / Director / Officers / Designated Employees of the Company shall forward to the Company the details of all holdings in securities of the Company presently held by them including the statement of holdings of dependent family members in the prescribed Form (**Annexure E**).

## 13. No Trading Period

- 13.1. The trading period during which the Company's securities can be traded is called trading window. The trading window shall be closed during the time the price sensitive information is un-published.
- 13.2. When the trading window is closed, the Designated Persons (including their immediate relatives) shall not trade in the Company's securities in such period.
- 13.3. The Compliance Officer shall close the trading window when he / she determines that a designated person or class of 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.
- 13.4. The trading window shall be opened 48 (Forty-Eight) hours after the UPSI becomes generally available. 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, insolvency professional entities, consultants, banks etc., assisting or advising the Company.
- 13.5. The Compliance Officer after considering various factors including the UPSI in question becoming generally available and being capable of assimilation by the market, shall decide the timing for re-opening of the trading window, however in any event it shall not be earlier than 48 (Forty-Eight) hours after the information becomes generally available.

#### 14. **Other Restrictions**

- 14.1. The disclosures to be made by any person under this Code shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.
- 14.2. The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be considered for purposes of this Code.
- 14.3. The disclosures made under this Code shall be maintained for a period of five (5) years.

#### 15. **Holding Period/Contra Trade**

Designated person (including their immediate relatives) who is permitted to trade shall not execute a contra trade i.e., enter into an opposite transaction during the next 6 (Six) months following the prior transaction ("contra trade"). The compliance officer may be empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate these SEBI PIT regulations.

16. **Disclosure by other Connected Persons**

The Compliance Officer at his / her discretion may require any other Connected Persons or class of Connected Persons to make disclosures of holdings and trading in securities of the Company as and when he / she deems fit in order to monitor compliance with these SEBI PIT regulations in the format as prescribed or amended by SEBI, from time to time (**Annexure E**).

17. **Penalty for non-compliance**

Any insider who trades in securities in contravention of the provisions of this Code or the SEBI PIT Regulations shall be guilty of insider trading and shall be inter-alia liable for punishment and penalty as mentioned in this Code and the Securities & Exchange Board of India Act, 1992.

18. **Amendment of this Code**

The Board of Directors (including Management Committee of the Board of Directors) is authorized to change/amend this Code from time to time at its sole discretion and/or in pursuance of any amendments made in the SEBI (PIT) Regulations. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant statutory, governmental and regulatory authorities are not consistent with the provisions laid down under this Code, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder.

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**ANNEXURE A**

**APPLICATION FOR PRE-DEALING APPROVAL**

Date: \_\_\_\_\_

To,  
The Compliance Officer  
**PACE DIGITEK LIMITED**  
Plot # V 12, Industrial Estate, Kumbalgodu,  
Bangalore Mysore Highway, Bangalore- 560074  
Karnataka, India.

Dear Sir / Madam,

**Subject:** Application for Pre-dealing approval in securities of the Company

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

S. No.	Particulars	Remarks / Details
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 (b) Securities (c) Subscription to	
6	Proposed date of dealing in securities	
7	Estimated number of securities proposed to be acquired/ subscribed/ sold	
8	Price at which the 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 / Specified Person)

**ANNEXURE B**

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

**UNDERTAKING**

I, ..... of the Company residing at  
....., am desirous of dealing in ..... shares of  
the Company as mentioned in my application dated for preclearance 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 Code of Conduct for prevention of Insider Trading (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.

I undertake to submit the necessary report within four 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 :
Date :	Designation:
Place :	Address :

**ANNEXURE C**

**FORMAT FOR PRE- CLEARANCE ORDER**

To,  
Name:  
Designation:  
Address:

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 executed within 7 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 days from the date of transaction/deal. In case the transaction is not undertaken a 'Nil' report shall be necessary.

Yours faithfully,

For **PACE DIGITEK LIMITED**

Compliance Officer

Date:  
Place:  
Encl: Format for submission of details of transaction

**ANNEXURE D**

**FORMAT FOR DISCLOSURE OF TRANSACTIONS**

(To be submitted within 2 days of transaction / dealing in securities of the Company)

To,  
The Compliance Officer  
**PACE DIGITEK LIMITED**  
Plot # V 12, Industrial Estate, Kumbalgodu,  
Bangalore Mysore Highway, Bangalore- 560074  
Karnataka, India.

**Dear Sir/Madam,**

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)

<b>Name of holder</b>	<b>No. of securities dealt with</b>	<b>Bought / sold / subscribed</b>	<b>DP ID / Client ID / Folio No</b>	<b>Price (INR)</b>

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 Contracts 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. (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).

Signature :  
Name :  
Designation:  
Address :

Date :  
Place :



**ANNEXURE E**

**FORMAT FOR INITIAL DISCLOSURE OF SECURITIES**

To,  
The Compliance Officer  
**PACE DIGITEK LIMITED**  
Plot # V 12, Industrial Estate, Kumbalgodu,  
Bangalore Mysore Highway, Bangalore- 560074  
Karnataka, India.

I,.....in my capacity as of the Company hereby submit the following details of securities held in the Company as on (date of becoming Specified Person).

**I. Details of securities held by me:**

Type of Securities	No. of Securities held	Folio No.	Beneficiary A/c Client ID

**II. Details of dependent(s):** Pursuant to the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Procedures and Conduct for Prevention of Insider Trading, I hereby declare that I have the following dependents:

Sr. No.	Name of Dependents	Relationship with Director / Officer / Designated Employee

**III. Details of securities held by dependent(s):**

Name of Relative	Relationship	Type of Securities	No. of Securities held	Folio No.	Beneficiary A/c Client ID

