

**SINGER INDIA LIMITED (“SIL”)  
 (“Company”)**

**The Code of conduct for Regulating, Monitoring and Reporting trading by an Insider  
 pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015(‘Code’)**

**1. Preamble**

Pursuant to the regulations of the SEBI (Prohibition of Insider Trading) Regulations, 2015, (‘PIT Regulations’), it is mandatory for every listed Company to formulate a code of conduct to regulate, monitor and report trading by its designated persons.

This Policy has been formulated and approved by the Board of Directors and has been amended by the Board of Directors from time to time to incorporate, among other things, the updated provisions of the Regulations. This policy shall act as a guideline for preserving the 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. This Code has been further amended by the Board of Directors at its meeting held on March 23, 2023.

This Code shall be applicable to all Designated Persons including their Immediate Relatives.

**2. Definitions**

The Words and expressions used and not defined in this Code but defined in the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation.

For the purpose of this Code, unless the context otherwise requires, –

- (a) **“Board of Directors”** means the Board of Directors of Singer India Limited.
- (b) **“Chief Investor Relation Officer or Compliance Officer”** means Company Secretary of the Company or any other person authorized by the Board of Directors.
- (c) **“Code” or “Code of Conduct”** shall mean this Code of Conduct for Regulating, Monitoring and Reporting of trading by an insider, as amended from time to time.
- (d) **“Companies Act”** means the Companies Act, 2013 as amended from time to time.
- (e) **“Company”** means Singer India Limited.

(f) **“Compliance Officer”** in relation to the Company means any senior officer, designated so and reporting to the board of directors or head of the organization in case board is not there, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board of directors of the listed company or the head of an organization, as the case may be

(g) **“Connected Person”** shall have the same meaning assigned to it under the PIT Regulations.

(h) **“Dealing /Trading in Securities”** means and includes subscribing, redeeming, switching, buying, selling, dealing, or agreeing to subscribe, redeem, switch, buy, sell, deal in the Company’s Securities, and “trade” shall be construed accordingly.

(i) **“Designated Persons”** means Directors, employees(who have access of Unpublished Price Sensitive Information., connected persons of the Company & their immediate relatives and such other person(s) who may be so designated by the Compliance Officer from time to time for the purpose of these Code and the Regulations.

(j) **“Director”** means a member of the Board of Directors of the Company.

(k) **“Key Managerial Person”** means person as defined in the Companies Act, 2013

(l) **“Generally Available Information”** means information that is accessible to the public on a non-discriminatory basis, including information published on the website of stock exchange(s) on which the Securities of the Company are listed.

(m) **“Immediate Relative”** in relation to a person means the spouse of such 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.

(n) **“Informant”** shall have the same meaning assigned to it under the PIT Regulations.

(o) **“Insider”** shall have the same meaning assigned to it under the PIT Regulations.

(p) **“Legitimate Purpose”** shall have the same meaning assigned to it under SIL’s Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information.

(q) Need to know means:

(i) that Unpublished Price Sensitive Information (UPSI) should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.

(ii) All non-public information directly received by any employee should immediately be reported to the head of the department.

(iii) No UPSI shall be communicated to any person in any manner which is contrary to the PIT

Regulations.

- (iv) Any person in receipt of UPSI pursuant to a Legitimate Purpose will be considered an “insider” for purposes of this Code and due notice must be given to such person to maintain confidentiality of such UPSI in compliance with the PIT Regulations and this Code.
- (v) Designated Persons while sharing UPSI shall ensure that the recipient of such information is aware of its confidentiality and sensitivity and shall ensure that the recipient’s use or further dissemination of such UPSI is in compliance with the provisions of this Code and the PIT Regulations.
- (vi) When a Designated Person or his/her Immediate Relatives share any UPSI for Legitimate Purpose or for any other purpose in accordance with this Code and/or the PIT Regulations, such sharing shall be subject to such limits (if any) on the use of such UPSI as may be specified. Further, such Designated Persons or his/her Immediate Relatives should make the recipient of UPSI aware of the duties and responsibilities attached to the receipt of UPSI and the liability that is attached to the misuse or unwarranted use of such UPSI.
- (vii) In case of slippage/ leakage of UPSI, Designated Persons shall inform the Compliance Officer and shall take responsible measures to put a stop on any further spread of such UPSI.
- (r) **“Promoter”** shall have the same meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended from time to time.
- (s) **“Promoter Group”** shall have the same meaning assigned to it under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended from time to time.
- (t) **“Trading Window”** means a trading period for trading in Company’s securities as specified by the Company from time to time.
- (u) **“Regulations”** shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.
- (v) **“Stock Exchange”** means a stock exchange which is recognized by the Central Government or SEBI under Section 4 of Securities Contracts (Regulation) Act, 1956 (42 of 1956).
- (w) **“Trading Plan”** means the trading plan as prescribed by the SEBI (Prohibition of Insider Trading) Regulations, 2015.”
- (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, delistings, disposals and expansion of business and such other transactions; (v)changes in key managerial personnel.
- (y) All other words and phrases will have the same meaning as defined under the Regulations (as amended) from time to time as also under the SEBI Act, 1992.

### **3. Preservation of Unpublished Price Sensitive Information (UPSI)**

- 1) All the Designated persons shall maintain the confidentiality of all UPSI in their possession.
- 2) The Designated persons shall not advise, communicate, counsel, inform or pass on such unpublished Price Sensitive Information to any person, directly or indirectly, other than communication required to be made/done in the ordinary course of business, or under any law.
- 3) The UPSI shall be handled on a “need-to-know” basis, i.e., UPSI should be disclosed only to those who need the information to discharge their duty and/or functions.
- 4) The board of directors shall ensure that a structured digital database is maintained containing such details and requirements as required under PIT Regulations.
- 5) While dealing with or handling UPSI within the Company, the Company shall establish policies, procedures and physical arrangements (collectively, “**Chinese Walls**”) designed to manage confidential information and prevent any spread and misuse of UPSI. Information shared outside the process should be limited to the specific transaction or purpose for which their assistance is required. Further, a person(s) may also be brought inside on any proposed or ongoing sensitive transaction(s) of the Company who may be an existing or proposed partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants etc. for legitimate purpose, in the ordinary course of business, discharge of legal obligations etc.
- 6) All files, papers and records containing UPSI shall be kept secure. In case the UPSI being available in the computer files, the same shall be secured with adequate security of login and password.
- 7) The Designated persons shall hold their investments in Securities for a Minimum Period of 30 days.

### **4. MECHANISM FOR PREVENTION OF INSIDER TRADING AND HANDLING OF UPSI**

The Company shall put in place adequate and effective system of internal controls to ensure compliance with the requirements given in PIT Regulations and other relevant laws.

The Audit Committee of the Company shall review compliance of this Code at least once in a financial year and shall verify that the systems for internal control are adequate and are operating effectively.

### **5. PROHIBITION ON INSIDER TRADING**

A Designated Person, shall not, directly or indirectly Trade in Securities of the Company, except when the Trading Window is open and he / she is not in possession of UPSI, and such Trade is in accordance with the PIT Regulations. A Designated Person should avoid such practices as would/may defeat the very purpose of this Code and/or PIT Regulations such as providing advice/tips to any third party in relation to the Company’s Securities while in possession of UPSI, enter into speculative trading, trading for short term considerations etc.

When a person who has traded in Securities of the Company has been in possession of UPSI, his trades would be presumed to have been motivated by the knowledge and awareness of such information in his possession. This presumption may be rebutted by demonstrating the circumstances as provided under the proviso to Regulation 4(1) of the PIT Regulations viz. off-market inter-se transfer between Insiders, trade executed pursuant to Trading Plan, transaction carried out through block deal mechanism etc.

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

- 1) The designated person shall not trade in securities that are listed on a stock exchange when in possession of unpublished price sensitive information except the insider may prove his innocence by demonstrating the circumstances including the following:-
  - a) the transaction is an off-market inter-se transfer between promoters who were in possession of the same unpublished price sensitive information without being in breach of Regulations 3 and both parties had made a conscious and informed trade decision;
  - b) in the case of non-individual insiders: –
    - (i) 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
    - (ii) appropriate and adequate arrangements were in place to ensure that these 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;
    - (iii) The trades were pursuant to a trading plan prescribed by SEBI (Insider Trading) Regulations, 2015.
- 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.
- 3) The Board may specify such standards and requirements, from time to time, as it may deem necessary for the purpose of this code.

## **7. Trading Plan**

- 1) The designated person shall be entitled to formulate a trading plan for dealing in securities of the Company 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 as per conditions and restrictions specified under the Regulations.
- 2) 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.
- 3) 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.

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

commencement of the Plan shall be deferred until such UPSI becomes generally available information. Further, the Insider shall also not be allowed to deal in securities of the Company, if the date of trading in securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.

- 4) Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed. It is hereby clarified that pre-clearance of trades, trading window norms and restrictions on contra trade shall not be required for trades executed as per an approved Trading Plan.

## **8. Trading Window**

- 1) Other than the period(s) for which the Trading Window is closed as prescribed hereunder, the same shall remain open for Trading in the Securities of the Company.
- 2) The Compliance Officer shall communicate the closure of the Trading Window to all Designated Persons through email or physical copies or any other permissible mode. Designated Persons (including their Immediate Relatives) shall not Trade in the Company's Securities when the Trading Window is closed.
- 3) Unless otherwise specified by the Compliance Officer, the Trading Window for Trading in Securities of the Company shall be closed for the Designated Persons, inter alia, prior to:-
  - (a) declaration of financial results,
  - (b) declaration of dividends,
  - (c) change in capital structure,
  - (d) Mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions
  - (e) changes in key managerial personnel, and
  - (f) material events in accordance with the listing agreement & any other law for the time being in force.

In respect of declaration of financial results in point (a), the Trading Window shall remain closed from the end of every quarter till 48 hours after the declaration of the financial results.

- 4) The Trading Window shall be re-opened 48 (Forty-Eight) hours after the information referred to above becomes generally available. 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 re-opening of the trading window, however in any event it shall not be earlier than 48 hours after the information becomes generally available.
- 5) All the Designated Persons shall strictly conduct all their Trading in the Securities of the Company only when the Trading Window is open and no Designated Person shall trade in the Securities of the Company during the period the Trading Window is closed or during any other similar period as may be specified by the Compliance Officer from time- to-time.
- 6) Notwithstanding anything contained in this Code, the trading window restrictions shall not apply in respect of (a) transactions specified in clauses (i) to (iv) and (vi) of the proviso to sub-regulation (1) of regulation 4 of PIT Regulations and in respect of a pledge of shares for a bonafide purpose such as raising of funds, subject to pre-clearance by the Compliance Officer and/or other approving authority and compliance with the respective regulations made by SEBI. Further, transactions which are undertaken in accordance with respective regulations

made by the Board such as acquisition by conversion of warrants or debentures, subscribing to rights issue, further public issue, preferential allotment or tendering of shares in a buy-back offer, open offer, delisting offer or transactions which are undertaken through such other mechanism as may be specified by the Board from time to time.

## 9. Disclosure by certain person

### A. Initial Disclosure:-

S No.	By Whom	What to be disclosed	When to be disclosed	Form
1.	Promoter/ Director/ KMP to the Compliance Officer	Holding of securities of the Company as on date of appointment or becoming Promoter	Within seven days of such appointment or becoming Promoter	In Prescribed Form as per Regulations

### B. Continual Disclosure:-

S No.	By Whom	What to be disclosed	When to be disclosed	Form
1.	Promoter/ member of the Promoter Group/ Director/ Designated Person and each of their Immediate Relative to the Compliance Officer	Number of such securities acquired or disposed in excess of Rs. 10,00,000/- or such higher amount as may be prescribed from time to time. whether in one transaction or a series of transactions over any calendar quarter, aggregates to a Traded value.	Within two trading days of such transaction. Any off-market trade done as per this Code shall be reported by the Designated Persons to the Company within two trading days.	In Prescribed Form as per Regulations
2	Compliance Officer to Stock Exchange	Details of above disclosure	Within two trading days of receipt of disclosure or becoming aware	In Prescribed Form as per Regulations

	<p>The Compliance Officer may, require any other Connected Person to disclose the holdings and trading in securities of the Company at such frequency as he may determine.</p>		<p>of such disclosure</p>	
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The Compliance Officer shall maintain records of all the above disclosures for a minimum period of five (5) years from the date of the filing thereof.

**10. Pre-clearance of trade in securities: -**

- 1) Every designated person who intends to deal in the securities of the Company, shall obtain a pre-dealing approval from Compliance Officer in form as specified under Annexure I for the proposed transaction as per the pre-dealing procedure prescribed hereunder. Provided however, that the pre-dealing approval shall not be required where the aggregate number of shares/securities proposed to be dealt does not exceed the threshold limit of Rs. 5,00,000/- (Rupees five lacs only) in value or such higher amount as may be specified by the Compliance Officer from time to time in one transaction or a series of transactions over any calendar quarter.
- 2) Application as per Annexure I shall be complete and correct in all respects and should be accompanied by such undertakings, declarations, and indemnity bonds as per Annexure – II and other documents/papers as may be prescribed by the Compliance Officer from time-to-time.
- 3) The application for pre-dealing approval with enclosures must be sent either personally or through electronic mail followed by hard copies of all the documents. The e-mail assigned for the purpose is [secretarial@singerindia.com](mailto:secretarial@singerindia.com)
- 4) The Compliance Officer shall consider the application made above and shall approve it within a reasonable time but not later than 2 (two) working days unless he is of the opinion that grant of such an approval would result in a breach of the provisions of this Code. Such approval/rejection shall be conveyed through electronic mail followed by hard copies of the approval and if no such approval/ rejection is received within a period of 2 (two) working days, the application shall be deemed to be approved.
- 5) Every approval letter shall be issued in format prescribed under Annexure – III. Every approval shall be dated and shall be valid for a period of 1 (one) week after the date of approval.
- 6) In case of non-availability/absence of the Compliance Officer due to official engagement, tour, leave, etc., the officer designated by him/her from time-to-time shall discharge the function referred to in (a) above.
- 7) All the designated persons shall ensure that they complete execution of every pre- cleared deal/ transaction in the Company's securities as prescribed above and not later than 1 (one) week after the date of the approval. The designated person shall file within 2 (two) days of the



execution of the deal/transaction, the details of such deal/transaction with the Compliance Officer in the prescribed form under Annexure IV. In case the transaction is not undertaken, a report to that effect shall be filed with Compliance Officer within 2 (two) days after the expiry of the validity period of the approval letter.

- 8) If a deal/transaction is not executed by the concerned designated person pursuant to the approval granted by the Compliance Officer within 1 (one) week, the designated person shall be required to apply once again to the Compliance Officer for pre clearance of the transaction covered under the said approval.
- 9) All the designated persons who buy or sell any number of shares of the Company shall not enter into an opposite transaction i.e sell or buy any number of shares during the next six months following the prior transaction.
- 10) In case of doubt, the designated person shall check with the Compliance Officer or the officer designated by him/her from time-to-time whether the provisions relating to pre- clearance are applicable to any proposed transaction in the Company's securities.

#### **11. Inquiry (Prevention of Leak of Unpublished Price Sensitive Information)**

The Company shall initiate appropriate inquiries on becoming aware of leak of Unpublished Price Sensitive Information or suspected leak of Unpublished Price Sensitive Information in accordance with the policy formulated by the Board of Directors of the Company and inform SEBI promptly of such leaks, inquiries and results of such inquiries. The Board may carry out above functions through any committee or may seek external assistance as may deem appropriate and/or desirable.

#### **12. Penalty for contravention of the code of conduct**

- 1) Every Designated Person shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her dependents).
- 2) Any Designated Person who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalised and appropriate action may be taken by the Company.
- 3) Designated Persons who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligibility for future participation in employee stock option plans, etc.
- 4) The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

#### **13. Others**

In Case of any amendment(s), clarification(s), circular(s) etc issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc shall prevail upon the provisions hereunder.

#### **14. Miscellaneous**

(1) The Board of Directors shall be empowered to amend, modify, and interpret these Rules of this Policy and such Rules of this Policy shall be effective from such date that the Board may notify in this behalf.

(2) How to Report

Report your concerns to the following mail id: Compliance officer/Company Secretary [secretarial@singerindia.com](mailto:secretarial@singerindia.com).

(3) "Retaliation for reporting suspected violations is strictly prohibited under this Policy. Employee who reports any alleged violations of insider trading laws in accordance with the Informant mechanism introduced vide SEBI (Prohibition of Insider Trading) (Third Amendment) Regulations, 2019 dated September 17, 2019, will be protected against any discharge, termination, demotion, suspension, threats, harassment, directly or indirectly or discrimination."

**ANNEXURE – I**

**APPLICATION FOR PRE - DEALING APPROVAL**

*(Pursuant to The Code of conduct for Regulating, Monitoring and Reporting trading by an Insider pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015)*

Date:

To,

The Compliance Officer, Singer  
India Limited  
ISIN of the company: INE638A01035  
A-26/4, 2<sup>nd</sup> Floor, Mohan Cooperative Industrial Estate, New  
Delhi-110 044

<b>Internal use</b>
Recd date and time:
Sign :

Dear Sir/Madam,

**SUB : APPLICATION FOR PRE-DEALING APPROVAL IN SECURITIES OF THE COMPANY.**

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015, I seek approval for purchase/sale/subscription of the \_\_\_\_\_ Securities (give description) of the Company as per the details given below:

Name : \_\_\_\_\_

State whether

Director     Promoter     Designated Employee/KMP/Others

<b>EMPL NO.</b> _____ <b>DESIGNATION</b> _____
<b>DEPARTMENT</b> _____
<b>LOCATION</b> _____

Nature of transaction (Buy/ sell/ subscribe)	*Name of Proposed Buyer/ Seller	No. of securities	**Date of purchase/ allotment	***Previous approval no. and date for purchase/ allotment )	DP/BEN ID of the account / foliono. where the securities will be credited/ debited	No. of Securities held in such Account/ FolioNo.
					DP ID _____ BEN ID _____ FOLIO NO _____	

\* applicable for off market transaction. \*\* applicable only if the application is in respect of sale of securities. \*\*\* applicable only if the application is in respect of sale of Securities for which an earlier purchase sanction was granted by the Compliance Officer.

I enclose herewith the form of Undertaking duly signed by me.

Yours faithfully,

Sign \_\_\_\_\_  
Designation \_\_\_\_\_

**Note** This application has to be necessarily submitted either by hand or through electronic mail at the dedicated e-mail id [secretarial@singerindia.com](mailto:secretarial@singerindia.com) and followed by a hard copy.

**ANNEXURE-II**  
**UNDERTAKING**  
**(TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-DEALING)**

Date:

To,

The Compliance Officer, Singer  
India Limited  
ISIN of the company: INE638A01035  
A-26/4, 2<sup>nd</sup> Floor, Mohan Cooperative Industrial Estate, New  
Delhi-110 044

I, \_\_\_\_\_ S/D/W/o \_\_\_\_\_, resident of \_\_\_\_\_,  
\_\_\_\_\_ hereby declare that I am a/an  
Director/Employee/KMP/Promoter of M/s. Singer India Limited.

I, further declare:

1. that, I am not in possession of or otherwise privy to any unpublished Price Sensitive Information up to the time of signing this undertaking.
2. that, in case, I have access to or receive any price sensitive information after signing this Undertaking but before execution of the transaction, I shall inform the Compliance Officer of the change in my position and I would completely refrain from dealing in the Securities of the Company till the time such Price Sensitive Information becomes public.
3. that, I declare that I have not contravened the Code as notified by the Company from time to time.
4. that, I undertake to submit the necessary report within two days of execution of the transaction or a 'Nil' report if the transaction is not undertaken.
5. that, I am aware and I shall be liable to face penal consequences including disciplinary action as set forth in the Code of the Company, in case the above declarations are found to be misleading or incorrect at any time.
6. that, I hereby agree to indemnify and keep the Company, its Directors & Compliance Officer indemnified from and against any and/or all penalties/fines that may be imposed on them by the Securities and Exchange Board of India and/or any other statutory authorities as a result of violation by me of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Code prescribed by the Company.
7. that, I declare that I have made full and true disclosure in the matter.

(Signature)

Name Designation

**ANNEXURE III**

**PRE-DEALING APPROVAL LETTER**

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

Approval No: SIL/S&L/SEBI (IT) REG/ 20.... / .....

Mr./Ms. \_\_\_\_\_

Emp No.: \_\_\_\_\_

Designation: \_\_\_\_\_

**SUB : PRE-DEALING APPROVAL/DISAPPROVAL**

**REF : YOUR APPLICATION DTD. \_\_\_\_\_**

Dear Mr. /Mrs. \_\_\_\_\_

With reference to your above application seeking approval for undertaking certain transactions in securities of the Company detailed therein, please be informed that you are hereby authorised/not authorised to undertake the transaction(s) as detailed in your said application.

This approval is being issued to you based on the various declarations, representations and warranties made by you in your said application.

This approval letter is valid till \_\_\_\_\_ (i.e. for one week). If you do not execute the approved transaction /deal on or before this date you would have to seek fresh pre-dealing approval before executing any transaction/deal in the securities of the Company. Further, you are required to file the details of the executed transactions in the attached format within two (2) days from the date of transaction/deal.

In case the transaction is not undertaken a "Nil" report shall be required to be furnished by you within two (2) days after the validity period of the approval letter.

Yours truly,  
**For Singer India Limited**

**Compliance Officer**

*Encl: Format for submission of details of transaction*

**ANNEXURE -IV**

**DISCLOSURE OF PRE-APPROVED TRANSACTIONS**

(To be submitted within two (2) days of transaction/ dealing in securities of the Company when transaction is undertaken otherwise within two (2) days after the expiry of the validity period of the approval letter issued in this behalf).

Date:

The Compliance Officer, Singer  
India Limited  
ISIN of the company: INE638A01035  
A-26/4, 2<sup>nd</sup> Floor, Mohan Cooperative Industrial Estate, New  
Delhi-110 044

Dear Sir,

**SUB : DETAILS OF PRE-APPROVED TRANSACTION**  
**REF : YOUR APPROVAL LETTER NO. \_\_\_\_\_ DTD. \_\_\_\_\_**

This is to inform you that I,

- have not bought/sold/subscribed any Securities of the Company.\*
- have bought/sold/subscribed to the \_\_\_\_\_ Securities (give description) as mentioned below on (insert date)\*.

Name of holder	** First or joint holder	No. of securities dealt with	Bought / Sold/ Subscribed*	DP ID/CLIENT ID ( electronic form ) or Folio no. for physical Sec. will be debited or credited*	Price (Rs)

\*Strike out whichever is not applicable, \*\* "F" first holder "J" joint holder

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of five (5) years and produce to the Compliance Officer/SEBI any or all 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 declare that the above information is correct and that the provisions of the Company's Code of Conduct for prevention of Insider Trading and/or applicable laws/rules/ regulations made thereunder have not been contravened for effecting the above said transaction(s).

I agree to hold the above securities for a minimum period of 30 days. In case there is any personal emergency or urgent need to sell these securities within the said period, I shall approach the Company (Compliance Officer) for necessary approval (applicable in case of purchase / subscription).

**Yours truly,**

**Signature:**

Name: \_\_\_\_\_ Emp No: \_\_\_\_\_

Designation \_\_\_\_\_ Dept/ Div