



**CODE OF CONDUCT  
FOR  
PREVENTION OF INSIDER TRADING  
OF  
GALAXY MEDICARE LIMITED**



## CONTENTS

SL NO	PARTICULARS	PAGE NO
1	INTRODUCTION	2
2	APPLICABILITY	2
3	DEFINITIONS	2
4	PROHIBITION ON COMMUNICATING OR PROCURING UPSI	5
5	PROHIBITION OF INSIDER TRADING	5
6	TRADING WINDOW	6
7	PRE-CLEARANCE OF TRADING	8
8	ADDITIONAL TRADING RESTRICTION ON DESIGNATED PERSONS	9
9	TRADING PLAN	9
10	PENALTY FOR INSIDER TRADING	10
11	DISCLOSURE	10
12	MISCELLANEOUS	11
13	AMENDMENTS	12



## 1. INTRODUCTION :

Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended (hereinafter referred to as “**PIT Regulations**”) requires *inter alia* Every Listed Company and Board of Directors or heads of every Intermediary shall ensure that the CEO or MD to formulate a Code of Conduct with their approval to Regulate, Monitor and Report Trading by its Designated Persons and Immediate Relatives of Designated Persons towards achieving compliance with these regulations and enforce a code of internal procedures and conduct based on the Model Code in accordance with the Regulations. Further, Regulation 7 of the PIT Regulations requires every Promoter, Member of the Promoter Group, Key Managerial Personnel, Directors and Connected Person of Listed Companies to disclose their Shareholdings and Changes to such Shareholding to the Respective Companies.

## 2. APPLICABILITY :

This Code shall be applicable to all Insiders (as defined herein) of the Company including Designated Persons and Immediate Relatives of Designated Persons as defined in this Policy. The SEBI Regulations prohibit an Insider from Trading in the Securities of a Company Listed on any Stock Exchange when in possession of any Unpublished Price Sensitive Information.

Unpublished Price Sensitive Information (“UPSI”) means any Information, which relates, directly or indirectly, to the Company or its Securities, that is not generally available which upon becoming generally available, is likely to materially affect the Price of the Securities of the Company.

“Generally Available” information means information that is accessible to the Public on a non-Discriminatory Basis. Information which is Published on the Website of Stock Exchange where the Securities of the Company are Listed or Published by way of a press release by the Company would ordinarily be considered generally available.

The SEBI Regulations Prohibit the Communication of UPSI to any person except in compliance with applicable law. Further, Procuring Any Person to Trade in the Securities of any Company when in possession UPSI is also prohibited under the SEBI Regulations and the Securities Laws. Violations of the SEBI Regulations and the Securities Laws Subject Insiders to Severe Penalties Including Disgorgement Proceedings, Fines and Imprisonment as per the Applicable Law.

## 3. DEFINITIONS:

**Act'** means the Securities and Exchange Board of India Act, 1992 as amended from time to time.



**'Code'** means this Code of Conduct To Regulate, Monitor and Report Trading by Insiders in Securities of the Company as amended from time to time.

**'Compliance Officer'** means the Company Secretary of the Company. If there is no Company Secretary, Any Other Senior Level Employee who shall report directly to the Managing Director and appointed by the Company as Compliance Officer.

**'Connected Person'** means the Persons so defined under Regulation 2(d) of the PIT Regulations, to the extent applicable to the Company.

**'Designated Persons'** shall include Person identified by the Board of Directors in Consultation with the Compliance Officer based on his/her Role and Function in the organization and the access to UPSI and shall also include:

- (i) The Promoters of the Company.
- (ii) Members of the Board of Directors of the Company.
- (iii) Key Managerial Personnel of the Company.
- (iv) Auditors of the Company.
- (v) All employees, support staff of the Accounts, Finance, Legal, Internal audit, Information technology and Secretarial Department of the Company at the Registered and Corporate Office.
- (vi) Key Managerial Personnel of the material subsidiary of the Company; if any.
- (vii) Secretaries/Executive Assistants reporting to the Directors and the Key Managerial Personnel.
- (viii) All Departmental Heads of the Company.
- (ix) Employees of other Departments/Divisions on a case-to-case basis, who could be reasonably expected to have access to UPSI(s) relating to the Company, to be decided by the Chairman/ Managing Director/ Compliance Officer/Chief Financial Officer, on a case-to-case basis.
- (x) Employees of Material Subsidiaries of the Company designated on the basis of their Functional Role or Access to UPSI in the organization by their Board of Directors.
- (xi) Employees up to Two Levels below the Board of Directors of the Company irrespective of their functional role in the company or ability to have access to UPSI.
- (xii) Any support staff of the Company, such as IT Staff or Secretarial Staff, Legal Staff, Finance Staff, Strategy Staff who have access to UPSI and
- (xiii) Such other persons as may be identified by the Compliance Officer.

For the purpose of this Code, the Aforesaid Persons are Individually or Collectively referred to as **"Designated Persons"**

**'Generally Available Information'** means Information that is accessible to the Public on a Non-Discriminatory Basis.



**'Immediate Relative'** means the 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.

For the purpose of this Code, the Declaration given by a Designated Person of an Immediate Relative who is either Dependent Financially on the Person or who Consults such person in taking decisions relating to Trading in Securities will be considered.

**'Insider'** means any Person who is

- i) In receipt of Unpublished Price Sensitive Information Pursuant to a "Legitimate Purpose" shall be considered an "Insider" for purposes of these Regulations.
- ii) A Connected Person.

**'Pre-Clearance of Trade'** means Prior Approval for Trading/ Dealing in the Securities of the Company.

**'Promoter'** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.

**'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.

**'Trading'** means and includes Subscribing, Buying, Selling, Dealing or Agreeing to Subscribe, Buy, Sell, Deal in Securities and 'Trade' shall be construed accordingly.

**'Trading Day'** means a Day on which recognized Stock Exchanges are Open for Trading.

**'Unpublished Price Sensitive Information/ UPSI'** means any information, relating to the Company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the Price of the Securities of the Company and shall, ordinarily including but not restricted to, information relating to the following:

- (i) Periodical financial results of the Company.
- (ii) Dividends (both interim and final).
- (iii) Change in Capital Structure.
- (iv) Mergers, Demergers, Acquisitions, Delisting, Disposals and Expansion of Business and such other Transactions.
- (v) Changes in Key Managerial Personnel.

**'Trading Window'** refers to the Period during which the Company's Securities can be Traded by the Designated Person as provided in this Code.



**'PIT Regulations'** means Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time.

Words and Expressions used and not defined in this Code but defined in SEBI Act, 1992, the SCRA Act, 1956, the Depositories Act, 1996 or Companies Act, 2013 and Rules and Regulations there under shall have the meanings respectively assigned to them in those Legislations.

#### **4. PROHIBITION ON COMMUNICATING OR PROCURING UPSI :**

An Insider shall not -

- i) Communicate, Provide, or allow access to any UPSI, relating to the Company or its Securities, to any Person including other Insiders, except to the extent allowed by these Rules or SEBI Regulations; or
- ii) Procure from or cause the Communication by an Insider of UPSI, relating to the Company or its Securities.

Provided that nothing contained above shall be applicable when an UPSI is Communicated, provided, allowed access to or procured:

- i) In furtherance of Legitimate Purposes, Performance of Duties or Discharge of Legal Obligations Pursuant to appropriate notice, confidentiality and non-disclosure agreements being executed or
- ii) In the event the Board of Directors Directs or Causes the Public Disclosure of UPSI in the best interest of the Company or
- iii) Within a Group of Persons if such persons have been identified and secluded within a **"CHINESE WALL"** or Information Barrier by the Compliance Officer from the rest of the Company for a particular purpose or for a specified period of time in furtherance of Legitimate Purposes, Performance of Duties or Discharge of Legal Obligations, and are subjected to, among other Conditions, Additional Confidentiality Obligations, Information Barriers designed to Prevent Exchanges of UPSI outside the "Chinese Wall" and the Execution of an Undertaking by such Persons to abstain and/or forego Trading during such Seclusion or till the UPSI No Longer Constitutes UPSI and has become generally available.

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

An Insider shall not directly or indirectly -



- i) Trade in Securities of the Company that are Listed or Proposed to be listed when in Possession of UPSI.
- ii) Trade in Securities of the Company except when the Trading Window is open and the Insider is not in Possession of UPSI.
- iii) Provide Advise/Tips to any third party on trading in Company's Securities while in possession of UPSI and an insider who has ceased to be associated with the Company shall not, for a period of Six Months from date of such Cessation, directly or indirectly trade in the Company's Securities while in Possession of UPSI.

Trading in Securities of Other Companies. No Insider may, while in Possession of Unpublished Price Sensitive Information about any Other Public Company gained in the course of employment with the Company, (a) Trade in the Securities of the Other Public Company, (b) "Tip" or Disclose such Material Non Public Information concerning that Company to anyone or (c) Give Trading Advice of any kind to anyone concerning the Other Public Company.

No Insider may take positions in Derivative Transactions in the Securities of the Company at any time.

The Restriction mentioned above may not apply to:

- (a) A Transaction that is an off-market inter-se transfer between Insiders who were in possession of the same UPSI without being in breach of these Rules and Both Parties had made a Conscious and Informed Trade Decision and
- (b) Trades Pursuant to a Trading Plan setup in accordance with these Rules and SEBI Regulations.

When a Person has Traded in Securities while in possession of Unpublished Price Sensitive Information, his Trades would be Presumed to have been Motivated by the Knowledge and wareness of such Information in his Possession.

## **6. TRADING WINDOW:**

- 1) Designated Persons may Trade in the Company's Securities after Securing Pre-Clearance from the Compliance Officer in accordance with these Rules.
- 2) Designated Persons shall not Trade in the Company's Securities when the Trading Window is Closed.



- 3) The Trading Window shall generally be Closed for all Insiders.
- 4) Additionally, the Trading Window shall be Closed in particular for a Designated Person or Class of Designated Persons when the Compliance Officer determines that a Designated Person or Class of Designated Persons can reasonably be expected to have Possession of UPSI, for such Periods as determined by the Compliance Officer. Designated Person or Class of Designated Persons will Receive a Notification on such Special Blackout Periods.
- 5) The Trading Window may be Re-Opened after Closure, not earlier than 48 Hours after the UPSI in question becomes generally available.
- 6) The Trading Window Restriction shall not apply for Below Cases;
  - i) Off-Market, *inter-se* transfer between Insiders who were in Possession of the same UPSI without violating the Policy and Both Parties had made a Conscious and Informed Trade Decision.
  - ii) Transaction carried out through the Block Deal Window Mechanism between Persons who were in Possession of the UPSI without Violating the Policy and Both Parties had made a Conscious and Informed Trade Decision
  - iii) Transaction Carried Out Pursuant to a Statutory or Regulatory Obligation to carry out a Bona Fide Transaction.
  - iv) Transaction Undertaken Pursuant to the exercise of Stock Options in respect of which the Exercise Price was Pre-Determined in Compliance with Applicable Regulations.
  - v) Trades executed as per the Trading Plan Setup in accordance with the Policy.
  - vi) Pledge of Shares for a Bona Fide Purpose such as Raising of Funds, Subject to Pre-Clearance by the Compliance Officer.
  - vii) Transactions Undertaken in accordance to respective Regulations made by SEBI, 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.



## 7. PRE-CLEARANCE OF TRADING :

- 1) All Designated Persons who intend to Trade in the Securities of Galaxy Medicare Limited (either in their own name or in the name of any Immediate Relative), whether Buying or Selling, during the Trading Window Open Period, and if the Value of such Securities likely to be Traded either in a Single Transaction or a Series of Transactions over any Calendar Quarter aggregates to more than Rs.10,00,000/- (Rupees Ten Lakh Only), must obtain Pre-Clearance for the Transactions. Pre-Clearance should be obtained by Submitting an Application in the Format Prescribed by the Company from time to time to the Compliance Officer, Indicating the Estimated Number of Units of Securities that the Designated Person or Immediate Relative(s) intend to trade, along with any other Details Specified in the Form. The Applicant must also declare that they are not in Possession of any Unpublished Price Sensitive Information.
- 2) The Compliance Officer shall not approve any Proposed Trade by Designated Person if the Compliance Officer determines that such Designated Person is in Possession of UPSI even though the Trading Window is Open.
- 3) The Compliance Officer may, after being satisfied that the Application and undertaking are True and Accurate, Approve Trading by a Designated Person, on the Condition that the Trade so approved shall be executed within Seven Trading Days following the Date of Approval.
- 4) The Board of Directors of the Company shall be the Approving Authority for Approving the Pre-Clearance Application of Compliance Officer and Executive Director.
- 5) The Designated Person shall, within Two Days of the Execution of the Trade, Submit the Details of Such Trade to the Compliance Officer in such format as may be prescribed by the Company from time to time. In case the Transaction is not undertaken, a report to that effect shall be filed in the said form.
- 6) If the Pre-Cleared Trade is not executed within Seven Trading Days after the Approval is given, the Designated Person must secure Pre-Clearance of the Transaction again.
- 7) Pre-Clearance of Trades shall not be required for a Trade Executed as per an Approved Trading Plan.
- 8) A Designated Person who Trades in Securities of the Company without complying with the Pre-Clearance Procedure as envisaged in these Rules or gives False Undertakings and/or makes Misrepresentations in the Undertakings executed by him/her while Complying with the Pre-Clearance Procedure shall be subjected to the Penalties as envisaged in these Rules.



#### **8. ADDITIONAL TRADING RESTRICTIONS ON DESIGNATED PERSONS :**

- 1) All Designated Persons who Trade in the Securities of the Company shall not enter into a Contra Trade during the next Six Months following the Prior Transaction. In case of Any Contra Trade be Executed, Inadvertently or otherwise, in Violation of such a Restriction, the Profits from such Trade shall be Liable to be Disgorged for Remittance to SEBI for Credit to the Investor Education and Protection Fund administered by SEBI.
- 2) The Above Restriction on Contra Trade shall not apply in case of Exercise/Sale of ESOP Shares Provided the Designated Persons do not Possess UPSI and the Sale is Executed when the Trading Window is Open and after obtaining Pre-Clearance.

#### **9. TRADING PLAN:**

- 1) A Designated Person shall be entitled to formulate a Trading Plan that Complies with the SEBI Regulations (a "Trading Plan") and Present it to the Compliance Officer for Approval and Public Disclosure. The Trading Plan may be Executed only after the Plan is Approved by the Compliance Officer and Disclosed to the Stock Exchanges on which the Securities of the Company are Listed.
- 2) Designated Person shall not exercise any influence over the amount of Securities to be Traded, the Price at which they are to be Traded, or the Date of the Trade. Designated Person may delegate Discretionary Authority to his/her Broker, but in no event Designated Person may Consult with the Broker regarding Executing Transactions, or otherwise Disclose Information to the Broker concerning the Company that might Influence the Execution of Transactions, under the Trading Plan after it Commences.
- 3) The Trading Plan once approved shall be Irrevocable and the Designated Person 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 Designated Person is in Possession of UPSI and the said information has not become generally available at the time of the Commencement of Implementation. The Commencement of the Trading Plan shall be deferred until such UPSI becomes generally Available Information.



## **10. PENALTY FOR INSIDER TRADING:**

- 1) An Insider who acts in Contravention of these Rules shall be Liable to have his Services or Relationship with the Company as the case may be Terminated.
- 2) Directors, Officers and Employees of the Company who Violate these Rules shall be subject to Disciplinary Action by the Company which may include Wage Freeze, Suspension, Recovery, Claw Back etc. and Ineligibility for Future Participation in the Company's Stock Option Plans or Termination.
- 3) The SEBI or any Other Appropriate Regulatory Authority may also be Informed of the Violation of these Rules so that Appropriate Action may be taken.

## **11. DISCLOSURE:**

### **1) Initial Disclosure:**

- (a) Every Promoter, Member of the Promoter Group, Key Managerial Personnel, Director of the Company and each of their Immediate Relatives shall Disclose his holding of Securities of the Company within Thirty Days of these Rules taking effect as per in the Format Prescribed by the Company from time to time.
- (b) Every Person, upon appointment as a Key Managerial Personnel or Director of the Company, or upon becoming a Promoter or Member of the Promoter Group, shall disclose their own and their Immediate Relatives' Holdings of Securities of the Company as of the date of such Appointment or becoming a Promoter to the Company within Seven Days, in the Format Prescribed by the Company from time to time.
- (c) Every Designated Person shall Disclose details like Permanent Account Number, Names of Educational Institutions from which they have Graduated and Names of their Past Employers.

### **2) Continual Disclosure:**

- (a) Every Designated person shall disclose Names and Permanent Account Number or any other Identifier authorized by Law of the following Persons to the Company on an Annual Basis and as and when the Information Changes:
  - i. Immediate Relatives.



- ii. Persons with Whom such Designated Person(s) Shares a Material Financial Relationship .
  - iii. Phone and Mobile Numbers which are used by them.
- (b) Every Promoter, Member of the Promoter Group, Designated Person, Director of the Company and each of their Immediate Relatives shall disclose, in the Format Prescribed by the Company from time to time, The Number of such Securities Acquired or Disposed of within Two Trading Days of Such Transaction, if the Value of the Securities Traded, Whether in One Transaction or a Series of Transactions over any Calendar Quarter, Aggregates to a Traded Value in Excess of Rs. 10,00,000/- (Rupees Ten Lakh Only).
- (c) Any Off-Market Trade done as per Regulation 5(6) of this Policy shall be Reported by the Insiders to the Company within Two Working Days.
- (d) The Disclosure shall be made within Two Working Days of:
- i. The Receipt of Intimation of Allotment of Shares, or
  - ii. The Acquisition or Sale of Shares or Voting Rights, as the case may be.

### **3) Disclosure to the Stock Exchange:**

The Compliance Officer shall not if the Stock Exchanges, Particulars of the Trades, within Two Trading Days of the Receipt of the Continual Disclosure or from becoming aware of such Information.

### **4) Disclosures by other Connected Persons:**

The Compliance Officer may require any other Connected Person to Disclose their Holdings and Trading in Securities of the Company in the Format Prescribed by the Company from time to time at such Frequency as the Compliance Officer may determine.

- 5) All Designated Persons must make an Annual Disclosure of the Number of Securities of the Company held as on 31st March Each Year by them including Details of Purchase/Sale of Securities of the Company during the Financial Year to the Compliance Officer. This Disclosure must be made within 30 (Thirty) Days from the Close of Each Financial Year.

## **12. MISCELLANEOUS:**

The Board of Directors shall be empowered to Amend, Modify, and Interpret these Rules and such Rules shall be effective from such date that the Board may notify in this behalf.



- 2) The Compliance Officer shall provide the Audit Committee of the Board, on a Quarterly Basis, all the details of Trading in Securities by the Designated Persons including any Violations of the Rules.
- 3) The Compliance Officer shall maintain :
  - i. An Updated List of Designated Persons.
  - ii. Records of Disclosures and Pre-Clearance Applications and Undertakings for a Period of Five Years and
  - iii. A Confidential List of any 'Restricted Securities' to which the Compliance Officer may require Designated Persons to seek Pre-Clearance before Trading in such 'Restricted Securities'.
- 4) The Company shall require all Connected Persons to formulate and adhere to a Code of Conduct to achieve Compliance with these Rules. In case such Persons observe that there has been a Violation of these Rules, then they shall inform the Board of Directors of the Company Promptly.
- 5) Any Suspected Violation of Leak of Unpublished Price Sensitive Information or Violation of this Policy can be reported under Whistle Blower Policy.

### **13. AMENDMENTS:**

This Code and any Subsequent Amendment(s) thereto, Shall be Promptly Intimated to the Stock Exchange(s) where the Securities of the Company are Listed.

\*\*\*\*\*



**FORM NO. 1**

**APPLICATION FOR PRE-CLEARANCE OF TRADE  
(FOR DESIGNATED PERSONS AND THEIR DEPENDENTS) \***

**To,**

**The Compliance Officer,**

**Galaxy Medicare Limited**

Address: Plot No.02, Zone-D, Mancheswar Industrial Estate, Bhubaneswar, Khurda, Orissa, India – 751010.

**Through Division/ Department Head/ Whole-Time Director**

1. Name of the Applicant:
2. Designation/ Nature of Relation with [●]:
3. Employee Pay Roll No.\* (If Applicable):
4. Nature of Securities Held: \*Equity Shares/ Debentures/ Other Securities
5. Number of Securities in the Company Held as on Date:
6. Nature of Proposed Dealing for which Approval is Sought: Purchase / Sale of Securities
7. Estimated Number of Securities Proposed to be Acquired/Subscribed /Sold:
8. Other Details:

Name of Depository Participant:

DP ID No.:

Client ID No.\* / Folio No.\*:

\*Strike Whichever is Not Applicable



## **UNDERTAKING TO BE SUBMITTED ALONG WITH THE APPLICATION FOR PRE-CLEARANCE**

In relation to the above dealing, I Undertake that:

- (a) I have No Access to nor do I have any Information that could be Construed as “Unpublished Price Sensitive Information” as defined in the Code until the time of Signing this Undertaking.
- (b) In the event that I have access to or received any information that could be construed as “Unpublished 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.
- (c) I have not Contravened the Provisions of the Code of Conduct for Prevention of Insider Trading as Notified by the Company from time to time.
- (d) I have made Full and True Disclosure in the Matter.
- (e) I hereby declare that I shall execute my order in respect of Securities of the Company within Seven Trading Days from the date that Approval of Pre-Clearance is given. If the Order is not executed within Seven Trading Days from the Date of Approval, I Undertake to Obtain Pre-Clearance for the Transaction Again.

Signature:

Name:

Date:



## PRE-CLEARANCE ORDER

With Reference to your Application Dated \_\_\_\_\_, We Inform You That Your Request for Dealing in \_\_\_\_\_(Nos.) or \_\_\_\_\_ Worth Shares of the Company is Approved. Please Note that the Said Transaction must be Completed on or before (date) that is within Seven Trading Day from Today.

Date:

For **Galaxy Medicare Limited**

Compliance Officer



**FORM NO. 2**  
**CONFIRMATION OF DEAL**

**To,**  
**The Compliance Officer,**  
**Galaxy Medicare Limited**

Address: Plot No.02, Zone-D, Mancheswar Industrial Estate, Bhubaneswar, Khurda, Orissa, India – 751010.

I Confirm that the Share Dealing for which Approval was Granted on \_\_\_\_\_ was Completed on \_\_\_\_\_ For Purchasing/Selling \_\_\_\_\_ (Nos.) Shares of the Company.

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

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

Pay Roll No.: \_\_\_\_\_

\_\_\_\_\_  
(Signature)

Date:



**FORM NO. 3**

**APPLICATION FOR WAIVER OF MINIMUM HOLDING PERIOD**

**(For Designated Persons and their Dependents)**

To,

**The Compliance Officer,**

**Galaxy Medicare Limited**

Address: Plot No.02, Zone-D, Mancheswar Industrial Estate, Bhubaneswar, Khurda, Orissa, India - 751010.

**Through Division/ Department Head/ Managing Director/ Compliance Officer**

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

Dear Sir/ Madam,

I Request You to Grant Me Waiver of the Restriction Mentioned in Clause 7 of the Code of Conduct for Prevention of Insider Trading with respect to \_\_\_\_\_ Shares of the Company. I Desire to Deal in the Said Purchase/ Sell the Said Shares on account of the following Reasons:

Thanking You,

Yours Faithfully,

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

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

Department: \_\_\_\_\_

Employee PL No. \_\_\_\_\_

APPROVAL GRANTED / REJECTED

FOR \_\_\_\_\_

Compliance Officer

Date:

1. Reasons to be given, if rejected



**FORM NO. 4**

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

To,

**The Compliance Officer,**

**Galaxy Medicare Limited**

Address: Plot No.02, Zone-D, Mancheswar Industrial Estate, Bhubaneswar, Khurda, Orissa, India - 751010.

**Statement of Holdings at the time of Pre-Clearance**

<b>Designation</b>	<b>Department</b>	<b>No. of Shares Held As On Date (Date of Application for Pre - Clearance)</b>	<b>Folio No. / DP ID / Client ID</b>	<b>Nature of Dealing for which Approval is Sought</b>	<b>No. of Shares / Value of Shares to be Dealt</b>

I/ We Hereby Declare That I/ we have not done any Opposite Transaction for the Last Six Months without the Approval of the Compliance Officer.

Signature : \_\_\_\_\_

\*Delete Whichever is Not Applicable