

Code of Conduct for Prevention of Insider Trading

Introduction:

Regulation 9 of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("the Regulations"), requires that the Board of Directors of each Listed Company is mandated to ensure that the Chief Executive Officer/Managing Director formulates a code of conduct, approved by them, to oversee, monitor, and report trading activities conducted by designated persons and the immediate relative(s) of designated persons. The objective is to ensure compliance with the Regulations by adhering to the minimum standards outlined in Schedule B of the Regulations, without any deviation from the provisions of the Regulations.

Dudigital Global Limited (the "Company") is dedicated to upholding transparency and fairness in dealing with all the stakeholders, while ensuring compliance with relevant laws and regulations. This code has been established as an integral component of the Code of Internal Procedures and Conduct, which governs the regulation, monitoring, and reporting activities of the Designated Person (defined hereinafter) and Immediate Relative(s) of the Designated Person (defined hereinafter) within the Company.

Definitions and Interpretation:

"Act" means the Securities and Exchange Board of India Act, 1992, as may be amended from time to time.

"Board" means the Board of Directors of Dudigital Global Limited.

"Code" means this Code of Conduct for Prevention of Insider Trading of Dudigital Global Limited, as amended from time to time.

"Compliance Officer" means the Company Secretary. In the absence of Company Secretary any senior officer, designated so and reporting to the board of directors, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board of directors of the Company.



"Connected Person" is as defined under the Regulation.

"Designated Person" shall include:

- 1. Every Promoter of the Company;
- 2. All persons forming a part of the promoter group of the Company;
- 3. Members of the Board of Directors of the Company including, executive or nonexecutive or independent directors;
- 4. Key Managerial Personnel of the Company;
- 5. Every employee in grade of General Managers and above;
- 6. Every employee in the Corporate Secretarial, Insurance, Taxation, Accounts, IT & Legal Department irrespective of their role, designation etc, as may be determined and informed by Compliance Officer;
- 7. Vertical heads;
- 8. Employees up to two levels below Chief Executive Officer or Chief Financial Officer of the Company irrespective of their functional role in the Company or ability to have access to Unpublished Price Sensitive Information.
- 9. Any other person/ employee of Dudigital Global Limited or its material subsidiary, designated by the Compliance Officer, either for a specific period of time or for an indefinite period of time, based on such person's role, function, designation and seniority in the Company and the extent to which such person may have access to Unpublished Price Sensitive Information.
- 10. Immediate Relative of all the above persons.

"Director" means a member of the Board of the Company.

"Generally Available Information" means information that is accessible to the public on a non-discriminatory basis.

"Immediate Relatives" with respect to any person, means the spouse of a person, and includes, parents, siblings, and children of such person or of the spouse (whether minors or adults) who are either financially dependent on such person or consult with such person while taking decisions relating to trading in securities.

"Insider" means any person who is:

- i) A connected person;
- ii) In possession of or having access to Unpublished Price Sensitive Information.



"Key Managerial Personnel" means key managerial personnel as defined under Section 203 of the Companies Act, 2013 and includes:

- i) Chief Executive Officer;
- ii) Managing Director;
- iii) Manager;
- iv) Company Secretary;
- v) Whole-Time Director;
- vi) Chief Financial Officer.

"Need to know basis" means that Unpublished Price Sensitive Information should be disclosed only to those within the Company who need the information to discharge their duty.

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

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

"Regulations" means the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as may be amended.

"Securities" means securities issued by Dudigital Global Limited listed on Stock Exchange from time to time.

"Stock Exchange" mean the stock exchanges where any Securities of Company are listed.

"Trading" or "Trade" means and includes subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell or deal in any Securities, and "trade" shall be construed accordingly.

"Trading Day" means a day on which the Stock Exchange is open for Trading

"Unpublished Price Sensitive Information" means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: -

- i) Financial results;
- ii) Dividends;
- iii) Change in capital structure;
- iv) Mergers, De-mergers, Acquisitions, Delisting, Disposals and expansion of business and such other transactions;
- v) Changes in Key Managerial Personnel;

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Terms that have not been defined in this code shall have the same meaning assigned to them in the Act, SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015 and/or any other SEBI Regulation(s) as amended from time to time.

Duties of Compliance Officer

The Compliance Officer's responsibilities include:

- i. The Compliance Officer shall report on insider trading to the Board of Directors of the Company and in particular, shall provide reports to the Chairman of the Audit Committee, if any, or to the Chairman of the Board of Directors at such frequency as may be stipulated by the Board of Directors.
- Assisting all Designated Partners/ Connected person in addressing any clarifications regarding the Insider Trading Regulations and Company's Code of Conduct.
- iii. Establishing policies for implementing the Code of Conduct and the Regulations in consultation with the Board/Audit Committee;
- iv. Prescribing procedures for various activities outlined in the Code of Conduct and the Regulations;
- v. Ensuring compliance with the aforementioned policies and procedures;
- vi. Monitoring adherence to regulations for the preservation of Unpublished Price Sensitive Information (UPSI);
- vii. Granting pre-clearance approvals to Designated Persons for trading in the Company's Securities by them/their Immediate Relatives and monitoring such trading;
- viii. Educating individuals and raising awareness about the duties and responsibilities associated with receiving UPSI, as well as the liability in case of misuse or unwarranted use of such information or communication;
- ix. Closing the trading window for periods deemed appropriate in compliance with the provisions of this code;
- x. Maintaining records as required under this Code of Conduct;
- xi. Reporting all details of trading in securities by Designated Persons, including any violations of the Code of Conduct, to the Audit Committee and the Board on a quarterly basis.



Responsibilities of Designated Person

Preservation of Unpublished Price Sensitive Information.

All individuals designated as Designated Persons and their Immediate Relatives must uphold strict confidentiality regarding all Unpublished Price-Sensitive Information. Accordingly, no Designated Person or their Immediate Relative shall:

- i) Transmit, communicate, provide or allow access to any Unpublished Price Sensitive Information to any individual;
- ii) Procure from or cause the communication by any other person with UPSI.
- iii) Either on his own behalf, or on behalf of any other person, Trade when in possession of any Unpublished Price Sensitive Information unless made in accordance with the Trading Plan. Such prohibition shall include Trades undertaken through portfolio management schemes, whether discretionary or non-discretionary;
- iv) advise any person to Trade in the Securities while being in possession, control or knowledge of Unpublished Price Sensitive Information. For avoidance of any doubt it is clarified that "advice" shall mean to include recommendations, communications or counselling.
- v) Reveal Unpublished Price Sensitive Information to their Immediate Relatives or any other individual;
- vi) Engage in discussions about Unpublished Price Sensitive Information in public places where it may be overheard by others;
- vii) Disclose Unpublished Price-Sensitive Information to any other Designated Person or any individual who does not require such information for their job;
- viii) Create the impression that he/she is trading based on Unpublished Price-Sensitive Information.

<u>Prohibition on Communication and Procurement of Unpublished Price</u> Sensitive Information:

An Insider is prohibited from communicating, providing, or allowing access to any Unpublished Price-Sensitive Information (UPSI) related to the Company or its securities to any person, including other Insiders, except as specified in the Code of Conduct;

No individual shall obtain from or induce an Insider to communicate UPSI related to the Company or its securities;



However, the above restrictions do not apply when UPSI is:

- i) Communicated, provided, allowed access to, or procured in furtherance of legitimate purposes, performance of duties, or discharge of legal obligations pursuant to appropriate confidentiality and non-disclosure agreements being executed;
- ii) Communicated, provided, allowed access to, or procured in connection with a transaction that would entail an obligation to make an open offer under the takeover regulations where the Board of Directors of the Company is of informed opinion that sharing of such information is in the best interest of the Company;
- iii) Communicated in the event the Board of Directors directs or causes the public disclosure of UPSI in the best interest of the Company, pursuant to appropriate confidentiality and non-disclosure agreements being executed;
- iv) Shared within a group of individuals if such persons have been identified and segregated within a "Chinese wall" or information barrier by the Compliance Officer from the rest of the Company for a specific purpose and/or a specified period of time in furtherance of legitimate purposes, performance of duties, or discharge of legal obligations. This group is subject to, among other conditions, additional confidentiality obligations and information barriers designed to prevent the exchange of UPSI outside the "Chinese wall."

Prohibition on Insider Trading:

An Insider is prohibited from engaging, either directly or indirectly, in the following actions:

- 1. Trade in securities that are listed or proposed to be listed when in possession of UPSI;
- 2. Trade in securities of the Company except when the Trading Window is open and the Insider is not in possession of UPSI.

Provided that the restriction in (i) above shall not apply to:

- i. 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 this Code of Conduct 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 being in breach of regulation 3 of SEBI (Prohibition of Insider Trading) Regulations, 2018 and both parties had made a conscious and informed trade decision;
- iii. transaction is carried out in pursuant to a statutory or regulatory obligation to carry out a bona fide transaction;
- iv. the transaction undertaken is in pursuant to the exercise of stock options in respect of which the exercise price was pre-determined in compliance with applicable regulations; and



v. Trades pursuant to a Trading Plan set up in accordance with this Code of Conduct.

Trade by any person in Company's securities in possession of UPSI, would be presumed to have been motivated by the knowledge and awareness of such information.

Chinese Wall

To safeguard against the improper use of confidential information, the Company has implemented "Chinese Wall" procedures. These procedures create a distinction between sections of the Company designated as "Inside Areas," where regular access to confidential/price sensitive information occurs, and sections involved in other activities or other support services, without such access to the confidential information, termed as "Public Areas."

In instances where Chinese Wall arrangements are implemented, Designated Persons working within an Insider Area are prohibited from communicating any Confidential or Unpublished Price Sensitive Information to Designated Persons or any other individuals in Public Areas without obtaining prior written approval from the Compliance Officer

Designated Persons within a Chinese Wall are obligated to ensure that the integrity of the Chinese Wall is not intentionally or inadvertently breached. Any known or suspected breaches of the Chinese Wall must be promptly reported to the Compliance Officer.

Crossing the Chinese Wall to enter Insider Areas is permissible for Designated Persons only with prior written approval from the Compliance Officer, subject to all restrictions applicable to such areas. This process, often referred to as 'crossing the wall' or 'bringing inside the wall,' must include clear reasons justifying the person's access to such information and may impose limits, if any, on the information provided on a need-to-know basis within the wall. During this process, Designated Persons must inform the individual about the duties and responsibilities associated with receiving Unpublished Price Sensitive Information, emphasizing the liability that arises from misuse or unwarranted use of such information.

Trading Window:

The Compliance Officer is responsible for announcing a 'trading window' during which Designated Persons can engage in trading the Company's securities, provided they obtain preclearance from the Compliance Officer as outlined in this Code of Conduct.

Designated Persons and their immediate relatives are prohibited from trading in the Company's securities when the trading window is closed. However, eligible company employees are allowed to exercise employee stock options even when the trading window is closed.



The trading window is shut for all Insiders from the first day immediately following the relevant calendar half year until 48 hours after the disclosure of the half yearly/annual financial results of the company to stock exchanges.

Furthermore, the trading window will be closed, specifically for a Designated Person or a class of Designated Persons, when the Compliance Officer determines that they can reasonably be expected to have possession of UPSI, for periods specified by the Compliance Officer.

The trading window may be reopened after closure, but not before 48 hours have passed since the UPSI in question became generally available.

Pre-clearance of trading:

- i. All Designated Persons who (or whose Immediate Relatives) intends to Trade in the Securities in a calendar quarter (either in one transaction or in a series of transactions) of a consideration price exceeding Rs. 10,00,000/- (Rupees Ten Lakhs Only) for the Securities should obtain a pre-clearance of trades by Compliance Officer as per the procedure described hereunder. This is a mandatory requirement even when the trading window is open.
- ii. Any Designated Person or his/her Immediate Relatives who carries on any transaction or series of transaction to circumvent this clause shall be in violation of this Code.
- iii. Designated Persons are prohibited from trading in Company securities and applying for pre-clearance if they possess UPSI, even if the trading window is open.
- iv. Prior to approving any trades, the Compliance officer shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any Unpublished Price Sensitive Information.
- v. Upon satisfying the accuracy of the application and undertaking, the Compliance Officer may approve trading by a Designated Person, with the condition that the approved trade must be executed within seven trading days from the date of approval, failing which fresh pre-clearance would be needed for the trades to be executed.
- vi. An application and undertaking shall be made to Compliance Officer as per **Annexure-I.**
- vii. Pre-clearance of trades is not necessary for a trade executed in accordance with an approved trading plan.
- viii. In the case of a trade by the Compliance Officer, pre-clearance must be obtained from the Managing Director/Executive Director of the Company.



- ix. Designated Persons must, within two days of executing a trade, submit trade details to the Compliance Officer. If the transaction is not undertaken, a report to that effect must be filed in the said form in **Annexure-II.**
- x. Any Designated Person who trades in securities without adhering to the preclearance procedure outlined in this Code of Conduct, or provides false undertakings and/or makes misrepresentations in the undertakings, will be subjected to the penal actions mentioned in this Code of Conduct.

Contra Trade:

Designated Persons engaging in the purchase or sale of any Securities of the Company are prohibited from entering into a opposite transaction, i.e., selling or buying any Securities, within the subsequent 6 (six) months following the preceding transaction ("Contra Trade"). Additionally, Designated Persons are not allowed to take positions in derivative transactions involving the Securities of the Company at any time.

If a Designated Person intends to initiate a Contra Trade, such a transaction can only be carried out with the prior approval of the Compliance Officer. The Compliance Officer, when granting an exception to above clause must document in writing the reasons for allowing such an exception and justify why it does not violate the Code or the Regulations.

If a Contra Trade is executed without prior approval from the Compliance Officer, the profits gained from such a trade are subject to disgorgement for remittance to SEBI, with the funds credited to the Investor Protection and Education Fund administered by SEBI under the Act.

It is clarified that the restrictions on undertaking Contra Trades do not apply to trades executed as a result of exercising employee stock options.

Trading Plan:

- i. All the Designated Person and their immediate relatives has the right to formulate a Trading Plan in accordance with SEBI Regulations ("Trading Plan") and submit it to the Compliance Officer for approval and subsequent public disclosure. Trades can then be executed on the Insider's behalf in line with the approved plan.
- ii. The Compliance Officer is responsible for reviewing the Trading Plan, seeking additional clarifications or undertakings as needed for compliance with SEBI Regulations, and disclosing the plan to the stock exchanges.

The Trading Plan must:

- not entail commencement of trading on behalf of the Designated Person or their Immediate Relatives earlier than 6 (six) months from the public disclosure of the Trading Plan;
- ii. Have a trading period lasting not less than 12 months.
- iii. Avoid any overlap with periods covered by existing trading plans.

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- iv. Exclude trading during the period between 20 trading days before the last day of any half-yearly/annual financial period for which results are required to be announced and two trading days after the disclosure of such results (including the window closure period).
- v. Specify the values of trades or the number of securities to be traded, along with the nature of the trade and the intervals or dates on which such trades will occur.
- vi. Not involve trading in securities for market abuse.
- vii. The implementation of the trading plan should not commence if any UPSI in possession of the insider at the time of formulating the plan has not become generally available at the time of plan implementation. In such cases, the commencement should be deferred until the UPSI becomes generally available.
- viii. Once approved, the Trading Plan is irrevocable, and the insider must mandatorily implement the plan without deviating from it or executing any trades outside the plan's scope.
- ix. Trading window norms and restrictions on contra trade do not apply to trades carried out in accordance with an approved trading plan.
- x. Pre-clearance of trades is not required for trades executed in line with an approved trading plan.
- xi. Upon approval of the Trading Plan, the Compliance Officer shall notify the plan to the stock exchanges on which the securities are listed.

Reporting and Disclosure:

The Compliance Officer shall place before the Board and the Chairman of the Audit Committee, on a quarterly basis, all the details of the trading in the Securities of the Company done by the Designated Persons or their Immediate Relatives together with the accompanying documents that such persons had executed under the pre- approval procedure as outlined above.

The Company shall be entitled to disclose to all the stock exchanges where its Securities are listed, the information provided by Designated Persons or their Immediate Relatives to the Compliance Officer in accordance with the Code.

All designated persons shall be required to disclose name and PAN (Permanent account number) or any other identifier authorized by law of the following persons to the Company on one time/annual basis and as and when the information changes:

- (i) Immediate relatives (annual disclosure);
- (ii) Persons with whom such designated person(s) shares a material financial relationship (annual disclosure);
- (iii) Phone, mobile, and cell numbers which are used by them (annual disclosure);



- (iv) Name of educational institutions from which designated persons have graduated (one time disclosure);
- (v) Names of the past employers (one time disclosure).

Disclosure of Interest or holding by Directors/employees and Substantial Shareholders:

The following disclosures shall be made to the Compliance Officer:

a) Initial Disclosure:

(i) Every person on appointment as Key Managerial Personnel or Director of the company or becoming a promoter or member of the promoter group shall disclose his holding of securities of the Company as on the date of appointment or becoming a promoter, to the Company within seven days if such appointment or becoming a promoter in the format as prescribed in **Annexure-III.**

b) Continual Disclosure:

- (i) Every promoter, member of the promoter group, designated person and director of every company shall disclose to the company the number of such securities acquired or disposed of within two trading days of such transactions if the value of the securities traded, whether in one transaction or series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 10,00,000/- (Rupees Ten Lakhs Only) or such other value as may be specified, in the format in **Annexure-IV**.
- (ii) Company shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading day of receipt of the disclosure or from becoming aware of such information.

c) Disclosures by other connected persons:

(i) Company may at its discretion require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the Company in such form and at such frequency as may be determined by the Company in order to monitor compliance with these regulations in the format as provided by the Regulations.



Amendment of this Code:

In case of any amendment(s), circular(s), clarification(s) etc., issued by the relevant authorities, not being consistent with the provisions laid sown under this code, then such amendment(s), circular(s), clarification(s) etc., shall prevail upon the provisions hereunder and this code shall stand amended accordingly from the effective date as laid down under such amendment(s), circular(s), clarification(s) etc.



Annexure-I

APPLICATION FOR PRE-TRADING APPROVAL

To,

Compliance Officer,

Dudigital Global Limited

Sub: Application for Trading in Securities of the Company.

Pursuant to the SEBI	(Prohibition of Insider	Trading)	Regulations,	2015 an	d the	Code of
Conduct for Preventior	of Insider Trading of th	ne Compa	any, I seek app	oroval to	purcha	ase/ sell/
subscribe	equity shares of the Co	mpany a	s per the deta	ils given l	elow:	

1.	Name of Applicant	
2.	Designation	
3.	Number of Securities held as on date	
4.	Folio No./ DP ID/ Client ID No.	
5.	Number of shares proposed to be Sold/ Acquired	
6.	Proposed date of trading in securities	
7.	Current market price (as on date of application)	
8.	Whether the proposed transaction will be through	
	stock exchange or off-market trade.	

I hereby confirm and undertake that:

- i. I and my relatives (We) do not have access to any price sensitive information and have complied with the code of conduct for prevention of insider trading as specified by the Company from time to time.
- ii. I/We shall execute the trade of Shares within 7 days of your approval failing which we shall apply again to you for your approval.
- iii. In the event that I/We have access to or received any information that could be construed as "Unpublished Prices 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.



iv. I hereby confirm and undertake to not execute any opposite transaction for 6 (six) months from the date of last transaction as per the Code.

I/We have not contravened the provisions of the Codes as notified by the company from time to time.

I/We further confirm that the aforesaid facts are true and correct and shall be fully responsible for any wrongful acts done by me or my relatives including such penalties as may be imposed by the Company.

You are requested to provide the pre-clearance of trade for the above transaction.

Signature:	Date:
Name:	Place:
Designation:	



Annexure-II

DISCLOSURE OF TRANSACTIONS WITH REFERENCE TO PRE-CLEARANCE APPROVAL OBTAINED

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

To, The Compliance O Dudigital Global Li				
I hereby inform th	at I			
have bough (date)	ought / sold/ subsc nt/sold/subscribed whichever is not ap	tosecur	•	below on
Name of holder	No. of securities traded	Bought / sold / subscribed	DP ID/Client ID/Folio No.	Price (Rs.)
	above information i applicable laws/re tion(s).		•	
Signature: Name: Designation:				Date: Place:

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Annexure-III

FORM-B

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

To,

The Compliance Officer,

Dudigital Global Limited (ISIN: INEOHPK01020)

Details of Securities held on appointment of Key Managerial Personnel or Director or upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation 6(2) of SEBI Regulations.

Name, Category PAN, of Person CIN/DIN, (Promoter/ & KMP address /Director with s/immedia	Date of appoint ment of Director /KMP OR Date of becoming Promoter	Promoter/ appointment of Director/ KMP		-	ment		Contracts becoming	erest of th held at the F ent of Direc	time of Promoter/
		Type of security (For e.g. – Shares, Warrants, Convertib le Debentur es etc.)	No.		Number of units (contracts * lot size	Notional value in Rupee terms	Contract Specifi cations	Number of units (contrac ts* lot size	Notional value in Rupee terms

Signature:	Date:
Name:	Place:
Designation:	



Annexure-IV

FORM C

SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (2) read with Regulation 6(2) – Continual Disclosure]

To,

The Compliance Officer,

Dudigital Global Limited (ISIN: INEOHPK01020)

Details of change in holding of Securities of Promoter, Member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoter / member of the promoter group/ designate d person/ Director s/immedia te relative to/others etc.)	Securities prior acquisition/ disposal	held to	Securities a	acquir	red/Dis	sposed	Securities post acquisition disposal	held	Date of allotme nt advice/ acquisit ion of shares/ disposa I of shares, specify	Date of intimati on to compa ny	Mode of acquisiti on /disposal (on market/ public/ rights/ preferent ial offer/ off market/ Inter-se transfer, ESOPs, etc.)	Exchange on which the trade was executed
		Type of securities (For eg.– Shares, Warrants, Convertibl e Debenture s, Rights entitleme nts etc.)	and % of share holdin g		No.	Value	Туре	securities (For eg. – Shares,	and % of shareh olding				

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	Trac	ding in derivatives	(Specify type of c	ontract, Future	s or Options etc.)		
Type of Contract		Buy			Sell I	Exchange on which the trade	
Contract (16)	Specifications (17)	Notional Value	No. and % of share holding (19)	Notional Value (20)	No. and % of share holding (21)	was executed (22)	
			, ,	. ,	. ,		

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

(ii) Value of transaction excludes taxes/brokerage/any other charges.

(iii)In case of Options, notional value shall be calculated based on Premium plus strike price of options.

Signature:	Date:
Name:	Place:
Designation:	

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