

**CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING IN THE
SECURITIES OF
G. G. DANDEKAR MACHINE WORKS LIMITED**

(As approved by the Board of Directors of the Company in its meeting held on 30th May 2014 in place of earlier Code of Conduct for Prevention of Insider Trading in the Securities of the Company dated 15th January 2003 and their amendment from time to time)

Preface:

Pursuant to SEBI (Insider Trading) Regulations, 1992, the Board of Directors of the Company in its meeting held on 15th January, 2003 approved the [Code of Conduct for Prevention of Insider Trading] (the [Code]) and the same has been amended from time to time.

In line with the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2008 issued in November, 2008 and Notification No. LAD-NRO/GN/2008/29/44801 dated 18 November 2008 ;the Code was once again amended by the Board of Directors of the Company in its meeting held on 21 January 2009.

The Securities and Exchange Board of India (SEBI) issued regulations for prohibition of Insider Trading in the year 1992 and the same have been amended by the SEBI from time to time. Through an amendment in November, 2008 SEBI has directed listed companies to have a Code of internal procedures and Conduct as near thereto the model code under regulations without diluting it in any manner.

The term Insider-trading is associated with the investments of Directors, Key Managerial Personnel, Designated Employees and Auditors in the Company's Securities having knowledge of price sensitive information. The term [Insider Trading] has been defined in the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2002, as amended from time to time (the [Regulations]).

The Regulations state that an insider shall not buy or sell the shares of the listed company while in possession of any unpublished price-sensitive information.

The Companies Act, 2013, which has come into effect partially on 1 April 2014, has also defined the term [Insider Trading]. In addition, it has defined the term [Price Sensitive Information].

An Insider shall not provide any price sensitive information to any counsel or an outsider while in possession of such information. However, it need not be concluded that the persons connected to the company are barred from possessing, buying and selling its shares. They are permitted to deal in the securities of the company, provided they make adequate disclosures about the transaction to the regulator and the exchanges on which the shares of the Company are listed.

The Company is committed to prohibit the Insider Trading with certain restrictions on Company Directors, Key Managerial Personnel, Designated Employees and Auditors keeping in mind the objective of the Regulations.

G. G. Dandekar Machine Works Limited
211/A, MIDC, Butibori Industrial Area,
Nagpur-441122

It is the responsibility of each of the Directors, Key Managerial Personnel, Designated Employees and Auditors to ensure compliance with this code by themselves and their dependents.

Accordingly, this code of internal procedures and conduct has been framed with a view:

- To prohibit the unlawful acts of Insider Trading as contemplated under the Regulations.
- To adopt appropriate mechanism and procedures to enforce the code to ensure proper compliance of the same.
- To abide by the code and disclosure / reporting procedures as specified herein.
- To initiate appropriate actions against persons involved in Insider Trading in contravention of this code.
- To appropriately communicate the existence of this code across the organisation.

DEFINITIONS:

The definitions of some of the terms used in the Code are given below. Other terms not defined herein shall have the meaning assigned to them under the Regulations and other related rules and guidelines, as amended from time to time.

- a. □Auditors□ means statutory Auditors and Cost Auditors of the Company.
- b. □Board / Directors□ means the Board of Directors of G. G. Dandekar Machine Works Limited (GGD) and shall include any Committee of the Board.
- c. □Company / GGD□ means G. G. Dandekar Machine Works Limited and includes its successors, assigns.
- d. □Compliance Officer□ means any employee designated as such by the Board.
- e. □Connected person□ means, any person, connected with the Company six months prior to an act of insider trading, who is a Director of the Company under the Companies Act, 2013, a Key Managerial Personnel, or who occupies the position as an Officer or an employee of the company or holds a position involving a professional or business relationship between himself and the Company whether temporary or permanent and who may reasonably be expected to have an access to unpublished price sensitive information in relation to that company.
- f. □Dependent□ shall include:
 - i. Father
 - ii. Mother
 - iii. Spouse
 - iv. Son/daughter declared as dependent by the Director / Key Managerial Personnel / Designated Employee or Auditors from time to time

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- g. Key Managerial Personnel shall include:
- i. The Chief Executive Officer;
 - ii. Manager;
 - iii. Company Secretary;
 - iv. The Chief Financial Officer;
 - v. Officer/s as may be designated as such;
 - vi. Such other officers as may be prescribed.
- h. Designated Employees shall include:
- i. Directors, Key Managerial Personnel and Designated Officers of the Company Management officers The employees designated by the company to whom these restrictions shall be applicable, keeping in mind the objective of the Code.
- i. Insider means any person who,
- i. is or was connected with the Company or is deemed to have been connected with the Company and who is reasonably expected to have access to unpublished price sensitive information in respect of securities of the Company, or
 - ii. has received or has had access to such unpublished price sensitive information,
 - iii. Promoter or part of promoter group of the Company.
- j. Insider Trading shall mean:
- a. an act of subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell or deal in any securities, by any Director, Key Managerial Personnel, Designated Officer, or any other officer of the Company or his / her relatives as defined hereinafter, either as principal or agent, if such Director, or Key Managerial Personnel, Designated Officer, or any other officer of the Company is reasonably expected to have access to non public price sensitive information in respect of securities of the Company; or
 - b. any act of counselling about brokering or communicating directly or indirectly, any non public price sensitive information to any person.
- k. Investigating Person means a Compliance Officer or any other any other person, not being a firm, body corporate or an association of persons, having experience in dealing with the problems relating to the securities market.
- l. Relative shall mean as defined in Section 2(77) of the Companies Act, 2013 read with Rule 4 of the Companies (Specification of definitions details) Rules, 2014, as may be amended from time to time and shall include the following:
- i. They are members of a Hindu undivided family; or
 - ii. They are husband and wife; or

- iii. The one is related to the other as;
 - a. Father (including step-father);
 - b. Mother (including step-mother);
 - c. Son (including step-son);
 - d. Son's Wife;
 - e. Daughter (including step-daughter);
 - f. Daughter's husband
 - g. Brother (including step-brother);
 - h. Sister (including step-sister);

- m. "Securities" means any of the following instruments issued or to be issued or created or to be created, for the benefit of the Company:
 - i. shares, scripts, stocks, bonds, debentures, debenture stock, derivatives or other marketable securities of like nature of GGD;
 - ii. Such other instruments as may be declared by the Central Government to be securities;
 - iii. Rights or interests in the above.

- n. "Trading Window" shall mean a trading period for trading in the Company's securities.

- o. "Price Sensitive Information / PSI" means any information which relates to the following matters or is of concern, directly or indirectly, to the Company, and is not generally known to public or published by the Company, but which if published or known, is likely to materially affect the price of Securities of the Company. The following shall be deemed to be PSI:
 - i. Periodical financial results of the Company (quarterly, half-yearly and annual).
 - ii. Intended declarations of dividend (interim and final).
 - iii. Issue of securities or buy-back of securities.
 - iv. Any major expansion plans or execution of new projects.
 - v. Amalgamation, mergers or takeovers.
 - vi. Disposal of the whole or substantial part of the Company's business.
 - vii. Any significant changes in policies, plans or operations of the Company.

- p. "Working Day" shall mean the working day when the regular trading is permitted on the concerned stock exchange where securities of the Company are listed.

Compliance Officer and his/her Responsibilities:

1. The Compliance Officer of the Company with regard to the Code shall report to the Chairman and/or Managing / Executive Director. The Compliance Officer shall be responsible for setting forth policies, procedures, monitoring adherence to the rules, pre-clearing the transactions, monitoring the trades and ensure implementation of the Code and compliance, under the overall supervision of the Board.

2. The Compliance Officer shall oversee PSI / corporate disclosure as and when required to the stock exchanges, analysts, shareholders and media and shall educate the staff on the disclosure policy and procedure.
3. The Compliance Officer shall maintain a record of the Designated Employees from time to time in consultation with the Chairman and/or Managing Director.
4. The Compliance Officer shall assist all the employees in addressing any clarifications regarding this Code.

Price Sensitive Information:

5. Directors / Key Managerial Personnel / Designated Employees and Auditors shall maintain the confidentiality of all price sensitive information and they shall not pass such information to any person including body corporate directly or indirectly by way of making a recommendation for the purchase or sale of Company Securities.
6. Price sensitive information shall be handled on a "need to know" basis i.e. shall be disclosed within the Company for discharging the duties.
7. Insider trading at any time by Directors / Key Managerial Personnel / Designated Employees, Auditors or his/his dependent / relative, or any other company on the basis of unpublished PSI is prohibited. Further, they shall not communicate or counsel or provide directly or indirectly any unpublished PSI to any person including a body corporate to deal in securities of the Company.
8. All security procedures for handling the files containing confidential information shall be followed for prevention of misuse of price sensitive information. Further, Directors / Key Managerial Personnel / Designated Employees and Auditors shall follow all the restrictions with regard to Trading Window.

Trading Window:

9. The Compliance Officer shall announce the closure of Trading Window from time to time and intimate the same to the concerned. The dealing in securities of the Company by Directors / Key Managerial Personnel / Designated Employees and Auditors is prohibited during such period.
10. The Trading Window shall be closed for the period of maximum 10 days during the time when the price sensitive information is unpublished and shall be opened 24 hours after the said information is made public.
11. When the Trading Window is closed, Directors / Key Managerial Personnel / Designated Employees and Auditors shall not deal in any transactions involving the purchase or sales of the Company's securities in such period.

12. In case of ESOP, the exercise of options shall be allowed in the period when the Trading Window is closed. However, sale of shares allotted on exercise shall not be allowed, when Trading Window is closed.

Pre-Clearance of Trade:

13. All Directors / Key Managerial Personnel /Designated Employees, Auditors or his/her dependent, who intent to deal in the securities should pre-clear such transactions.
14. An application may be made in the prescribed form in **Annexure I** to the Compliance Officer indicating the estimated numbers of securities to be dealt in. All other details as prescribed in the form shall also be provided with an undertaking as prescribed in **Annexure II**.

Other Restrictions:

15. All Directors / Key Managerial Personnel /Designated Employees, Auditors or his dependent shall execute their order in respect of the securities of the company within one week after the approval of pre-clearance is given; else make a fresh application for preclearance.
16. All Directors / Key Managerial Personnel /Designated Employees and Auditors who buy or sale any securities of the Company shall not enter into an opposite transaction in securities, including derivate transactions in the shares of the Company, during next 6 (six) months following the prior transaction.
17. In case Directors / Key Managerial Personnel /Designated Employees and Auditors subscribe to public offers by the Company they shall hold such investments for the minimum period of 30 days from the date of allotment of such securities.
18. In case the sale of securities is necessitated by personal emergency, the holding period as aforesaid, may be waived by the Compliance Officer, in consultation with the Chairman and/or Managing Director, after recording in writing his/her reasons in this regard.

Reporting of Transactions:

19. Any person who holds more than 5% shares or voting rights of the Company shall disclose **to the Company**, the number of shares or voting right held by such person, on becoming such holder within 2 working days of the acquisition of shares in **Annexure III** **Form A**.
20. Any person who is a Director / Key Managerial Personnel / Designated Employee of the Company shall disclose **to the Company**, the number of shares or voting rights held and position taken in derivatives by such person and his dependents within two working days of becoming a director or officer of the Company in **Annexure IV - Form B**.

21. Any person who is a promoter or part of promoter group of the Company shall disclose **to the Company**, the number of shares or voting rights held by such person within two days of becoming such promoter or person belonging to the promoter group **in Annexure IV - Form B.**
22. Any person who holds more than 5% shares or voting rights in the Company shall disclose **to the Company** the number of shares or voting rights held and change in shareholding or voting rights, even if such change results in shareholding falling below 5%, if there has been change in such holdings from the last disclosure made and such change exceeds 2% of total shareholding or voting rights in the Company, in **Annexure V □Form C.**
23. Any person who is Director /Key Managerial Personnel / Designated employee of the Company shall disclose **the Company and the stock exchange** where the securities of the Company are listed, in **Annexure VI □Form D**, the total number of shares or voting rights held any change in shareholding or voting rights, if there has been a change in such holdings of such person and his dependent form the last disclosure made and the change exceeds Rs. 5 lakh in value or 25,000 shares or 1% of total shareholding or voting rights, whichever is lower,.
24. Any person who is a promoter or part of promoter group of listed company, shall disclose **the Company and the stock exchange** where the securities are listed, in **Annexure VI □Form D**, the total number of shares or voting rights held and change in shareholding or voting rights, if there has been a change in such holdings of such person from the last disclosure made and the change exceed Rs. 5 lakhs in value or 25,000 shares or 1% of total shareholding or voting rights, whichever is lower.
25. All Directors / Key Managerial Personnel /Designated Employees and Auditors shall be required to forward details of their security transactions annually by the April 15 of every year □(in **Annexure VII**).
26. The Compliance Officer shall maintain the record of all declarations in appropriate forms for the period of 3 years.
27. The Compliance Officer shall place before the Chairman and/or Managing / Executive Director all the details of dealing in securities by Insiders alongwith other documents on monthly basis under the pre-dealing procedures. (**Annexure VIII**)
28. The Chairman and/or Managing / Executive Director shall place before the Board a statement of all such transactions at Board meeting after the end of June, September, December and March quarter, every year. (**Annexure IX**)

Investigation:

29. The Compliance Officer shall have power to investigate suspected contravention of this code and submit his report on findings to Chairman and/or Managing / Executive Director within 7 days of commencement of investigation or such extended time period as the Chairman and/or Managing Director may approve. (**Annexure X**)
30. Based on the report of the Compliance Officer, the Chairman and/or Managing / Executive Director shall be entitled to appoint any person to further investigate a suspected contravention of this Code.
31. The Chairman and/or Managing / Executive Director shall have the power to delegate to the person so appointed all the powers including powers to call for information, examination, interrogation, recording evidence, etc.
32. In any investigation of suspected contravention of this Code the onus to prove that there is no violation of this code shall be on the concerned Insiders or their Relatives.
33. The Company's investigating officer shall, within 7 working days from the conclusion of the investigation, submit a report to the Chairman and/or Managing / Executive Director.
34. The Chairman and/or Managing / Executive Director after consideration of the investigation report shall communicate the findings to the insider or any other person, being investigated and shall take any action as contemplated in this code.

Penalty for Contravention:

35. Any Directors / Key Managerial Personnel / Designated employees and Auditors found guilty in investigation, who traded in securities or communicated / counsel any information for trading in contravention of this code shall be penalized and appropriate action shall be taken by the Chairman and/or Managing / Executive Director of the Company.
36. Any Directors / Key Managerial Personnel / Designated employees and Auditors found guilty in investigation, who violated the code, shall also be subject to further disciplinary action.
37. The Compliance Officer shall inform such violations to SEBI.
38. The above actions by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) regulations.

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Amendment:

The Company reserves its right to amend or modify the Code in whole or in part, at any time, when it deems appropriate, to suit the requirements under the applicable SEBI Regulations.

For G. G. Dandekar Machine Works Limited

Sd/-

Atul C. Kirloskar
Chairman

30 May 2014

ANNEXURE I

**PRE-CLEARANCE FORM PURSUANT TO REGULATION 14 OF THE CODE OF CONDUCT
FOR PREVENTION OF INSIDER TRADING IN SECURITIES OF G. G. DANDEKAR
MACHINE WORKS LIMITED**

Date:

Name and Address of Insider:

REQUEST FOR PRE-CLEARANCE

To,
Compliance Officer
G. G. Dandekar Machine Works Limited

Name of the Insider / Relative :
PAN :
Folio/Client/DP ID/ DP name :
Shareholding (% to capital) :
Details of the proposed transaction :

Sr. No.	Type of securities	No. of shares to be dealt with	% to Capital	Date of proposed transaction	Mode of transaction

Name:

Signature:

Date:

Encl: Undertaking

FOR OFFICE USE ONLY
CLEARANCE BY COMPLIANCE OFFICER

TO,

Your request dated .. for pre-clearance for purchase/sale of .. . equity/preference shares/debentures of the company has been accepted. Please ensure that the transaction for which this pre - clearance is granted is completed by .

or

Your request dated .. for pre-clearance for purchase/sale of .. . equity/preference shares/debentures of the company has been rejected.

Reasons, if any, for rejection:

DATE OF PRE - CLEARANCE :
NAME :
SIGNATURE :

ANNEXURE II

UNDERTAKING PURSUANT TO REGULATION 14 OF THE CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING IN SECURITIES OF G. G. DANDEKAR MACHINE WORKS LIMITED

Date: (To be the same as request for pre clearance)

Name & Address of Insider-
PAN-

TO,
Compliance Officer
G. G. Dandekar Machine Works Limited
Pune 411 038

I, _____, being an insider in terms of the Code of Conduct for Prevention of Insider trading in securities of the Company, hereby undertake that:

- (a) I have no access to Unpublished Price Sensitive Information upto the signing of this undertaking;
- (b) in the event of access to Unpublished Price Sensitive Information after the date of the undertaking but before the execution of the transaction, I shall not deal in the security; and
- (c) I have not contravened 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.

Signature:

Name:

Annexure III

**FORM FOR PROVIDING DETAILS OF TRANSACTIONS PURSUANT TO
REGULATION 19 OF THE CODE OF CONDUCT FOR PREVENTION OF INSIDER
TRADING IN SECURITIES OF KIRLOSAR INDUSTRIES LIMITED.**

FORM A

**SECURITIES AND EXCHANGE BOARD OF INDIA (PROHIBITION OF INSIDER
TRADING) REGULATIONS, 1992**

[REGULATION 13(1) AND (6)]

***Regulation 13(3)- Details of shareholding in respect of persons holding more than 5% shares
in a listed company***

Name, PAN & Address of the Shareholder	Shareholding prior to acquisition / sale	No and % of shares/ Voting rights acquired / sold	Date of receipt of allotment/ advice/ acquisition of shares/sale of shares (specify)	Date of intimation to the Company	Mode of acquisition (market purchase, public/ rights/ preferential allotment) sale	No. & % of shares/ voting rights post acquisition /sale	Trading Member through whom the trade was executed with SEBI Registration No. of TM	Exchange on which the trade was executed	Buy Quantity	Buy Value	Sell Quantity	Sell Value

Signature:

Name:

Date:

ANNEXURE IV

**FORM FOR PROVIDING DETAILS OF TRANSACTIONS PURSUANT TO
REGULATION 20& 21 OF THE CODE OF CONDUCT FOR PREVENTION OF
INSIDER TRADING IN SECURITIES OF KIRLOSAR INDUSTRIES LIMITED.**

□FORM B□

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992
[Regulations 13(2), 13(2A) and 13(6)]

**Details of shares or voting rights held by Director or Designated Officer and his dependents
or Promoter or Person who is part of Promoter Group of a listed company, or positions
taken in derivatives by Director or Officer of a listed company and his dependents.**

Name, PAN No. & address of Promoter/ Person who is part of Promoter Group/Director/Officer	Date of assuming office of Director/ Officer OR Date of becoming Promoter/ part of Promoter Group.	No. & % of shares/voting rights held at the time of becoming Promoter/ part of Promoter Group/Director/Officer.	Date of intimation to the Company	Mode of acquisition (market purchase/ public/ rights/ preferential offer etc.)	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade Was executed	Buy quantity	Buy value

Note: The above table shall be applicable with suitable modifications to disclosures for position taken in derivatives also. □

Signature:

Name:

Date:

ANNEXURE V

**FORM FOR PROVIDING DETAILS OF TRANSACTIONS PURSUANT TO
REGULATION 22 OF THE CODE OF CONDUCT FOR PREVENTION OF INSIDER
TRADING IN SECURITIES OF G. G. DANDEKAR MACHINE WORKS LIMITED**

FORM C

**SECURITIES AND EXCHANGE BOARD OF INDIA (PROHIBITION OF INSIDER
TRADING) REGULATIONS, 1992**

[REGULATION 13(3) AND (6)]

***Regulation 13(3)- Details of change in shareholding in respect of persons holding more than
5% shares in a listed company***

Name , PAN & Address of the Share holder	Share holding prior to acqui sition / sale	No and % of shares / Voting rights acquir ed / sold	Date of receipt of allotment / advice/ acquisitio n of shares/ sal e of shares (specify)	Date of intimatio n to the Compan y	Mode of acquisiti on (market purchase , public/ rights/ preferent ial allotmen t) sale	No. & % of shares/ voting rights post acquisitio n sale	Trading Member through whom the trade was executed with SEBI Registration No. of TM	Excha nge on which the trade was execut ed	Buy Quantity	Buy Valu e	Sel l Qu ant ity	Sell Val ue

Signature:

Name:

Date:

ANNEXURE VI

**FORM FOR PROVIDING DETAILS OF TRANSACTIONS PURSUANT TO
REGULATION 23 & 24 OF THE CODE OF CONDUCT FOR PREVENTION OF
INSIDER TRADING IN SECURITIES OF G. G. DANDEKAR MACHINE WORKS
LIMITED**

□FORM D□

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992
[Regulations 13(4), 13(4A) and 13(6)]

**Details of change in shareholding or voting rights held by Director or Designated Officer
and his dependents or Promoter or Person who is part of Promoter Group of a listed
company.**

Signature:

Name, PAN No. & Address of Promoter / Person who is part of Promoter Group/ Director/ Officer.	No. & % of shares/ voting rights held by the Promoter/ Person who is part of Promoter Group/ Director/ Officer	Date of receipt of allotment advice/ acquisition/ sale of shares/ voting rights	Date of intimation to company	Mode of Acquisition (market purchase/ public/ rights/ preferential offer, etc.)/sale	No. & % of shares/ voting rights post acquisition/ sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed	Buy quantity	Buy value	Sell quantity	Sell value

Name:

Date:

ANNEXURE VII

**INFORMATION PURSUANT REGULATION 25 OF THE CODE OF CONDUCT FOR
PREVENTION OF INSIDER TRADING IN SECURITIES OF G. G. DANDEKAR
MACHINE WORKS LIMITED**

Name of the insider :

Department :

Pan:

No. of shares held by me and my relatives in the company as on _____ are as under

		Relationship	Name	No. Of shares held in	Directorship in other companies	Partnership/ sole proprietorship in firms and names of other partner therein
A		Self				
B		Members of Hindu Undivided Family				
C		Husband / Wife				
D	1	Father (including step father)				
	2	Mother (including step mother)				
	3	Son (including step son)				
	4	Son's wife				
	5	Daughter (including step daughter)				
	-6	Daughter's husband				
	7	Brother (including step brother)				
	-8	Sister (including step sister)				

I further declare that following relatives are/are not dependent on me (Put H)

Sr.	Relative	Dependent	Not Dependent
1	Husband/Wife		
2	Father (including step Father)		
3	Mother (including step Mother)		
4	Sons (including step Son)		
5	Daughter (including step Daughter)		

Signature

Name:

Date:

ANNEXURE VIII

INFORMATION PURSUANT REGULATION 27 OF THE CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING IN SECURITIES OF G. G. DANDEKAR MACHINE WORKS LIMITED

To: Chairman/Managing Director/Executive Director

From: Compliance Officer

Period:

Sr. No.	Name of Insider / Relative	No. and % of Shares	Type of Transaction	Date of Preclearance	Non compliance of procedure and reasons thereof
1.					
2.					

Compliance Officer

Date:

Noted

CHAIRMAN/MANAGING DIRECTOR/EXECUTIVE DIRECTOR

ANNEXURE IX

INFORMATION PURSUANT REGULATION 28 OF THE CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING IN SECURITIES OF G. G. DANDEKAR MACHINE WORKS LIMITED

To: Chairman/Managing Director/Executive Director

From: Compliance Officer

Period:

Sr. No.	Name of Insider / Relative	No. and % of Shares	Type of Transaction	Date of Preclearance	Non compliance of procedure and reasons thereof
1.					
2.					

Compliance Officer

Date:

Noted and placed before the Board

CHAIRMAN/MANAGING DIRECTOR/EXECUTIVE DIRECTOR

ANNEXURE X

INVESTIGATION REPORT PURSUANT TO REGULATION 29 OF THE CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING IN SECURITIES OF G. G. DANDEKAR MACHINE WORKS LIMITED

To: Chairman/Managing Director/Executive Director

From: Compliance Officer

The following non-compliances/violations with the Code of Conduct for Prevention of Insider Trading in securities of G. G. Dandekar Machine Works Limited have taken place

Sr. No.	Name of the Insider	Details of transactions	Regulation violated	Details of violation

This is for your information and necessary action.

Signature:

Name:

Date: