



Asian Energy Services Limited

(formerly Asian Oilfield Services Limited)

Code of internal procedure and conduct for regulating, monitoring and reporting of trading by insiders

1. Introduction

This Code of Conduct will be known as “Asian Energy Services Limited: Code of Conduct to Regulate, Monitor and Reporting of Trading by Insiders” (hereinafter referred to as “Code”).

This Code has been made pursuant to Regulation 9 of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as the “Regulations”). Further to strengthen the legal framework to Prohibition of Insider Trading, SEBI has amended the SEBI (Prohibition of Insider Trading) Regulations, 2015 vide SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018.

2. Objective

Objective of this document is to provide clarity to all engaged with AESL as an employee about their role in prevention of insider trading and the expectations from them as well as a documented procedure detailing the steps to be followed while trading in company securities.

This Policy sets forth AESL minimum compliance standards with respect to insider trading.

3. Scope

The Company endeavours to preserve the confidentiality of un-published price sensitive information (UPSI) and to prevent misuse of such information. The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations. To achieve these objectives, and in compliance with the aforesaid Regulations, AESL has adopted this Fair Disclosure Code. For interpretations, AESL’s compliance officer may be contacted.

4. Definitions and Abbreviations

4.1 “Act” means the Securities and Exchange Board of India Act, 1992 (15 of 1992).

4.2 “Board” means the Securities and Exchange Board of India.

4.3 “Board of Directors” means the Board of Directors of the Company.

4.4 “Companies Act” means The Companies Act, 2013.

4.5 “Company” or “the Company” means Asian energy Services Limited.

4.6 “Compliance Officer” means the Company Secretary for the time being of the Company or any senior officer appointed by the Board of Directors for the purpose of this Code and the Regulations.

4.7 “Connected person” means-

4.7.1 any person who is or has during the six months prior to the concerned act been associated with the Company, directly or indirectly, in any capacity including by reason of

frequent communication with Company's officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the Company or holds any position including a professional or business relationship between himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.

4.7.2 Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established -

- an immediate relative of connected persons specified in clause (i); or
- a holding company or associate company or subsidiary company; or
- an intermediary as specified in section 12 of the Act or an employee or director thereof; or
- an investment company, trustee company, asset management company or an employee or director thereof; or
- an official of a stock exchange or of clearing house or corporation; or
- a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
- a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
- an official or an employee of a self-regulatory organization recognised or authorized by the Board; or
- a banker of the company; or
- a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten per cent of the holding or interest.

4.8 "**Designated Persons**" shall mean and include;

- Directors of the Company;
- Chief Executive Officer (CEO) and employees up to two levels below the CEO;
- Any other employees of the Company based on their functional role or access to unpublished price sensitive information as may be designated by the Board of Directors;

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- Employees of material subsidiaries of the Company based on their functional role or access to unpublished price sensitive information as may be designated by their Board of Directors
 - Promoters of the Company;
 - Any support staff such as employees in finance, legal, secretarial, communication and/or IT departments who have access to unpublished price sensitive information as identified by the Compliance Officer in consultation with the Board of Directors from time to time.
- 4.9 **“Generally Available Information”** means information that is accessible to the public on a non-discriminatory basis.
- 4.10 **“Immediate Relative”** means a 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.
- 4.11 **“Insider”** means any person who is-
- a connected person, or
 - in possession of or having access to Unpublished Price Sensitive Information
- 4.12 **“Key Managerial Personnel”** in relation to the Company, means—
- the Chief Executive Officer or the Managing Director or the manager;
 - the Company Secretary;
 - the Whole-time Director;
 - the Chief Financial Officer; and
 - such other officer as may be prescribed under the Companies Act.
- 4.13 **“Legitimate purposes”** shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the Regulations.
- 4.14 **“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.
- 4.15 **“Promoter group”** 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.

- 4.16 **"Securities"** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund.
- 4.17 **"Takeover Regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.
- 4.18 **"Threshold Limit"** means the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregating to a traded value of Ten Lakhs Rupees.
- 4.19 **"Trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly.
- 4.20 **"Trading Day"** means a day on which the recognized stock exchanges are open for trading.
- 4.21 **"Trading Window"** means a trading period for trading in the Company's Securities as specified by the Company from time to time in Clause 9 of this Code.
- 4.22 **"Unpublished Price Sensitive Information"** 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 and shall, ordinarily including but not restricted to, information relating to the following: –
- financial results;
 - dividends;
 - change in capital structure;
 - mergers, de-mergers, acquisitions, de-listings, disposals and expansion of business and such other transactions;
 - changes in key managerial personnel;

Words and expressions used and not defined in this Code but defined in the Regulations, Act, Companies Act, the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or the Depositories Act, 1996 (22 of 1996) shall have the meanings respectively assigned to them in those legislations, as amended from time to time.

5. Responsibilities

The Compliance Officer, subject to the supervision of the Board of Directors shall be responsible for –

- Setting forth policies, procedures, monitoring adherence to the Code and Regulations for the preservation of unpublished price sensitive information, approval of trading plan, pre-clearance of trades and monitoring of trades and implementation of this Code.

- Reporting to the Board of Directors and shall provide reports to the Chairman of the Audit Committee at least once in a year.
- Maintaining the record of the Promoters, Directors, Key Managerial Personnel, Designated Persons and other connected persons and incorporate changes from time to time.
- Assisting all employees in addressing any clarifications in the Regulations or this Code.
- Advising all Designated Persons not to trade in securities of the Company when the Trading Window is closed.
- Advising all Directors, Promoters, Key managerial personnel and Designated Persons to furnish the details of transactions in the securities of the Company as stated in clauses 10-12 in the prescribed form and to maintain a record of all the intimations received for a period of at least five years.
- Obtaining disclosures from Promoters, Directors, Key Managerial Personnel, Designated Persons and other connected persons and to give information, in respect of the disclosures received, to all the Stock Exchanges where the securities are listed, as applicable.
- Maintaining records of all disclosures as stated in clauses 10-13 of this Code and to report the same to the Chairman of the Audit Committee, on a half yearly basis.

6. Communication or procurement of unpublished price sensitive information

- 6.1 All information is to be handled on a "need to know" basis. It should be disclosed only to those within the Company who need the information to discharge their duty.
- 6.2 No insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to a Company or securities listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- 6.3 Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password etc.
- 6.4 No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to the Company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- 6.5 The Board of Directors shall make a policy for determination of 'legitimate purposes' as a part of Code of Fair Disclosure and Conduct.
- 6.6 Any person in receipt of unpublished price sensitive information pursuant to a legitimate purpose shall be considered an insider for the purposes of these regulations and due

notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information.

6.7 Notwithstanding anything contained above, an unpublished price sensitive information may be 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 listed company is of informed opinion that sharing of such information is in the best interests of the Company;
- not attract the obligation to make an open offer under the takeover regulations but where the Board of Directors of the Company is of informed opinion that sharing of such information is in the best interests of the Company and the information that constitute unpublished price sensitive information is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the Board of Directors may determine to be adequate and fair to cover all relevant and material facts.

6.8 For purposes of sub-clause (6.7) above, the Board of Directors shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the purpose of sub-clause (6.7) above, and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information.

6.9 The Board of Directors shall ensure that a structured digital database is maintained containing the names of such persons or entities as the case may be with whom, information is shared under the Regulations along with Permanent Account Number or any other identifier authorized by law. Such databases shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.

7. Restriction on trading when in possession of unpublished price sensitive information

7.1 Save as provided in this Code and the Regulations, no insider shall trade in securities of the Company when in possession of unpublished price sensitive information.

7.2 Insiders shall maintain the confidentiality of all unpublished price sensitive information. They shall, while in possession of any unpublished price sensitive information, neither trade in the securities of the Company on the basis of unpublished price sensitive information nor pass on such information to any person directly or indirectly by way of making a recommendation for trading in securities of the Company.

8. Institutional Mechanism for Prevention of Insider Trading

8.1 The Whole-time Director/Chief Executive Officer of the Company shall put in place adequate and effective system of internal controls to ensure compliance with the Regulations to prevent insider trading.

- 8.2 The internal controls shall include:
- All employees who have access to unpublished price sensitive information are identified as designated person;
 - all the unpublished price sensitive information shall be identified and its confidentiality shall be maintained as per the requirements of these regulations;
 - adequate restrictions shall be placed on communication or procurement of unpublished price sensitive information as required by these regulations;
 - lists of all employees and other persons with whom unpublished price sensitive information is shared shall be maintained and confidentiality agreements shall be signed or notice shall be served to all such employees and persons;
 - all other relevant requirements specified under these regulations shall be complied with;
 - periodic process review to evaluate effectiveness of such internal controls
- 8.3 The Board of Directors of the Company shall ensure that the Whole-time Director/Chief Executive Officer ensures compliance with Regulation 9 and Regulation 9A (1) and (2) of the Regulations.
- 8.4 The Audit Committee shall review compliance with the provisions of these regulations at least once in a financial year and shall verify that the systems for internal control are adequate and are operating effectively.
- 8.5 The Company shall formulate written policies and procedures for inquiry in case of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information, which shall be approved by board of directors of the company and accordingly initiate appropriate inquiries on becoming aware of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information and inform the Board promptly of such leaks, inquiries and results of such inquiries.
- 8.6 The Company shall have a whistle-blower policy and make employees aware of such policy to enable employees to report instances of leak of unpublished price sensitive information.
- 8.7 If an inquiry has been initiated by the Company in case of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information, the relevant intermediaries and fiduciaries as per the Regulations shall co-operate with the Company in connection with such inquiry conducted by the Company.
- 9. Trading Plans**
- 9.1 An insider shall be entitled to formulate a trading plan 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.
- 9.2 Such trading plan shall :-

- Not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
- Not entail trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced and the second trading day after the disclosure of such financial results;
- Entail trading for a period of not less than twelve months;
- Not entail overlap of any period for which another trading plan is already in existence;
- Set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
- Not entail trading in securities for market abuse.

9.3 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 express undertakings that :

- The person is not in possession of unpublished price sensitive information; or
- He would ensure that any unpublished price sensitive information in his possession becomes generally available before he commences his trades;

Or, such other undertaking as may be necessary to enable such assessment and to approve and monitor the implementation of the plan. The Compliance Officer may thereafter approve the plan.

Provided that pre-clearance of trades shall not be required for a trade executed as per an approved trading plan.

Provided further that trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

9.4 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.

Provided that the implementation of the trading plan shall not be commenced if any unpublished price sensitive information in possession of the insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation and in such event the compliance officer shall confirm that the commencement ought to be deferred until such unpublished price sensitive information becomes generally available information.

9.5 Upon approval of the trading plan, the Compliance Officer shall notify the plan to the stock exchanges on which the securities are listed.

10. Trading Window

10.1 Designated persons may execute trades subject to compliance with this Code and the Regulations. Towards this end, a notional trading window shall be used as an instrument of monitoring trading by the Designated Persons. The trading window shall be closed when the Compliance Officer determines that a Designated Person or class of Designated Persons can reasonably be expected to have possession of unpublished price sensitive information. Such closure shall be imposed in relation to such securities to which such unpublished price sensitive information relates. Designated Persons and their immediate relatives shall not trade in securities when the trading window is closed.

Trading restriction period shall be made applicable from the end of every quarter till 48 hours after the declaration of financial results.

The gap between clearance of accounts by audit committee and board meeting shall be as narrow as possible and preferably on the same day to avoid leakage of material information.

10.2 The notice of closure of Trading Window intimated to the Stock Exchange, if any, wherever the securities of the Company are listed, by the Compliance Officer, shall be deemed as intimation to the Designated Persons / Insiders for adherence and compliance with this Code.

10.3 The trading window restrictions mentioned in sub-clause (1) 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 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 compliance with the respective regulations made by the Board;
- (b) 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, open offer, delisting offer.

10.4 The timing for re-opening of the trading window shall be determined by the Compliance Officer taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, which in any event shall not be earlier than forty-eight hours after the information becomes generally available.

10.5 The "Trading Window" shall, inter-alia, remain closed from :

10.5.1 the end of every quarter till 48 hours after the declaration of financial results/ recommendation/declaration of dividend; and

10.5.2 the actual date of Board Meeting/Committee Meeting; until 48 hours after the decision is made generally available, wherein, decision is required to be taken on the following matters:

- change in capital structure;
- mergers, de-mergers, acquisitions, de-listings, disposals and expansion of business and such other transactions; and
- changes in key managerial personnel;

10.6 Trading Window may be closed by the Company during such time in addition to the above period, as it may deem fit by the Compliance Officer.

11. Pre-clearance of Trades

11.1 When the trading window is open, trading by Designated Persons and their immediate relatives shall be subject to pre-clearance by the Compliance Officer, if the value of the proposed trades is above threshold limit.

11.2 Designated Persons / their immediate relatives intending to deal in the securities of the Company up to the threshold limit, as defined and provided hereinbefore, may do so without any pre-clearance from the Compliance Officer. In all other cases, they should pre-clear the transactions as per the pre-dealing procedure as provided hereinafter.

11.3 Designated Persons / their immediate relatives shall make an application in the prescribed Form I, to the Compliance Officer indicating the estimated number of securities that he/she intends to deal in, the details as to the depository(ies) with which he/she maintains a Demat/Trading account, the details as to the securities in such depository mode and such other details as may be required by the Compliance Officer in this matter.

11.4 He / She shall execute an undertaking in favour of the Company, incorporating, therein, inter alia, the following clauses:

- that he/she does not have any access or has not received Unpublished Price Sensitive Information up to the time of signing the undertaking;
- that in case he/she has access to or receives Unpublished Price Sensitive Information after the signing of the undertaking but before the execution of
- the transaction he/she shall inform the Compliance Officer of the change in his/her position and that he/she would completely refrain from dealing in the securities of the Company till the time such information becomes generally available;
- that he/she has not contravened any provisions of this Code and the Regulations;
- that he/she has made a full and true disclosure in the said matter.

11.5 Designated Persons / their immediate relatives shall execute their transactions in respect of securities of the Company within seven (7) trading days after the approval of pre-clearance is given failing which the transaction has to be pre-cleared again. Reporting of trades executed or decisions not to trade and recording of such reasons shall be

made/done in Form II. They shall not execute a contra trade during the six months following the prior transaction. In case of emergency the six months holding period may be waived by the Compliance Officer (application to be made in Form III) after recording in writing the reasons in this regard provided that such relaxation does not violate this Code/ Regulations.

11.6 In case of the Compliance Officer intending to deal in the securities of the Company beyond the threshold limit, the pre-clearance of the Managing Director or in his absence, the Chairman of the Board, will have to be obtained. Similarly in case of emergency Compliance Officer may obtain the waiver from the Managing Director or in his absence, the Chairman of the Board, provided that such relaxation does not violate this Code/ Regulations.

11.7 In case a contra trade is executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Board for credit to the Investor Protection and Education Fund administered by the Board under the Act.

12. Reporting Requirements

12.1 Initial Disclosures

12.1.1 Every promoter, member of the promoter group, key managerial personnel and director of the Company shall disclose his holding of securities of the Company as on the date of this Code taking effect, to the Company within thirty days of this Code taking effect in Form A;

12.1.2 Every person on appointment as a Director or a Key Managerial Personnel of the Company or upon becoming a Promoter or member of the promoter group shall disclose his/her holding of securities of the Company as on the date of appointment or becoming a Promoter, to the Company within seven days of such appointment or becoming a promoter in Form B.

12.2 Continual Disclosures

12.2.1 The Promoters, member of the promoter group, Designated Person and Directors of the Company shall disclose to the Company in Form C unless any other Form is specified by the Board, stating 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, exceeds the threshold limits as defined herein above ;

12.2.2 The Company shall notify the particulars of such trading to the stock exchanges on which the securities are listed, as applicable, within two trading days of receipt of the disclosure or from becoming aware of such information.

12.2.3 The disclosure of the incremental transactions after any disclosure shall be made by persons as specified in (1) above, when the transactions effected after the prior disclosure crosses the threshold specified in this clause.

Note:

1. Trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account for the purpose of making Initial/Continual disclosures as required in Clause 11 and 12 above.
2. Disclosures made under Clause 11 and 12 above shall include those relating to trading by such person's immediate relatives and by any other person for whom such person takes trading decisions.

12.3 Quarterly / Annual Disclosures

Designated Persons shall furnish to the Compliance Officer the following:

- 12.3.1 Quarterly statement of transactions in securities of the Company in Form IV annexed hereto to be submitted within 30 days of the close of each quarter. If there is no transaction in a particular quarter, nil statement need not be submitted.
- 12.3.2 Annual statement of all their holdings in securities of the Company to be submitted within 30 days of the close of each Financial Year in Form V annexed hereto.
- 12.3.3 The Designated Person shall be required to disclose names and Permanent Account Number or other identifier authorized by law, phone, mobile cell numbers used by them of immediate relatives or persons with whom such Designated Person shares material financial relationship on an annual basis and as and when the information changes.
- 12.3.4 The term "material financial relationship" shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift from a designated person during the immediately preceding twelve months, equivalent to at least 25% of the annual income of such designated person but shall exclude relationships in which the payment is based on arm's length transactions.
- 12.3.5 In addition, the names of educational institutions from which Designated Persons have graduated and names of their past employers shall also be disclosed on a one time basis.

13. Preservation of disclosures

The disclosures made under these regulations shall be maintained by the Compliance Officer, for a minimum period of five years.

14. Penalty for non-compliance of this Code

- 14.1 Any Promoter, member of promoter group, Director, Designated Person or other connected person, who trades in securities or communicates any information for trading in securities in contravention of this Code, shall be penalized and appropriate action shall be taken against them by the Company after giving reasonable opportunity to them to show-cause. He/ she shall also be subject to disciplinary action, as deemed appropriate by the Board of Directors which may include wage freeze, suspension, recovery clawback, in-eligibility for future participation in ESOPs etc.

14.2 In addition to the action which may be taken by the Company, the persons violating the Regulations or this Code shall also be subject to action under SEBI Act. In case of any violation, the Board of Directors shall inform the Board accordingly.

15. Voluntary Disclosure of Information

The Board has set up a mechanism for voluntary disclosure relating to alleged violation of insider trading laws under Chapter IIIA of the SEBI (Prohibition of Insider Trading) Regulations, 2015. Any informant is required to follow the procedure prescribed in the aforesaid Chapter for submission of information.

16. General

The decision of the Board of Directors with regard to any or all matters relating to this Code shall be final and binding on all concerned. The Board of Directors shall have the power to modify, amend or replace this Code in part or full, as may be thought fit from time to time in their absolute discretion.

17. Reference document (s)

SEBI (Prohibition of Insider Trading) Regulation, 2015

18. Associated Document (s)

Code of Fair Disclosure of Unpublished Price Sensitive Information

19. Annexures

19.1 Form A: Form for Initial Disclosures under clause 12.1.1

19.2 Form B: Form for Initial Disclosures under clause 12.1.2

19.3 Form C: Form for Continual Disclosures under clause 12.2.1

19.4 Form I: Application for Pre-Clearance and undertaking

19.5 Form II: Reporting of trades executed/decisions not to trade and recording of such reasons

19.6 Form III: Application for waiver of minimum holding period

19.7 Form IV: Form for Quarterly Statement

19.8 Form V: Form for Annual Statement

===== End of Document =====



FORM A

**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (a) read with Regulation 6 (2)]**

Name of the company : **Asian Energy Services Limited**

ISIN of the company : **INE276G01015**

Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

Name, PAN No., CIN / DIN & address with contact no	Category of Person (Promoters / KMP / Directors/ immediate relatives / others etc.)	Securities held as on the date of regulation coming into force		% of Share holding	Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option Contracts held as on the date of regulation coming into force	
		Type of security (e.g. Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	6	7	8	9

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

Date :

Signature:

Place :

Designation:



FORM B

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (b) read with Regulation 6(2)]

Name of the company : Asian Energy Services Limited

ISIN of the company : INE276G01015

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

Name, PAN No., CIN / DIN & address with contact nos	Category of Person (Promoters / KMP / Directors/ immediate relatives / others Etc.)	Date of appointment of Director /KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP		% of Share holding	Open Interest of the Future contracts held at the time of becoming Promoter/ appointment of Director/KMP		Open Interest of the Option Contracts held at the time of becoming Promoter/ appointment of Director/KMP	
			Type of security (e.g. Shares, Warrants Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	6	7	8	9	10

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

Date :

Signature:

Place :

Designation:

FORM C

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (2) read with Regulation 6(2)]

Name of the company : **Asian Energy Services Limited**

ISIN of the company : **INE276G01015**

Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN No., CIN/ DIN & address of Promoter/ Employee/ Director with contact nos.	Category of Person (Promoters / KMP / Directors/ immediate relatives/ others etc.)	Securities held prior to acquisition/ disposal		Securities acquired/ Disposed		% of Shareholding		Date of allotment advice / acquisition of shares / sale of shares specify		Date of intimation to the company	Mode of acquisition (market purchase/ public/ rights/ preferential offer/off market/ Inter-se transfer etc.)	Trading in Derivatives (Specify type of contract, Futures or options etc.)				Exchange on which the trade was executed
		Type of security (For eg.- Shares, Warrants Convertible Debentures etc.)	No.	Type of Security (For eg.- Shares, Warrants, Convertible Debentures etc.)	No.	Pre Trans action	Post trans action	From	To			Buy		Sell		
												Value	Number of units (contracts * lot size)	Value	Number of units (contracts * lot size)	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

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

Date :

Signature

Place :

Designation

Form I

Asian Energy Services Limited

FORMAT OF APPLICATION FOR OBTAINING PRE-CLEARANCE APPROVAL

[Clause 11.3 of Asian Energy Services Limited: Code of internal procedure and conduct for regulating, monitoring and reporting of trading by insiders]

The Compliance Officer,

Date

Asian Energy Services Limited

3B, 3rd Floor, Omkar Esquare, Chunabhatti Signal

Eastern Express Highway

Sion (East), Mumbai 400022

Dear Sir,

Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 and Asian Energy Services Limited Code of Conduct to Regulate, Monitor and Report Trading by Insiders, I seek approval to purchase/sale/subscribe for not more than securities of the Company (having approximately Market value of Rs. as on the date of application) as per the details given below:

1	Name of designated person	
2	Designation	
3	Number of securities held as on date	
4	Folio no. / DP ID / Client ID	
5	Estimated number of securities proposed to purchase / sale / subscribe	
6	Estimated price at which transaction is proposed to be executed	
7	Whether the transaction would be through stock exchange or off-market deal	
8	In case of Off-market deal, Folio number / DP ID / Client ID where securities will be credited	

Yours truly,

(Signature of the Designated Person) (Name of the Designated Person)



Asian Energy Services Limited

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

UNDERTAKING

Date

The Compliance Officer,
Asian Energy Services Limited
3B, 3rd Floor, Omkar Esquare, Chunabhathi Signal
Eastern Express Highway
Sion (East), Mumbai 400022

Dear Sir,

I,(name of the Designated Person),..... (designation) of the Company residing at(address of the Designated Person) hereby declare that I am not in possession of any Unpublished Price Sensitive Information (as defined in the Asian Energy Services Limited Code of Conduct to Regulate, Monitor and Report Trading by Insiders) upto the date of signing of this Undertaking.

I further declare that in case I have access to any Unpublished Price Sensitive Information after the signing of Undertaking and before the execution of Trade for which Pre- clearance is requested in

Form I (enclosed), I shall:

1. Promptly inform the Compliance Officer
2. Refrain from trading in securities of the Company.
3. Apply afresh for obtaining pre-clearance approval from the Compliance Officer of the Company in Form I only after 2 days of such Unpublished Price Sensitive Information becoming public.

Upon obtaining preclearance for trading in securities of the Company, I undertake to execute the transaction within seven (7) trading days failing which I shall seek pre- clearance again.

I undertake to submit Form II within 4 working days of execution of the transaction/ a NIL report in case the transaction is not executed. I declare that I have made true and complete disclosure in the matter.

Yours truly,

(Signature of the Designated Person) (Name of the Designated Person)



Form II

Asian Energy Services Limited

FORMAT FOR DISCLOSURE OF TRANSACTIONS EXECUTED/NOT EXECUTED AFTER OBTAINING PRE-CLEARANCE

[Clause 11.5 of Asian Energy Services Limited: Code of internal procedure and conduct for regulating, monitoring and reporting of trading by insiders]

Date

The Compliance Officer,
Asian Energy Services Limited
3B, 3rd Floor, Omkar Esquare, Chunabhatti
Signal, Eastern Express Highway, Sion (East),
Mumbai 400022

Dear Sir,

With reference to trading approval granted by the Company to me on, I hereby inform that I have bought/sold/subscribed for equity shares of the Company for Rs. on

In connection with the aforesaid transaction, please find enclosed copy of the following for your records:

Broker's contract note/Proof of payment to/from brokers/ Extract of bank passbook/statements (in case of demat transaction)/ Copy of Delivery instruction slips (applicable in case of sale transactions)

I hereby undertake to preserve the original copy of the above mentioned document for a period of 5 years) and produce to the Compliance Officer/Securities Exchange Board of India, if required in future.

Yours truly,

(Signature of the Designated Person) (Name of the Designated Person)

Note: After pre-clearance, if the Designated Person opts not to trade in securities should provide the reasons for taking such decision.



Form III

Asian Energy Services Limited

APPLICATION FOR WAIVER OF MINIMUM HOLDING PERIOD

[Clause 11.5 of Asian Energy Services Limited: Code of internal procedure and conduct for regulating, monitoring and reporting of trading by insiders]

Date

The Compliance Officer,
Asian Energy Services Limited
3B, 3rd Floor, Omkar Esquare, Chunabhatti
Signal, Eastern Express Highway, Sion (East),
Mumbai 400022

Dear Sir,

Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 and Asian Energy Services Limited Code of Conduct to Regulate, Monitor and Report Trading by Insiders, I.....(name and designation of the Designated Person) had (provide the details of purchase/sale/subscribe for shares as the case may be) (number of securities) of the Company on after obtaining pre-clearance on . The details of transaction executed were submitted on (date) in Form II. I seek your approval to waive off the time restrictions and permit to execute a contra-trade for(number of securities) of the Company due to (valid reason(s) for executing contra trade).

I declare that I am not in possession of any Unpublished Price Sensitive Information (as defined in the Asian Energy Services Limited Code of Conduct to Regulate, Monitor and Report Trading by Insiders) up to the date of this application.

I further declare that in case I have access to any Unpublished Price Sensitive Information after the signing of this application and before executing a contra Trade (if permitted), I shall:

1. Promptly inform the Compliance Officer
2. Refrain from trading in securities of the Company. Yours truly,

(Signature of the Designated Person)

(Name of the Designated Person)

Enclosed :

1. Copy of pre-clearance approval
2. Copy of Form I & II

FORM IV

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

Transactions by Designated Persons as identified by the Company

**[Clause 12.3.1 of Asian Energy Services Limited: Code of internal procedure and conduct for regulating, monitoring and reporting of trading by insiders]
during (Q1, Q2, Q3, Q4) of _____ (Year) in securities of the Company**

Name, PAN No. CIN/ DIN & address Of Designated Persons with contact nos.	Connecti on with the Company	Securities held prior to acquisition/ disposal		Securities acquired/ Disposed		% of Shareholding		Date of allotment advice / acquisition of shares / sale of shares specify		Date of intimation to the company	Mode of acquisition (market purchase/ public/ rights/ preferential offer/off market/ Inter-se transfer etc.)	Trading in Derivatives (Specify type of contract, Futures or options etc.)		Exchange on which the trade was executed	
		Type of security (For eg.– Shares, Warrants Convertible Debentures etc.)	No.	Type of Security (For eg.– Shares, Warrants, Convertible Debentures etc.)	No.	Pre Trans action	Post trans action	From	To			Buy			Sell
												Number of units (contracts * lot size)	Value		Number of units (contracts * lot size)
1	2	3	4	5	6	7	8	9	10	11	12	14	15	16	17

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

Date :

Signature

Place :

Designation

FORM V

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

Transactions by Designated Persons as identified by the Company

[Clause 12.3.2 of Asian Energy Services Limited: Code of internal procedure and conduct for regulating, monitoring and reporting of trading by insiders]

Details of transactions executed during the Financial yearin securities of the Company

Date.....

The Compliance Officer,
Asian Energy Services Limited
3B, 3rd Floor, Omkar Esquare, Chunabhatti
Signal, Eastern Express Highway, Sion (East),
Mumbai 400022

I,(name of the Designated Person),..... (designation) of the Company residing at
.....(address of the Designated Person) hereby declare that –

*1.The quarterly disclosures made by me in Form IV to the Company was/were a true and complete disclosure of transaction(s) made by me during the Financial year

In accordance with the quarterly disclosures made by me, the following is the consolidated statement of transactions made during the Financial Year

Opening balance of securities of the Company held as on DD/MM/YYYY	Purchase/Sale made during the year	Closing balance of securities of the Company held as on DD/MM/YYYY

*I was holding (number of securities) securities of the Company on 1st April 20.....(start of the financial year). However, I have not traded in securities of the Company during the Financial Year ended 31st March 20.....(end of the financial year).

Date: Signature

Place: Designation

* Please delete/modify as per the factual position