

**CODE OF INTERNAL PROCEDURES AND
CONDUCT FOR REGULATING,
MONITORING AND REPORTING OF TRADING BY
INSIDERS**

(Effective from May 15, 2015)

The Securities and Exchange Board of India (SEBI) had formulated Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 under the powers conferred by section 30 read with clause (g) of sub-section (2) of section 11 and clause (d) and clause (e) of section 12A of the Securities and Exchange Board of India Act, 1992 to prevent trading by the Directors, Promoters, Key Managerial Personnel and Designated Employees of the Companies on the basis of unpublished price sensitive information possessed by them and thus protect the interests of investors. These regulations came into force with effect from May 15, 2015 and are applicable to all companies whose shares are listed on Indian Stock Exchanges.

In compliance with the aforesaid SEBI Regulations and to regulate and prohibit insider trading in the securities of the Choksi Imaging Limited, it has framed the following Code for Prevention of Insider Trading.

All the directors, Promoter, Key managerial Personnel and Designated employees (as defined hereinafter) are requested to abide by this Code of Conduct.

I. DEFINITIONS:

1. “**Act**” means the Securities and Exchange Board of India Act, 1992.
2. “**Company**” means Choksi Imaging Limited.
3. “**Board**” means the Board of Directors of the Company.
4. “**Director**” means a member of the Board of Directors of the Company.
5. “**Compliance Officer**” means any senior officer, designated so and reporting to the board of directors or head of the organization in case board is not there, who

is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board of directors of the listed company or the head of an organization, as the case may be.

6. **"Promoter"** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof:
7. **"Key Managerial Person"** means person as defined in Section 2(51) of the Companies Act, 2013.
8. **"Designated Employee"**(s) shall include:-
The following Employees shall be included in the term "designated employees (DE)":-

Tier - I

The Chief Executive Officer, Chief Financial Officer, Vice Presidents and Employees having higher designation in the Company.

Tier - II

Every employee in the finance, accounts, secretarial and legal department as may be determined and informed by the Compliance Officer;

Tier - III

Any other employee as may be determined and informed by the Compliance Officer from time to time.

The Compliance Officer shall maintain a record of the Designated Employees and any change made in the list of designated employees from time to time.

9. **"Connected Person"** means any person who is or has during the six months prior to the concerned act been associated with a company, directly or indirectly, in any capacity including by reason of frequent communication with its 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.

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, -

- (a) An immediate relative of connected persons specified in clause (i); or
- (b) A holding company or associate company or subsidiary company; or
- (c) An intermediary as specified in section 12 of the act or an employee or director thereof; or
- (d) An investment company, trustee company, asset management company or an employee or director thereof; or
- (e) An official of a stock exchange or of clearing house or corporation; or
- (f) 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
- (g) 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
- (h) An official or an employee of a self-regulatory organization recognised or authorized by the board; or
- (i) A banker of the company; or
- (j) A concern, firm, trust, hindu undivided family, company or association of persons wherein a director of the Company or his immediate relative or banker of the Company, has more than ten per cent, of the holding or interest.

10. **"Insider"** means any person who,
 - i) A connected person; or
 - ii) In possession of or having access to unpublished price sensitive information.
11. **"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.
12. **"Dependant Family Members"** means a spouse, children and parents, who are financially dependent on the Directors, Officers and DE and such other family members of the Directors, Officers and DE as may be notified by him/her.

The Company has designated the following persons as dependant family members:

- (a) Spouse;
- (b) Minor son;
- (c) Dependant parent;
- (d) Dependant major son;
- (e) Dependant unmarried daughter;
- (f) Dependant brother;
- (g) Dependant sister

13. "**Designated Person**" means all Promoter /Directors/ KMP/ Designated Employees, connected person and insider of company are collectively referred to as Designated Person.
14. "**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;
15. "**Dealing in Securities**" means an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in the securities of the Company by any person either as a principal or as an agent.
16. "**Generally available Information**" means information that is accessible to the public on a non-discriminatory basis.
17. "**Takeover regulations**" means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;
18. "**Trading**" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;
19. "**Trading Day**" means a day on which the recognized stock exchanges are open for trading;
20. "**Unpublished Price Sensitive Information**" means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price

of the securities and shall, ordinarily including but not restricted to, information relating to the following:

- (i) Financial results;
- (ii) Dividends;
- (iii) Change in capital structure;
- (iv) Mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
- (v) Changes in key managerial personnel; and
- (vi) Material events in accordance with the listing agreement.

21. Interpretations of certain words and expressions

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

II. APPLICABILITY:

This Code shall apply to all Directors/ Promoter / KMP/ Designated Employees, connected person, insider of company and shall be called “code of internal procedures and conduct for regulating, monitoring and reporting of trading by insiders.

III. PRESERVATION OF MISUSE OF “PRICE SENSITIVE INFORMATION”:

All information shall be handled within the Company on a need-to-know basis and no unpublished price sensitive information shall be communicated, provided, allowed access to or procured to any person except in furtherance of the insider's legitimate purposes, performance of duties or discharge of his legal obligations.

Unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction which 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 the proposed transaction is in the best interests of the Company; or
- not attracting 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 the proposed transaction is in the best interests of the Company and the information that constitute unpublished price sensitive information is disseminated to be made generally available atleast two trading days prior to the proposed transaction being effected in such form as the Board of Directors may determine.

However, 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 limited purpose and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information.

Limited access to confidential information:

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password, etc.

IV. TRADING PLAN:

An insider shall be entitle to formulate a trading plan for dealing in securities of the Company and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.

Trading Plan shall:

- (i) Not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
- (ii) 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 by the issuer of the securities and the second trading day after the disclosure of such financial results;
- (iii) Entail trading for a period of not less than twelve months;
- (iv) Not entail overlap of any period for which another trading plan is already inexistence;
- (v) 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
- (vi) Not entail trading in securities for market abuse.

The Compliance Officer shall consider the Trading Plan made as above and shall approve it forthwith. However, he shall be entitled to take express undertakings as

may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per provisions of the Regulations.

The Trading Plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.

However, the implementation of the trading plan shall not be commenced, if at the time of formulation of the plan, the Insider is in possession of any unpublished price sensitive information and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Plan shall be deferred until such unpublished price sensitive information becomes generally available information. Further, the Insider shall also not be allowed to deal in securities of the Company, if the date of trading in securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.

Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

V. TRADING WINDOW AND WINDOW CLOSURE:

Designated Person shall conduct their dealings in the securities of the Company only when the Trading Window is open and shall not deal in any transaction involving the purchase, sale or other dealing of / in the securities of the Company during the Trading Window Closure Period.

The Trading Window shall be closed for / in connection with the following purposes:

- (i) Financial results;
- (ii) Dividends;
- (iii) Change in capital structure;
- (iv) Mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
- (v) Changes in key managerial personnel; and
- (vi) Material events in accordance with the listing agreement.

The trading window shall be, inter alia, closed from the date on which intimation is given by the Company to the Stock Exchange(s) of the date of the Board Meeting to be held for consideration / approval of the aforesaid items.

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

In case of ESOPs, exercise of option may be allowed in the period when the trading window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when trading is closed.

The Compliance Officer shall intimate the closure of trading window to all the designated employee of the Company when he determines that a designated person 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.

The trading window shall also be applicable to any person having contractual or fiduciary relation with the Company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the Company.

VI. PRE-CLEARANCE OF TRADE:

All Designated Persons, who intend to deal in the Company's Securities during the period other than the trading window closure period, shall have to obtain prior permission from the Compliance Officer by making an application in the prescribed format (refer Form "A") along with an Undertaking incorporating the following Clauses

- (a) Designated Persons does not have access or has not received price sensitive information up to the time of signing the Undertaking.
- (b) That in case the Designated Persons has access to or receives 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 position and that he/she would completely refrain from dealing in the securities of the Company till the time such information becomes public.
- (c) That he/she has not contravened the Code for Prevention of Insider Trading as notified by the Company from time to time.

- (d) That he/she has made full and true disclosure in the matter.

However, prior permission will not be required if number of Equity Shares or other listed Securities to be traded does not exceed 5,000 Nos. in any one period of 90 days. Prior permission shall also not be required for acquiring securities pursuant to exercise of stock options granted by the Company under its ESOP Scheme in force from time to time.

In case of dealing by the Compliance Officer, prior permission from the Chairman shall be obtained. In the absence of the Compliance Officer due to leave etc., the Officer designated by him/her from time-to-time shall discharge the function referred to in the above sub-clauses.

- (e) Request for pre-clearance may also be made through e-mail (personal e-mail ID may be used while on leave) and addressed to the Compliance Officer or such other officer as designated if the Compliance Officer is on leave followed by submission of duly signed form as required in accordance with the provision of this Code.

The transaction for which permission is sought shall be carried out within 7 days after the approval has been obtained. If the order is not executed within one week after the approval is given, designated persons shall pre-clear the transaction again.

Designated Person shall file within 2 (two) Working Days of the execution of the deal, the details of such deal, with the Compliance Officer in the prescribed form (see Form B). In case the transaction is not undertaken, a report to that effect shall be filed (see Form B).

In case of doubt, the designated person shall check with the Compliance Officer or the Officer designated by him/her from time-to-time whether the provision relating to pre-clearance are applicable to any proposed transaction in the Company's Securities.

The responsibility of complying with the provisions of the Insider Trading Regulations and the Code shall be entirely on the Designated Person of the Company including for their Dependent(s).

VII. MINIMUM PERIOD FOR HOLDING OF SHARES/ LISTED SECURITIES:

1. All Designated person who buy or sell any number of shares of the company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction. All designated person shall also not take positions in derivative transactions in the shares of the company at any time. In case of any contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund administered by SEBI under the Act.
2. In the case of subscription in the primary market (initial public offers), the above mentioned entities shall hold their investments for a minimum period of 30 days. The holding period would commence when the securities are actually allotted.
3. In case of justifiable emergencies, the aforesaid period of 6 months may be waived on an application made to the Compliance Officer in the prescribed format and the reasons for such waiver being recorded in writing in that behalf (refer Form "C" hereto for format of such application). However, no such sale will be permitted when the Trading window is closed
4. In case of sale by the Compliance Officer before expiry of 6 months, prior permission from the Chairman and in case of the Chairman, prior permission from Director(s) authorized by the Board of Directors of the Company shall be obtained.

VIII. DISCLOSURE REQUIREMENTS

1. Initial Disclosure:

- (a) Every Promoter/ Key Managerial Personnel / Director / Designated Employees of the Company, within thirty days of these regulations taking effect, shall disclose to the Company the number of Securities held by him/her as also by his/her dependant family members in the prescribed Form (refer Form "D").
- (b) Every person on appointment as a key managerial personnel or a director of the Company or upon becoming a promoter 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 of such appointment or becoming a promoter.

2. **Continual Disclosure:**

- (a) Every promoter, employee and director of the Company shall disclose to the Company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of ten lakh rupees (refer Form B)

The disclosure shall be made within 2 working days of:

- (a) The receipt of intimation of allotment of shares, or
(b) The acquisition or sale of shares or voting rights, as the case may be.

Disclosure under this code shall be sent to the Compliance officers of the Company.

3. **Annual Disclosure:**

All the Directors /Promoter/ KMP/Designated Employees shall forward annual statements of all holdings in Company's Securities alongwith list of their dependants as on 31st March every year in such form and manner as may be prescribed by the Compliance Officer from time-to time. (Refer Form "C" hereto for format of such disclosure).

4. **Disclosure by the Company to the Stock Exchange(s)**

Within 2 days of the receipt of intimation under Clause 8.2, the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received.

5. **Records of Disclosure received by the Company**

The Compliance officer shall maintain records of all the declarations in the appropriate form given by the directors / Promoters / KMP / designated employees for a minimum period of five years.

IX. **OTHER RESTRICTIONS:**

- (i) The disclosures to be made by any person under this Code shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.
- (ii) The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account for purposes of this Code.
- (iii) The disclosures made under this Code shall be maintained for a period of five years.

X. REPORTING TO THE BOARD:

The Compliance Officer shall place before the Board on a quarterly basis details of all disclosures received and waivers and permissions granted under this Code.

XI. PENALTY:

1. This Code is pursuant to SEBI (Prohibition of Insider Trading) Regulations, 1992 and any designated employee/director/promoter/ KMP who contravenes this Code is liable to be penalised and appropriate action will be taken against them by the Company after giving reasonable opportunity to them to explain their stand in the matter. They shall also be subject to disciplinary action including wage freeze, dismissal, ineligibility for future participation in ESOP, forfeiture of benefits, etc.
2. In addition to the action taken by the Company the person violating this Code shall also be subject to action by SEBI as per SEBI Act and Regulations
3. In case of any violation of any of the provisions of the Regulations, the Company/Compliance Officer shall inform SEBI of the same.

XII. MISCELLANEOUS:

The Management has the right to change / amend this Code from time to time at its sole discretion and/or in pursuance of any amendments made in the SEBI (Prohibition of Insider Trading) Regulations, 2015.

The decision of the Compliance Officer / Chairman shall be final, binding and conclusive and shall not be justifiable in any forum.

All correspondence with the Company in regard to this Code should be sent to the Compliance Officer and marked "CONFIDENTIAL".

XVII. CONFIRMATION:

The Insider Trading Regulations and the Code have been uploaded on the website. All Directors/promoter/KMP and Designated Employees hereby acknowledge to having read and fully understood their obligations under the Insider Trading Regulations and the Code and have undertaken to unconditionally abide by the same. They can contact the Compliance Officer for any clarification/ assistance.

FORM - "A"

APPLICATION FOR PRE-DEALING APPROVAL

(refer clause no. VI of the Code for Prevention of Insider Trading)

From:

Name:

Designation:

To,

Compliance Officer

Choksi Imaging Limited

With reference to the Code for Prevention of Insider Trading ("the Code") of the Company, I seek your approval to subscribe to / agree to subscribe to / purchase / sell* / deal as an agent / principal in _____ (nos) of _____ (description of security) of the Company.

The statement of securities of the Company held as on _____ and my Undertaking in the prescribed format are enclosed for your perusal in this connection.

* I declare that the minimum holding period stipulated in the Code of the Company with respect to the securities proposed to be sold has been complied with.

Date:

Signature:

FORM - "A 1"

STATEMENT OF HOLDING OF SECURITIES AT THE TIME OF PRE-CLEARANCE (refer clause no. VI of the Code for Prevention of Insider Trading)

To,
Compliance Officer,
Choksi Imaging Limited

I, _____, hereby declare that the details of securities held by me and the securities held by my dependant family members in the Company as on this date are furnished below

| Name | Relation | Folio No / DP ID / Client ID No. / ESOP* | Type of Security | No. of Security |
|------|----------|--|------------------|-----------------|
| | | | | |
| | | | | |
| | | | | |

*Where the securities proposed to be sold are pursuant to cashless exercise of stock options, please mention "ESOP Entitlement" in this column.

Date: _____

Signature _____

FORM - "A 2"

UNDERTAKING

(refer clause no. VI of the Code for Prevention of Insider Trading)

To,
Choksi Imaging Limited
Compliance Officer

I, _____ (name and designation), am desirous of dealing in _____ (nos.) of _____ (description of security) of the Company as mentioned in my application dated _____ for pre-clearance of the transaction.

As required by the **Code for Prevention of Insider Trading ("the Code")** of the Company, I hereby state as follows:

- a) I have no access to nor do I have any information that could be construed as "Price Sensitive Information" as defined in the Code up to the time of signing this undertaking;
- b) In the event that I have access to or received any information that could be construed as "Price Sensitive Information" as defined in the Code, after the signing of this Undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same in writing and shall completely refrain from dealing in the securities of the Company until such information becomes public;
- c) I have not contravened the provisions of the Code in force as of date;
- d) I have made full and true disclosure in the above matter.

Date:
Signature:

FORM - "A 3"

PRE-CLEARANCE ORDER

(refer clause no. VI of the Code for Prevention of Insider Trading)

To,

Name: _____

Designation: _____

Place: _____

This is to inform you that your request for dealing in _____ (nos) of _____ (description of security) of the Company as mentioned in your above mentioned application is approved. Please note that the said transaction must be completed on or before _____ i.e. within 7 days from today and you shall not enter into an opposite transaction for a period of 6 months following this transaction

In case you do not execute the approved transaction / deal on or before the aforesaid date you would have to seek fresh pre-clearance before executing any transaction/deal in the securities of the Company. Further, you are required to file the details of the executed transactions in the attached format within 2 days from the date of transaction/deal. In case the transaction is not undertaken a 'Nil' report shall be necessary.

Yours faithfully,

For **Choksi Imaging Limited**,

Compliance Officer

Date: _____

FORM - "A 4"

DISCLOSURE OF TRANSACTIONS

(refer clause no. VI of the Code for Prevention of Insider Trading)

To,
Choksi Imaging Limited,
The Compliance Officer
Mumbai

I hereby inform that I

- have not bought / sold/ subscribed any securities of the Company
- have bought/sold/subscribed to _____ securities as mentioned below on _____ (date)

| Name of holder | Type of Securities | No. of securities dealt with | Bought/ sold/ subscribed | DP ID/Client ID / Folio No |
|----------------|--------------------|------------------------------|--------------------------|----------------------------|
| | | | | |
| | | | | |

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

I declare that the above information is correct and that no provisions of the Company's Code and/or applicable laws/regulations have been contravened for effecting the above said transactions(s).

Signature:

Name:

Designation:

FORM - "B"

APPLICATION FOR WAIVER OF MINIMUM HOLDING PERIOD

(refer clause no. VII of the Code for Prevention of Insider Trading)

Date:

To,
Compliance Officer,
Choksi Imaging Limited

Dear Sir,

I request you to grant me waiver of the minimum holding period of 3 months as required under the Code for Prevention of Insider Trading with respect to the following securities of the Company held by me.

| Name | Relation | Folio No, / DP ID / Client ID No. / ESOP* | Type of Security | No. of Security | Date of acquisition |
|------|----------|---|------------------|-----------------|---------------------|
| | | | | | |
| | | | | | |
| | | | | | |

The reasons for seeking this waiver are:

(Mention reasons)

Thanking you,

Yours faithfully,

Name
Designation

FORM- "C"

INITIAL DISCLOSURE OF SECURITIES

(refer clause no. VIII of the Code for Prevention of Insider Trading)

To,
The Compliance Officer,
Choksi Imaging Limited

I, _____, in my capacity as _____ of the Company hereby submit the following details of securities held in the Company as on _____ (date of becoming Specified Person).

I. Details of securities held by me:

| Type of Securities | No. of securities held | Folio No | Beneficiary Client ID | A/c |
|--------------------|------------------------|----------|-----------------------|-----|
| | | | | |

II. Details of dependent(s) :

Pursuant to the provisions of SEBI (Prohibition of Insider Trading) Regulations, 1992 and the Company's Code of Procedures and Conduct for Prevention of Insider Trading, I hereby declare that i have the following dependents:

| Sr. No. | Name of the dependent | Relation with Director / Officer / Designated Employee |
|---------|-----------------------|--|
| | | |
| | | |

III. Details of securities held by dependent(s):

| Name of Relative | Relationship | Type of securities | No. of Securities held | Folio No | Beneficiary A/c Client ID |
|------------------|--------------|--------------------|------------------------|----------|---------------------------|
| | | | | | |

Date:

Signature:

FORM "D"

CHANGE IN SECURITIES

(refer clause no. VIII of the Code for Prevention of Insider Trading)

To,
The Compliance Officer
Choksi Imaging Limited

| (1) | (2) | (3) | (4) | (5) | (6) | (7) |
|--|---|--|---|--------------------------------------|---|--|
| <i>Name, PAN No. & address Of shareholders</i> | <i>Shareholding prior to acquisition/sale</i> | <i>No. & % of shares/ Voting rights acquired /sold</i> | <i>Receipt of allotment advice/ acquisition of shares/ sale of Shares Specify</i> | <i>Date of intimation To company</i> | <i>Mode of acquisition (market purchase/ public/ rights/ preferential offer etc.)</i> | <i>No. & % of shares/ Voting rights post acquisition /sale</i> |
| | | | | | | |

| (8) | (9) | (10) | (11) | (12) | (13) |
|--|---|---------------------|------------------|----------------------|-------------------|
| <i>Trading member Through whom the trade Was executed with SEBI Registration No. of the TM</i> | <i>Exchange on which The trade was Executed</i> | <i>Buy quantity</i> | <i>Buy value</i> | <i>Sell quantity</i> | <i>Sell value</i> |
| | | | | | |

Date:

Signature:

FORM "E"

ANNUAL DISCLOSURE

(refer clause no. VIII of the Code for Prevention of Insider Trading)

To,
The Compliance Officer
Choksi Imaging Limited

Dear Sir / Madam,

I, _____ of the Company hereby declare that securities held by me or/and by my dependent family members in the Company as on March 31, _____ and the transactions during the period April 1, _____ to March 31, _____ are as per details furnished below:

| Name | Folio No | Relation | Type of Security | Securities held on April 1, _____ | Securities acquired during the period | Securities sold during the period | Balance Securities held as on March 31, _____ |
|------|----------|----------|------------------|-----------------------------------|---------------------------------------|-----------------------------------|---|
| | | | | | | | |

I declare that minimum holding period stipulated in the Code for Prevention of Insider Trading with respect to the securities sold, has been complied with and that the information furnished herein is complete and correct.

Date:

Place:

Signature: