



LAHOTI OVERSEAS LTD.

REGD OFFICE:
307, ARUN CHAMBERS, TARDEO ROAD,
MUMBAI - 400 034 INDIA
TEL.:91-22-23516389/90
FAX :91-22-23511930
E-Mail : umesh@lahotioverseas.com
Website: www.lahotioverseas.in

CODE OF CONDUCT POLICY FOR PREVENTION OF INSIDER TRADING

I] Preamble:

To bring in line the Code of Conduct of the Company with the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time, including any modification or re-enactments thereof, the Company has adopted the following Code in this regard in its Board meeting held on May, 2015 and the same shall come into force with immediate effect.

II] Applicability

This Code applies to:

- i. All the Employees of Lahoti Overseas Limited;
- ii. Connected persons as defined in this Code;
- iii. Subsidiaries of the Company

III] Definitions

In this Code, unless repugnant to the meaning or context thereof, the following expressions, wherever used in this Code, shall have the meaning as defined below:

- i. **“Act”** means the Securities and Exchange Board of India, 1992 (15 of 1992);
- ii. **“Board/Directors”** shall mean the Board of Directors of the Company
- iii. **“Company”** shall mean Lahoti Overseas Limited (LOL)
- iv. **“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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board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 Company or the head of the organization, as the case may be.
- v. **“Code”** means this Code of Conduct for Prevention of Insider Trading, 2015, as modified from time to time
- vi. **“Connected Person”** means
 - (i) 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





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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.

- (ii) 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;
- vii. **“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 either as a principal or as an agent.





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- viii. **“Designated Employee (s)”** shall include:
- All Directors of LOL
 - Key Managerial Personnel
 - Every employee in the Category of “Manager” and above;
 - Every employee in the accounts, finance, secretarial and legal department of the Company;
 - Any other employee as may be determined and informed by the Compliance Officer from time to time.
- ix. **“Director”** shall mean the member of the Board of Directors of the Company;
- x. **“Employee”** means every employee of the Company including the Directors in the employment of the Company.
- xi. **“Generally available information”** means information that is accessible to the public on a non-discriminatory basis.
- xii. **“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.
- xiii. **“Insider”** means any person who is,
- a connected person; or
 - in possession of or having access to unpublished price sensitive information.
- xiv. **“Key Managerial Person”** means person as defined in Section 2(51) of the Companies Act, 2013.
- xv. **“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.
- xvi. **“Regulations”** shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.
- xvii. **“SEBI”** means Securities and Exchange Board of India.
- xviii. **“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.
- xix. **“Specified”** means specified by the Board in writing.
- xx. **“Specified Persons”** means the Directors, connected persons, the insiders, the Designated Employees and the promoters and immediate relatives are collectively referred to as Specified Persons.





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- xxi. **"Stock Exchange"** shall mean a stock exchange in which the shares of THE Company are listed.
- xxii. **"Takeover regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.
- xxiii. **"Trading"** means and includes subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell, deal in any securities and "trade" shall be construed accordingly.
- xxiv. **"Trading Day"** means a day on which the recognized stock exchanges are open for trading
- xxv. **"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;
 - (vi) material events in accordance with the listing agreement.

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.





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III] Compliance Officer

The Company Secretary of LOL shall be the Compliance Officer for the purpose of this Code and will report to the Managing Director/Whole-time Director.

In the absence of the Company Secretary, any other person as may be designated or authorized by the Managing Director/Whole-time Director shall be the Compliance Officer for the purpose of this Code.

The Compliance Officer shall be responsible for setting forth formulation of policies, procedures, monitoring adherence to the rules for the preservation of Price Sensitive Information, pre-clearing of all Designated Employees proposed Dealings, addressing any clarifications/difficulties regarding the Regulations and/or the Code and the implementation of the Code, under the overall supervision of the Managing Director/Whole-time Director.

IV] Control on Unpublished Price Sensitive Information

- i. Persons including Designated Employees and Connected persons collectively known as Insiders who are in possession of Unpublished price sensitive information (hereinafter referred as “UPSI”) shall handle such information with care and to deal with such information during business transactions only on a need to know basis. They shall maintain confidentiality in this regard and the UPSI shall be communicated to any person except in furtherance of the insider’s legitimate purposes, performance of duties or discharge of his legal obligations.
- ii. No insider shall communicate, provide or allow access to any unpublished price sensitive information, relating to a company or securities listed or proposed to be 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.
- iii. No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties of discharge of legal obligation.
- iv. Notwithstanding anything contained in the Code, an unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction that would:–
 - a) 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.





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- b) 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 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 at least two trading days prior to the proposed transaction being effected in such form as the board of directors may determine.
- v. For purposes of above clause, the parties shall be required 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 Clause (iv) and shall not otherwise trade in securities of the company when in possession of unpublished price sensitive information.
- vi. For the purpose of prompt public disclosure of Unpublished Price Sensitive Information, the Company also adopts the Code regarding practice & procedure for Fair Disclosure.

Documents of the Company such as papers, records and files containing UPSI of any manner shall be kept secured and UPSI being available in the computer files, the same shall be secured through password protection.





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V] Control on Trading when in possession of UPSI

The Insider in possession of the UPSI shall not trade in the securities that are listed or proposed to be listed on a recognized stock exchange.

Provided that the insider may prove his innocence by demonstrating the circumstances including the following: –

(i) the transaction is an off-market inter-se transfer between promoters who were in possession of the same UPSI without being in breach of regulation 3 of SEBI (Prohibition of Insider Trading) Regulations, 2015 and both parties had made a conscious and informed trade decision;

(ii) in the case of non-individual insiders: –

(a) the individuals who were in possession of such UPSI were different from the individuals taking trading decisions and such decision-making individuals were not in possession of such UPSI when they took the decision to trade; and

(b) appropriate and adequate arrangements were in place to ensure that these regulations are not violated and no UPSI was communicated by the individuals possessing the information to the individuals taking trading decisions and there is no evidence of such arrangements having

been breached;

(iii) the trades were pursuant to a trading plan set up in accordance with regulation 5 of SEBI (Prohibition of Insider Trading) Regulations, 2015.





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V] Trading plan

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.
2. Such trading plan shall:-
 - a. not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
 - b. 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;
 - c. entail trading for a period of not less than twelve months;
 - d. not entail overlap of any period for which another trading plan is already in existence;
 - e. 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
 - f. not entail trading in securities for market abuse.
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 such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.
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.
5. Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.





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VI] Trading Window

- i. The “Trading Window” for the purpose of this Code shall mean the period during which Dealing in Securities is permitted.
- ii. The Designated Employees and the Connected Persons shall engage in Dealing in Securities only when the Trading Window is open.
- iii. Unless otherwise specified by the Compliance Officer, the Trading Window shall be, inter alia, closed 7 days prior to the following:
 - a. Declaration of financial results (quarterly, half-yearly and annually).
 - b. Declaration of dividends (interim and final).
 - c. Issue of Securities by way of public/rights/bonus etc.
 - d. Any major expansion plans or execution of new projects.
 - e. Amalgamation, mergers, takeovers and buy-back.
 - f. Disposal of whole or substantially whole of the undertaking.
 - g. Any significant changes in policies, plans or operations.

The Trading Window shall be opened 24 hours after the information relating aforementioned items is made public.

VII] Pre-clearance of Trade

- i. All Designated Employees and their immediate relatives who intend to trade in the securities of the company above a minimum of 25000 shares of the company per transaction should pre-clear the transactions as per the pre-trading procedure as described hereunder.
- ii. An application shall be made in Form I to the Compliance Officer indicating the estimated number of securities that the Designated Employees or their immediate relatives intends to trade in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the Company in this behalf.
- iii. The Compliance Officer shall consider the application made as above, inter alia, having regard to the Trading Window, and may clear/refuse to clear the same, without assigning any reason(s) for refusal to clear the same.
- iv. In the event, the clearance above has been given, the concerned Designated Employees and/or immediate relatives shall carry out the Dealing in Securities within seven trading days after the approval of pre-clearance is given. If the proposed Dealing in Securities of the Company is not completed within seven trading days after approval is given, the





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concerned Designated Employees and/or immediate relatives must pre-clear the proposed Dealing in Securities again by following the procedure mentioned herein above.

- v. An undertaking (Form II) shall be executed In favour of the Company by such Designated Employees incorporating, inter alia, the following clauses, as may be applicable:
- a) That the Designated Employee does not have any access or has not received “Price Sensitive Information” up to the time of signing the undertaking.
 - b) That in case the Designated Employee 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 of conduct for prevention of insider trading as notified by the Company from time to time.
 - d) That he/she has made a full and true disclosure in the matter.
- vi. In case the Designated Employees and/or immediate relatives decides not to execute the trade after securing pre-clearance, he/she shall inform the Compliance Officer of such decision alongwith reasons thereof immediately.
- vii. All Designated Employees who buy or sell any number of shares of the company shall not execute a contra trade i.e. sell or buy any number of shares during the next six months following the prior transaction.
- viii. The Compliance Officer may grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate the regulations.
- ix. Should a contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the act.





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VIII] Disclosures

1. Initial Disclosures:

- a) Every promoter, key managerial personnel and director of every company whose securities are listed on any recognized stock exchange shall disclose his holding of securities of the company as on the date of these regulations taking effect, to the company within thirty days of these regulations taking effect;
- 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.

Initial Disclosures to be made at the time of effectiveness of this Code as per the below requirements.

Concerned Person	To whom	Disclosure to be made	Timeline	Format
Promoter/KMP/Director/ Designated Employee	Compliance officer	Holding of securities of the Company as on the date of this Code taking effect i.e. 27 th May, 2015	Within 30 days from the Code taking effect	Form A
Promoter/KMP/Director/ Designated Employee	Compliance officer	Holding of securities of the Company as on the date appointment or becoming Promoter	Within 7 days of such appointment or of becoming Promoter	Form B





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2. Continual Disclosures.

- a) Every promoter, employee and director of every company shall disclose to the company the number of such securities acquired or disposed of within two trading days of such 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 or such other value as may be specified;
- b) Every company shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.

Concerned Person	To whom	Disclosure to be made	Timeline	Format
Promoter/KMP /Director/Designated Employee	Compliance officer	Number of such shares acquired or disposed	Within 2 trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 10 lakhs or such other value as may be specified.	Form C
Company	Stock Exchange in which securities are Listed (BSE and MPSE)	Number of such shares acquired or disposed	Within 2 trading days of receipt of disclosure or becoming aware of such disclosure	Form C





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3. Disclosures by other connected persons

Any company whose securities are listed on a stock exchange may, at its discretion require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the company in such form and at such frequency as may be determined by the company in order to monitor compliance with these regulations.

Every Connected Persons shall make disclosures of holdings and trading in securities of the Company in Form D and at such frequency as may be determined by the Company in order to monitor compliances with these regulations.

The Compliance Officer shall maintain records of all the disclosures/declarations/undertakings/forms as mentioned in this Code, as received from time to time, for a period of five years.

The Compliance Officer shall report to the Board of Directors for the purpose of the Code and in particular, shall provide reports to the Chairman of the Audit Committee and to the Chairman of the Board annually.

VII] Penalty on Contravention

Any contravention of these regulations shall be dealt with by the Board in accordance with the Act.

In case any violation of the Regulation or the Code is observed, SEBI may be informed of the same by the Company.

This Code and any amendment thereto shall be available on the website of the Company.





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FORM I

FORMAT OF APPLICATION FOR SEEKING PRE-CLEARANCE FOR DEALING IN SECURITIES

Date:

To,
The Compliance Officer,
Lahoti Overseas Limited
Mumbai

Dear Sir/Madam,

Application for seeking Pre-clearance for dealing in securities of the Company

Pursuant to the SEBI (Prohibition of Insider Trading), Regulations, 2015 and the Company' Code of Conduct for Prevention of Insider Trading, 2015, I seek approval to purchase / sale / subscription of ____ Equity Shares of the Company as per the details given below:

Sr. No.	Particulars	Remarks
1	Name of the applicant	
2	Designation	
3	Department	
4	Employee No.	
5	Number of securities held as on date	
6	Folio No. / DP ID / Client ID No.	
7	The proposal is for	(a) Purchase of securities (b) Subscription of securities (c) Sale of Securities
8	Proposed date of dealing in securities	
9	Estimated number of securities proposed to be acquired/subscribed/sold	
10	Price at which transaction is proposed	
11	Current market price (as on date of application)	
12	Whether the proposed transaction will be through stock exchange or off-market deal	
13	Folio No./DP ID/Client ID No. where the securities will be credited/debited	

I enclose herewith the form of Undertaking signed by me.

Yours faithfully

(Signature)





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FORM II

FORMAT OF UNDERTAKING TO BE ACCOMPANIED WITH APPLICATION FOR SEEKING PRE-CLEARANCE

UNDERTAKING

Date:

To,
Lahoti Overseas Limited,
Mumbai

I, _____ of the Company
residing at _____, am desirous of
dealing in _____* shares of the Company as mentioned in my application dated _____ for
pre-clearance of the transaction.

I further declare that I am not in possession of or otherwise privy to any unpublished Price Sensitive Information (as defined in the Code) up to the time of signing this Undertaking.

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 and shall completely refrain from dealing in the securities of the Company until such information becomes public.

I declare that I have not contravened the provisions of the Code as notified by the Company from time to time.

If approval is granted, I shall execute the deal within 7 days of the receipt of approval failing which I shall seek pre-clearance.

I declare that I have made full and true disclosure in the matter.

** Indicate number of shares*

Yours faithfully

Signature





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Form A

Initial Disclosure

Name of the Company: **Lahoti Overseas Limited**
ISIN of the Company: **INE515C01023**

Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and other such personas as mentioned in the Code:

Name, PAN No., CIN/DIN & address with Contact No.	Category of Person (Promoter s / KMP / Directors / Immediate relatives / others, etc)	Securities held as on the date of this code coming into force		% of share holding	Open Interest of the future contracts held as on the date of this code coming into force		Open Interest of the Option contracts held as on the date of this code coming into force	
		Type of Securities (for eg. – Shares, Warrants, Convertible Debentures, etc)	No.		Number of units (contract s lot size)	Notional value in Rupee terms	Number of units (contract s lot size)	Notional value in Rupee terms
1	2	3	4	5	6	7	8	9

Signature : _____
Designation : _____
Date : _____
Place : _____





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Form B

Initial Disclosure

Name of the Company: **Lahoti Overseas Limited**
ISIN of the Company: **INE515C01023**

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 person as mentioned in the Code:

Name, PAN No., CIN/DIN & address with Contact No.	Category of Person (Promoters / KMP / Directors / Immediate relatives / others, etc)	Date of appointment of Director / KMP or Date of becoming Promoter	Securities held as on the date of this code coming into force		% of shareholding	Open Interest of the future contracts held as on the date of this code coming into force		Open Interest of the Option contracts held as on the date of this code coming into force	
			Type of Securities (for eg. – 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

Signature : _____
Designation : _____
Date : _____
Place : _____





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Form C

Continual Disclosure

Name of the Company: **Lahoti Overseas Limited**
ISIN of the Company: **INE515C01023**

Details of change in holding of Securities of Promoter, Employee of Director of a listed company and other such persons as mentioned in the Code.





LAHOTI OVERSEAS LTD.

REGD OFFICE:
 307, ARUN CHAMBERS, TARDEO ROAD,
 MUMBAI - 400 034 INDIA
 TEL.:91-22-23516389/90
 FAX :91-22-23511930
 E-Mail : umesh@lahotioverseas.com
 Website: www.lahotioverseas.in

Name, PAN No., CIN/DIN & address with Contact No.	Category of Person (Promoters / KMP / Directors / Immediate relatives / others , etc	Securities held prior to acquisition / disposal		Securities acquired / disposed		% of sharehold ing		Date of allotment of advice / acquisiti on of shares / sale of shares		Date of intim ation to com pany	Mode of acquisiti on (market purchase / public rights / preference 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 Securities (for eg. - Shares, Warrants, Convertible Debentur es, etc)	No.	Type of Securities (for eg. - Shares, Warrants, Convertible Debenture s, etc)	No.	Pre tran saction	Post tra nsaction	Buy Value	Buy Numb er of units			Sell Value	Sell Numb er of units			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

Signature: _____

Designation: _____

Date: _____

Place: _____





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Form D

Disclosures by Connected Persons

Name of the Company: **Lahoti Overseas Limited**
ISIN of the Company: **INE515C01023**

Details of transactions by other connected persons as identified by the Company as mentioned in the Code.





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Name, PAN No., CIN/DIN & address of connected persons with Contact No.	Connection with Company any	Securities held prior to acquisition / disposal		Securities acquired / disposed	% of sharehold ing	Date of allotment of advice / acquisition of shares / sale of shares specify		Date of intim ation to company	Mode of acquisti on (market purchase / public rights / preference 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 Securities (for eg. – Shares, Warrants, Convertible Debenture s, etc)	No.			From	To			Buy		Sell				
										Value	Numb er of units	Value	Numb er of units			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

Signature: _____ Designation: _____ Date: _____ Place: _____

