

GVP INFOTECH LIMITED

POLICY ON PROHIBITION OF INSIDER TRADING

GVP INFOTECH LIMITED

(Formerly known as Fourth Dimension Solutions Ltd)

Regd. Off.: 710, Naurang House, Kasturba Gandhi Marg, New Delhi-110001 **Contact :** +91 11 41562293

Email : secretarial@gvpinfotech.com | **Website :** www.gvpinfotech.com

CIN : L74110DL2011PLC221111

INTRODUCTION

The Securities and Exchange Board of India (SEBI), in its endeavor to protect the interests of investors in general, had formulated the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“Regulations”) under the powers conferred on it under the SEBI Act, 1992.

SEBI vide its Circular No. LD-NRO / GN / 2014-15 / 21 185, dated 15th January 2015, has introduced SEBI (Prohibition of Insider Trading) Regulations, 2015, to be effective from 15th May 2015 and the same have been made applicable to all companies whose shares were listed on Indian stock exchanges.

As per Regulation 9 of the newly introduced SEBI (Prohibition of Insider Trading) Regulations, 2015 contains new provisions and requires a listed company to formulate a “Code of Conduct” accordingly to regulate, monitor and report trading by employees and other connected persons in adherence with the minimum standard set as set out in amended code of conduct.

The Company endeavors to prepare the formulate a code of conduct to regulate, monitor and report trading by its employees and other connected persons towards achieving compliance with these regulations, adopting the minimum standards as set out in the regulations, without diluting the provisions of these regulations in any manner.

In compliance with the above requirements and Regulations, GVP INFOTECH LIMITED (“the Company”) has adopted this policy and code based as per the said Regulations. The Company endeavors to ensure timely and adequate disclosure of price sensitive information.

OBJECTIVE

The Policy is required for the Company to prevent the misuse and ensure timely and adequate disclosure of Unpublished Price Sensitive Information (‘UPSI’) and to maintain the uniformity, transparency and fairness in dealing with the stakeholders.

DEFINITIONS

- **ACT**

Act means the Securities and Exchange Board of India Act, 1992 and amendments thereto including any statutory modification(s) or re-enactment thereof for the time being in force.

- **BOARD**

Board means the Board of Directors of the Company.

- **CODE**

Code means this Code of Conduct for Prevention of Insider Trading including modifications made therein from time-to-time by the Company.

- **COMPANY**

Company means GVP INFOTECH LIMITED.

- **COMPLIANCE OFFICER**

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Compliance Officer shall be the person holding the position of the Company Secretary of the Company, from time to time.

CONNECTED PERSON

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 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 recognized 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 a company or his immediate relative or banker of the company, has more than ten per cent. of the holding or interest;

DIRECTOR

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

GENERALLY AVAILABLE INFORMATION

Generally Available Information means information that is accessible to the Public on a nondiscriminatory basis.

INSIDER

An "Insider" means any person who is:

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- a) a Connected Person or
- b) in possession of or having access to UPSI.

IMMEDIATE RELATIVE

Immediate Relative means a spouse of an insider and includes parent, sibling, and child of MRS such insider or of the spouse, any of whom is either dependent financially on such insider or consults such insider in taking decisions relating to trading in securities.

INSIDER TRADING

Insider Trading means when Insiders use Unpublished Price Sensitive Information to arrive at Securities trading (including buying as well as selling) decisions, the action is referred to as Insider Trading.

KEY MANAGERIAL PERSONNEL

Key Managerial Personnel means person as defined in Section 2(51) of the Companies Act, 2013.

TRADING WINDOW

Trading Window means a trading period for trading in the Securities of the Company as specified by the Company from time to time.

PROMOTER

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.

SECURITIES

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;

UNPUBLISHED PRICE SENSITIVE INFORMATION

UPSI 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: -

- financial results;
- dividends;
- change in capital structure;
- mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
- changes in key managerial personnel; and
- material events in accordance with the listing agreement.

PROHIBITION ON COMMUNICATING OR PROCURING UPSI

An Insider shall not -

- a) communicate, provide, or allow access to any UPSI, relating to the Company or its securities, to any person including other Insiders, except to the extent allowed by these Rules or SEBI Regulations; or
- b) procure from or cause the communication by an Insider of UPSI, relating to the Company or its securities.

Provided that nothing contained above shall be applicable when an UPSI is communicated, provided, allowed access to or procured in furtherance of legitimate purposes, performance of duties or discharge of legal obligations pursuant to appropriate notice, confidentiality and nondisclosure agreements being executed

ROLE OF COMPLIANCE OFFICER

- a) The Compliance Officer shall maintain a record of designated employees as per Form -I
- b) The Compliance Officer shall report on insider trading to the Board of Directors of the Company and in particular, shall provide reports to the Chairman of the Audit Committee, if any, or to the Chairman of the Board of Directors at such frequency as may be stipulated by the Board of Directors
- c) The Compliance Officer shall from time to time inform the Stock Exchanges of any Price Sensitive Information on immediate basis
- d) The Compliance Officer shall assist all employees in addressing any clarifications regarding the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct.
- e) The Compliance Officer shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of Price Sensitive Information, preclearing of Designated Employees and their dependents' trades, monitoring of trades and the implementation of the Code of Conduct under the overall supervision of the Board of the Company.
- f) The Compliance Officer shall report a compliance status on half yearly basis to the Chairman of the Audit Committee and Board of Directors.

TRADING PLAN

An insider shall be entitled 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 shall: -

- a) Not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;

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- b) Not entail trading for the period between twentieth trading day prior to the last day of any financial period for which results are required to be announced by the Company 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.

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.

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.

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

LEGITIMATE PURPOSE

Legitimate purpose shall include sharing of UPSI 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 Regulations.

The UPSI shall be shared by concerned person(s) only in furtherance of legitimate purpose(s) which shall include the following;

1. Sharing of UPSI in the ordinary course of business as an Insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants.
2. Sharing of UPSI where such communication is in furtherance of performance of duty (ies).
3. Sharing of UPSI for discharge of legal obligation(s).
4. Sharing of UPSI for any other purpose as may be prescribed under the Regulations or any other law for the time being in force, in this behalf, as may be amended from time to time.

An action shall not be considered to be undertaken for a “legitimate purpose” if such action leads to “market abuse” and result into personal benefit of any Insider.

TRADING WINDOW

The Company shall specify a trading period, to be called “Trading Window”, for trading in the Company’s securities.

The Directors, connected persons and Designated Employees of the Company shall not trade in the Securities of the Company when trading window is closed.

The trading window shall be, inter alia, closed at the time: -

- 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 changes in policies, plans or operations of the Company.

The trading window shall remain close from the end of every quarter till 48 hours after the declaration of financial results and for any other cases, such other period as may be specified by the Compliance Officer from time to time in consultation with the Chairman & Managing Director of the Company.

PRE-CLEARANCE OF TRADING

Designated Person shall obtain a pre-clearance as per the procedure prescribed hereunder for any trading in any securities of the Company proposed to be undertaken by such Designated Person. Such pre-clearance would be required when the value of securities traded whether in one transaction or a series of transactions over a calendar year aggregates to a traded value in excess of Rs. 10 Lakhs.

PRE-CLEARANCE PROCEDURE

Every Designated Person is required to obtain pre-clearance from the Compliance Officer by making an application in Form - II along with the undertaking before he/she and/or any of his/her immediate relatives, deals in securities (either buy/acquire or sell/dispose), if the market value of securities involved in the deal, in aggregate calendar year, exceeds Rs. 10 Lakhs.

It is hereby clarified that the value of securities traded will include the aggregate of purchases as well as sale of securities.

The application shall be made together with an undertaking to the Company as prescribe herewith annexure. The undertakings shall state that the Designated Person is not in possession of Unpublished Price Sensitive Information relating to securities at the time of signing of the undertaking and that should he/she

receive any such Unpublished Price Sensitive Information after signing but before execution of the applied for transaction, he/she will refrain from executing transaction.

Designated Person and/or any of his immediate relatives shall execute their order in respect of securities of the Company within one week after the approval of pre-clearance is given. The Designated Person and/or any of his immediate relatives shall file within 2 days of the execution of the deal, the details of such deal with the Compliance Officer in Form - III.

The application for pre-clearance if granted shall be valid for 7 days starting from the date of pre-clearance. In other words, the pre cleared transaction is required to be executed within 7 days starting from the date of pre-clearance, failing which pre-clearance would be required to be sought afresh.

Pre-clearance of the trades to be executed by the Compliance Officer will be approved by the Chairman of the Company and responsibilities with regard to Compliance Officer shall lie on the chairman mutatis mutandis.

DISCLOSURES

The disclosures to be made by any person shall include those relating to trading by such person, immediate relatives, and by any other person for whom such person takes trading decisions.

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 the purposes of arriving at the value of trade, subject to trading of such Derivatives is permitted by any law for the time being in force.

1. Initial Disclosure

- a. Every Promoter including member of promoter group, Designated Person, KMP and Director, is required furnish details of securities held by him in or his immediate relatives in Form - III within 30 days of this policy coming in to effect
- b. Every person on appointment as key managerial personnel or a director of the Company or upon becoming a promoter shall disclose his holding of securities of the Company in Form IV as on the date of appointment or becoming a promoter, to the Company within 7 days of such appointment or becoming a promoter.

2. Continual Disclosure

- a. Every promoter, designated person and director of the Company shall disclose to the Company the number of such securities acquired or disposed of within 2 trading days of such transaction in Form V 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. 10,00,000/- (Rupees Ten Lakhs Only)
- b. Disclosure by other connected person in the case of change in security of listed company in Form-VI.
- c. The Compliance Officer shall notify the stock exchanges, particulars of the Trades, within two trading days of the receipt of the Continual Disclosure or from becoming aware of such information.

3. Annual Disclosures

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 the format specified in Form-VII hereto.

REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES

Disclosure	Categories required to make disclosure	Particular	Time period
Internal Disclosure			
Initial Disclosure to the Company (Internal)	- Promoter - Director - Key Managerial Personnel	Holding of Securities of the Company as on 15th May 2015. (date on which the Regulations come into force) including the statement of holdings of Immediate Relatives and any other person for whom you take Trading decisions in the prescribed Form III	Within 30 days of this Policy coming in to effect.
Continual Disclosure to be made to the Company (Internal)	- Promoter - Employee - Key Managerial Personnel - Director - Connected Person	Number of Securities acquired or disposed of in case the value of Securities traded, whether in one transaction or a Series of transactions over a calendar quarter, aggregates to a traded Value in excess of ten lacs rupees or such other value as may be specified by SEBI, in the prescribed Form-V (by Promoters, KMP, Directors, Employees) and / or as prescribed. Further the other connected person or class of connected person to make disclosure in Form - VI about — his/her holdings and Trading in Securities of the Company	Within Two trading day of such transaction.
Disclosure required to notify the stock exchange			
Initial Disclosure to the Company (Public)	upon appointment as: - Director - Key Managerial Personnel - Designated Person or becoming a Promoter	Holding of Securities of the Company as on the date of appointment as Director/ Key Managerial Personnel / Designated Person on the date of becoming a director / promoter / KMP including the statement of holdings of Immediate Relatives and any other person for whom you take Trading decisions in the prescribed Form IV.	Within 7 days of appointment as director / Key Managerial Personnel / Designated Person / date of becoming promoter
Continual Disclosure to be made by the Company (Public)	Company required to notify the stock exchange	In case the value of securities traded by a promoter, employee or director, whether in one transaction or series of transactions over a calendar quarter aggregates to a traded value in excess of Ten lacs rupees.	Within Two Trading days of receipt of the disclosure or becoming aware of the information.

RECORD

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

MISCELLANEOUS

- **In Case of Violation of The SEBI (Prohibition of Insider Trading) Regulations 2015**

Any Designated Person who trades in securities or communicates any information for trading in securities, in contravention of this policy / code may be penalized and appropriate action may be taken by the Company.

Designated Person who violates this policy / code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligibility for future participation in employee stock option plans, etc.

- **Authority to Amend**

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

FORM I REGISTER OF DESIGNATED EMPLOYEES

Sr. Nos	Name	Designation	PAN	Department	Employee No	Date of Joining	Date of Becoming designated employees	Date of cessation as designated employees	Remark

FORM II
APPLICATION FOR PRE-TRADING APPROVAL

To,
The Compliance officer,
GVP INFOTECH LIMITED

Pursuant to the SEBI (prohibition of Insider Trading) Regulation, 2015 and the Company Insider Trading Policy, I seek approval to purchase / sale / subscribe _____ equity shares of the company as per details given below:

1	Name of the Applicant	
2	Designation	
3	Number of securities held as on the date	
4	Folio No. / DP ID / Client ID	
5	The purpose is for (Purchase/ Sale / Subscribe)	
6	Proposed date of trading	
7	Estimate number of securities proposed to be purchase / Sale / Subscribe	
8	Current Market price (as on date of Application)	
9	Whether the proposed transaction will be through stock exchange or off market trade	
10	Folio No. / DP ID / Client ID where the securities will be credit / debit	

I enclose herewith the Undertaking signed by

Signature

Name

UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-CLEARANCE

To,
The Compliance Officer,
GVP Infotech Limited

I, _____, _____ of the Company residing at,

_____ am desirous of trading
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 any unpublished price sensitive information up to the time
of signing this Undertaking.

In the event that I have access to or receive any unpublished price sensitive information after the signing
of this undertaking but before executing the transaction for which approval is sought, shall inform the
Compliance Officer of the same and shall completely refrain from trading in the securities of the Company
until such information becomes public.

I declare that i have not contravened the provisions of the Rules as notified by the Company from time to
time. In the event of this transaction being in violation of the Rules or the applicable laws, **(a)** i will,
unconditionally, release, hold harmless and indemnify to the fullest extent, the Company and its directors
and officers, (the 'indemnified persons') for all losses, damages, fines, expenses, suffered by the
indemnified persons, **(b)** I will compensate the indemnified persons for all expenses incurred in any
investigation, defense, crisis management or public relations activity in relation to this transaction and **(c)**
I authorize the Company to recover from me, the profits arising from this transaction and remit the same
to the SEBI for credit of the Investor Protection and Education Fund administered by the SEBI.

I undertake to submit the necessary report within two days of execution of the transaction / a 'Nil' report
if the transaction is not undertaken.

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

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

Signature

Name:

Date;

Place;

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FORM-III

SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (1) (a) read with Regulation 6(2) — Initial disclosure to the company]

Name of the company: GVP INFOTECH LIMITED

ISIN of the company: INE382T01030

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

Name/PAN/DIN, Address with contact details	Category of Person • Promoters • KMP/ Directors • Immediate Relatives to directors or KMP • Others	Securities held as on the date of regulation coming into force		% of shareholding
		Type of security (For eg. — Shares, Warrants, Convertible securities)	No	
1	2	2	4	5

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

Details of Open Interest (OI) in derivatives of the company held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2).

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		
Contract specifications	Number of unit (contracts * lot size)	Notional value terms in	Contract specifications	Number of units (contracts * lot size)	Notional value In Rupee terms
6	7	8	9	10	11

Note: In case of Options, notional value shall be calculated based on premium plus strike price of options

Name & Signature:

Designation:

Date:

Place:

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FORM-IV

SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (1) (b) read with Regulation 6 (2) — Disclosure on becoming a director/KMP/Promoter]

Name of the company: GVP INFOTECH LIMITED

ISIN of the company: INE382T01030

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

Name/PAN/DIN, Address with contact details	Category of Person • Promoters • KMP/ Directors • Immediate Relatives to directors or KMP • Others	Securities held as on the date of regulation coming into force		% of shareholding
		Type of security (For eg. — Shares, Warrants, Convertible securities)	No	
1	2	2	4	5

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

Details of Open Interest (OI) in derivatives of the company 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).

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		
Contract specifications	Number of unit (contracts * lot size)	Notional value terms in	Contract specifications	Number of units (contracts * lot size)	Notional value In Rupee terms
6	7	8	9	10	11

Note: In case of Options, notional value shall be calculated based on premium plus strike price of options

Name & Signature:

Designation:

Date:

Place:

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FORM-V**SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (1) (b) read with Regulation 6 (2) — Disclosure on becoming a director/KMP/Promoter]**

Name of the company: GVP INFOTECH LIMITED

ISIN of the company: INE382T01030

Details of change in holding of Securities of Promoter, Employee or Director of a listed company.

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

Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company.

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		
Contract specifications	Number of unit (contracts * lot size)	Notional value terms in	Contract specifications	Number of units (contracts * lot size)	Notional value In Rupee terms
6	7	8	9	10	11

Note: In case of Options, notional value shall be calculated based on premium plus strike price of options**Name & Signature:****Designation:****Date:****Place:****GVP INFOTECH LIMITED**

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FORM-VI

SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7(3) — Transactions by Other connected persons as identified by the company

Name/PAN/DIN, Address with contact details	Connection with company	Securities held prior to acquire/disposal		Securities acquired/disposed				Securities held post acquire/disposal		Date of allotment advise/ acquisition of shares/sale of shares specify		Date of Intimation to the company	Mode of acquisition / disposal (On market/off market/right/preferential offer/Inter-se transfer/E SOP etc.
		Type of security (For eg. — Shares, Warrants, Convertible securities)	No & percentage of holding	Type of security (For eg. — Shares, Warrants, Convertible securities)	No	Value	Transaction type (Buy / Sale)	Type of security (For eg. — Shares, Warrants, Convertible securities)	No & percentage of holding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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

Details of trading in derivatives of the company by Other connected persons in Regulation 7(3).

Trading in derivatives (Specify type of contract, Futures or Options etc.)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sale		
Notional Value	No of Units (Contracts *Lot size)	Notional Value	No of Units (Contracts *Lot size)	Notional Value	No of Units (Contracts *Lot size)	
15	16	17	18	19	20	21

Note: In case of Options, notional value shall be calculated based on Premium plus strike price of options.

Name & Signature:

Designation:

Date:

Place:

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FORM-VII
ANNUAL DISCLOSURE

Date:
Name:
Designation:
DIN / Employee code
PAN
Address:

Sir,

With reference to above, I wish to inform you that I along with my immediate relatives are holding equity shares / other securities of the Company as follows:

1. Details of holding in my name:

Name	No. of security held on the beginning of the FY	Number of securities brought during the year	Number of Securities sold during the year	No. of Security held on at the end of the FY	Folio No / DP ID/ Client ID

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

Name & Signature:
Designation:
Date:
Place:

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