

Code of Conduct

[Under the SEBI (Prohibition of Insider Trading) Regulations, 2015
Applicable to the Directors/Officers/Designated Employees and Connected Persons]

Fluidomat Limited

This code may be called as code of conduct of **Fluidomat Limited (FL)** for prevention of Insider Trading. This Code can be modified/amended/alterd by Directors/Compliance Officer authorized by the Board. But in case of any statutory modification or amendment or alteration of the provisions of SEBI (Prohibition of Insider Trading), Regulations 2015, the newly modified / amended / altered provisions of the Regulation shall be placed before the Board of Directors of the FL for noting and the amended code shall be deemed to be implemented effective from the date of approval of the same by the Board.

1. PREAMBLE

Insider trading means dealing in securities of a listed company traded on any Stock Exchange in India by insiders which term includes Directors, Officers, Designated Employees and Connected Persons of FL based on- or when in possession of unpublished price sensitive information (UPSI).

The SEBI, as part of its efforts to protect the interest of investors in general, had issued the SEBI (Prohibition of Insider Trading) Regulations, 2015, under the powers conferred on it by the SEBI Act, 1992, which is made applicable to all the listed companies. The Regulations prohibits insider trading.

2. APPLICABILITY

This code shall be applicable to all the Directors, Officers, Designated Employees and Connected Person of FL.

3. DEFINITIONS

- (a) **Act** - means the Securities & Exchange Board of India Act, 1992;
- (b) **Board of Director**- means the Board of Directors of Fluidomat Limited
- (c) **Body Corporate**- means a body corporate as defined under Sub section 11 of Section 2 of the Companies Act, 2013
- (d) **FL**- means Fluidomat Limited (FL)
- (e) **Compliance Officer**- The Officer appointed by the Board of Directors of FL for the purpose of these regulations from time to time.
- (f) **Code**- means this Code of Conduct for Prevention of Insider Trading including modifications made thereto from time-to-time.
- (g) **Trading**- means and includes subscribing, buying, selling or agreeing to subscribe, buy, sell or deal in any securities and “ trade” shall be construed accordingly.
- (h) **Promoter**- shall have the meaning assigned to it under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof.
- (i) **Designated Employees**- shall mean and include –Top three tier of FL Management, namely:-
 - i. Chief Executive Officer (CEO), Chief Financial Officer (CFO);
 - ii. General Manager and above of all the departments of FL;
 - iii. Senior Manager and above of Finance and Accounts, Secretarial, Banking Department of FL.



