GUIDELINES FOR PRICE-SENSITIVE INFORMATION INSIDER TRADING IN EIDESVIK OFFSHORE ASA

Instructions for insider trading managers

6.1 Introduction

Since Eidesvik Offshore ASA is listed on the Oslo Stock Exchange, the regulations of the Norwegian Securities Trading Act relating to insider trading shall apply to trading with the Company's shares etc. The purpose of the Company's insider trading procedures is to ensure that the Company and its employees, board members etc. comply with these regulations. Insider trading managers have the overall responsibility for following up and ensuring compliance with the Company's shares etc.

6.2 New primary insiders

Insider trading managers shall ensure that all primary insiders receive a copy of the Company's insider trading regulations for primary insiders when they start working at the Company.

Inside trading managers shall ensure that all primary insiders confirm in wring that they have received and reviewed the insider trading regulations by signing a copy of the regulations in the specified field and returning this copy to the inside trading manager. Such signed copies shall be stored as long as the persons in question are associated with the Company and for at least one year after they have left the Company.

The following persons are considered primary insiders:

- a. Members of the Board of Directors;
- b. Deputy members/observers of the Board of Directors;
- c. Senior employees at the Company, who can normally be assumed to have access to pricesensitive information.
- d. Senior employees and Board members at other companies in the Group, who can normally be assumed to have access to price-sensitive information;
- e. Members of the control committee;
- f. The Company's auditor.

It is up to the Board of Directors to determine who is to be currently regarded as primary insider. As far as most of the abovementioned categories are concerned, it will be self-evident who is to be regarded as primary insider. The Board of Directors, however, shall assess which leading employees can normally be assumed to have access to price-sensitive information and who therefore are to be regarded as primary insiders. The same assessment must be made in relation to senior employees and board members at other companies of the Group.

6.3 List of primary insiders

The insider trading manager shall keep a list of primary insiders at the Company and their associates. Associates may only be included in the list if they own shares

or listed options issued by the Company, or pre-emption right, options or futures contracts or equivalent rights to such shares/options.

The list shall be kept in accordance with the current requirements of the Oslo Stock Exchange. The list shall be up-to-date at all times. Changes to the list shall be reported to the Oslo Stock Exchange immediately in accordance with the current requirements of the Oslo Stock Exchange. Copies of previous lists shall be stored for at least 10 years.

The following are considered to be associates:

- a. A spouse or a person with whom the primary insider cohabits under "marriage-like conditions",
- b. Primary insiders' children under the age of 18, as well as the children under the age of 18 of the persons mentioned in (ii) (ii) with whom the primary insider cohabits,
- c. company, in which the primary insider him/herself and/or someone mentioned in (i) or (ii) above, and/or someone with whom the primary insider has binding co-operation when it comes to owner rights, has controlling influence. Controlling influence exists if one controls more than half of the votes in the Company.

6.4 Notices from primary insiders

In accordance with the insider trading regulations for primary insiders, primary insiders have a duty to report all trade deals in the Company's shares etc. to the Oslo Stock Exchange and to send a copy of such notices to the insider trading manager. The insider trading manager shall create a protocol for storing all such notices.

Furthermore, primary insiders have a duty to send lists of associates who have shares etc. in the Company to the Oslo Stock Exchange with a copy to the insider trading manager. The insider trading manager shall store all such received lists. If a received list of associates renders changes necessary in the Company's list or primary insiders and associates, as mentioned in section 3 above, the insider trading manager shall make these necessary changes.

6.5 Authorisation

The insider trading manager shall receive authorisation requests from primary insiders.

Insider trading managers shall communicate authorisation requests to the person who is to grant the authorisation. Authorisation requests shall be processed by the CEO. In the CEO's absence, authorisation requests shall be handled by the person designated by the CEO. Authorisation requests from the CEO shall be handled by the Chairperson of the Board of Directors.

If the transaction is authorised, the insider trading manager shall ensure that a written authorisation notice is prepared using a form included in Appendix 1 and sent to the primary insider. If the transaction is not authorised, the insider trading manager shall ensure that a written notice of rejection is prepared according to the form included in Appendix 2 and sent to the primary insider.

All written authorisation requests, as well as copies of all authorisation notices and authorisation rejections, shall be stored for at least 10 years.

6.6 Authorisation principles

Authorisation shall only be granted if the authorisation manager finds that there is no pricesensitive information in the Company. Hence, it is not sufficient to attest that the primary insider who has requested authorisation is unaware of any price-sensitive information. Upon receipt of an authorisation request, the authorisation manager must therefore conduct an assessment whether such information exists. Such assessment shall be carried out without undue delay.

Price-sensitive information refers to information about the Company, the Company's shares or any other circumstances that can affect the price and are not public knowledge or generally known on the market.

It shall be assessed separately for each case which investigations to conduct in connection with an authorisation request. As part of the authorisation, however, the authorisation manager shall:

Assess whether non-public information about the Company, its shares or any other conditions s/he is aware of could affect the price of the Company's shares. Assess the need to obtain information about the status of projects which, by virtue of their nature, could be price-sensitive.

Review received post in order to examine whether any information that might be price-sensitive has been received.

6.7 List of persons who receive price-sensitive

information

In situations where it is relevant to disclose non-public information to persons who are neither employees nor board members in the Company, the insider trading manager shall ensure that a list is created of the persons who have access to price-sensitive information. Such list shall be drafted using the form included in Appendix 3. If price-sensitive information, which has been provided to such persons, is made public at a later time in connection with a stock exchange listing, the list shall be forwarded to the Oslo Stock Exchange and to the Financial Supervisory Authority of Norway.

If it becomes relevant to disclose information, which shall be assumed to have a material bearing for the price of the Company's shares, to persons who are neither employees nor board members in the Company, nor have an assignment to carry out for the Company, the insider trading manager shall ensure that such persons submit a confidentiality and standstill declaration before they are given access to the information. A simple example of such declaration is included as Appendix 4. However, it should be assessed in connection with each situation whether more extensive confidentiality declarations are necessary. The Company shall send a copy

of such declarations to the Oslo Stock Exchange if access to the information, which must be assumed to be of material bearing for the price of the Company's shares, is granted. In these situations, an in-house legal practitioner or external lawyer should be consulted. The insider trading manager shall ensure that a list and declarations as mentioned above are stored for at least 10 years.

6.8 List of companies in which the Company has representatives in the Board of Directors The insider trading manager shall prepare and keep up-to-date a list of listed companies where Eidesvik Offshore ASA is represented in the board of directors by virtue of its ownership.

The insider trading manager shall ensure that the Oslo Stock Exchange is notified in accordance with the rules laid down in section 4 of the insider trading regulations for primary insiders, if Eidesvik Offshore ASA trades with the shares of such listed companies or carries out any other transactions which require notification pursuant to the rules described in the abovementioned provision.

6.9 Measures in connection with non-compliance

If the insider trading manager becomes aware of any conditions which give grounds for suspicion that there is violation of the insider trading regulations for primary insiders or the regulations of the Norwegian Securities Trading Act relating to insider trading, the matter shall be investigated further.

If the insider trading manager becomes aware of violation of the insider trading regulations for primary insiders or the regulations of the Norwegian Securities Trading Act relating to insider trading, the insider trading manager shall assess which measures should be taken. Violation of the regulation shall be reported to the CEO. In case of serious violations of the regulations, the Board of Directors shall be informed.

6.10 Updating

The insider trading manager shall ensure that the Company's insider trading regulations for primary insiders and any other insider trading procedures are kept up-to-date. In case of changes in the insider trading regulations, the insider trading manager shall assess the need for, and if relevant initiate, information measures for employees and members of the Board of Directors.

(Appendix no. 1 to "GUIDELINES FOR PRICE-SENSITIVE INFORMATION INSIDER TRADING IN EIDESVIK OFFSHORE ASA"):

AUTHORISATION OF HANDEL EIDESVIK OFFSHORE ASA

To: (primary insider)

Date:

I hereby refer to authorisation request dated I hereby report that authorisation has been granted.

The authorisation is valid provided that the transaction is carried out within ten days from today's date.

If the transaction is not carried out by this date, a new authorisation request might have to be submitted.

The general ban on trading shares etc. if one is aware of price-sensitive information, cf. section 2 of the insider trading regulations for primary insiders, shall apply even if authorisation has been granted.

If a transaction is carried out pursuant to this authorisation, it must be reported to the Oslo Stock Exchange immediately and a copy must also be sent to the insider trading manager, cf. section 4 of the insider trading regulations for primary insiders.

..... (Sign)

(Appendix no. 2 to "GUIDELINES FOR PRICE-SENSITIVE INFORMATION INSIDER TRADING IN EIDESVIK OFFSHORE ASA"):

REJECTION OF AUTHORISATION REQUEST, EIDESVIK OFFSHORE ASA

To: (primary insider)

Date:

I hereby refer to authorisation request dated

I hereby report that jltkg authorisation has been granted.

.....

(Appendix no. 3 to "GUIDELINES FOR PRICE-SENSITIVE INFORMATION INSIDER TRADING IN EIDESVIK OFFSHORE ASA"):

LIST OF RECIPIENTS OF INSIDER TRADING INFORMATION IN EIDESVIK OFFSHORE ASA

Name	Company	Address	Assignment/case involving receipt of

Date: TO BE STORED FOR AT LEAST 10 YEARS TO BE FORWARDED TO THE OSLO STOCK EXCHANGE TOGETHER WITH ANY LISTING CONCERNING THE INFORMATION IN QUESTION

(Appendix no. 4 to "GUIDELINES FOR PRICE-SENSITIVE INFORMATION INSIDER TRADING IN EIDESVIK OFFSHORE ASA"):

CONFIDENTIALITY AND TRADE BAN DECLARATION

The undersigned hereby makes this declaration to Eidesvik Offshore ASA ("the Company")

- [name of recipient company] ("Recipient") [Description of the relationship because of which third parties are given access to price-sensitive information and of the role of the recipient company (e.g. bank, accounting firm, law firm)] and will, in this connection, be able to receive information relating to the Company which is not available to the general public. In order to meet the requirements in subsection 5-1 of the Stock Exchange Regulations, all of the Recipient's employees and consultants who are given access to such information shall submit a confidentiality and trade ban declaration.
- 2) I am aware that information about the Company to which I can be given access (including discussions in progress regarding a possible transaction) could affect the price of listed financial instruments issued by the Company

("Price-sensitive Information").

- 3) I hereby undertake to keep all Price-sensitive Information confidential as well as not to disclose Price-sensitive Information to any of the Recipient's employees or consultants who have not signed a corresponding confidentiality and trade ban declaration or to any third parties before the Price-sensitive Information has been published or has generally lost its relevance.
- 4) I undertake not to carry out on own or someone else's behalf subscription, sale, purchase or swap of listed financial instruments issued by the Company and/or companies in the same group as the Company, or rights to such financial instruments as long as I have knowledge of Price-sensitive Information which has not been published or lost its relevance.
- 5) I am aware that the Company has a duty to keep lists of recipients of Price-sensitive Information and to send these lists to the Oslo Stock Exchange and to the Financial Supervisory Authority of Norway, if such information is sent to the Oslo Stock Exchange, cf. subsection 2-2 of the Securities Trading Act.
- 6) This declaration is governed by Norwegian law and I accept Oslo District Court as nonexclusive venue in connection with any action arising from this declaration.

Place/date: Name in block letters:

(Appendix no. 5 to "GUIDELINES FOR PRICE-SENSITIVE INFORMATION INSIDER TRADING IN EIDESVIK OFFSHORE ASA"):

INSIDER TRADING REGULATIONS FOR PRIMARY INSIDERS IN EIDESVIK OFFSHORE ASA

7.1 INTRODUCTION

Since Eidesvik Offshore ASA ("Eidesvik") is listed on the Oslo Stock Exchange, the regulations of the Norwegian Securities Trading Act relating to insider trading shall apply to trading with the Company's shares etc. In addition to the general ban on insider trading - which applies to everyone - the act lays down some additional rules, which apply particularly to primary insiders. These insider trading regulations have been prepared in order to ensure that the Company's primary insiders abide by the provisions of the Act.

Violation of the rules could result in criminal liability. Breach, or complicity in a breach, of the general ban on insider trading is punishable by up to 6-year imprisonment. The other rules have a sentencing framework of up to 1-year imprisonment.

For employees in the Company, a violation of the insider trading regulations will also constitute violation of obligations to the Company and could lead to employment reactions, including termination or dismissal.

The person responsible for insider requests in the Company is [name], [telephone number], [email address] ("Insider trading manager"). If you are uncertain about something associated with the insider trading regulations, you should contact your insider trading manager.

7.2 General trade ban

Persons who have knowledge of price-sensitive information may not sell, purchase, subscribe or swap shares in Eidesvik. They may not enter into, purchase, sell or swap options or futures contracts or equivalent rights associated with the Company's shares.

Persons who have knowledge of price-sensitive information may not solicit such trade deals. What does price-sensitive information mean?

Price-sensitive information refers to information about the Company, the Company's shares or any other circumstances that can affect the price of the Company's shares and which are not public knowledge or generally known on the market.

Examples of situations that can easily involve prince-sensitive information are negotiations about larger transactions, the period before balance sheet presentations, occasions where the Company plans to carry out an issue, occasions where the Company's management has been informed that major proceedings have been initiated or given notice of against the Company, occasions where the Company or subsidiaries/affiliated companies conduct negotiations about important contracts or where important contracts are in danger of being terminated. It must be emphasised, however, that these are just examples and not an exhaustive list of conditions which can be considered price-sensitive.

Who does the ban concern?

The statutory ban on insider trading shall apply to each and everyone regardless of whether or not they have any affiliation to the Company. The ban shall apply regardless of the way in which price-sensitive information has been obtained. The ban shall apply regardless of whether or not the shares are traded on own or someone else's behalf. If a person has knowledge of price-sensitive information, s/he cannot trade shares on behalf of, e.g. the Company (purchase or sale of own shares), other companies or family members.

The ban also applies to trade deals carried out by others, e.g. an agent, on behalf of the person who has knowledge of price-sensitive information. You should therefore ensure that no one trades on your behalf if you possess such information. If you receive knowledge of price-sensitive information after having placed a trading order with an agent, the order must be withdrawn immediately.

If you have entered into an agreement for active management of your assets with a professional agent, you have to ensure that the agent does not trade with the Company's shares on your behalf at a time when you possess price-sensitive information. This shall apply even if the agent does not receive this information.

If your position is such that you regularly receive such information, you should therefore generally instruct the agent not to trade with Company shares in connection with the management of your portfolio.

Which transactions does the ban concern?

The ban applies to the first purchase and sale of shares in the Company. This applies regardless of whether or not the shares are traded on a stock exchange, regardless of whether or not an agent is used to make the transaction and regardless of whether the transaction takes place in or outside Norway.

Furthermore, the ban covers subscription of new shares in the Company. You should therefore not submit a subscription form in an emission, if you have knowledge of price-sensitive information. Purchase and sale of pre-emption rights to the Company's shares also falls within the scope of the ban.

The ban shall also apply to swapping of shares. If shares are transferred for compensation in something other than money, this will also be covered by the ban on insider trading if you have knowledge of price-sensitive information.

The ban also covers entering into options or futures contracts associated with the Company's shares (also financial options), whether the options/futures are listed or not, but does not cover normal execution of previously entered options or futures contracts upon termination of the contract. Exercise of options/futures prior to contract termination, however, shall be covered by the ban.

The ban does not apply to transfer of shares as a result of inheritance or estate administration, and neither does it apply to gift transfers. The condition for this exception, however, is for the recipient - neither directly or indirectly - to receive any remuneration for the shares.

7.3 Investigation and authorisation obligation for

primary insiders

Primary insiders are not authorised to purchase, sell, subscribe or swap shares without authorisation from the insider trading manager. Primary insiders must also conduct an independent investigation of whether there is price-sensitive information about the Company or its shares before conducting purchase, sale, swap or subscription of the Company's shares. The investigation and authorisation obligation shall also apply to trade deals carried out by the primary insiders on behalf of others.

The investigation and authorisation obligation shall also apply to entering into, purchase, sale or swap of options or futures contracts or equivalent rights associated with the Company's shares. The investigation and authorisation obligation shall also apply to soliciting trade deals as mentioned above.

Who is a primary insider?

The following persons are considered primary insiders:

- a. Members of the Board of Directors;
- b. Deputy members/observers of the Board of Directors;
- c. Senior employees at the Company, who can normally be assumed to have access to non-published, price-sensitive information.
- d. Members of the control committee;
- e. The Company's auditor.

To which transactions does the investigation and authorisation obligation apply?

As a starting point, it applies to the same transactions as the ones covered by the general trade man, cf. Section 2 above.

How is authorisation granted?

Authorisation is granted by submitting a written authorisation request to the insider trading manager. The form included in Appendix 1 can be used for such requests. Authorisation will only be granted if the authorisation manager finds that there is no price-sensitive information in the Company. If the request is granted, you will receive a written authorisation notice. If the request is not granted, you will be notified.

How long is an authorisation valid?

Unless otherwise specified in the authorisation notice, the authorisation will be valid for two days from the date specified in the authorisation notice. If the transaction is not completed within two days after this date, a new authorisation is required. This means, i.a. that if you have placed an order with an agent because of an authorisation and no transaction has been carried out by the expiry of the abovementioned deadline, the order has to be withdrawn. Note that an authorisation does not mean exception from the general ban on insider trading. Even if you have received an authorisation, you may not carry out trade deals with the Company's shares etc. if you have knowledge of price-sensitive information.

What kind of own investigation does the primary insider have to conduct?

The primary insider must assess on his/her own whether or not there is price-sensitive information in connection with ongoing cases, which falls within the scope of his/her area of responsibility. S/he should also review received post, emails etc. in order to examine whether s/he has received information that could be price-sensitive. The primary insider must ensure that there are reporting procedures, thanks to which s/he will be informed about any price-sensitive information in his/her area of responsibility. When in doubt, discuss the matter with the insider trading manager.

7.4 Primary insiders' reporting obligation

Primary insiders shall notify the Oslo Stock Exchange about any purchase, sale or subscription of shares in the Company or options, which can be converted to shares in the Company. Companies represented in the Board of Directors of Eidesvik also have the same reporting obligation as a result of their ownership in the Company.

The reporting obligation also applies in connection with contracting, purchase or sale of preemption rights, options and equivalent rights associated with the Company's shares.

Primary insiders shall also submit notices when their associates carry out such trade deals etc.

How is notice given?

Notice shall be given in writing directly to the Oslo Stock Exchange. Notices should be primarily submitted by email ("<u>ma@oslobors.no</u>"), or alternatively by telefax (22 41 65 90). Insider trading managers shall receive a copy of all notices being sent.

What does the notice have to contain? The notice shall include the following:

- (I) The date of the trade deal.
- (II) Number of shares covered by the trade deal.
- (III) Whether the trade deal has been conducted by the primary insider him/herself or by an associate.
- (IV) The price at which the trade deal is conducted.
- (V) How many shares etc. the primary insider and his/her associate have together after the trade deal.

If the notice concerns a trade deal conducted by an associate, it is not necessary to specify the associate it is a matter of.

Notices regarding options must state the option premium, strike price, whether it is a matter of a call option or put option and when the options can be exercised.

Which transactions does the reporting obligation cover?

As a starting point, the reporting obligation applies to the same transactions as the ones covered by the trade ban, cf. Section 2 above. In addition, the reporting obligation also applies to exercise of options or futures contracts in connection with the expiry of the contract. There is no reporting obligation when shares are transferred in connection with inheritance or gift.

When does notice have to be given?

Notice shall be given as soon as the trade deal is finalised and not after the opening of the Oslo Stock Exchange (i.e. before 10 a.m.) on the next day. As far as trading via stock exchange is concerned, the trade is considered finalised as soon as a purchase or sell order is matched in the trading system of the stock exchange. Primary insiders who place trade orders with an agent must therefore ensure that they are notified as soon as the trade deal is finalised so that a notice can be sent. If trading does not take place via a stock exchange, the trade deal is regarded as finalised once a binding agreement has been entered into. In connection with subscription of shares in issues where the number of shares to be allocated to the primary insider is uncertain, notice shall be given as soon as the primary insider has been notified about the number of shares that will be allocated to him/her. If there is no uncertainty as to the number of shares that will be allocated to him/her. Stock Exchange on the next day.

A spouse or a person with whom the primary insider cohabits under "marriage-like conditions",

(ii) Primary insiders' children under the age of 18, as well as the children under the age of 18 of persons mentioned in section (i) with whom the primary insider cohabits,

(iii) company over which the primary insider him/herself and/or someone mentioned in (i) or (ii) above, and/or someone with whom the primary insider has binding co-operation when it comes to owner rights has controlling influence.

Controlling influence exists if one controls more than half of the votes in the Company.

7.5 Notice concerning associates

Primary insiders shall give the Oslo Stock Exchange a list of associates with shares in the Company, options that can be converted into shares in the Company or pre-emption rights, options or futures contracts or equivalent rights linked to the Company's shares. In case of changes concerning associates that have shares etc. in the Company, the primary insider shall send the Oslo Stock Exchange an updated list.

Who is considered an "associate"? The following are considered to be associates:

- (i) spouse or a person with whom the primary insider cohabits under "marriage-like conditions",
- (ii) Primary insiders' children under the age of 18, as well as the children under the age of 18 of persons mentioned in section (i) with whom the primary insider cohabits,
- (iii) company, in which the primary insider him/herself and/or someone mentioned in (i) or (ii) above, and/or someone with whom the primary insider has binding co-operation when it comes to owner rights, has controlling influence. Controlling influence exists if one controls more than half of the votes in the Company.

What does the list have to contain?

The list shall contain names and personal identity numbers, corporate identity numbers or similar identification numbers (e.g. D-number) of associates or the like that have shares in the Company. The list can be provided using the form included in Appendix 2.

How is the list submitted?

The list shall be sent directly to the Oslo Stock Exchange by email ("<u>mp@oslobors.no</u>") or telefax (22 41 65 90). The insider trading manager shall be given a copy of the list.

7.6 Reporting obligation in connection with trading of own shares

If Eidesvik purchases or sells own shares, or convertible bonds, which can be converted to shares in the Company, notice shall be given to the Oslo Stock Exchange.

The reporting obligation shall also apply to contracting, purchase, sale or swap of subscription rights, options or futures contracts or equivalent rights associated with the Company's shares.

The rules outlined in section 4 above about how notice is to be submitted, what it is to contain, when to be submitted and which transactions the reporting obligation covers shall correspondingly apply to the reporting obligation for trading of own shares.

7.7 Confidentiality

Everyone who has knowledge of price-sensitive information shall make sure that third parties do not have access to such information.

Who is considered a "third party"?

In general, everyone to whom the Company does not have a justified need to disclose pricesensitive information shall be regarded as a third party. The confidentiality obligation does not prevent normal information flow inside the Company, but price-sensitive information shall only be provided to employees who have factually based need for the information in connection with their work. Price-sensitive information can also be given to external consultants (e.g. auditors, lawyers, consultants, financial advisers) to the extent they have factually based need for it. Also, other third parties, e.g. partners, bank connections or contracting parties, can be given pricesensitive information if the Company has factually-based need to give these access to such information, but it is important to perform a critical assessment in advance of what it is necessary to give access to. If price-sensitive information is given to persons who are not employees or board members of the Company, the insider trading manager shall be notified, see section 7 below.

What does the confidentiality obligation mean?

First, the confidentiality obligation refers to an obligation not to actively disclose price-sensitive information to third parties. Secondly, it also refers to an obligation to prevent third-party access to such obligation. This means, for example, that documents containing such information must be stored properly and the Company's general procedures for processing confidential information must be followed.

I hereby confirm that I have received and reviewed the insider trading regulations.

Signature:

Place/date:

Name in block letters:

(One copy must be sent back to the insider trading manager and one must be kept by the primary insider).

(Appendix 1 to INSIDER TRADING REGULATIONS FOR PRIMARY INSIDERS IN EIDESVIK OFFSHORE ASA)

AUTHORISATION REQUEST, EIDESVIK OFFSHORE ASA

From: (primary insider)

Date:

I hereby request authorisation for trading with financial instruments issued by the Company and/or options or futures contracts or equivalent rights to such financial instruments.

I hereby confirm pursuant to Section 3 of the insider trading regulations that I have conducted an investigation of whether there is non-public price-sensitive information and my investigation has not uncovered any such information.

.....

(sign.)

(Appendix 2 to INSIDER TRADING REGULATIONS FOR PRIMARY INSIDERS IN EIDESVIK OFFSHORE ASA)

LIST OF ASSOCIATES TO PRIMARY INSIDERS, EIDESVIK OFFSHORE ASA

Primary insider's name:

Date:

Date of previous list:

The following associates have shares or any other financial instruments in the Company:

Name Address/Personal ID no./Corporate ID no. /D-number. /VPS account number.

THE LIST SHALL BE KEPT UP-TO-DATE BY THE PRIMARY INSIDER SO THAT CHANGES CAN BE REPORTED TO THE STOCK EXCHANGE WITHOUT UNDUE DELAY. A COPY SHALL ALSO BE SENT TO THE INSIDER TRADING MANAGER IN THE COMPANY.