

# **AARON INDUSTRIES LIMITED**

## **CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSONS AND IMMEDIATE RELATIVES OF DESIGNATED PERSONS**

**(Effective from February 10, 2018)**

**(Amended on November 12, 2022)**

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## 1. Preamble:

Aaron Industries Limited has adopted the 'Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons and Immediate Relatives of Designated Persons' (hereinafter referred to as the Code of Conduct or the Conduct or the Code) is framed in line with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time in order to protect the interest of stakeholders of the Company. This code is applicable to all Designated Persons, immediate relatives of Designated Persons, Connected Persons, Promoters, and Promoter Group of the Company.

## 2. Definitions:

“**Act**” means the Securities and Exchange Board of India Act, 1992.

“**Board**” means the Board of Directors of the Company.

“**Code**” or “**Code of Conduct**” shall mean this Code of Conduct to Regulate, Monitor, and Report Trading by Designated Persons and Immediate Relatives of Designated Persons of “Aaron Industries Limited” as amended from time to time.

“**Company**” means “Aaron Industries Limited”.

“**Compliance Officer**” means Company Secretary or any senior officer, designated so and reporting to the Board of Directors, 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board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.

Explanation – For the purpose of this Code, “**financially literate**” shall mean a person who has the ability to read and understand basic financial statements i.e. balance sheet, profit and loss account, and statement of cash flows.

“**Connected Person**” this term shall have the meaning given to it under Regulation 2(d) of the Regulations and shall also include such other persons as may be identified by the Board to be Connected Persons from time to time.

“**Designated Person(s)**” means and includes:

- (a) All Promoters, Directors, and Key Managerial Personnel;
- (b) Employees upto two levels below the Chief Executive Officer of the Company and its material subsidiaries irrespective of their functional role in the company or ability to have access to Unpublished Price-Sensitive Information;
- (c) Any other persons, including members of the support staff of the Company (such as Information Technology department, Corporate Communications Department) who may have access to Unpublished Price Sensitive Information as may be decided by the Managing Director of the Company in consultation with the Compliance Officer from time to time.

“**Generally available Information**” means information that is accessible to the public on a non-discriminatory basis.

**"Immediate Relative"** means a spouse of a person and includes the 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.

**"Insider"** means any person who is:

- (i) a connected person; or
- (ii) in possession of or having access to unpublished price-sensitive information.

**"Key Managerial Person"** means a person as defined in Section 2(51) of the Companies Act, 2013.

**"Promoter and Promoter Group"** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, or any modification thereof.

**"Regulation"** shall mean the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation, 2015, and any amendments thereto.

**"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.

**"Stock Exchange"** means an exchange where the Company's shares are listed and traded.

**"Takeover Regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, and any amendments thereto;

**"Trading"** means and includes subscribing, buying, selling, dealing, pledging, or agreeing to subscribe, buy, sell or deal in or pledge any securities of the Company, and "trade" shall be construed accordingly.

**"Trading Day"** means a day on which the recognized stock exchanges are open for trading;

**"Unpublished Price Sensitive Information"** or **"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:

- (i) Financial Results;
- (ii) Dividends;
- (iii) Change in Capital Structure;
- (iv) Mergers, de-mergers, acquisitions, delisting, disposals, and expansion of business and such other transactions;
- (v) Changes in Key Managerial Personnel; and
- (vi) Material events in accordance with the listing agreement

**"Whole Time Director (WTD)"** this term shall have the meaning as assigned to it under Section 2(94) of the Companies Act, 2013, as amended.

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

### 3. Role of Compliance Officer:

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.

The Compliance Officer shall assist all employees in addressing any clarifications regarding the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, and the Company's Code of Conduct.

### 4. Preservation of Confidentiality of UPSI / Confidential Information:

All Designated Employees and Connected Persons shall maintain the confidentiality of price-sensitive information. All information shall be handled within the Company on a need-to-know basis and no unpublished price-sensitive information shall be communicated to any person except in furtherance of legitimate purposes, performance of duties, or discharge of legal obligations.

Explanation – The term “**legitimate purpose**” shall include sharing of unpublished price-sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, credit rating agencies, insolvency professionals, or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.

The Company shall, however, in no circumstances share information solely for the purpose of evading the compliances of the Regulations or circumventing the prohibitions of these Regulations.

Notwithstanding anything contained in this regulation, unpublished price-sensitive information may be communicated, provided, allowed access to, or procured, in connection with a transaction that would: -

- (i) 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 sharing of such information is in the best interests of the Company; or
- (ii) 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 sharing of such information 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 to be adequate and fair to cover all relevant and material facts.
- (iii) However, the Board of Directors shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for a limited purpose, and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information.

**(iv) Need to know:**

“Need to know” basis means that Unpublished Price Sensitive Information should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information. All non-public information directly received by any employee should immediately be reported to the head of the department.

(v) Confidential Information / UPSI shall be kept with adequate security.

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

**(vi) Digital Database of information:**

The board of directors shall ensure that a structured digital database is maintained containing the nature of unpublished price-sensitive information and the names of such persons who have shared the information and also the names of such persons with whom information is shared under this regulation along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such database shall not be outsourced and shall be maintained internally with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.

The board of directors or head(s) of the organization of every person required to handle unpublished price-sensitive information shall ensure that the structured digital database is preserved for a period of not less than eight years after completion of the relevant transactions and in the event of receipt of any information from the Board regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.

**(vii) Chinese Wall:**

To prevent the misuse of UPSI, the Company shall follow the ‘Chinese Wall’ approach and separate those departments which routinely have access to such information, considered as “inside areas” from other departments, considered as “public areas”. Employees in the inside areas shall not be allowed to communicate any UPSI to anyone in the public areas, except as may be required on a need-to-know basis, performance of duties or discharge of legal obligations, or for Legitimate Purposes in accordance with the Code and the Regulations.

**5. Prevention of Misuse of ‘Unpublished Price Sensitive Information’ (UPSI):**

Designated Persons and immediate relatives of designated persons in the Company shall be governed by an internal code of conduct governing dealing in securities.

No insider shall trade in securities of the Company on a stock exchange when in possession of unpublished price-sensitive information.

**6. Trading Plan:**

- a. 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.

b. Such Trading Plan Shall:

- (i) Not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
- (ii) Not entail trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced by the issuer of the securities and the second trading day after the disclosure of such financial results;
- (iii) Entail trading for a period of not less than twelve months;
- (iv) Not entail overlap of any period for which another trading plan is already in existence;
- (v) set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
- (vii) Not entail trading in securities for market abuse.

c. The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of the 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.

Provided that pre-clearance of trades shall not be required for a trade executed as per an approved trading plan.

Provided further that trading window norms and restrictions on contra-trade shall not be applicable for trades carried out in accordance with an approved trading plan.

d. 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.

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

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

**7. Trading Window and Window Closure:**

- a. The trading window shall be closed when the Compliance Officer determines that a designated person or class of designated persons can reasonably be expected to have possession of unpublished price-sensitive information. Such closure shall be imposed in relation to such securities to which such unpublished price-sensitive information relates. Designated persons and their immediate relatives shall not trade in securities when the trading window is closed.

- b. The trading periods of the stock exchanges, called “trading window”, are available for trading in the Company’s securities.
- c. The trading window shall be made applicable from the end of every quarter till 48 hours after the declaration of financial results. Trading Window for events other than financial results, shall be closed for the period as may be determined by the Compliance Officer of the Company from time to time. The Compliance Officer after taking into account various factors including the unpublished price-sensitive information in question becoming generally available and being capable of assimilation by the market shall decide the timing for re-opening of the trading window, however in any event it shall not be earlier than forty-eight hours after the information becomes generally available.
- d. All Designated Persons (and their immediate relatives) shall conduct all their dealings in the securities of the Company only in a valid trading window and shall not deal in any transaction involving the purchase or sale of the Company’s securities during the periods when the trading window is closed, as referred above or during any other period as may be specified by the Company from time to time.
- e. The trading window restrictions mentioned in sub-clause (1) shall not apply in respect of – (a) transactions specified in clauses (i) to (iv) and (vi) of the proviso to sub-regulation (1) of regulation 4 and in respect of a pledge of shares for a bonafide purpose such as raising of funds, subject to pre-clearance by the compliance officer and compliance with the respective regulations made by the Board; (b) transactions which are undertaken in accordance with respective regulations made by the Board such as acquisition by conversion of warrants or debentures, subscribing to rights issue, further public issue, preferential allotment or tendering of shares in a buy-back offer, open offer, delisting offer or transactions which are undertaken through such other mechanism as may be specified by the Board from time to time.
- f. The Compliance Officer after taking into account various factors including the unpublished price-sensitive information in question becoming generally available and being capable of assimilation by the market shall decide the timing for re-opening of the trading window, however in any event it shall not be earlier than 48 (Forty-Eight) hours after the information becomes generally available.

#### **8. Pre-Clearance of Trades:**

- a. When the trading window is open, any Designated Person (and/or their immediate relative) shall trade in Securities of the Company subject to pre-clearance by the Compliance Officer, 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 (Market Value) should pre-clear the transaction.
- b. Designated Person (and/or their immediate relative) who proposes to execute the trade in Securities of the Company shall submit an application duly filled and signed to the Compliance Officer. The format of the application is annexed as ‘Annexure 1’. It is clarified that the designated person should submit the application on behalf of his/her immediate relative(s), for trades proposed to be executed by the immediate relative(s).



- c. Prior to approving any trades, the Compliance Officer shall seek declarations to the effect that the applicant for pre-clearance is not in possession of any unpublished price-sensitive information. He/she shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.
- d. The Compliance Officer shall approve/reject the pre-clearance application within four trading days in 'Annexure 2'.
- e. Designated Person shall execute pre-cleared trade within seven trading days from approval and shall report his/her trade details to Compliance Officer in 'Annexure 3' within two trading days from the trade. In case of non-trading, Designated Person shall report his/her decision of non-trading along with reasons to the Compliance Officer in 'Annexure 3'.
- f. In case of failure in executing trade within seven trading days, Designated Person shall be required to take fresh pre-clearance for the trades to be executed in 'Annexure 1'.
- g. Designated Persons and their Immediate relatives who are permitted to trade shall not execute a contra-trade within the next six months from the previous transaction. The Compliance Officer may grant relaxation from the strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate these Regulations. If contra trade is executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Securities and Exchange Board of India for credit to the Investor Protection and Education Fund.

## 9. Disclosures by Certain Persons:

### a. Initial Disclosures:

Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter or Member of the Promoter Group shall disclose his/her 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. (Form A set out in Annexure 4)

### b. Continual Disclosures:

Every Promoter, Member of the Promoter Group, Designated Person, 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 10 (Ten) lakh rupees or such other value as may be specified; (Form B set out in Annexure 5)

The 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.

**c. Disclosure by Other Connected Persons:**

Disclosures by other connected persons shall be as per SEBI (Prohibition of Insider Trading) Regulations, 2015 in the prescribed form. (**Form C** set out in **Annexure 6**)

**d. Other Disclosures to the Company:**

Designated persons shall be required to disclose names and Permanent Account Number or any other identifier authorized by the law of the following persons to the company on an annual basis and as and when the information changes:

- a) immediate relatives
- b) persons with whom such designated person(s) shares a material financial relationship
- c) Phone, mobile and cell numbers which are used by them

In addition, the names of educational institutions from which designated persons have graduated and names of their past employers shall also be disclosed on a one-time basis.

Explanation – The term “material financial relationship” shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding twelve months, equivalent to at least 25% of such payer’s annual income but shall exclude relationships in which the payment is based on arm’s length transactions.

**10. Process for how and when People are brought ‘Inside’ on Sensitive transactions:**

The Compliance Officer in consultation with WTD of the Company shall decide on how and when any person(s) should be brought ‘inside’ on any proposed or ongoing sensitive transaction(s). The Compliance Officer (along with WTD) shall consider whether such person being wall-crossed, is being provided UPSI on a need-to-know basis. Further, information shared with such wall – crosser should be limited to the specific transaction or purpose for which their assistance is required.

Additionally, a person(s) may also be brought inside on any proposed or ongoing sensitive transaction(s) of the Company who may be existing or proposed partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, etc. for the legitimate purpose which shall include the following;

- a. in the ordinary course of business
- b. in furtherance of performance of duty(ies);
- c. for discharge of legal obligation(s).
- d. for any other genuine or reasonable purpose as may be determined by the Compliance Officer of the Company.
- e. for any other purpose as may be prescribed under the Securities Regulations or Company Law or any other law for the time being in force, in this behalf, as may be amended from time to time.

### **11. Intimation of Duties and Responsibilities and the liability to the Person(s) who has/have been brought inside' on Sensitive Transaction(s).**

Any person(s) who has/have been brought inside on any proposed and/or ongoing sensitive transaction(s) and in receipt of unpublished price sensitive information shall be considered an 'insider' for purposes of this Code and due notice shall be given to such persons, in the format as set out in by the Compliance Officer in consultation with WTD and/or CFO of the Company;

- a. To make such person aware that the information shared is or would be confidential.
- b. To instruct such person to maintain the confidentiality of such unpublished price-sensitive information in compliance with these regulations.
- c. To make such person aware of the duties and responsibilities attached to the receipt of such information and the liability attached to misuse or unwarranted use of such information.

### **12. Penalties/Punishments:**

- a. Any designated person who Trades in Securities of the company or communicates any UPSI in contravention of this Code will be penalized and appropriate action will be taken against such designated person by the Company after giving reasonable opportunity of being heard in the matter. Such designated person shall also be subject to disciplinary action by the company including wage freeze, suspension, recovery, clawback, in-eligibility for future participation in ESOPs, etc.
- b. In case any violation of Regulations is observed, the Compliance Officer shall promptly inform the same to the stock exchange(s) where the concerned securities are traded.
- c. In addition to the aforesaid penalties/punishments, the persons violating the Regulations will also be subject to any other action by SEBI as per SEBI Act.

### **13. Miscellaneous:**

- a. The gap between clearance of financial results by the Audit Committee and the Board of Directors Meeting for approval of such financial results should be as narrow as possible and preferably on the same day to avoid leakage of UPSI.
- b. The Board of Directors of the Company shall have the power to modify or replace this Code in part or full as may be thought fit from time to time in its absolute discretion.
- c. The decision of the Board of Directors with regard to all matters relating to this Code will be final and binding on all concerned.
- d. In case any provisions of this Code are contrary to or inconsistent with the provisions under the Regulations, the provisions of Regulations shall prevail.

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**APPLICATION FOR PRE-CLEARANCE OF TRADE**

Date:

To,  
The Compliance Officer,  
**Aaron Industries Limited,**  
Surat.

Dear Sir/Madam,

**Sub: Application for Pre-Clearance of Trades in Securities of the Company**

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

1.	Name of the applicant	
2.	Designation	
3.	Number of securities held as on date	
4.	Folio No. / DP ID / Client ID No.	
5.	The proposal is for	a) Purchase of securities b) Subscription to securities c) Sale of Securities d) Pledge of securities e) Gift of securities f) Any other purpose (Please specify)
6.	Proposed date of dealing in securities	
7.	Estimated number of securities proposed to be purchased/subscribed/sold/pledge/gifted	
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 No. where the securities will be credited/debited	

I enclose herewith the form of Undertaking signed by me.

Yours faithfully,

\_\_\_\_\_  
(Signature)

Name:

Designation:

Date:

Place:

## UNDERTAKING

With reference to my application for pre-clearance of trades in securities, I solemnly confirm and declare THAT:

- i) I do not have access and /or have not received any “Unpublished Price Sensitive Information” up to the time of signing the undertaking.
- ii) in case I have access to or receive “Unpublished Price Sensitive Information” after the signing of the undertaking but before the execution of the transaction, I shall inform the Compliance Officer of any change in my position, and I shall refrain from dealing in the securities of the Company till the time such information becomes public.
- iii) I have not contravened the Code for Prevention of Insider Trading in Equity shares/securities, as notified by the Company from time to time.
- iv) I am aware that, I shall be liable to face penal consequences as set forth in the Code including disciplinary action under the Code of the Company, in case the above declarations are found to be misleading or incorrect at any time.
- v) I have made a full and true disclosure in this regard to the best of my knowledge and belief.
- vi) I hereby undertake not to transact in securities in the sanctioned period in case the trading window is declared closed subsequently.
- vii) I hereby undertaken not to make contra-trade transactions in the securities of the Company.

Pre-clearance may kindly be accorded in terms of provisions of the Code for Prevention of Insider Trading of the Company.

Yours faithfully,

\_\_\_\_\_  
(Signature)

Name:

Designation:

Date:

Place:

**FORMAT OF PRE-CLEARANCE ORDER**

To,  
Name: \_\_\_\_\_  
Designation: \_\_\_\_\_  
Place: \_\_\_\_\_

This is to inform you that your request for dealing in \_\_\_\_\_ (nos) shares of the Company as mentioned in your application dated \_\_\_\_\_ is approved. Please note that the said transaction must be completed on or before \_\_\_\_\_ (date) that is within 7 trading days from today.

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

Yours faithfully,

For **Aaron Industries Limited**

**Compliance Officer**

Date: \_\_\_\_\_

Encl: Format for submission of details of transaction

**FORMAT OF DISCLOSURE OF TRANSACTIONS**

(To be submitted within 2 days of transaction/trading in securities of the Company)

To,  
The Compliance Officer,  
**Aaron Industries Limited**  
B-65 & 66, Jawahar Road No.4,  
Udhyog Nagar, Udhana,  
Surat-394210, Gujarat.

I hereby inform you that I:

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

(strike out whichever is not applicable)

<b>Name, Address, and PAN of the holder</b>	<b>No. of securities dealt with</b>	<b>Bought/ Sold/ Subscribed</b>	<b>DP ID/ Client ID/ Folio no.</b>	<b>Price (Rs.)</b>

I undertake to preserve documents evidencing proof of the above transaction for a period of 3 years and produce the same to the Compliance officer/SEBI when required.

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

Date: \_\_\_\_\_

Signature: \_\_\_\_\_

Name:

Designation:

**FORM A**
**SEBI (Prohibition of Insider Trading) Regulations, 2015  
[Regulation 7 (1) (b) read with Regulation 6(2) – Disclosure on becoming a Key  
Managerial Personnel/Director/Promoter/Member of the Promoter Group]**

Name of the Company: \_\_\_\_\_

ISIN of the Company: \_\_\_\_\_

**Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter or Member of the Promoter Group of a listed Company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).**

Name, PAN, CIN/DIN & Address with contact nos.	Category of Person (KMP / Director or Promoter or Member of the Promoter Group/ Immediate relative to/others, etc.)	Date of appointment of KMP/Director / OR Date of becoming Promoter/ Member of the Promoter Group	Securities held at the time of appointment of KMP/Director or upon becoming Promoter or Member of the Promoter Group		% of Shareholding
			Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements, etc.)	No.	
1	2	3	4	5	6

*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 on the securities of the Company held on appointment of KMP or Director or upon becoming a Promoter or Member of the Promoter Group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).**

Open Interest of the future contracts held at the time of appointment of Director/KMP or upon becoming Promoter/Member of the Promoter Group			Open Interest of the Option Contracts held at the time of appointment of Director/KMP or upon becoming Promoter/Member of the Promoter Group		
Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
7	8	9	10	11	12

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

Name &amp; Signature:

Designation:

Date:

Place:



**FORM B**  
**SEBI (Prohibition of Insider Trading) Regulations, 2015**  
**[Regulation 7 (2) read with Regulation 6(2) – Continual Disclosure]**

Name of the Company: \_\_\_\_\_

ISIN of the Company: \_\_\_\_\_

**Details of change in holding of Securities of Promoter, Member of the Promoter Group, Designated Person or Director of a listed Company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).**

Name, PAN, CIN/DIN, & Address with contact nos.	Category of Person (Promoter/member of the promoter group/designated person/Directors/immediate relative to/ others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/acquisition of shares/disposal of shares, specify		Date of intimation to Company	Mode of acquisition /disposal (on market / Public/ rights/ preferential offer/ off market/ Inter-se transfer, ESOPs, etc.)	Exchange on which the trade was executed
		Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements etc.)	No. and % of share holding	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No.	Value	Transaction Type (Purchase/sale Pledge / Revocation / Invocation/ Others-please specify)	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of shareholding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

**Note:** (i) "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.  
(ii) Value of transaction excludes taxes/brokerage/any other charges.

**Details of trading in derivatives on the securities of the Company by Promoter, Member of the Promoter Group, Designated Person or Director of a listed Company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).**

Trading in derivatives (Specify type of contract, Futures or Options etc.)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
16	17	18	19	20	21	22

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

Name & Signature:

Designation:

Date:

Place:

**FORM C**  
**SEBI (Prohibition of Insider Trading) Regulations, 2015**  
**Regulation 7(3) – Transactions by Other connected persons as identified by the Company**

**Details of trading in securities by other Connected Persons as identified by the Company**

Name, PAN, CIN/DIN, & address with contact nos. of other connected persons as identified by the Company	Connect ion with Company	Securities held prior to acquisition/ disposal		Securities acquired/Disposed				Securities held post acquisition/ disposal		Date of allotment advice/ acquisition of shares/ disposal of shares, specify		Date of intimation to Company	Mode of acquisition /disposal (on market / Public/ rights/ preferential offer/ off market/ Inter-se transfer, ESOPs, etc.)	Exchange on which the trade was executed
		Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements etc.)	No. and % of share holding	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No.	Value	Transaction Type (Purchase/sale Pledge / Revocation / Invocation/ Others-please specify)	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of shareholding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

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

(ii) Value of transaction excludes taxes/brokerage/any other charges.

**Details of trading in derivatives on the securities of the Company by other Connected Persons as identified by the Company**

Trading in derivatives (Specify type of contract, Futures or Options etc.)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
16	17	18	19	20	21	22

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

Name & Signature:

Designation:

Date:

Place: