

# **CODE OF CONDUCT**

## **TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSONS**

### **INTRODUCTION**

The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, (hereinafter referred to as the 'Regulations') mandates the listed Companies to frame a Code of Conduct to regulate, monitor and report trading by designated persons and immediate relatives of designated persons towards achieving compliance with regulations.

The purpose of this code is to set minimum standards to regulate, monitor and report trading done by designated persons and immediate relatives of designated persons of the company and to develop a culture of honesty and accountability.

### **DEFINITIONS**

- a) **"Act"** means the Securities and Exchange Board of India Act, 1992 (15 of 1992)
- b) **"the Company" or "Company"** means CSL Finance Limited.
- c) **"Board of Directors" or "the Board"** means the Board of Directors of CSL Finance Limited.
- d) **"Officers"** shall mean all the Directors and members of management one level below the Board of Directors.
- e) **"Relatives"** mean relatives as defined in the Companies Act, 2013 as amended.
- f) **"Associates"** shall include any person or entity, whose relation or association with the officer is such so as to influence the objective decision making by the officer.
- e) **"Compliance Officer"** means any senior officer, designated so and reporting to the board of directors or head of the organization in case board is not there, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation

of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board of directors of the listed company or the head of an organization, as the case may be.

[Explanation –For the purpose of this regulation, “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]

f) "**Connected Person**" means,-

(i) 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.

(ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established,-

- (a) an immediate relative of connected persons specified in clause (i); or
- (b) a holding company or associate company or subsidiary company; or
- (c) an intermediary as specified in section 12 of the Act or an employee or director thereof; or
- (d) an investment company, trustee company, asset management company or an employee or director thereof; or
- (e) an official of a stock exchange or of clearing house or corporation; or
- (f) a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
- (g) a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
- (h) an official or an employee of a self-regulatory organization recognised or authorized by the Board;
- (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;

g) Designated Person' shall mean:

Employees and connected persons designated on the basis of their functional role. The board of directors shall in consultation with the compliance officer specify the designated persons to be covered by such code on the basis of their role and function in the organisation. Due regard shall be had to the access that such role and function would provide to unpublished price sensitive information in addition to seniority and professional designation.

h) "**Unpublished Price Sensitive Information**" means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: –

(i) financial results;

(ii) dividends;

(iii) change in capital structure;

(iv) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;

(v) changes in key managerial personnel

i) "insider" means any person who is

- a connected person; or

- in possession of or having access to unpublished price sensitive information;

## **OBJECTIVE**

The Code has been drafted to:

- a. ensure that the Board of Directors and the Senior Management Personnel maintain the standards of conduct required of them and also become aware of those situations where there is likely to be a potential conflict between the interest of the company and the interest of the officers of the company and in such circumstances, no step is taken against the interest of the Company.

- b. set and implement high standards of transparency, integrity, accountability and corporate social responsibility in all dealings.

## **AUTHORITY**

The code of conduct has been approved by the Board of Directors of the Company pursuant to Clause 49 of the Listing Agreement at their duly held meeting.

## **APPLICABILITY**

This code shall be applicable to all the Officers of the company.

## **CODE OF CONDUCT**

The Officers of the company shall always act in the best interests of the Company and shall observe the highest standards of ethical conduct and integrity and shall work to the best of their ability and judgment.

### **A. ROLE OF COMPLIANCE OFFICER:**

The Compliance Officer shall be designated so and be a financially literate, senior officer capable of appreciating requirements for legal and regulatory compliance. The Compliance Officer shall report to the Board of directors and provide reports on dealing in Securities by Designated Persons to the Chairman of the Audit Committee on a quarterly basis. For the purpose of this Code, the Compliance Officer shall be the Company Secretary.

In the absence of the Compliance Officer for any reason, any senior officer, reporting to the Board, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance, shall carry out the responsibilities of the Compliance Officer as required under this Code and the Regulations.

The Compliance Officer shall be responsible for :-

- administering this Code and other requirements under the SEBI Insider Trading Regulations for compliance of the policies, procedures prescribed therein.
- setting forth policies, procedures, maintenance of records and monitoring adherence to the rules for preservation of UPSI;
- monitoring of trades and implementation of this Code under the overall supervision of the Board of Directors of the Company;
- providing disclosures to the stock exchange as required under the SEBI Insider Trading Regulations;

- pre-clearing of Trades by Designated Persons and their Immediate Relatives, in accordance with the SEBI Insider Trading Regulations and this Code;
- maintaining a list of Designated Persons and also updating changes to the list from time to time; - maintaining a record of the opening and closing of the Trading Window; - reviewing the Trading Plan and assessing the potential of the plan for violation of the SEBI Insider Trading Regulations, if any;
- approving and monitoring the implementation of the Trading Plan;
- notify the Trading Plan to the stock exchanges where the Securities are listed, on approval of the plan; and - maintaining records of all declarations and disclosures received by him/ her under this Code for a minimum period of 5 years.

The Compliance Officer shall be authorized to seek such information from the Designated Persons and Connected Persons as may be required to ensure or verify compliance with this Code and the SEBI Insider Trading Regulations and to give such approvals as are specified in the Code.

The Compliance Officer shall assist Designated Persons in addressing any clarifications regarding the SEBI Insider Trading Regulations and this Code.

#### **B. Legal, Honest and Ethical Conduct**

The Officers of the company shall always act in accordance with the highest standards of personal and professional integrity, honesty and ethical conduct. They shall act with due care, competence and diligence, without allowing their independent judgment to be subordinated.

Honest conduct is a conduct that is free from fraud or deception. Ethical conduct is ethical handling of actual or apparent conflicts of interest between personal and professional relationship.

#### **C. RESTRICTIONS ON COMMUNICATION OR PROCUREMENT OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

1. No Insider shall communicate, provide, or allow access to any Unpublished Price Sensitive Information, relating to the Company or Securities listed or proposed to be listed, to any person including other Insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

2. No person shall procure from or cause the communication by any Insider of Unpublished Price Sensitive Information, relating to the Company or Securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

Explanation – The term “legitimate purpose” shall include but not be limited to 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, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of this policy or the SEBI Regulations.

Any person in receipt of Unpublished Price Sensitive Information pursuant to a “legitimate purpose” shall be considered an “Insider” for purposes of this policy and due notice shall be given to such persons to maintain confidentiality of such Unpublished price sensitive information in compliance with this policy.

3. Notwithstanding anything contained in this Code, any 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 are of the informed opinion that sharing of such information is in the best interests of the Company
- (ii) not attract the obligation to make an open offer under the Takeover Regulations but where the Board of Directors are of the informed opinion that sharing of such information is in the best interests of the Company and the information that constitutes Unpublished Price Sensitive Information is disseminated to be made Generally Available Information at least 2 (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.

For purposes of clause 3 above, 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 the purpose of clause 3, and shall not otherwise Trade in Securities of the Company when in possession of Unpublished Price Sensitive 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 the SEBI Regulations along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such databases 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 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 SEBI regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.

#### **D. Need to know basis**

All information shall be handled within the organisation on a need-to-know basis and no Unpublished Price Sensitive Information (UPSI) shall be communicated to any person. Provided that nothing contained above shall be applicable when an UPSI is communicated, provided, allowed access to or procured:

- (i) in furtherance of legitimate purposes, performance of duties or discharge of legal obligations pursuant to appropriate confidentiality and non disclosure agreements being executed; or
- (ii) in the event the Board of Directors direct or cause the public disclosure of UPSI in the best interest of the Company; or
- (iii) within a group of persons if such persons have been identified and secluded within a “chinese wall” or information barrier by the Compliance Officer from the rest of the Company for a particular purpose or for a specified period of time in furtherance of legitimate purposes, performance of duties or discharge of legal obligations, and are subjected to, among other conditions, additional confidentiality obligations, information barriers designed to prevent exchanges of UPSI outside the “chinese wall”, and the execution of an undertaking by such persons to abstain and / or forego Trading during such seclusion or till the UPSI no longer constitutes UPSI.

(iii) Limited access to confidential information: Files containing confidential information shall be kept secure. Computer files must have adequate security of login and pass word, etc. Files containing confidential information should be deleted / destroyed after its use

#### **E. Prohibition on Insider Trading**

An Insider shall not, directly or indirectly, -

- i. Trade in securities that are listed or proposed to be listed when in possession of UPSI;
- ii. Trade in securities of the Company except when the Trading Window is open and the Insider is not in possession of UPSI.

Provided the restriction in C (i) above shall not apply to:

- (a) a transaction that is an off-market inter-se transfer between Promoters who were in possession of the same UPSI without being in breach of these Rules and both parties had made a conscious and informed trade decision; and
- (b) Trades pursuant to a Trading Plan set up in accordance with these Rules.
- (c) In case of Employees Stock Option Plans(ESOPs), exercise of options may be allowed during the period when the Trading Window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when the Trading Window is closed.

#### **F. Trading Window**

- i. The Compliance Officer shall notify a 'trading window' during which the Officers of the company may trade in the Company's securities after securing pre-clearance from the Compliance Officer in accordance with these Rules.
- ii. Officers of the company shall not Trade in the Company's securities when the trading window is closed.
- iii. Additionally, the trading window shall be closed in particular for an Officer of the company when the Compliance Officer determines that such person can reasonably be expected to have possession of UPSI, for such periods as determined by the Compliance Officer.
- iv. The trading window may be re-opened after closure, not earlier than 48 hours after the UPSI in question becomes generally available.

#### **G. Re-opening of the trading window:**

The timing for the re-opening of the trading window shall be determined by the compliance officer taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, which in any event shall be not less than forty-eight hours after the information becomes generally available. The trading window shall also be applicable to any person having



contractual or fiduciary relation with the company, such as auditors, accountancy firms, law firms, analysts, consultants etc, assisting or advising the company.

#### **H. Pre-clearance of Trading:**

When the trading window is open, trading by officers shall be subject to pre-clearance by the compliance officer, if the value of the proposed trade is above the thresholds stipulated by the Board:

- 1) The Officers of the company may trade in the securities of the Company when the trading window is open, after obtaining approval of the Compliance Officer of the company
- 2) The Compliance Officer shall not approve any proposed Trade by any Officer of the company if the Compliance Officer determines that such officer is in possession of UPSI even though the trading window is open.
- 3) The Compliance Officer may, after being satisfied that the application and undertaking are true and accurate, approve Trading by an officer of the company, on the condition that the Trade so approved shall be executed within seven trading days following the date of approval.
- 4) The officer of the company shall, within two days of the execution of the Trade, submit the details of such Trade to the Compliance Officer. In case the transaction is not undertaken, a report to that effect shall be filed with the Compliance Officer.
- 5) Prior to approving any trades, the compliance officer shall be entitled to seek declarations to the effect that the appellant for pre-clearance is not in possession of UPSI.
- 6) If the pre-cleared Trade is not executed within seven trading days after the approval is given, the Officer must secure pre-clearance of the transaction again.
- 7) An Officer who Trades in securities without complying with the preclearance procedure as envisaged in these Rules or gives false undertakings and/or makes misrepresentations in the undertakings executed by him/her while complying with the pre-clearance procedure shall be subjected to the penalties as envisaged in these Rules.
- 8) Nothing in this rule shall apply to any Trade involving a value less than Rs.5 Lakhs or such other amount as may be specified by the Board of Directors from time to time (a “de minimis Trade”) provided the Designated Person is not in possession of UPSI while executing the de minimis Trade.

#### **I. Restricted list:**

The compliance officer shall confidentially maintain a list of securities as a 'restricted list' which shall be used as the basis for approving or rejecting applications for pre-clearance of trades.

**J. Additional trading restrictions on Designated Persons**

- 1) No Director or Key Managerial Personnel shall enter into derivative transactions in respect of the securities of the Company.
- 2) All Officers of the company who Trade in the securities of the company shall not enter into an opposite transaction during the next six months following the prior transaction. The compliance officer is empowered to grant relaxation from strict application of such restriction for reasons recorded in writing provided that such relaxation does not violate the regulations.
- 3) In case of any contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the SEBI for credit to the Investor Protection and Education Fund administered by SEBI.

**K. Trading Plan:**

- 1) Officers of the company shall be entitled to formulate a Trading Plan that complies with the SEBI Regulations (a "Trading Plan") and present it to the Compliance Officer for approval and public disclosure pursuant to which Trades may be carried out in his behalf in accordance with such plan.
- 2) The Compliance Officer shall review and approve the Trading Plan if it complies with the SEBI Regulations and shall disclose the Trading Plan to the stock exchanges.
- 3) The Trading Plan once approved shall be irrevocable and the Designated Person 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. However, the implementation of the Trading Plan shall not be commenced, if at the time of formulation of the plan, the officer is in possession of UPSI and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Trading Plan shall be deferred until such UPSI becomes generally available information. Further, the officer shall also not be allowed to Trade 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 Trading Window announced by the Compliance Officer.

#### **L. Conflict of Interest**

The Officers of the company shall not engage in any business, relationship or activity which might conflict with the interest of his/her company or that would tend to influence him/her to act in any manner other than in the best interests of the Company. Every Officer of the company should make a full disclosure to the Board of any transaction that they reasonably expect, could give rise to an actual conflict of interest with the Company and seek the Board's authorization to pursue such transactions, if needed.

#### **M. Confidentiality**

The Officers of the company should maintain confidentiality of information entrusted to them in carrying out their duties and responsibilities.

The Officers of the company and his or her immediate family members shall not derive any benefit or assist others to derive any benefit from the access to and possession of information about the Company, which is not in the public domain and thus constitutes insider information. The Confidential information includes all non-public information (including private, proprietary, and other) that might be of use to competitors or the disclosure of which might be harmful to the company or its Associates.

#### **N. Fair Dealing**

The Officers of the company should endeavour to deal fairly and not seek to take unfair advantage of the Company through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair dealing.

#### **O. Disclosure of Interest**

The Officers of the company should disclose the necessary information to the Company and the Board of Directors at regular intervals in respect of declarations required to be made under Applicable Law, including the Companies Act, 2013 as amended, details of related parties and details of any material financial and commercial transactions where a conflict of interest is likely.

#### **P. Compliance with the "Code of Conduct for Prevention of Insider Trading"**

The Officers of the company should comply with the provisions of the Code of Conduct for Prevention of Insider Trading at all times.

The Company is empowered to take appropriate action against any person, who violates this Code. Such action may include wage freeze, suspension, ineligibility for future participation in employee stock option plan, recovery, etc.

#### **Q. Compliance with Laws & Regulations**

The Officers of the company should comply with all the applicable laws, rules and regulations for the time being in force both in letter and in spirit.

#### **R. Violations of the Code**

The Officers of the company shall ensure compliance with the Code. The Company will take appropriate action against any Officers of the company whose actions are found to violate the Code, after giving him/her a reasonable opportunity of being heard. Where laws have been violated, the Company will cooperate fully with the appropriate authorities/regulators and enforcement agencies.

#### **S. Modification and Amendments**

The Company reserves the right to modify and/or amend this Code at any time. This Code and subsequent amendment(s) thereto, shall be promptly intimated to the stock exchanges where the Securities of the Company are listed.

#### **T. Disclosure of Code on Public Domain**

This Code and any amendment thereof will be published on the Company's website [www.csifinance.in](http://www.csifinance.in).

#### **U. REPORTING OF ALLEGED VIOLATIONS**

Retaliation for reporting suspected violations is strictly prohibited under this policy. Employee who reports any alleged violations of insider trading laws in accordance with the Informant mechanism introduced vide SEBI (Prohibition of Insider Trading) (Third Amendment) Regulations, 2019 dated 17 September 2019, will be protected against any discharge, termination, demotion, suspension, threats, harassment, directly or indirectly or discrimination.

#### **Acknowledgement**

The Officers of the company shall acknowledge receipt of the Code and confirm having received and read this code of conduct and agree to comply with the code.

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# FORM I

CSL FINANCE LIMITED

## PRE-CLEARANCE OF TRADES

(Under CPIL's Code of Conduct for Regulating, Monitoring and Reporting of trading by Insiders)

**The Compliance Officer**  
CSL FINANCE LIMITED  
410-412, 18/12, 4<sup>th</sup> Floor, W.E.A, Arya samaj  
Road, Karol Bagh, Delhi-110005

<b><u>Internal use</u></b>
Recd date and time:
Sign:

### SUB: APPLICATION FOR TRADING IN SHARES OF THE COMPANY AND UNDERTAKING

Dear Sir,

I, \_\_\_\_\_, a Designated Person/ Director of the Company, propose to trade in the Shares of the Company as per details hereunder:

Name of person proposing to trade in shares of the Company and relationship with Designated Person/ Director:	
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No. of Shares of the Company held by the person as on date of the application: \_\_\_\_\_

Sr. No.	Physical Form	Demat Form		No. of shares Presently held
	Folio No.	DPID	Client ID	

Particulars of proposed transaction in Shares of the Company:

Number of Shares held in the Company (A)	Number of Shares of the Company proposed to be Sold (B)	Number of Shares of the Company proposed to be acquired (C)	Balance holding (A) +(C)/ (A) -(B)

Name of Depository:	
DP ID No.:	Client ID No.:

Number of Shares of the Company that would be held by the person after this application	
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**I hereby undertake and confirm that,**

- 1) I do not have any access or have not received "Unpublished Price Sensitive Information" up to the time of signing this undertaking
- 2) In case I have access to or have received " Unpublished Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction I will inform the Compliance officer of the change in my position and that I and my immediate relatives would completely refrain from dealing in the securities of the Company till the time such information becomes public.
- 3) I have not contravened the prevailing Code of Conduct to Regulate, Monitor and Report Trading by Insiders.
- 4) I have made a full and true disclosure in this matter.

We further confirm that the aforesaid facts are true and correct and shall be fully responsible for any wrongful acts done by me or my relatives including such penalties as may be imposed by the Company.

You are requested to provide the pre-clearance of trade for the above transaction.

Thanking you,

Yours sincerely,

Place:  
Date:

Signature:  
Name :  
Designation :  
& Department

E-Mail ID for Communication of Approval:

## FORM II

### FORMAT FOR DISCLOSURE OF TRADES EXECUTED/NOT EXECUTED AFTER OBTAINING PRE-CLEARANCE

(Under CPIL's Code of Conduct for Regulating, Monitoring and Reporting of trading by Insiders)

[Clause 11.1 (a) of : Code of Conduct to Regulate, Monitor and Report Trading by Insiders]

(Fill either PART-A or PART B as applicable)

#### PART-A

#### Reporting of Trades executed after obtaining pre-clearance

**Date:**

#### **The Compliance Officer**

CSL FINANCE LIMITED  
410-412, 18/12, 4<sup>th</sup> Floor, W.E.A, Arya samaj  
Road, Karol Bagh, Delhi-110005

I, \_\_\_\_\_, a Designated Person/ Director of the Company, hereby declare that with reference to pre-clearance of trade approved granted by the Company on \_\_\_\_\_, I hereby inform that I have bought/sold/subscribed to the equity shares of the Company as mentioned below within seven trading days from the date of pre-clearance obtained.

Name of the Holder	No. of Securities	Brought/sold/subscribed	Price (Rs.)

Yours truly,

(Signature of the Designated Person)

(Name of the Designated Person)

**PART-B**

**REPORTING OF TRADES NOT EXECUTED AFTER OBTAINING PRE-CLEARANCE AND REASONS THEREOF**

**Date:**

**The Compliance Officer**

CSL FINANCE LIMITED  
410-412, 18/12, 4<sup>th</sup> Floor, W.E.A, Arya samaj  
Road, Karol Bagh, Delhi-110005

I, \_\_\_\_\_, a Designated Person/ Director of the Company,  
hereby declare that with reference to pre-clearance of trade approved granted by the Company on  
\_\_\_\_\_, I hereby inform that I have not bought/sold/subscribed for \_\_\_\_\_ equity  
shares of the Company within seven trading days from the date of pre-clearance obtained  
due to \_\_\_\_\_(mention the reason).

Yours truly,

(Signature of the Designated Person)

(Name of the Designated Person)



## FORM III

### ANNUAL DISCLOSURE OF SHAREHOLDING

(Under CPIL's Code of Conduct for Regulating, Monitoring and Reporting of trading by Insiders)

#### The Compliance Officer

CSL FINANCE LIMITED

410-412, 18/12, 4<sup>th</sup> Floor, W.E.A, Arya samaj

Road, Karol Bagh, Delhi-110005

#### Annual Disclosure of Shareholding

Following are the details of shares held by me and my Immediate Relatives as on 31st March, 20.....

Name	Relationship	No. of Shares held in the Company as on 31st March _____	Other Details such as Folio / DP Id / Client Id
	Self		
Immediate Relatives;			
1.			
2.			
3.			

I/ We declare that the above disclosure is true and correct and is in accordance with the previous disclosures given to the Company.

Signature :

Name :

Designation :

Department :

Date :

E-Mail ID for communication :

## FORM B

### 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		% Shareholding of
			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 & Signature: \_\_\_\_\_

Designation: \_\_\_\_\_

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

Place: \_\_\_\_\_

**FORM C**

**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/Director s/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 share holding	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 D (Indicative format)**

**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	Connection 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 entitlement, etc.)	No. and % of shareholding	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 share holding	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:

Place:

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