



**GACL – Code of Conduct for Prevention of Insider Trading**

Pursuant to The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992, a Code of Conduct for Prohibition of Insider Trading was adopted by the Board of Directors of the Company and thereafter amended from time to time with the approval of the Board. Section 195 of the Companies Act, 2013, stipulates that no person including any Director or Key Managerial Personnel of a Company shall enter into insider trading. Securities and Exchange Board of India vide its Notification dated 15<sup>th</sup> January, 2015 has repealed the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992 and its place had notified the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as the 'Regulations'), which came into force with effect from 15<sup>th</sup> May, 2015. In view of the same, this Code was adopted by the Board of Directors of the Company. This Code of Conduct is known as 'GACL -Code of Conduct for Prevention of Insider Trading (hereinafter referred as 'Insider Trading Code'), which has been further amended by the Board of Directors on 11<sup>th</sup> February, 2021 and may be modified/amended/alterd by the Board of Directors from time to time.

**1. Applicability**

This Insider Trading Code of Conduct is applicable to 'connected persons', 'immediate relatives' of connected persons, Promoters, Directors, Key Managerial Personnel, 'Designated Employees' and any person who is in possession of or having access to unpublished price sensitive information.

**2. Definitions**

- a. **"Act"** means the Securities and Exchange Board of India Act, 1992 (15 of 1992).
- b. **"Board"** means the Securities and Exchange Board of India.
- c. **"Company"** means Gillanders Arbuthnot And Company Limited.
- d. **"Compliance officer"** means Company Secretary or such other 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board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.





e. **"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 -
  - an immediate relative of connected persons specified in clause (i); or
  - a holding company or associate company or subsidiary company; or
  - an intermediary as specified in section 12 of the Act or an employee or director thereof; or
  - an investment company, trustee company, asset management company or an employee or director thereof; or
  - an official of a stock exchange or of clearing house or corporation; or
  - 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
  - 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
  - an official or an employee of a self-regulatory organization recognized or authorized by the Board; or
  - a banker of the company; or
  - 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.
- f. **"Dealing in Securities"** means an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in the securities of the Company either as principal or agent.
- g. **"Designated Employees/Persons"** means senior employees of the Secretarial and finance & accounts department and the persons whose name appears in Annexure 1 to this Code. Annexure 1 may be altered/modified/amended by the Managing Director & CEO to include such other employees as may be determined by the Company and to give effect to resignations/ appointments from time to time.



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- h. **"Generally available information"** means information that is accessible to the public on a non-discriminatory basis.
- i. **"Immediate relative"** means a spouse of a person, and includes 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;
- j. **"Insider"** means any person who is:  
i) a connected person; or  
ii) in possession of or having access to unpublished price sensitive information.
- k. **"Key Managerial Person"** means person as defined in Section 2(51) of the Companies Act, 2013.
- l. **"Promoter"** shall have the same meaning as assigned to them in the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof.
- m. **"Regulations"** shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.
- n. **"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.
- o. **"Specified"** means specified by the Board in writing.
- p. **"Specified Persons"** means the Directors, connected persons, the insiders, the Designated Employees and the promoters and immediate relatives are collectively referred to as Specified Persons.
- q. **"Takeover regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.
- r. **"Trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly.
- s. **"Trading day"** means a day on which the recognized stock exchanges are open for trading.

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- t. **"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; and
  - vi. material events in accordance with the listing agreement.

Words and expressions used and not 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 thereunder shall have the meanings respectively assigned to them in those legislations. Mr. Rajat Arora, Company Secretary of the Company will be the Compliance Officer under this Code and will be responsible for the implementation and adherence of this code. He shall report to the Board of Directors and in particular, shall provide reports to the Chairman of the Audit Committee.

### **3. Preservation of Price Sensitive Information**

- a. 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 the insider's legitimate purposes, performance of duties or discharge of his legal obligations.

Unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction which entails: -

- an obligation to make an open offer under the takeover regulations where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the Company; or
- not attracting 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 the proposed transaction 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.

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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 the limited purpose and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information

b. Need to Know:

(i) "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.

(ii) All non-public information directly received by any employee should immediately be reported to the head of the department.

c. Limited access to confidential information:

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

**4. Prevention of misuse of "Unpublished Price Sensitive Information"**

Employees and connected persons designated on the basis of their functional role ("designated persons") in the Company shall be governed by an internal code of conduct governing dealing in securities.

a. Trading Plan:

The Regulations entitles an insider to formulate a trading plan. If any Insider/ Designated Person wishes to formulate a trading plan for dealing in securities of the Company, he may do so and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out in accordance with such plan. The Trading Plan is optional.

The 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;

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- (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
  - (vi) not entail trading in securities for market abuse.
- b. The Compliance Officer shall consider the Trading Plan made as above and shall approve it forthwith. However, he shall be entitled to take express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per provisions of the Regulations.
- c. 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.

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 Trading Window announced by the Compliance Officer.

- d. Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed. However, if any insider opts for a Trading Plan, the same needs to be as per the provisions of the SEBI PIT Regulations.

## **5. Trading Window and Window Closure**

- a. (i) The trading period, i.e. the trading period of the stock exchanges, called 'trading window', is available for trading in the Company's securities.
- (ii) The Trading Window shall be closed during the time any of the following information is unpublished and which if published is likely to materially affect the price of the Securities of the Company:
- a. Declaration of Financial Results;
  - b. Declaration of Dividends;
  - c. Change in capital structure;
  - d. Mergers, Demergers, Acquisitions, Delisting, Disposals and Expansion of business and such other transactions;

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- e. Changes in Key Managerial Personnel; and
- f. Such other information as may be specified by the Compliance Officer for this purpose.

In respect of declaration of financial results, the Trading Window shall remain closed from the first day of the month following the respective quarter, half-year or financial year, as the case may be, till 48 (forty-eight) hours after the declaration of Financial Results.

(iii) When the trading window is closed, the Specified Persons shall not trade in the Company's securities in such period.

(iv) All Specified Persons 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 to in Point No. (ii) above or during any other period as may be specified by the Company from time to time.

(vi) In case of ESOPs, exercise of option may be allowed in the period when the trading window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when trading is closed.

- b. The Compliance Officer shall intimate the closure of trading window to all the designated employees of the Company when he 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.
- c. The Trading Window shall be opened 48 (Forty Eighty) hours after the unpublished price sensitive information becomes generally available.
- d. 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.
- e. 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.

## **6. Pre-clearance of trades**

When the trading window is open, trading by designated persons shall be subject to pre-clearance by the compliance officer, if the value of the proposed trades is above Rs.5,00,000/- (Rupees five lakhs only).



The pre-dealing procedure shall be hereunder:

(i) An application may be made in the prescribed Form (Annexure 2) to the Compliance officer indicating the estimated number of securities that the Specified Employee intends to deal in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the company in this behalf.

(ii) An undertaking in the prescribed Form (Annexure 3) shall be executed in favour of the Company by such Specified Employee incorporating, inter alia, the following clauses, as may be applicable:

- That the employee/director/officer does not have any access or has not received "Price Sensitive Information" up to the time of signing the undertaking.
- That in case the Specified Employee has access to or receives "Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction he/she shall inform the Compliance Officer of the change in his position and that he/she would completely refrain from dealing in the securities of the Company till the time such information becomes public.
- That he/she has not contravened the code of conduct for prevention of insider trading as notified by the Company from time to time.
- That he/she has made a full and true disclosure in the matter.

(iii) All Specified Persons and their shall execute their order in respect of securities of the Company within one week after the approval of pre-clearance is given. The Specified Person shall file within 2 (two) days of the execution of the deal, the details of such deal with the Compliance Officer in the prescribed form. In case the transaction is not undertaken, a report to that effect shall be filed in the prescribed Form(Annexure 5).

(iv) If the order is not executed within seven days after the approval is given, the employee/director must pre-clear the transaction again.

(v) All Specified Persons who buy or sell any number of shares of the Company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction. All Specified Persons shall also not take positions in derivative transactions in the shares of the Company at any time. 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 Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

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In case of subscription in the primary market (initial public offers), the above mentioned entities shall hold their investments for a minimum period of 30 days. The holding period would commence when the securities are actually allotted.

(vi) The Compliance Officer may waive off the holding period in case of sale of securities in personal emergency after recording reasons for the same. However, no such sale will be permitted when the Trading window is closed.

## **7. Other Restrictions**

- a. The disclosures to be made by any person under this Code shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.
- b. The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account for purposes of this Code.
- c. The disclosures made under this Code shall be maintained for a period of five years.

## **8. Disclosures of Trading by Insiders**

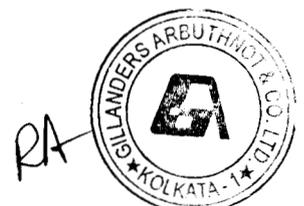
### **a. General Provisions**

- i. The disclosures to be made by any person shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.
- ii. The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account. However, trading in derivatives of securities should be permitted by any law for the time being in force.
- iii. The disclosures made shall be maintained by the company, for a minimum period of five years.

### **b. Disclosures by certain persons**

#### **i. Initial Disclosures**

- Every promoter, Key Managerial Personnel and Director of the Company shall disclose his holding of securities in the company as on the date of these regulations taking effect, to the Company within thirty days of these regulations taking effect in Form A;





- Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a promoter shall disclose his holding of securities of the Company as on the date of appointment or becoming a promoter, to the Company in Form B within seven days of such appointment or becoming a promoter.

ii. Continual Disclosures

- Every promoter, employee and director of the company shall disclose to the Company the number of such securities acquired or disposed of within two trading days of such transaction in Form C 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 ten lakh rupees;
- 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.

The Compliance officer shall maintain records of all the declarations in the appropriate form given by the directors / officers / designated employees for a minimum period of five years

**9. Dissemination of Price Sensitive Information**

- a. No information shall be passed by Specified Persons by way of making a recommendation for the purchase or sale of securities of the Company.
- b. Disclosure/dissemination of Price Sensitive Information with special reference to analysts, media persons and institutional investors:

The following guidelines shall be followed while dealing with analysts and institutional investors:-

- Only public information to be provided.
- At least two Company representatives be present at meetings with analysts, media persons and institutional investors.
- Unanticipated questions may be taken on notice and a considered response given later. If the answer includes price sensitive information, a public announcement should be made before responding.
- Simultaneous release of information after every such meet.



## **10. Code of Practices and procedures for fair disclosure of unpublished price sensitive information**

- i) The Divisional and Functional Heads of the Company shall intimate any unpublished price sensitive information promptly to the Compliance Officer so that prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
- ii) On receipt of unpublished price sensitive information the Compliance Officer shall take steps to upload the same in the Company's website and simultaneously inform the Stock Exchanges where the shares of the Company are listed to ensure uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
- iii) Mr. Rajat Arora, Company Secretary and Compliance Officer of the Company is designated as 'Chief Investor Relations Officer' to deal with dissemination of information and disclosure of unpublished price sensitive information.
- iv) The Compliance Officer shall take steps to promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise, to make such information generally available.
- v) The Compliance Officer after receiving information and feedback from the Managing Director & CEO, Divisional and Functional heads shall make appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- vi) The Chairman, Directors, Divisional and functional heads of the Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.

## **11. Penalty**

- i) Every Designated Person shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her dependents).
- ii) Any Designated Person who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalized and appropriate action may be taken by the Company.

**Annexure 1**

S.N.	Name	Division / Department	Designation	Location
1.	Mr. V. Kumar	Tea	Joint President	Head Office
2.	Mr. B.C. Kaushik	Textile	President (GIS Cotton Mill)	Champdani, W. B.
3.	Mr. Utpal Konar	Engineering (MICCO)	Senior Vice President	Head Office
4.	Mr. Subhayan Bhattacharya	Engineering (MICCO)	Vice President	Head Office
5.	Mr. G. Samanta	General	Assistant Vice President	Head Office
6.	Mr. Tapan Jyoti Sarkar	Tea	Assistant General Manager	Head Office
7.	Mr. Dulal Maji	Engineering (MICCO)	Assistant General Manager	Head Office
8.	Mr. R. K. Verma	Textile	Deputy General Manager (Commercial)	Champdani, W. B.
9.	Mr. Somnath Mukherjee	Property	General Manager	Head Office
10.	Mr. Ranjan Dutta	Textile	Deputy Manager (Commercial)	Head Office

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**Annexure 2****Form for obtaining pre-clearance**

To,

The Compliance Officer  
Gillanders Arbuthnot and Company Limited

Through Division / Department Head:

1 a	Name of the applicant:	
b)	Name of the dependent (for any dealing of shares by dependents)	
2.	Designation	
3.	Permanent Account Number	
4.	Number and value of securities in the Company held as on date (with folio / DP ID/Client ID No.)	
5.	Nature of securities held	Equity Shares / Debentures / Other Securities
6.	Mode in which the securities are held :	Physical / dematerialized
7.	The Proposal is for	a) Acquisition in the open market (b) Subscription to the securities (c) Sale of securities
8.	Proposed date of dealing in securities :	
9.	Nature of proposed dealing	Purchase / Sale of securities
10.	Estimated number of securities proposed to be acquired / subscribed / sold :	
11.	Price at which the transaction is proposed	
12.	Current market price (as on the date of application) :	
13	Whether the proposed transaction will be through stock exchange or of market deal	
14.	Proposed mode of dealing in securities :	Physical / dematerialised

15.	If securities are held / proposed to be dealt in dematerialized form: Name of the Depository DP I D Number Client I D number	
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In relation to the above Dealing, I undertake that:

- a. I have no access to nor do I have any information that could be construed as "Price Sensitive information" as defined in the Code upto the time of signing this undertaking.
- b. In the event that I have access to or received any information that could be construed as "Price Sensitive Information" as defined in the Code, after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public;
- c. I have not contravened the provisions of the code of Conduct for Prevention of Insider Trading as notified by the Company from time to time;
- d. I have made full and true disclosure in the matter;
- e. I hereby declare that I shall execute my order in respect of securities of the Company within one week after the approval of pre-clearance is given. If the order is not executed within one week after the approval is given. I undertake to obtain pre-clearance for the transaction again.

Place:

Date:

**Signature of the Applicant**

**Annexure 3**

**Form for Undertaking**

To,

Gillanders Arbuthnot and Company Limited

I, \_\_\_\_\_, \_\_\_\_\_ of the Company  
residing at \_\_\_\_\_, am desirous of dealing in  
\_\_\_\_\_ \* shares of the Company as mentioned in my application dated \_\_\_\_\_  
for pre-clearance of the transaction.

I further declare that I am not in possession of or otherwise privy to any unpublished Price Sensitive Information (as defined in the Company's Code of Conduct for prevention of Insider Trading (the Code) up to the time of signing this Undertaking.

In the event that I have access to or received any information that could be construed as "Price Sensitive Information" as defined in the Code, after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public. I declare that I have not contravened the provisions of the Code as notified by the Company from time to time.

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

If approval is granted, I shall execute the deal within 7 days of the receipt of approval failing which I shall seek pre-clearance. I declare that I have made full and true disclosure in the matter.

Date:

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

\* Indicate number of shares

**Annexure 4**

**FORMAT FOR 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 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 transaction/deal. In case the transaction is not undertaken a 'Nil' report shall be necessary.

Yours Faithfully,

For Gillanders Arbuthnot And Company Limited

Compliance Officer

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

Encl: Format for submission of details of transaction

**Annexure 5**

**FORMAT FOR DISCLOSURE OF TRANSACTIONS**

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

To,  
The Compliance Officer,  
Gillanders Arbuthnot and Company Limited

I hereby inform that I

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

Name of holder	No. of securities dealt with	Bought/sold/ subscribed	DP ID/Client ID / Folio No	Price (Rs.)

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 3 years and produce to the Compliance officer / SEBI any of the following documents:

1. Broker's contract note.
2. Proof of payment to/from brokers.
3. Extract of bank passbook/statement (to be submitted in case of demat transactions).
4. Copy of Delivery instruction slip (applicable in case of sale transaction).

I agree to hold the above securities for a minimum period of six months. In case there is any urgent need to sell these securities within the said period, I shall approach the Compliance Officer for necessary approval. (applicable in case of purchase / subscription).

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**

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015  
[Regulation 7 (1) (a) read with Regulation 6 (2) - Initial disclosure to the company]

Name of the company: \_\_\_\_\_

ISIN of the company: \_\_\_\_\_

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

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/Members of Promoter Group/ KMP / Directors/ immediate relatives/ others etc)	Securities held as on the date of regulation coming into force		% of Share holding	Open Interest of the Future contracts held as on the date of regulation coming into force			Open Interest of the Option Contracts held as on the date of regulation coming into force						
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.		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				

Note: i. "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEB(Prohibition of Insider Trading) Regulations, 2015.  
ii. In case of Options, notional value shall be calculated based on premium plus strike price of options.

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

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

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

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

**FORM B**

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015  
[Regulation 7 (1) (b) read with Regulation 6(2) - Disclosure on becoming a director/KMP/Promoter]

Name of the company: \_\_\_\_\_

ISIN of the company: \_\_\_\_\_

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN No., CIN/DIN & Address with contact nos.	Category of Person (Promoters/ Members of Promoter Group / KMP / Directors/immediate relatives/others etc.)	Date of appointment of Director /KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP	% of Share holding	Open Interest of the Future contracts held at the time of becoming Promoter/appointment of Director/KMP			Open Interest of the Option Contracts held at the time of becoming Promoter/appointment of Director/KMP		
					Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
			Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.	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

Notes: i. "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.  
ii. In case of Options, notional value shall be calculated based on premium plus strike price of options.

Signature:

Designation:

Date:

Place:

**FORM C**

Securities and Exchange Board of India (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, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN No., CIN/DIN, & address of Promoter/ Employee / Director with contact nos.	Category of Person (Promoter s/ Members of Promoter Group /KMP / Directors/ immediate relatives/ others etc.)	Securities held prior to acquisition/disposal		Securities acquired /Disposed			Securities held post acquisition/disposal		Date of intimation to company	Mode of acquisition (market purchase/public rights/preferential offer / off market/ Inter-se transfer etc
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/Sale/Pledge / Revoke/ Invoke)	Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)		

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

Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

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

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

Signature:

Designation:

Date:

Place:

**Form D (Indicative format)**

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015  
Regulation 7(3) – Transactions by Other connected persons as identified by the company

Name of the company: \_\_\_\_\_

ISIN of the company: \_\_\_\_\_

**Details of trading in securities by other connected persons as identified by the company**

Name, PAN No., CIN/DIN & address of connected persons, as identified by the company with contact nos.	Connection with company	Securities held prior to acquisition/disposal	Securities acquired /Disposed	% of shareholding	Date of allotment advice/acquisition of shares/ sale of shares specify	Date of intimation to company	Mode of acquisition (market purchase/public rights/preferential offer / off market/ Inter-se transfer etc.	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
								Buy		Sell		
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.	Pre transaction	Post transaction	From	To	Value	Number of units (contracts * lot size)	Value	Number of units (contracts * lot size)	

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

Name:

Signature:

Date:

Place: