

MEGLON INFRA-REAL (INDIA) LIMITED

**CODE OF INTERNAL PROCEDURES AND CONDUCT FOR REGULATING,
MONITORING AND REPORTING OF TRADING BY DESIGNATED PERSONS AND ITS
IMMEDIATE RELATIVES**

1. 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 the Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of trading by Designated Person and its immediate relatives of **Meglon Infra-Real (India) Limited** as amended from time to time.

“**Company**” means **Meglon Infra-Real (India) Limited**.

“**Compliance Officer**” means Company Secretary and in his/her absence 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board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: 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**” 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himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.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 recognized or authorized by the Board; or

- (i) a banker of the Company ;or
- (j) a concern, firm, trust, hindu undivided family, Company or association of persons wherein a director of the Company or his immediate relative or banker of the Company , has more than ten per cent, of the holding or interest.

“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 i.e. **Meglon Infra-Real (India) Limited** either as principal or agent.

“Designated Person” shall include:

- i. Every employee in the finance, accounts, secretarial, legal and IT department as may be determined and informed by the Compliance Officer;
- ii. Directors & KMP of the Company and material subsidiary;
- iii. Executive Assistants & Secretary to Directors & KMP
- iv. Every employee of material subsidiary designated on the basis of their role or access to UPSI
- v. All promoters of the Company.
- vi. Chief Executive Officer and employees upto two level below CEO, intermediary, fiduciary and its material subsidiary irrespective of their role in the Company or access to UPSI
- vii. Any other employee as may be determined and informed by the Compliance Officer from time to time.

“Director” means a member of the Board of Directors of the Company

“Employee” means every employee of the Company including the Directors in the employment of the Company.

"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 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,

- (i) A Connected person;
- (ii) In possession of or having access to unpublished price sensitive information;
- (iii) In receipt of UPSI pursuant to legitimate purpose

“Key Managerial Person” means person as defined in Section 2(51) of the Companies Act, 2013

"Legitimate Purpose" shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with any internal / external stakeholders and as further set out in "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information"

"Promoter" 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.

"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.

"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;

"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, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly. As per explanation given by the Act, this definition is an inclusive definition and may include pledge, derivatives on the Securities of the Company as the case maybe.

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

"Unpublished Price Sensitive Information" ("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, delistings, disposals and expansion of business and such other transactions;
- (v) changes in key managerial personnel

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

Words and expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956(42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made there under shall have the meanings respectively assigned to them in those legislation.

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

UPSI 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 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 UPSI 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.

However, the Board of Directors of the Company 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 UPSI.

Explanation: “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 in furtherance of legitimate purposes and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.

Limited access to Confidential Information

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

3. Prevention of misuse of “UPSI”

- a) Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password, etc.
- b) Structured digital database shall be maintained containing the names of such employees or persons or entities as the case may be with whom UPSI is shared under this Code along with the Permanent Account Number (PAN) or any other identifier authorized bylaw where PAN is not available. Such databases shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.
- c) Confidentiality agreements shall be signed or notice shall be served to all such employees or persons or entities to maintain confidentiality of such UPSI in compliance with the Regulations.

When a person who has traded in securities has been in possession of Unpublished Price Sensitive Information, his trades would be presumed to have been motivated by the knowledge and awareness of such information in his possession.

4. Trading Plan:

4.1 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.

(This plan intends to give an option to persons who may be perpetually in possession of unpublished price sensitive information and enabling them to trade in securities in a compliant manner)

4.2 Trading Plans 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;
- (i) entail trading for a period of not less than twelve months;
- (ii) not entail overlap of any period for which another trading plan is already in existence;
- (iii) 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
- (iv) not entail trading in securities for market abuse.

4.3 The Compliance Officer shall consider the Trading Plan made as above and shall approve it forthwith in consultation with the Managing Director in his absence Whole-Time Director in his absence Chief Financial Officer. 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.

4.4 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.

4.5 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.

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

4.7 The trading window norms, restriction on contra trade shall not be applicable for trade carried out in accordance with an approved trading plan. The pre-clearance of trade shall not be required for a trade executed as per approved trading plan.

5. Trading Window and Window Closure:

- (i) The trading day, called 'trading window', is available for trading in the Company's securities.
- (ii) The trading window shall be, inter alia, closed 7 days prior to and during the time the unpublished price sensitive information is published. However, if necessary or essential then the Trading restriction can be made applicable from the end of every quarter till 48 hours after the declaration of financial results. The applicability of such trading restriction shall be decided by the Compliance Officer after consultation with CFO and Managing Director of the Company. However, trading restriction period can be made applicable from the end of every quarter till 48 hours after the declaration of financial results.
- (iii) The gap between clearance of accounts by audit committee and board meeting shall be as narrow as possible and preferably on the same day to avoid leakage of material information.
- (iv) When the trading window is closed, the designated Person and their immediate relatives shall not trade in the Company's securities in such period.
- (v) The trading window may be re-opened after closure, not earlier than 48 hours after the Unpublished Price Sensitive Information in question becomes generally available.
- (vi) The trading window shall be closed when the Compliance officer determines that a designated person or class of designated persons and their immediate relatives can reasonably be expected to have possession of UPSI. The Compliance Officer shall also intimate the closure of trading window to all the designated person of the Company when he/she determines that a designated person or class of designated persons and their immediate relatives can reasonably be expected to have possession of unpublished price sensitive information. The closure of trading window shall also be intimated to the Stock Exchanges where the securities of the Company are listed. The period during which the trading window is closed shall be termed as '**Prohibited Period**'.
- (vii) All the designated person and their immediate relatives of the Company shall conduct all their dealings in the securities of the Company only when trading window is open.
- (viii) 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, merchant bankers, analysts, consultants etc., assisting or advising the Company.

6. Pre-clearance of Trades:

All the Designated Persons (or on behalf of their immediate relative) of the Company, who intend to deal in the securities of the Company when the trading window is opened and if the value of the proposed trades is above 25,000 shares or up to Rs. 10 Lakhs (market value) or 1% of total shareholding, whichever is less, should pre-clear the transaction from the Compliance Officer. The pre-dealing procedure shall be hereunder;

- (i) An application may be made in the prescribed Form (**Annexure-1**) to the Compliance officer indicating the estimated number of securities that the Designated person or his/her immediate relative 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 (**Annexure-1**) shall be executed in favour of the Company by such Designated Person or his/her immediate relative incorporating, *inter alia*, the following clauses, as may be applicable:
 - (a) That he/ she does not have any access or has not received "UPSI" up to the time of signing the undertaking.
 - (b) That in case he/ she has access to or receives "Unpublished 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/ her position and that he/she would completely refrain from dealing in the securities of the Company till the time such information becomes public
 - (c) That he/she has not contravened the code of conduct for prevention of insider trading as notified by the Company from time to time
 - (d) That he/she has made a full and true disclosure in the matter.
- (iii) All Designated Person or his/her immediate relative shall execute their order in respect of securities of the Company within one week after the approval of pre-clearance is given. The Designated Person or his/her immediate relative 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. (**Annexure - 3**).
- (iv) If the order is not executed within seven days after the approval is given, the Designated Person or his/her immediate relative must pre-clear the transaction again.
- (v) All Designated Person or his/her immediate relative 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 Designated Person or his/her immediate relative 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 SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

(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:

- (i) 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.
- (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 in to account for purposes of this Code.
- (iii) The disclosures made under this Code shall be maintained for a period of five years.

8. Reporting Requirements for transactions in securities Initial Disclosure:

- (a) Every promoter/ member of the promoter group/ Key Managerial Personnel / Officers / Designated Person of the Company shall be required to forward following detail of their holdings in securities of the Company presently held by them including the statement of holdings of Immediate Relatives to the Compliance Officer, in the prescribed Form within 30 days of this Code of Conduct coming into effect in the prescribed Form **Annexure - 4**
- (b) Every person on appointment as a Key Managerial Personnel or a director of the Company or upon becoming a promoter/ member of promoter group shall disclose his holdings of securities of the Company as on the date of appointment or becoming a promoter or member of promoter group, to the Company within seven days of such appointment or becoming a promoter or member of promoter group in the prescribed Form **Annexure - 5**

9. Continual Disclosure:

Every Promoter, Member of Promoter Group, Designated Person 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 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 Lakhs Rupees or such other value as may be specified prescribed '**Form - C**' & '**Form - D**' ('**Annexure - 6 & 7**').

The disclosure shall be made within 2 trading days of:

- (a) the receipt of intimation of allotment of shares, or
- (b) the acquisition or sale of shares or voting rights, as the case maybe.

10. Disclosure by the Company to the Stock Exchange(s):

Within 2 days of the receipt of intimation under Clause 9, the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received. 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.

11. Dissemination of Price Sensitive Information:

- i. No information shall be passed by Insiders by way of making a recommendation for the purchase or sale of securities of the Company.
- ii. 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.

12. Penalty for contravention of the code of conduct:

- Every Insider/Designated Person/Connected 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 Immediate Relatives).
- Any Insider/Designated Person/Connected Person who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalised and appropriate action may be taken by the Company.
- Insider/Designated Person/Connected Person who violates the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligibility for future participation in employee stock option plans, etc.
- The actions taken by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

13. Code of Fair Disclosure:

A code of practices and procedures for fair disclosure of UPSI for adhering each of the principles is set out below:

1. Prompt public disclosure of UPSI that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. Uniform and universal dissemination of UPSI to avoid selective disclosure.
3. Designation of Chief Financial Officer a senior officer as a chief investor relations officer to deal with dissemination of information and disclosure of UPSI.
4. Prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. Ensuring that information shared with analysts and research personnel is not UPSI.
7. Developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
8. Handling of all UPSI on a need-to-know basis.

14. Amendment:

The Board reserves its right to amend or modify this Policy in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification shall be inconsistent with the applicable provisions of the Listing Regulations, Act or any law for the time being in force. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this policy, then such amendment(s), clarification(s), circular(s), etc. shall prevail upon the provisions hereunder and this policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s), etc.

Annexure-1
PRE-CLEARANCE OF TRADE
(To be submitted in Duplicate)

Date:

The Compliance Officer
Meglon Infra-Real (India) Limited.

| | |
|---|---|
| Name of the applicant | |
| Designation | |
| PAN No/Passport No. | |
| Number and value of securities in the Company held as on date (with folio / DP ID / Client IDNo.) | |
| Nature of securities held | *Equity Shares / Other Securities |
| The Proposal is for | I. Acquisition in the open market II. subscription to the securities III. sale of securities (Delete whichever not applicable) |
| Proposed date of dealing in securities | Within a week |
| Nature of proposed dealing | Purchase / Sale of securities (delete whichever not applicable) |
| Estimated number of securities proposed to be acquired / subscribed / sold | |
| Price at which the transaction is proposed | |
| Current market price (as on the date of application) | |
| Whether the proposed transaction will be through stock exchange or off market deal | |
| Name of the Depository DP ID Number Client ID number | |

In relation to the above Dealing, I undertake that:

- I. 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;

- II. 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;
- III. 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;
- IV. I have made full and true disclosure in the matter.
- V. 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.
- VI. I hereby confirm that I shall not engage into the reverse transaction i.e. Buying/ selling of shares, within 6 months of buying/ selling respectively.

Place: _____

Signature

*** Strike whichever is not applicable.**

Annexure-2
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.

Yoursfaithfully,

For **Meglon Infra-Real (India) Limited.**

Compliance Officer

Date:
Place:

Encl: Format for submission of details of transaction

Annexure- 3

FORMAT FOR DISCLOSURE OF TRANSACTIONS

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

To,
The Compliance Officer,
Meglon Infra-Real (India) 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)

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:

| Name of Holder | No. of securities dealt with | Bought/Sold/ Subscribed | DP ID/Client ID / Folio No | Price (Rs.) |
|----------------|------------------------------|-------------------------|----------------------------|-------------|
| | | | | |

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 slips (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:
Designati

Annexure - 4

FORM- A

SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (1) (a) read with Regulation 6 (2) including modification thereof - Initial disclosure to the Company]

Name of the Company:- _____

ISIN of the Company: _____

Details of Securities held by Promoter, Member of Promoter Group, 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/Member of promoter group / KMP / Directors/immediate relatives/others etc.) | Securities held as on the date of regulation coming into force | | % of Shareholding | Open Interest of the Future contracts held at the time of becoming Promoter or member of promoter group /appointment of Director/KMP | | Open Interest of the Option Contracts held at the time of becoming Promoter or member of promoter group /appointment of Director/KMP | |
|--|---|--|-----|-------------------|--|-------------------------------|--|-------------------------------|
| | | Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.) | No. | | Number of units (contracts * lotsize) | Notional value in Rupee terms | Number of units (contracts * lotsize) | Notional value in Rupee terms |
| 1 | 2 | 3 | 4 | 5 | 6 | | 7 | |
| | | | | | | | | |

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

Signature:

Designation:

Date:

Place:

**Annexure - 5
FORM- B**

SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (1) (b) read with Regulation 6(2) including modification thereof - Disclosure on becoming a Director/KMP/Promoter/Member of 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 promoter group 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/Member of promoter group / KMP / Directors/immediate relatives/others etc.) | Date of appointment of Director /KMP OR Date of becoming Promoter or member of promoter group | Securities held at the time of becoming Promoter or member of promoter /appointment of Director/KMP | | % of Shareholding | Open Interest of the Future contracts held at the time of becoming Promoter or member of promoter group /appointment of Director/KMP | | Open Interest of the Option Contracts held at the time of becoming Promoter or member of promoter group /appointment of Director/KMP | |
|--|---|---|---|-----|-------------------|--|-------------------------------|--|-------------------------------|
| | | | Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.) | No. | | Number of units (contracts * lotsize) | Notional value in Rupee terms | Number of units (contracts * lotsize) | Notional value in Rupee terms |
| 1 | 2 | 3 | 4 | 5 | 5 | 6 | | 7 | |
| | | | | | | | | | |

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

Signature:
Designation
Date:
Place:

**Annexure - 6
FORM- C**

**SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (2) read with Regulation 6(2) including modification thereof - Continual Disclosure**

Name of the Company:

ISIN of the Company: _____

Details of change in holding of Securities of Promoter, Member of Promoter Group, Designated Persons and Director of a listed company and other such persons as mentioned in Regulation 6(2).

| Name, PAN No., CIN/DIN, & address With | Category of Person (Promoter/memb KMP/designated Directors/immediate relatives/others etc.) | Securities held prior to acquisition/disposal | | Securities acquired/Dis d | | % of shareholdin | | Date of allotment advice/ acquisition shares/ sale of shares specify | | Date of intimatio n to Company | Mode of acquisition (market purchase/ public rights/ preferenti offer / off market/ Inter-se transfer etc) | Trading in derivatives (Specify type of contract, Futures or Option setc) | | | | Exchange on which the trade was executed |
|--|---|---|-----|--|-----|------------------|-------------------|--|----|--------------------------------|--|---|---------------------------------------|-------|---------------------------------------|--|
| | | Type of security (For eg.- Shares, Warrants, Convertible Debenture setc.) | No. | Type of securit (For Shares, Warrants, Conve rtible setc.) | No. | Pre transa ction | Post trans action | From | To | | | Buy | | Sell | | |
| | | | | | | | | | | | | Value | Number of units (contracts * lotsize) | Value | Number of units (contracts * lotsize) | |
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 |
| | | | | | | | | | | | | | | | | |

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

Signature:

Designation:

Date:

Place:

Annexure - 7
Form D (Indicative format)

**SEBI (Prohibition of Insider Trading) Regulations, 2015 Regulation 7(3) including modification thereof -
Transactions 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. | Connecti on with Company | Securities held prior to acquisition/disposal | | Securities acquired/Dispos ed | | % of shareholding | | Date of allotment advice/ acquisition of shares/ sale of shares specify | | Date of intimation to Compan | Mode of acquisition (market purchase/ public/ rights/ preferential offer / off market/ Inter-se transfer etc.) | Trading in derivatives (Specify type of contract, Futures or Option setc) | | | | Exchange on which the trade was executed |
|---|--------------------------|---|-----|---|-----|-------------------|------------------|---|----|------------------------------|--|---|--|-------|--|--|
| | | Type of security (For eg.- Shares, Warrants, Convertible Debenture setc.) | No. | Type of security (For eg.- Shares, Warrants, Convertible Debenture setc.) | No. | Pre transaction | Post transaction | From | To | | | Buy | Sell | | | |
| | | | | | | | | | | | | Value | Number of units (contracts * lot size) | Value | Number of units (contracts * lot size) | |
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 |

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

Name:
Signature:

Date:
Place: