



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

| Version | Board Approval Date |
|----------------|----------------------------|
| V0 | |

Sresta Natural Bioproducts Limited
CIN: U01122TG2004PLC042837

Code of Conduct for Prevention of Insider Trading

1. Introduction

The Securities and Exchange Board of India (“SEBI”) notified the SEBI (Prohibition of Insider Trading Regulations) 2015 (“Regulations” or “Insider Trading Regulations”) on January 15, 2015 replacing the SEBI (Prohibition of Insider Trading) 1992, which became effective from May 15, 2015.

Regulation 3 & 4 of the Regulation prohibits Communication or procurement of unpublished price sensitive information and Trading when in possession of unpublished price sensitive information which are quoted below.

“Regulation 3(1): No insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, to any person including other insiders except where such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.

Regulation 3(2): No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

Regulation 4(1): No insider shall trade in securities that are listed or proposed to be listed on a stock exchange when in possession of unpublished price sensitive information.”

It is also mandatory in terms of the Regulations for every listed company to formulate a Code of Conduct for Prevention of Insider Trading.

2. Preamble

The Board of Directors (the “Board”) of Sresta Natural Bioproducts Limited (“Sresta” or “the company”) has adopted the following code of conduct for prevention of insider trading and to regulate, monitor and report trading by the designated persons as required under Regulations.

3. Applicability and Effective date of this code

This code of conduct is applicable to all designated persons

4. Definitions

a. "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; 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 a company or his immediate relative or banker of the company, has more than ten per cent of the holding or interest;
- b. "Designated Persons" means
 - i. Promoters
 - ii. Directors
 - Key Managerial Personnel of our Company in terms of Regulation 2(1)(bb) of the SEBI ICDR Regulations and Section 2(51) of the Companies Act
 - iii. Executive Committee members of the Company
 - iv. All Leader of Functions (LOFs)
 - v. All employees in finance department handling finalization of financial statements
 - vi. All other persons who may be in possession of UPSI
 - vii. And such other persons as may be notified by the Compliance Officer as per direction of the Board considering the objectives of the Code
- c. "Generally available information" means information that is accessible to the public on a nondiscriminatory basis;
- d. "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;
- e. "Insider" means any person who is:
 - i. a connected person; or
 - ii. in possession of or having access to unpublished price sensitive information;
- f. "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

- g. "Trading" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly.
- h. "Trading day" means a day on which the recognized stock exchanges are open for trading;
- i. **Trading Window**" means a trading period for dealing in the Company's shares during which Designated Persons and their Immediate Relatives can deal in the shares of the Company.
- j. "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; and
 - vi.

Words and phrases used in the Code and not defined hereinabove shall have the same meaning ascribed to such terms in the Act, the Insider Trading Regulations, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations notified thereunder.

The above list is only for illustrative purpose. Any information relating to a company or securities, that is not generally available would be unpublished price sensitive information if it is likely to materially affect the price upon coming into the public domain, shall also come under the definition of "Unpublished Price Sensitive Information."

5. Compliance Officer

- 5.1 The Board of the Company shall appoint the Company Secretary as the Compliance Officer to ensure compliance and for effective implementation of this code of conduct under the Insider Trading Regulations.
- 5.2 The Compliance Officer shall report to the Board of Directors and in particular, the Chairman of the Audit Committee.
- 5.3 The Compliance Officer shall be responsible for compliance of this code of conduct and other requirements under the Insider Trading Regulations including setting forth the policies, procedures, maintenance of records, monitoring adherence to the rules for preservation of unpublished price sensitive information, monitoring of trades and the implementation of the code of conduct under the overall supervision of the Board of Directors of the Company.
- 5.4 The Compliance Officer shall assist all the employees in addressing any clarifications and provide necessary assistance on the Insider Trading Regulations and this code of conduct.

The Compliance officer shall place the reports before the Board of Directors/Audit Committee, detailing dealings in the securities by the Designated Persons under this code on a quarterly basis.

6. Responsibilities of Designated Persons

6.1 Preservation of Price Sensitive Information

All Designated Persons shall maintain the confidentiality of Unpublished Price Sensitive Information (UPSI) coming into their possession or control. In order to comply with the confidentiality obligation, the Designated Persons shall not

- a. Communicate, provide or allow access to any UPSI to any person or
- b. Discuss UPSI in public places or

Disclose UPSI to any person who does not *need to know* the information for discharging his or her duties/obligations

6.2 Restriction on trading

No Designated Persons shall trade in securities of the Company when in possession of UPSI and when the trading window is closed. Further no designated person shall apply for pre-clearance of any proposed trade when such designated persons are in possession of UPSI, even if the trading window is not closed.

6.3 Need to know

The designated persons, who are privy to UPSI, shall handle such information with care and to deal with the information with them when transacting their business strictly on a need-to-know basis and no UPSI should be communicated to any person except in furtherance of the legitimate purposes, performance of duties or discharge of his or her obligations.

6.4 Limited access to Confidential Information

Files containing confidential information shall be kept secured. Computer files must have adequate security of log in and password, etc.

6.5 Chinese Wall

- a. To prevent the misuse of confidential information the Company shall adopt a "Chinese Wall" policy which separates those areas of the Company which routinely have access to confidential information, considered "inside areas" from those areas which deal with sales/marketing/investment advice or other departments providing support services, considered "public areas".
- b. The employees in the inside area shall not communicate any UPSI to anyone in public area.
- c. The employees in inside area may be physically segregated from employees in public area.
- d. Demarcation of the various departments as inside area may be implemented by the Company.

- e. In exceptional circumstances employees from the public areas may be brought "over the wall" and given confidential information on the basis of "need to know" criteria, under intimation to the compliance officer.

7. Prevention of misuse of Price Sensitive Information

All the Designated Persons of the Company shall be subject to trading restrictions as given below:

7.1 Trading Window

7.1.1 The Trading window for trading in securities shall be closed for such period as may be decided by the Compliance Officer of the Company and unless otherwise specified, the trading window shall be closed at the time of:

- a. Declaration of Financial results (quarterly, half-yearly and annual)
- b. Declaration of dividends (interim and final)
- c. Change in the capital structure i.e issue of securities by way of public / rights / bonus etc.
- d. Any major expansion plans or execution of new projects
- e. Mergers, de-mergers, acquisitions, takeovers and buy-back
- f. Disposal of whole or substantially whole of the undertaking
- g. Changes in key managerial personnel
- h. Any significant changes in policies, plans or operations of the Company
- i. Material events in accordance with the clauses of SEBI (LODR) Regulations

The Closure of Trading Window shall be communicated to all the Designated Persons of the Company by the Compliance officer by Electronic Means (i.e. e-mail) or such other means as he/she may deem fit.

7.1.2 The trading window shall be opened 48 hours after the information referred to preceding para is made available to the public.

7.1.3 When the Trading Window is closed, the Directors/ Designated Employees/Connected Person(s) shall not trade in securities of the Company.

7.1.4 All Designated Persons/Connected Person(s) of the Company shall conduct their trade in the securities of the Company only in valid trading window, subject to pre-clearance by the Compliance Officer as per the procedure mentioned hereunder.

7.2 Pre-Clearance of Trades

7.2.1 Every Designated Person shall obtain a *pre-trading* approval as per the procedure prescribed hereunder for trading in any securities of the Company proposed to be undertaken by such Designated Persons.

7.2.2 For the purpose of obtaining a *pre-trading* approval, the concerned Specified Person shall make an application in the prescribed form (see Annexure 1) to the Compliance Officer. The Compliance Officer should submit his/her application for pre-trading approval to the Managing Director.

7.2.3 The Compliance Officer shall consider the application made as above and shall approve it forthwith preferably on the same working day but not later than the next working day unless he is of the opinion that grant of such an approval would result in a breach of the provisions of this Code, or the Regulations.

7.2.4 Every approval letter shall be issued in such or similar format (see Annexure 2) as may be prescribed by the Company from time-to-time. Every approval shall be dated and shall be valid for a period of seven trading days from the date of approval. In the absence of the Compliance Officer due to leave etc., the Officer designated by him/her from time-to-time shall discharge the function above.

7.2.5 All the designated Persons shall ensure that they / their immediate relatives and persons for whom such designated persons takes trading decisions complete execution of every pre-cleared trade in the securities of the Company as prescribed above and no later than seven trading days from the date of the approval. The Designated Persons shall file within 2 (two) trading days of the execution of the transaction, the details of such transaction, with the Compliance Officer in the prescribed form (see Annexure 3). In case the transaction is not undertaken, a report to that effect shall be filed (see Annexure 3).

7.2.6 No Designated Persons/Connected Person(s) shall enter into or execute a contra trade within six months from the date of trading in securities of the Company. The compliance officer is empowered only to grant relaxation for sale of securities of the

Company on genuine requirements with reasons to be recorded in writing, subject to such relaxation does not violate the insider trading regulations.

7.3 Trading Plans

7.3.1 The designated persons are entitled to formulate the trading plan and present it to the compliance officer for approval and public disclosure, pursuant to which trade may be carried out by them. However, such trading plan

- a. Shall not entail to commencement of trading earlier than six months from the public disclosure of the plan.
- b. Shall not entail trading for the period during the period from 20th March of every year to till the second trading day after the disclosure of annual financial statements.
- c. Shall entail trading for a period of not less than 12 months.
- d. Shall not entail overlap of any period for which another trading plan is already in existence.
- e. Shall 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 interval at, or dates on which such trades shall be effected and
- f. Shall not entail trading in securities for market abuse.

7.3.2 The Compliance Officer shall review the trading plan and shall be entitled to seek such express undertakings as may be necessary to approve and monitor the implementation of the plan. Further, the Compliance officer has the power to defer the commencement of the trading plan till UPSI becomes generally available, if he/she is of the opinion that the designated person possesses UPSI at the formulation of the plan.

7.3.3 The Compliance officer shall notify the plan to the stock exchanges upon approval.

7.3.4 The trading plan once approved shall be irrevocable and the designated persons shall have to implement the same without any deviation from it or to execute trade outside the scope of the trading plan.

8. Disclosure requirements of trading in securities

8.1 In addition to complying with the reporting requirements as prescribed under this Code, all the designated persons shall file with the Compliance Officer, inter-alia, the details of the immediate relative, persons for whom such designated persons take trading decisions and their holdings/dealing in the securities of the Company as detailed below.

- a. Every designated person shall within thirty (30) days from on the effective date of this code disclose their holdings in the securities of the Company in prescribed format (see Annexure 4) to the Company;
- b. Every person on appointment or promotion, becomes a designated person shall within seven(7) days of such appointment or promotion disclose their holdings in the securities of the Company in prescribed format (see Annexure 5) to the Company
- c. Every designated person shall disclose to the Company in prescribed format (Annexure 6) the number of such securities acquired or disposed of within Two (2) trading days of such transaction if the value of securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to traded value in excess of Rs. 10 Lakhs.
- d. Any or all the connected persons shall disclose their holdings and trading in the securities of the Company in such form (see Annexure 7) as and when required by the Compliance Officer for ensuring compliance with the regulations.
- e. Annual statements of all holdings in securities of the Company as on 31st March every year in such form and manner (see Annexure 8) as may be prescribed by the Compliance Officer from time-to-time.

8.2 The Compliance Officer shall maintain records of all the above declarations/disclosure for a minimum period of 5 (five) years from the date of the filing thereof.

9. Penalty for contravention of Code of Conduct

9.1 Any Designated Person who trades in the securities when in possession of UPSI or communicates any UPSI in contravention of the code of conduct may be penalized and appropriate action taken by the Managing Director or Board of Directors as the case may be.

- 9.2 The violation of this code of conduct shall also invite disciplinary action by the Company which may include wage freeze, suspension, ineligibility for future participation in employees' stock options, plans, etc
- 9.3 The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

10. Information to SEBI in case of violation

In case, it is observed by the Company / Compliance Officer that there has been a violation of SEBI (Prohibition of Insider Trading) Regulations, 2015, the Company shall promptly inform the SEBI Stock Exchange(s), where the Equity Shares are traded, or any other appropriate regulatory authority, as required, in the standardized format as prescribed by SEBI in Circular SEBI/HO/ISD/ISD/CIR/P/2020/135 dated July 23, 2020 (or in such form and manner as may be specified by SEBI from time to time) so that appropriate action may be taken.

Any instance of violation of the Insider Trading Regulations shall be placed before the Board and if deemed fit by the Board such instances of violation shall promptly inform the stock exchange(s) where the concerned securities are traded, in such form and such manner as may be specified by the Board from time to time .

11. REPORTING REQUIREMENTS TO THE COMPANY & STOCK EXCHANGE

Initial disclosures

- a) Company's Securities held by every Promoter, member of the Promoter Group, key managerial personnel of the Company, Directors, and the Designated Persons are required to be disclosed, to the Company, within thirty days of the Insider Trading Regulations being effective. in the format prescribed in **Form A**.
- b) Every person on appointment of Directors, or Key Managerial Personnel of the Company or becoming a Promoter or member of the Promoter Group shall disclose his/ their holding of Securities, if any, to the Company, as on the date of appointment in the Company or becoming a Promoter or member of the Promoter Group in the format specified within seven days of such appointment or becoming a Promoter or member of the Promoter Group. in the format prescribed in **Form B**.

Continual Disclosures:

- a) Continual disclosure in the format prescribed in **Form C** of the Company's Securities acquired or disposed of by the Promoter, members of the Promoter Group, Director and/or Designated Persons, in case the number of Securities of the Company traded, whether in one transaction or a series of transactions over a calendar quarter, to a traded value in excess of ten lakh rupees, shall be made within two Trading Days of such transaction by such concerned person to the Company. The disclosures shall also include trading in derivatives of the Company. Further, every Insider shall disclose to the Company, the number of such Securities acquired or disposed of through an off-market inter-se transaction within two Trading days of such transaction.
- b) The Company shall notify the particulars of the above-mentioned trading to the stock exchange on which the Securities are listed, within two Trading days of receipt of disclosure or becoming aware of such information.

12. RESTRICTIONS ON COMMUNICATION AND TRADING BY INSIDERS

- a) Insiders shall maintain the confidentiality of all UPSI and shall not pass on such information to any other person, directly or indirectly, including but not limited to making recommendation for trading in securities of the Company, except where such communication is in furtherance of legitimate purposes, performance of duties and discharge of legal obligation.

Provided further that any person in receipt of UPSI pursuant to legitimate purpose shall be considered as an Insider and due notice shall be given to maintain confidentiality of such UPSI.

- b) In case an Insider or any other person notices any leak of UPSI/ suspects leak of UPSI, a complaint may be raised under the Whistle-blower Policy and same shall be investigated as per the Policy and Procedure for enquiry in case of leak or suspected leak of UPSI framed by the Company.
- c) Insiders shall not trade in the Securities of the Company or counsel any person to trade in the Securities of the Company while in possession of UPSI. If covered persons had traded securities while in possession of the UPSI, such trades will be presumed to have been motivated by the knowledge and awareness of such information in his possession.
- d) Restriction on communication of UPSI is not applicable in case of:

- (i) a transaction that would entail an open offer under SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto, where the Board is of the informed opinion that sharing of such information is in the best interest of the Company; or
- (ii) a transaction that would not attract an open offer, where the Board is of the informed opinion that sharing of such information is in the best interest of the Company, provided that such UPSI is made public at least two trading days before the proposed transaction in such form as the Board may determine to be adequate and fair to cover all relevant and material facts.
- (e) For the purposes of Clause 4(d), the parties with whom UPSI is shared, shall enter into confidentiality / non-disclosure agreements with the Company and be required to keep the UPSI confidential and shall not trade in the Securities of the Company when in possession of UPSI.
- (f) The Board shall maintain a structured digital database containing the names of such persons or entities as the case may be with whom information is shared along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number 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
- (g) Designated Persons may trade in the Securities of the Company only when the Trading Window is open and if they do not possess UPSI at the time of trading. This, however, does not prevent employees from exercising their stock options during the time the Trading Window is closed, although, the shares obtained on exercise of options cannot be traded in any manner during the time the Trading Window is closed or when the employee is in possession of Unpublished Price Sensitive Information.

FORM OF APPLICATION FOR PRECLEARANCE OF TRADES

(Pursuant to clause 7.2.2 of Sresta's Code of Conduct for Prohibition of Insider Trading)

Date:

To
The Compliance Officer
Sresta Natural Bioproducts Limited
RK Towers
HITECH City, Hyderabad

Dear/Sir,

Application for pre-trading in the securities of the Company

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's code of Conduct for prevention of Insider Trading, I seek approval for purchase/sale/subscription/deal in the of the Company as per details given below:

| | | |
|----|---|--|
| 1. | Employee No. | |
| 2. | Name and Designation of the Designated Person | |
| 3. | Is the pre-clearance sought for purchase/sale/ subscription/ dealing in the securities of the Company | |
| 4. | In case the trade is proposed to be effected by immediate relative or by any person for whom trading decision is taken by Designated Person; Name of the immediate relative or such person. | |
| 5. | No. of Securities proposed to be traded | |
| 6. | No. of securities held as on date | |
| 7. | - In physical form | |

| | | |
|-----|--|--|
| | - In dematerialised form | |
| | Total | |
| | Is the trade proposed to be done through the stock market or through an off-market trade. In case of off-market trade, name of the contracting party | |
| 8. | Is the trade proposed to be done in physical form, Folio no. | |
| 9. | If the trade is proposed to be done in demat form, details of DP ID and client ID | |
| 10. | Details of previous approval no. for trades (Buy/Sell/deal) undertaken | |

I hereby confirm and declare that:

- a. 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 up to the time of signing the undertaking.
- b. In case I get access to or receive unpublished price sensitive information after the signing of the undertaking but before the execution of the transaction, I shall inform the Compliance officer of the change in position and I would completely refrain from trading in the securities of the Company till the time such information becomes public.
- c. I undertake to execute the trade within seven (7) trading days from the date of approval failing which I agree to obtain fresh approval.
- d. I undertake to submit the necessary report within two (2) working days from the execution of the transaction/a "Nil" report if the transaction is not undertaken.
- e. I am aware that, I shall be liable to face penal consequences as set forth in the code including disciplinary action under the code of the company, in case the above declarations are found to be misleading or incorrect at any time
- f. I have not contravened the Code as notified by the Company from time to time.
- g. I have made a full and true disclosure while applying for clearance to trade

Signature :
Name of Designated person
Designation

For use of Compliance Officer:

| <i>Application recd. date</i> | <i>Approval Date</i> | Approval No. | Compliance Officer's signature |
|-----------------------------------|--------------------------|--------------|--------------------------------|
| | | | |

FORMAT FOR PRE-TRADING APPROVAL LETTER

Date:

Approval No:

To

Mr./Mrs.

Emp No.:

Designation:

Dear Mr./Mrs.

Pre-dealing approval/disapproval -Your application dated

With reference to your above application seeking approval for undertaking certain trading in Securities of the Company detailed therein, please be informed that you are / your immediate relative/ for whom trading decision is taken by you is hereby authorised/not authorised to undertake the transaction(s) as detailed in your said application.

This approval is being issued to you based on the various declarations, representations and warranties made by you in your said application.

This approval letter is valid till _____ (i.e. for seven (7) trading days). If you / your immediate relative/..... do(es) not execute the approved transaction /deal on or before this date you would have to seek fresh pre-dealing approval 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 two (2) Working Days from the date of transaction/deal. In case the transaction is not undertaken a "Nil" report shall be necessary.

Yours faithfully,

Compliance Officer

Encl: Format for submission of details of transaction

FORMAT FOR DISCLOSURE OF PRE-APPROVED TRANSACTIONS

(To be submitted within 2 Working Days of transaction/Dealing in Securities of the Company)

Date:

To
The Compliance Officer
Amara Raja Batteries Limited

Dear Sir,

Details of Pre-approved transaction

Ref: Your approval letter No.dated

I hereby inform you that I / my

- a. have not bought/sold/subscribed/dealt with any Securities of the Company
- b. have bought/sold/subscribed/dealt with theSecurities (give description) as mentioned below on(insert date)

| | |
|--------------------------------------|--|
| Name | |
| No. of securities dealt with | |
| DP ID/Client ID/Folio No. | |
| Value (Rs.) | |
| Exchange on which trade was executed | |
| Mode of acquisition | |

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 5 (Five) years and produce to the Compliance Officer/SEBI any of the following documents as and when requested:

- 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 declare that the above information is correct and that no provisions of the Company’s Insider Trading Code and/or applicable laws/regulations have been contravened for effecting the above said transaction(s).

I agree not to undertake any contra trade in the Securities for a period of six months from the date of the aforesaid transaction. In case there is any urgent need to undertake a contra trade within the said period, I shall approach the Company (Compliance Officer) for necessary approval.

Yours truly,

Signature :

Name :

Designation :

FORM A

SEBI (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/KMP/Directors/ Immediate relatives/others etc) | Securities held as on the date of regulation coming into force | | % of Shareholding |
|--|--|--|-----|----------------------|
| | | Type of security (For eg.- Shares, Warrants, Convertible Debentures etc.) | No. | |
| 1 | 2 | 3 | 4 | 5 |
| | | | | |

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

| 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 | | |
|--|---|-------------------------------------|---|---|--|
| Contract Specifications | Number of Units (contracts * lot size) | Notional value in Rupee terms | Contract Specification s | Number of units (contracts * lot size) | Notional value in Rupee terms |
| 6 | 7 | 8 | 9 | 10 | 11 |
| | | | | | |

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

Signature:

Designation:

Date:

Place:

FORM B
SEBI (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/ 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 Shareholding |
|--|---|---|--|-----|-------------------|
| | | | Type of security (For eg. – Shares, Warrants, Convertible Debentures 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 of the company 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).

| 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 | | |
|---|--|-------------------------------|---|--|-------------------------------|
| 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

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, Employee or Director 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 / KMP / Directors/ immediate relative to/ others etc.) | Securities held prior to acquisition/disposal | | Securities acquired/ Disposed | | | | Securities held post acquisition/disposal | | Date of allotment advice/ acquisition of shares/ sale 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.) |
|---|--|--|----------------------------|--|-----|-------|---|--|----------------------------|---|----|-------------------------------|---|
| | | Type of security (For eg. Shares, Warrants, Convertible Debentures etc.) | No. and % of share holding | 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.) | No. and % of share holding | From | To | | |
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 |

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 the Promoter, Employee or Director of a Listed Company 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 | | |
| | | Value | Number of units (contracts * lot size) | Value | Number of units (contracts * lot size) | |
| 15 | 16 | 17 | 18 | 19 | 20 | 21 |
| | | | | | | |

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

Signature:

Designation:

Date:

Place:

FORM D

SEBI (Prohibition of Insider Trading) Regulations, 2015

Regulation 7(3) – Transactions by Other connected persons as identified by the Company

| Name, PAN No., 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/ sale 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.) |
|---|-------------------------|--|----------------------------|--|-----|-------|---|--|----------------------------|---|----|-------------------------------|---|
| | | Type of security (For eg. Shares, Warrants, Convertible Debentures etc.) | No. and % of share holding | 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.) | No. and % of share holding | From | To | | |
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 |

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 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 | | |
| | | Value | Number of units (contracts * lot size) | Value | Number of units (contracts * lot size) | |
| 15 | 16 | 17 | 18 | 19 | 20 | 21 |
| | | | | | | |

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

Signature:

Designation:

Date:

Place:

FORMAT OF ANNUAL STATEMENT OF HOLDINGS BY DESIGNATED PERSONS

Date

To

The Compliance officer

.....

.....

Dear/Sir,

As on I along with my immediate relatives and persons for whom I take trading decisions, have undertaken the following trading in the securities of the Company

Description of security:

| Name of the Holder(s) with folio number/ DP ID & Client ID | Nature of Transaction | Date of Transaction | Number of securities | Price at which transaction was undertaken | Holdings post the transaction |
|--|-----------------------|---------------------|----------------------|---|-------------------------------|
| | | | | | |
| | | | | | |
| | | | | | |
| | | | | | |

Regards,

Signature

Name

Designation

Note: The above disclosure shall include the holding of designated persons, their immediate relatives and any persons for whom trading decisions are taken by designated person.