

JINDAL POLY INVESTMENT AND FINANCE COMPANY

Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading by Insiders

(As revised and approved in the Meetings of the Audit Committee and Board of Directors held on 30th January, 2019 and effective from 01st April, 2019.)

Purpose:

The objective of this Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading by Insiders (hereinafter referred to as the “Code”) is to regulate, monitor and report trading by its Designated Persons. The Designated Person, as defined in this Code shall be prohibited, from, communicating, providing or allowing access to any Unpublished Price Sensitive Information (UPSI), relating to the Company or securities listed or proposed to be listed on the stock exchanges, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

1. General Principles

- 1.1. Jindal Poly Investment and Finance Company Limited (“**JPIFCL**” or the “**Company**”) endeavors to preserve the confidentiality of Unpublished Price Sensitive Information (as hereinafter defined) and to prevent misuse of such information. The Company is committed to high standards of corporate governance, transparency and fairness in dealing with its shareholders and in ensuring adherence to all applicable laws and regulations of India.
- 1.2. The underlying principles in defining the Code to the Insiders are to help maintain the standards of business conduct in line with the stated values of the Company and help Insiders in striving to perform their duties according to the highest ethical standards of honesty, integrity, accountability, confidentiality and independence as well as to ensure confidentiality of all the UPSI.
- 1.3. The Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 read with Securities and Exchange Board of India (Prohibition of Insider Trading) (Amendment) Regulations, 2018 (collectively referred to as the “**Regulations**”) make it mandatory for every listed public company to lay down a “Code of Conduct” to be observed by its directors, officers, employees and Designated Persons.
- 1.4. This Code embodies and encapsulates the restrictions, formats and rules of conduct to be followed by Insiders and Designated Persons and is intended to serve as a guiding charter for all persons associated with its functioning. It is necessary that all Insiders and

Designated Persons are fully aware of the provisions of this Code. This Code is in addition to, and not in substitution of the Regulations, and it is important that Insiders and Designated Persons are aware of and comply with the provisions of the Regulations as well.

- 1.5. This Code shall apply to all Insiders and Designated Persons where any Insider is in doubt as to how a particular situation should be dealt with under this Code, he/she may consult with the Compliance Officer (as hereinafter defined).

2. Definitions and Interpretation

2.1. For the purpose of the Code:

2.1.1. **“Act”** means the Securities and Exchange Board of India Act, 1992, as may be amended from time to time.

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

2.1.3. **“Compliance Officer”** has the meaning as prescribed to it in Clause 3.

2.1.4. **“Connected Person”**

- (i) means any person who is or has during the six months prior to the concerned act been associated with the 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/herself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to UPI 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;
 - 1. Dependent's of Connected Persons; or
 - 2. a holding company or associate company or subsidiary company, of the Company; or
 - 3. an intermediary (as specified in section 12 of the Act), of Coffee Day Enterprises Limited or an employee or director thereof; or
 - 4. an investment company, trustee company, asset management company, of the Company, or an employee or director thereof; or
 - 5. an official of a stock exchange or of clearing house or corporation on which

Securities have been listed or traded; or

6. 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
7. 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
8. an official or an employee of a self-regulatory organization recognised or authorized by SEBI; or
9. a banker of the Company; or
10. a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of the Company or his Dependant, or banker of the Company, has more than ten per cent of the holding or interest;

2.1.5. **“Deemed Insider”** means and includes;

- (i) Dependents of the Insiders;
- (ii) Trustees of any trust the beneficiaries of which include any of the Insiders;
- (iii) Trustees of any trust who are conferred with the Power of Attorney to act on behalf of beneficiaries in respect of securities of the Company, wherein any of the Insiders are holding interest;
- (iv) a concern, firm, trust, Hindu undivided family, company or association of persons wherein any of the Insiders directly or indirectly owns shares or interest in;

2.1.6. **“Dependent”**, with respect to any person, means the parents, siblings, spouse, children, children of the spouse (whether minors or adults) of such person who are either financially dependent on such person or consult with such person while taking decisions relating to trading in securities.

2.1.7. **“Key Managerial Personnel (‘KMP’)** shall have the same meaning as defined in sub-section (51) of Section 2 of the Companies Act, 2013.

2.1.8. **“Designated Person”** will include the following:

1. The Promoter of the Company;
2. All the functional heads and employees of the Company at the designation of Vice President and above;
3. President / CEO or Person in-charge of material subsidiary if any of the Company;

4. Members of the Board of Directors of the Company including, executive or non-executive or independent or nominee directors;
 5. Chief Financial Officer; (6) Company Secretary;
 6. All Employees and staff of the Company working in Finance & Accounts, Taxation, Secretarial, IT, Legal and other Departments;
 7. Employees up to two levels below Managing Director/Whole-Time Director of the Company and its material subsidiary;
 8. Immediate relatives of the persons mentioned in (1) to (8) above;
 9. any other employee designated by the Compliance Officer, either for a specific period of time or for an indefinite period of time, based on such person's role, function, designation and seniority in the Company and the extent to which such person may have access to UPSI.
- 2.1.9. **“Director”** means a member of the Board.
- 2.1.10. **“Generally Available Information”** means information that is accessible to the public on a non-discriminatory basis.
- 2.1.11. **“Insiders”** means collectively all the Employees, Directors, Promoters, Designated Persons, Connected Persons and who have accessed to UPSI and includes all Deemed Insiders.
- 2.1.12. **“Stock Exchange”** means the stock exchanges where any Securities of the Company are listed.
- 2.1.13. **“Trading” or “Trade”** means subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell or deal in Securities.
- 2.1.14. **“Trading Day”** means a day on which the Stock Exchange is open for Trading
- 2.1.15. **“Trading Plan”** has the meaning as prescribed to in this Code.
- 2.1.16. **“Trading Window”** has the meaning as prescribed in this Code.
- 2.1.17. **“Unpublished Price Sensitive Information”** means any information, relating to the 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.

2.2. All terms used in the Code, but not defined above shall have the meanings prescribed to them in the Act or the Regulations, as the case may be.

2.3. Interpretation

In this Code, unless the context otherwise requires:

2.3.1. Headings and underlining are for convenience only and shall not affect the interpretation or construction of this Code or any provisions contained herein.

2.3.2. Words importing the singular shall include the plural and vice versa; and words importing either gender shall include the other.

2.4. Compliance Officer

2.1 The Company Secretary has been appointed and shall act as the Compliance Officer for the purpose of compliance this Code and the Regulations. The Compliance Officer shall report to the Board. All reports with regard to the Regulations or the Code shall be submitted to the Board and/or audit Committee including its Chairman.

2.2 In the absence of the Compliance Officer for any reason, any senior officer, reporting to the Board or the Whole Time Director shall carry out the responsibilities of the Compliance Officer as required under this Code, and the Regulations.

2.3 The duties and responsibilities of the Compliance Officer are to enforce and ensure compliance of this Code and the Regulations. Accordingly, the Compliance Officer is authorized to seek such information from Insiders/Designated Persons as may be required from time to time and to give such approvals as are specified by this Code.

2.4 The Audit Committee shall review compliance of this Code once in a financial year; and adequacy of internal control system including its operative effectiveness with regard to prevention of insider trading.

2.5. Responsibilities of Insiders

All Insiders shall maintain strict confidentiality with respect to the UPSI. To this end, no Insiders shall:

1. pass on UPSI to any person; or
2. disclose UPSI to any Deemed Insiders or any business acquaintances, friends or

- any other person; or
3. discuss UPSI in public places where others might overhear; or
 4. disclose UPSI to any other Insiders or who does not need to know the information to do his or her job; or
 5. give others the perception that he/she is trading on the basis of UPSI.

2.6. Need to Know

Unpublished Price Sensitive Information should be disclosed only to those within and outside the Company who need to know such UPSI to discharge their duty and whose possession of such UPSI will not give rise to a conflict of interest or appearance of misuse thereof.

Any insider who got the possession of UPSI on 'need to know' basis for legitimate purposes, performance of duties or discharge of legal obligations shall maintain confidentiality of the said UPSI and will be deemed to be considered as designated person and shall abide with the Code & the Regulation.

2.7. Chinese Walls

2.7.1 Additionally, while dealing with or handling the UPSI, the Company may establish policies, procedures and physical arrangements (collectively "Chinese Walls") designed to manage the confidential information and prevent the inadvertent spread and misuse of UPSI, or the appearance thereof.

2.7.2 Chinese Walls shall be used to separate areas that have access to UPSI ("Insider Areas") from those who do not have such access ("Public Areas") within the Company.

2.7.3 Where Chinese Walls arrangements are in place, Insiders working within an Insider Area are prohibited from communicating any Confidential or UPSI to Insiders in Public Areas without the prior approval of the Compliance Officer.

2.7.4 Insiders within a Chinese Wall have a responsibility to ensure the Chinese Wall is not breached deliberately or inadvertently. Known or suspected breaches of the Chinese Wall must be referred to the Compliance Officer immediately.

2.7.5 An Insiders may cross the Chinese Wall to enter the Insider Areas only with the prior approval of the Compliance Officer, and would be subject to all restrictions that apply to such areas.

2.7.6 The establishment of Chinese Walls does not suggest or imply that UPSI can circulate freely within Insider Areas. The provision of Clause 5.2 shall be applicable within Insider Areas as well.

2.8 Limited access to confidential information

Files containing Confidential or UPSI shall be kept secure. Computer files must have adequate security of login and password. Without prejudice to the above, the Company shall follow such guidelines for maintenance of electronic records and systems as may be prescribed from time to time after consultations with the person in charge of the IT and IS teams.

2.9 Restrictions on Insiders

2.9.1 No Insiders shall –

1. either on his own behalf, or on behalf of any other person, Trade when in possession of any UPSI unless made in accordance with the Trading Plan;
2. advise any person to Trade in the Securities while being in possession, control or knowledge of UPSI. For avoidance of any doubt it is clarified that “advice” shall mean to include recommendations, communications or counselling.

Provided that for the purposes of the Code, Trading and advising any person to Trade by a Deemed Insiders shall be deemed to have been done by the concerned Insiders and such Insiders shall be liable to comply with all the provisions of the Code as may be applicable to such dealings and advice. The Insiders shall ensure that the Deemed insiders complies with all the provisions of this Code. Nothing contained herein shall preclude the insiders or Connected Person to Trade in the Securities of the Company in the ordinary course of business without being in possession of UPSI.

2.9.2 Each Insiders shall ensure that their respective wealth managers, portfolio managers or similar persons do not Trade in the Securities of the Company on behalf of any Insiders, unless such Insider is permitted to Trade in the Securities of the Company in accordance with this Code.

2.10 Restrictions on opposite transactions and short selling

2.10.1 Contra Trade

1. All Insiders/Designated Persons who buy or sell any number of Securities of the Company shall not enter into an opposite transaction i.e. sell or buy any number of Securities during the next 6 (six) months following the prior transaction (“Contra Trade”). All Designated Persons shall also not take positions in derivative transactions in the Securities of the Company at any time.
2. If a Designated Person intends to enter into a Contra Trade, such Contra Trade may be made only with prior approval of the Compliance Officer. The Compliance Officer while approving such exception to Clause 4.6.1 (i), shall record in writing the reasons

for which such exception was granted and why such exception would not be in violation of the Code or the Regulations.

3. In the event that a Contra Trade has been executed without prior approval of the Compliance Officer the profits from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

2.10.2 Short Selling

No Designated Person shall directly or indirectly sell any Security if such Designated Person

1. does not own the Security sold; or
2. owns the Security but does not deliver such Security against such sale within the acceptable settlement cycle ("short sale").

3. Trading Plan

3.1. All Insiders and Connected Persons shall be entitled to formulate a trading plan ("**Trading Plan**"). The Trading Plan so formulated shall be presented to the Compliance Officer and for public disclosure and such Persons may Trade only in accordance with his Trading Plan.

3.2. The Trading Plan shall;

1. not entail commencement of trading on behalf of the Company or Connected Person earlier than 6 (six) months from the public disclosure of the plan;
2. not entail trading of Securities 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 Company and the second Trading Day after the disclosure of such financial results;
3. entail trading for a period of not less than 12 (twelve) months;
4. not entail overlap of any period for which another trading plan is already in existence;
5. 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 (which shall not exceed more than 1 (one) week) at, or dates on which such trades shall be effected; and
6. not entail trading in securities for market abuse.

3.3. The Compliance Officer shall review the Trading Plan to assess whether such plan would have any potential for violation of the Regulations and shall be entitled to seek such

express undertaking as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.

- 3.4. The Trading Plan once approved shall be irrevocable and the Insiders shall mandatorily have to implement the Trading Plan and shall not be entitled to deviate from it or to execute any trade outside the scope of the Trading Plan.

4. Trading Window

- 4.1. The Company shall specify a trading period for trading in the Securities (**“Trading Window”**).

- 4.2. Unless otherwise specified by the Compliance Officer, the Trading Window shall:

4.2.1. In respect of declaration of financial results (standalone & consolidated), the Trading Window is required to be closed from the end of every quarter till 48 hours after the declaration of financial results. Designated persons shall not trade in securities when trading window is closed.

4.2.2. Trading window shall inter alia also be closed 2 (two) calendar days prior to and 48 hours after

1. any intended announcements regarding amalgamation, dividend mergers, de-merger takeovers and buy- back, disposal of whole or substantially whole of the undertaking, issue of Securities by way of public/ rights/bonus etc., any major expansion plans or execution of new projects, any change in KMP.

2. any changes in policies, plans or operations of the Company that could have a material impact on its financial performance.

4.3 The Trading Window shall remain close during the time the UPSI remains un-published.

4.4 All Designated Persons (and their Dependants) shall conduct all their dealings in the Securities only when the Trading Window is open and no Designated Person shall deal in the Securities during the period when the Trading Window is closed or during any other period as may be specified by the Compliance Officer from time to time.

4.5 In addition to the above, the Compliance Officer may after consultation with the Whole Time Director, declare the Trading Window closed, on an “as-needed” basis for any reason.

4.6 Despite the Trading Window being open, Designated Persons (and their Dependants) would only be allowed to Trade subject to the conditions as specified in this Code provided that they are not in possession of any UPSI at the time they carry out the transaction.

5. Pre clearance of transactions in Securities

5.1 Applicability

- 1) When the Trading Window is open, all Insiders and Designated Persons who (or whose Dependent) intends to Trade in the Securities in a calendar quarter (either in one transaction or in a series of transactions) of a consideration price exceeding Rs. 10,00,000 (Rupees Ten Lakhs) for the Securities should obtain a prior approval for the transactions as per the procedure described hereunder, except for off-market inter-se transfer between insiders who are in possession of UPSI.
- 2) Any insider who carries on any transaction or series of transaction to circumvent this clause shall be in violation of this Code.

5.2 Procedure for the purpose of obtaining a prior approval to a transaction

The Insider or Designated Person (as the case may be) should make an application, in the prescribed form to the Compliance Officer per the format prescribed in Annexure -1. Such application shall be accompanied by an undertaking in favour of the Company by such Designated Person in such format as specified in **Annexure II**.

5.3 Approval

- 5.3.1 The Compliance Officer shall consider the application made as above and shall approve it unless he/she is of the opinion that the grant of such approval would result in a breach of the provisions of the Code, or the Regulations or the Act or any other law in force from time to time.
- 5.3.2 The Compliance Officer shall convey his decision to the Insiders or Designated Person (as the case may be) within 7 (seven) Trading Days of receipt of the application.
- 5.3.3 Every approval shall be dated and shall be valid for a period of 7 (seven) calendar days or such lesser period as prescribed in the approval.
- 5.3.4 All transactions involving the Compliance Officer shall be approved by the Whole Time Director.

5.4 Completion of approved transaction

- 5.4.1 All Insiders and Designated Persons shall ensure that they complete execution of every approved transaction in the Securities as provided in this Code within the expiry of the approval period and send within 2 (two) Trading Days of execution of the transaction, the details of such transaction, with the Compliance Officer.
- 5.4.2 If a transaction is not executed within the approval period, the Insiders or Designated

Person (as the case may be) must apply to the Compliance Officer for pre clearance of the transaction, if they intend to transact again.

5.4.3 The disclosures required to be made by any person shall extend to such person's Dependants or any other person financially dependant on such person or any person who consults with such person while taking trading decisions. Additionally the disclosures requirements under this Clause would be required to be made irrespective of the transaction being pre-approved.

5.5 Advice regarding Pre-Clearance

In case of doubt, Insiders shall be responsible to check with the Compliance Officer or one of the contact persons designated by the Compliance Officer, if any, from time to time, whether the provisions of this Clause 6 are applicable to any particular proposed transaction in the Securities.

6. Penalty for Contravention

6.1. Every Insider and Designated Person is individually responsible for complying with the applicable provisions of the Code (including to the extent the provisions hereof are applicable to his/her Deemed Insiders).

6.2. The provisions of the Code shall be complied with in entirety by the Insiders and/or Designated Persons and in the event of any contravention, the Audit Committee shall decide the sanctions, penalty and disciplinary actions, including but not restricted to recovery of profits, salary freeze, suspension and/or termination of employment.

6.3. If necessary, the Company may inform the Stock Exchange/SEBI and any other applicable regulatory authority for any instances of violation of this Code or the Regulations which comes to the Company's knowledge. In addition to the action taken by the Company, the Insiders who violated the provisions of this Code shall provide any information required by and comply with any order passed by SEBI or other regulatory authorities under any other applicable laws/rules/regulations.

7. Disclosures and Reporting

a. Initial Disclosure

Every person on appointment as a KMP or a Director of the Company shall disclose his holding of Securities of the Company as on the date of appointment, to the Company within seven days of such appointment in the format set out in **Annexure III**.

b. Continual Disclosure:

Every employee and Director of the Company shall disclose to the Company in the format

set out in **Annexure IV**, the number of such Securities acquired or disposed off 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 Rupees Ten Lakh or such other value as may be specified.

c. Disclosure by other connected persons:

The Compliance Officer at his discretion may require any other Connected Person or class of Connected Persons to make disclosures of holdings and trading in Securities of the Company as and when he/she deems fit in order to monitor compliance with these Regulations.

d. Disclosure by Company

The Company shall notify the particulars of disclosures mentioned above to all Stock Exchanges on which the company is listed, within 2 (two) Trading days of the receipt of the disclosure or from becoming aware of such information.

e. Reporting to the Board and Maintenance of Disclosures:

- i. The Compliance Officer shall place before the Chairman of the Audit Committee on a quarterly basis, details of trading in the Company Securities by the Designated Persons and the accompanying documents that such persons had executed under the pre-clearance procedure as envisaged under the Insider Trading Code.
- ii. The Compliance Officer shall maintain records of all the declarations in appropriate forms given by the Designated Persons for a minimum period of five years.
- iii. Every Designated Person shall also provide in Annual Disclosure and as and when the information
 - a. changes, the names and PAN or any other identifier authorized by law of the following persons to the Company in the format specified within 30 days from the end of the year/ change of information:
 - 1) immediate relatives
 - 2) persons with whom such designated person(s) shares a material financial relationship*
 - 3) phone, Mobile and cell numbers which are used by them

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

The transaction pertaining to off-market inter-se transfer between insiders who were in possession of the same UPSI without being in breach of the Regulation, such off-market trade(s) shall be disclosed by the insiders to the Company within two working days.

Further, in terms of Regulation 4(1)(i) of the Regulations, the company shall notify the particulars of such trading to the stock exchanges on which the securities are listed, within two trading days of receipt of the disclosure or from becoming aware of such information

Every Designated Person shall disclose the names of educational institutions from which he/ she has graduated and names of past employers on a one time.

8. General

1. Designated Persons are advised to comply with the Insider Trading Code and Regulations, as amended from time to time, carefully and acquaint themselves with all the provisions contained therein. The Compliance Officer shall assist the Designated Persons in addressing any clarifications regarding the Regulations and Insider Trading Code.
2. The Compliance Officer shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of UPSI, pre-clearing of trades by Designated Persons or their Immediate Relatives and the implementation of the Insider Trading Code under the overall supervision of the Board of the Company.
3. The Board shall have power to amend any of the provisions of the Policy, substitute any of the provisions with a new provision or replace the Policy entirely with a new Policy according to subsequent modification(s)/amendment(s) to the Regulations.
4. The Code is the internal policy of the Company to prevent Insiders, Deemed Insiders and Connected Persons who are considered by the Company to be insiders of the Company for the purposes of the Regulations, from Trading. It is however the responsibility of each Insiders, Deemed Insiders and Connected Person to ensure compliance with the provisions of the Regulations and other related laws. The Company shall not be responsible or liable for any violation or contravention by any Insiders, Deemed Insiders or Connected Person, of the Regulations or other related law.

Application for Pre-clearance of Trade pursuant to Insider Trading Code

Date:

The Compliance officer,
Jindal Poly Investment and Finance Company Limited,
Plot No. 12, Local Shopping Complex,
Sector – B -1, Vasant Kunj,
New Delhi - 110070

Dear Sir,

I intend to deal in the Securities of Company. Detailed particulars of proposed transaction are as follows:

S. No.	Particulars	Particulars
1.	Name of the Applicant	
2.	Designation, Department & Employee Code	
3.	DPID-Client Id & Details of Depository	
4.	Name(s) of Account Holder(s)	
5.	Relation with Designated Employee :	
6.	No. of Securities held (including those held by Immediate Relatives) before proposed transaction:	
7.	Nature of proposed transaction (Purchase / sale/other)	
8.	Estimated No. of Securities to be dealt in proposed transaction (including by Immediate Relatives):	
9.	Estimated value of Securities to be dealt in proposed transaction (including by Immediate Relatives):	
10.	Reason for proposed transaction :	

You are requested to pre-clear the above transaction.

Thanking You,

(Signature)

Name

Designation

Place:

Undertaking for Pre-clearance of Trade pursuant to Insider Trading Code

Date:

The Compliance officer,
Jindal Poly Investment and Finance Company Limited,
Plot No. 12, Local Shopping Complex,
Sector – B -1, Vasant Kunj,
New Delhi - 110070

I _____, of the Company R/O _____
am desirous of trading in _____ Securities 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 any Unpublished Price Sensitive Information ('UPSI') up to the time of signing this undertaking.

In the event that I have access to or receive any UPSI 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 trading in the Securities of the Company until such information becomes public.

I declare that I have not contravened the provisions of the Rules as notified by the Company from time to time.

In the event of this transaction being in violation of the Rules or the applicable laws,

- a. I will, unconditionally, release, hold harmless and indemnify to the fullest extent, the Company and its directors and officers, (the 'indemnified persons') for all losses, damages, fines, expenses, suffered by the indemnified persons.
- b. I will compensate the indemnified persons for all expenses incurred in any investigation, defense, crisis management or public relations activity in relation to this transaction and I authorize the Company to recover from me, the profits arising from this transaction and remit the same to the Securities Exchange Board of India ('SEBI') for credit of the Investor Protection and Education Fund administered by the SEBI.

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

If approval is granted, I shall execute the trade within seven days of the receipt of approval failing which I shall seek pre-clearance afresh.

I declare that I have made full and true disclosure in the matter.

Thanking you,

(Signature)

Place:

Name: Designation:

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, CIN/DIN & Address with contact nos.	Category of Person (KMP/Directors/ Immediate Relative /others, etc.)	Date of appointment of Director/KMP	Securities held at the time of /appointment of Director/KMP		% of Shareholding
			Type of security (For e.g. - Shares, Warrants, Convertible Debentures, etc.)	No. of Securities	
	2	3	4	5	6

Details of Open Interest (OI) in derivatives of the Company held on appointment of Key Managerial Personnel (KMP) or Director

Open Interest of the Future contracts held at the time of /appointment of Director/KMP			Open Interest of the Option Contracts held at the time of /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
(7)	(8)	(9)	(10)	(11)	(12)

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

Date :

Place :

Signature :

Name :

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, CIN/DIN, & address with contact nos.	Category of Person (/KMP/ Directors /Immediate Relative / 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, Stock Options, etc.)
		Type of Security (For e.g. -Shares, Warrants, Convertible Debentures, etc.)	No. of Securities	% of shareholding	Type of Security (For e.g. - Shares, Warrants, Convertible Debentures, etc.)	No. of securities	Value	Transaction Type (Buy/Sale /Pledge/ R evoke/I nvoke	Type of Security (For e.g. - Shares, Warrants, Convertible Debentures, etc.)	No. of Securities	% of shareholding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14		

Details of trading in derivatives of the Company by Promoter, Employee or Director

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