

## GANESH BENZOPLAST LIMITED

### CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

This code is framed for regulating, monitoring and reporting of trading by designated person, pursuant to the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations 2015 as amended from time to time and supersedes the earlier code of May 15, 2015 . It shall come into force with effect from 1<sup>st</sup> day of April, 2019.

#### 1. APPLICABILITY

The Code shall be applicable to the following persons including their immediate relative:

- a. All Directors of the Company
- b. Designated persons
- c. other connected persons as mentioned in the code.

#### 2. DEFINITIONS

- a. "**Act**" means the Securities and Exchange Board of India Act, 1992 as amended from time to time.
- b. "**Board of Directors**" means the Board of Directors of M/s Ganesh Benzopalst Limited.
- c. "**Company**" or "**the Company**" means Ganesh Benzoplast Limited.
- d. "**Compliance Officer**" means the Chief Financial Officer of the Company, appointed in terms of Section 203 of the Companies Act 2013, is appointed as the Compliance Officer, 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of this code under the overall supervision of the Board of Directors of the Company.
- e. "**Connected person**" means-
  - i. any person who is or has during the six months prior to the concerned act been associated with a company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the company or holds any position including a professional or business relationship between himself and the company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.
  - ii. Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established, -

- 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;
- f. **"Designated Persons"** means as decided by the Board of Directors in consultation with the Compliance Officer of the Company; means a person occupying any of the following position in the company:
- (i) All Directors
  - (ii) All Promoters
  - (iii) All Key Managerial Personnel
  - (iv) All General Managers
  - (v) employees who are HODs and in the rank of VP and above;
  - (vi) employees in the finance, accounts, secretarial and legal department
  - (vii) such other key person who may be so designated, from time to time, by the Board of Directors for the purpose of this Code.
- g. **"generally available information"** means information that is accessible to the public on a non-discriminatory basis. (Information published on the website of a stock exchange, would ordinarily be considered generally available).
- h. **"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.
- i. **"insider"** means any person who is-
- (i) a connected person; or
  - (ii) in possession of or having access to Unpublished Price Sensitive Information;
- j. **"key managerial personnel"**, means person as defined in Section 2(51) of the Companies Act, 2013.

- k. **"Promoter"/ "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;
- l. **"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.
- m. **"takeover regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.
- n. **"trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities and "trade" shall be construed accordingly.
- o. **"trading day"** means a day on which the recognized stock exchanges are open for trading where securities of the company are listed.
- p. **"trading window"** means trading period for trading in the Company's Securities. All days shall be the trading periods except when trading window is closed;
- q. **"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) declaration of financial results;
  - (ii) declaration of dividends ;
  - (iii) change in capital structure;
  - (iv) mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
  - (v) changes in key managerial personnel; and

All other words and phrases will have the same meaning as defined under the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time. Words and expressions used and not defined herein but defined in the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made there under shall have the meanings respectively assigned to them in that legislation.

### 3. COMPLIANCE OFFICER

The Company has appointed Chief financial Officer as compliance Officer, under the said regulations.

The Compliance Officer shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of "Price Sensitive Information", pre-clearing of designated persons' and their Immediate relatives trades, monitoring of trades and the implementation of the code of conduct under the overall supervision of the Board of the listed Company.

The Compliance Officer shall provide reports to the Chairman of the Audit Committee, if any, or to the Chairman of the Board of Directors at such frequency as may be stipulated by the Board of Directors.

The Compliance Officer shall assist all the employees in addressing any clarifications regarding the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the Company's code of conduct.

#### **4. PRESERVATION OF "PRICE SENSITIVE INFORMATION"**

1. All Designated persons and Connected Persons shall maintain the confidentiality of price sensitive information. All information shall be handled within the organization 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.
2. 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.
3. Notwithstanding anything contained in this regulation, an unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction that would:-
  - (i) entail an obligation to make an open offer under the takeover regulations where the board of directors of the company is of informed opinion that the proposed transaction is in the best interests of the company;
  - (ii) not attract the obligation to make an open offer under the takeover regulations but where the board of directors of the company is of informed opinion that the proposed transaction is in the best interests of the company and the information that constitute unpublished price sensitive information is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the board of directors may determine.
4. For purposes of sub-regulation (3), the parties shall be required to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the purpose of clause 5 and shall not otherwise trade in securities of the Company, when in possession of unpublished price sensitive information.
5. For prompt disclosure of UPSI, the Company adopts the code regarding practice and procedure for fair disclosure.

## **5. PREVENTION OF MISUSE OF "PRICE SENSITIVE INFORMATION"**

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.

All Directors/Designated persons and their dependant family members / Immediate relatives, of the Company will be subject to trading restrictions as enumerated below :-

### **Trading window**

The Company will specify a trading period, to be called "Trading Window", for trading in the Company's Equity Shares. The trading window shall be closed for 7 days or any other period as may be specified by the Board from time to time before the happening of the following events and shall remain closed upto forty-eight hours, after the publication of the price Sensitive Information. Trading Window may be further closed by the Company during such time in addition to the above period as it may deem fit from time to time.

The trading window will be, inter alia, closed at the time of:-

- i) declaration of financial results;
- (ii) declaration of dividends ;
- (iii) change in capital structure;
- (iv) mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
- (v) changes in key managerial personnel; and

In respect of declaration of financial results. the "Trading Window shall remain closed from the end of every quarter till 48 hours from the time the results are communicated to the Stock Exchange.

When the trading window is closed, the Directors/Designated persons and their dependent family members will not trade in the Company's Equity Shares in such period.

All Directors/Designated persons of the Company and their dependent family members/ Immediate relatives, will conduct all their dealings in the Equity Shares of the Company only in a valid trading window and will not deal in any transaction involving the purchase or sale of the Company's Equity Shares during the periods when trading window is closed, or during any other period as may be specified by the Company from time to time.

The Compliance Officer shall intimate the closure of trading window to all the designated persons of the Company when he determines that a designated person or class of designated persons can reasonably be expected to have possession of unpublished price sensitive information. Such closure shall be imposed in relation to such securities to which such unpublished price sensitive information relates.

The Compliance Officer after taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, shall decide the timing for re-opening of the trading window,

however in any event it shall not be earlier than forty-eight hours after the information becomes generally available.

The trading window shall also be applicable to any person having contractual or fiduciary relation with the Company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the Company.

### **Pre-Clearance of Trades**

All Designated Persons, 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 50,000 shares or up to Rs. 10 Lakhs (market value) or 1% of total shareholding, whichever is less, should pre-clear the transaction. However, no designated person shall be entitled to apply for pre-clearance of any proposed trade if such designated person is in possession of unpublished price sensitive information even if the trading window is not closed and hence he shall not be allowed to trade.

### **Procedure for Pre-Clearance of Trades**

- (i) An application may be made in the prescribed Form (Annexure I) to the Compliance officer indicating the estimated number of securities that the Specified Employee intends to deal in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the company in this behalf.
- (ii) An undertaking (Annexure II) shall be executed in favour of the Company by such Specified Employee incorporating, inter alia, the following clauses, as may be applicable:
  - (a) That the employee/director/officer does not have any access or has not received "Price Sensitive Information" up to the time of signing the undertaking.
  - (b) That in case the Specified Employee has access to or receives "Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction he/she shall inform the Compliance Officer of the change in his position and that he/she would completely refrain from dealing in the securities of the Company till the time such information becomes public.
  - (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 Specified Persons and their relatives shall execute their order in respect of securities of the Company within one week after the approval of pre-clearance is given. The Specified Person shall file within 2 (two) days of the execution of the deal, the details of such deal with the Compliance Officer in the prescribed form. In case the transaction is not undertaken, a report to that effect shall also be filed. (Annexure IV).
- (iv) If the order is not executed within seven days after the approval is given, the employee/director must pre-clear the transaction again.

## **Restriction on Contra-Trade**

- (i) All Specified Persons who buy or sell any number of shares of the Company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction.
- (ii) In case of any contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund administered by SEBI under the Act.
- (iii) In case of subscription in the primary market (initial public offers), the above mentioned entities shall hold their investments for a minimum period of 30 days. The holding period would commence when the securities are actually allotted.
- (iv) 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.

## **Other Restrictions**

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.

The disclosures made under this Code shall be maintained for a period of five years.

## **Trading Plans**

- (i) Any insider as defined in the said regulations can formulate trading plans and submit it to the compliance officer for approval and public disclosure, pursuant to which trade may be carried out on his behalf in accordance with such plan as per conditions and restrictions mentioned in the said Regulation. Such trading plan shall:–
  - a) not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
  - b) 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 Company and the second trading day after the disclosure of such financial results;
  - c) entail trading for a period of not less than twelve months;
  - d) not entail overlap of any period for which another trading plan is already in existence;
  - e) 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
  - f) not entail trading in securities for market abuse.
- (ii) The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of the Regulations and shall be entitled to seek such

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

- (iii) 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.
- (iv) 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.
- (v) Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

### **Internal control**

- (i) The Chief Financial Officer, Managing Director or such other analogous person of the Company, intermediary or fiduciary shall put in place adequate and effective system of internal controls to ensure compliance with the requirements given in these regulations to prevent insider trading.
- (ii) The internal controls shall include the following:
  - a. all employees who have access to unpublished price sensitive information are identified as designated employee;
  - b. all the unpublished price sensitive information shall be identified and its confidentiality shall be maintained as per the requirements of these regulations;
  - c. adequate restrictions shall be placed on communication or procurement of unpublished price sensitive information as required by these regulations;
  - d. lists of all employees and other persons with whom unpublished price sensitive information is shared shall be maintained and confidentiality agreements shall be signed or notice shall be served to all such employees and persons;
  - e. all other relevant requirements specified under these regulations shall be complied with;
  - f. periodic process review to evaluate effectiveness of such internal controls.
- (iii) The board of directors of company and the board of directors or head(s) of the organisation of intermediaries and fiduciaries shall ensure that the Chief Financial Officer or the Managing Director or such other analogous person ensures compliance with regulation 9 and sub-regulations (1) and (2) of this regulation.



- (iv) The Audit Committee of the Company or other analogous body for intermediary or fiduciary shall review compliance with the provisions of these regulations at least once in a financial year and shall verify that the systems for internal control are adequate and are operating effectively.
- (v) The Company shall formulate written policies and procedures for inquiry in case of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information, which shall be approved by board of directors of the company and accordingly initiate appropriate inquiries on becoming aware of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information and inform the Board promptly of such leaks, inquiries and results of such inquiries.
- (vi) The whistle-blower policy of the Company includes such provisions to make employees aware of such policy to enable employees to report instances of leak of unpublished price sensitive information.
- (vii) In case of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information and on initiation of inquiry by the Company the relevant intermediaries and fiduciaries shall co-operate with the Company in connection with such inquiry conducted by the Company.

## **6. REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES**

### **Initial Disclosure**

Every promoter/ Key Managerial Personnel / Director / Officers / Designated Employees of the Company, within thirty days of these regulations taking effect, shall forward to the Company the details of all holdings in securities of the Company presently held by them including the statement of holdings of dependent family members in the prescribed Form.

Every person on appointment as a key managerial personnel or a director of the Company or upon becoming a promoter shall disclose his holding of securities of the Company as on the date of appointment or becoming a promoter, to the Company within seven days of such appointment or becoming a promoter.

### **Continual Disclosure**

Every promoter, 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 Rs. Ten lakhs.

The disclosure shall be made within 2 working 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 may be.

## **Disclosure by the Company to the Stock Exchange**

Within 2 days of the receipt of intimation under above Clause, the Compliance Officer shall disclose to all Stock Exchange 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.

## **7. PENALTY FOR CONTRAVENTION OF THE CODE OF CONDUCT**

- (i) Every Specified Person shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her dependents).
- (ii) Any Specified 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.
- (iii) Specified Persons who violate 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.
- (iv) 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.

**Annexure I**  
**FORMAT OF APPLICATION FOR OBTAINING PRE-CLEARANCE APPROVAL**

**To,**  
**The Compliance Officer**  
**Ganesh Benzoplast Limited**  
**Dina Building, 1<sup>st</sup> Floor**  
**M K Road, Marine Lines (E)**  
**Mumbai-400 002.**

Dear Sir/Madam,

**Application for Pre-Clearance approval in 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 to purchase / sale / subscription of \_\_\_\_\_ equity shares of the Company as per details given below:

1	Name of the applicant	
2	Designation	
3	Number of securities held as on date	
4	Folio No. / DP ID / Client ID No.)	
5	Nature OF Transaction	
6	Proposed date of dealing in securities	
7	Estimated number of securities proposed to be acquired/subscribed/sold	
8	Price at which the transaction is proposed	
9	Current market price (as on date of application)	
10	Whether the proposed transaction will be through stock exchange or off-market deal	
11	Folio No. / DP ID / Client ID No. where the securities will be credited / debited	

I enclose herewith the form of Undertaking signed by me.

Thanking You,  
**Yours truly,**

**Signature :**

**Date:**

**Place:**

## Annexure II

### FORMAT OF UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR OBTAINING PRE-CLEARANCE APPROVAL

#### UNDERTAKING

To,  
**The Compliance Officer**  
**Ganesh Benzoplast Limited**  
**Dina Building, 1<sup>st</sup> Floor**  
**M K Road, Marine Lines (E)**  
**Mumbai-400 002.**

I, /of , r/o , am desirous of dealing in shares of the Company as mentioned in my application dated for preclearance of the transaction.

I further declare that I am not in possession of or otherwise privy to any unpublished price sensitive information upto the time of signing this undertaking.

In case I have access to or I receive any price sensitive information after signing this undertaking but before execution of the transaction, I shall inform the Compliance Officer of the change in my position and I would completely refrain from trading in the securities of the Company till the time such price sensitive information becomes public / generally available.

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

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

If approval is granted, I shall execute the deal within 7 days of the receipt of approval failing which I shall seek pre-clearance.

I state that after buying/ selling of the shares, I shall not enter into an opposite transaction i.e. sell/buy during the next six months following the prior transaction. However, in case of personal emergency, I will approach for waiving the requirement with reasons, which shall be stated.

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

Thanking You,  
**Yours truly,**

**Signature :**

**Annexure III**

**FORMAT FOR PRE- CLEARANCE ORDER**

To,

Name : \_\_\_\_\_

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

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

This is to inform you that your request for dealing in \_\_\_\_\_ (nos) shares of the Company as mentioned in your application dated \_\_\_\_\_ is approved. Please note that the said transaction must be completed on or before \_\_\_\_\_ (date) that is within 7 days from today.

In case you do not execute the approved transaction /deal on or before the aforesaid date you would have to seek fresh pre-clearance before executing any transaction/deal in the securities of the Company.

Further, you are required to file the details of the executed transactions in the attached format within 2 days from the date of transaction/deal. In case the transaction is not undertaken a 'Nil' report shall be necessary.

Yours faithfully,

**FOR GANESH BENZOPLAST LIMITED**

COMPLIANCE OFFICER

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

Encl: Format for submission of details of transaction

**Annexure IV**  
**FORMAT FOR DISCLOSURE OF TRANSACTIONS**

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

**To,**  
**The Compliance Officer**  
**Ganesh Benzoplast Limited**  
**Dina Building, 1<sup>st</sup> Floor**  
**M K Road, Marine Lines (E)**  
**Mumbai-400 002.**

I hereby inform that I

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

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

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

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

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

I declare that the above information is correct and that no provisions of the Company's Code and/or applicable laws/regulations have been contravened for effecting the above said transactions(s).

Thanking You,  
**Yours truly,**

**Signature :**

**Name :**

**Department :**

**Annexure V**

**FORMAT OF APPLICATION FOR WAIVER OF MINIMUM HOLDING PERIOD**

**To,  
The Compliance Officer  
Ganesh Benzoplast Limited  
Dina Building, 1<sup>st</sup> Floor  
M K Road, Marine Lines (E)  
Mumbai-400 002.**

Dear Sir,

I request you to grant me waiver of the minimum holding period of 6 months as required under the Code of Conduct to Regulate, Monitor and Report Trading by Insiders with respect to..... Shares of the Company held by me / ..... (Name of relative) single / jointly acquired by me on.....(Date).

I desire to deal in the said shares on account of ..... (give reasons).

Thanking You,

**Yours truly,**

**Signature :**

**Name :**

**Department :**

**Date :**

**Place:**

**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, CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP/Directors/immediate relative to/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.

**Signature :**

**Name :**

**Department :**

**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, CIN/DIN & address with contact nos.	Category of Person (Promoters/KMP/Directors/immediate relative to/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

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

**Signature :**

**Name :**

**Department :**

**Date :**

**Place:**