



# CODE OF CONDUCT FOR REGULATING & REPORTING TRADING BY INSIDERS AND FOR FAIR DISCLOSURE

Ansal Housing and Construction Limited



**CODE OF CONDUCT FOR REGULATING & REPORTING TRADING BY INSIDERS  
AND  
FOR FAIR DISCLOSURE**

---

**PREAMBLE**

On January 15, 2015, the Securities and Exchange Board of India (SEBI) has notified the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“2015 Regulations”) to be effective from May 15, 2015, i.e. on the 120<sup>th</sup> day from the notification of the Regulations, replacing the SEBI (Prohibition of Insider Trading) Regulations, 1992.

Regulation 9(1) of the aforesaid Regulations casts a duty upon the Board of Directors of every listed company to formulate a code of conduct to regulate, monitor and report trading by its employees and other connected persons towards achieving compliance with these regulations, adopting the minimum standards set out in the Schedule B to the 2015 Regulations.

Accordingly the Company Policy on Prohibition of Insider Trading framed under the SEBI (Prohibition of Insider Trading) Regulations, 1992 stands replaced with this Code of Conduct to Regulate, Monitor and Report Trading by Insiders, with effect from 27<sup>th</sup> May, 2015.

**DEFINITIONS**

**For the purpose of this Code of Conduct:**

1. 'Act' means the Securities and Exchange Board of India Act, 1992 (15 of 1992);
2. 'Board of Directors' means the Board of Directors of Ansal Housing & Construction Ltd.
3. 'Body Corporate' means a body corporate as defined under section 2 of the Companies Act, 2013;
4. 'Companies Act' means the Companies Act, 2013;
5. 'Company' means Ansal Housing & Construction Limited (hereinafter called AHCL) ;
6. 'Compliance Officer' means any senior officer, designated so and reporting to the Board of directors, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board of directors of the listed company or the head of an organization, as the case may be;
7. '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 or 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;

8. 'Dealing in Securities' means an act of subscribing, buying, selling or agreeing to subscribe, buy, sell or deal in any securities by any persons either as principal or agent;

9. 'Designated Employee' means:

- I. Every Employee in the top three layers of the Management;
- II. Every Employee in the corporate finance & accounts department and Secretarial Department; and
- III. Any other Employee as may be designated by the Compliance Officer in consultation with the Managing Director of the Company considering the objectives of the Code.

10. 'Designated person' means connected person and/or designated employee.

11. '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;

12. 'Insider' means any person who, is
  - I. A connected person; or
  - II. In possession of or having access to unpublished price sensitive information.
13. 'Price Sensitive Information' means any information which relates directly or indirectly to a Company and which if published is likely to materially affect the price of securities of the Company;

Explanation

The following shall be deemed to be 'Price Sensitive Information':

- I. Periodical financial results of the company;
  - II. Intended declaration of dividends (both interim and final);
  - III. Issue of securities or buy-back of securities;
  - IV. Any major expansion plans or execution of new projects;
  - V. Amalgamation or mergers or takeovers;
  - VI. Disposal of the whole or substantial part of the undertaking;
  - VII. Any significant changes in policies, plans or operations of the Company.
  - VIII. Considering the nature of business of the Company, any other information, which in the opinion of the Board of Company is likely to materially affect the price of Securities of the company.
14. 'Promoter' shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof;
  15. '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;
  16. 'Stock Exchange' means a stock exchange which is recognised by the Central Government or SEBI under Section 4 of Securities Contracts (Regulation) Act, 1956 (42 of 1956);
  17. 'Takeover regulations' means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;
  18. 'Trading' means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly ;
  19. 'Trading day' means a day on which the recognized stock exchanges are open for trading;
  20. 'Trading Window' means a trading period for trading in Company's Securities by Directors, Officers and Designated Person or as specified by the Company from time to time.
  21. 'Unpublished price sensitive information' means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: –

- I. financial results;
- II. dividends;
- III. change in capital structure;
- IV. mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
- V. changes in key managerial personnel; and
- VI. material events in accordance with the listing agreement.

## **CODE**

### **1. Applicability**

The Code applies to the following categories of persons including their 'immediate relatives'

- Promoters
- Directors
- KMPs (Key Managerial Person as defined under the Companies act, 2013)
- Designated Person

### **2. Compliance Officer**

- I. AHCL has appointed the Company Secretary as the Compliance officer, who shall report to Board of Directors.
- II. The Compliance Officer shall be responsible for setting policies, procedures, monitoring adherence to the rules for the preservation of "Price Sensitive Information", "pre-clearing trades" of Directors, Officers, Designated Employees' and connected persons (directly or through respective department heads as decided by AHCL), monitoring of trades and the implementation of the code of conduct under the overall supervision of the Board.
- III. The Compliance Officer shall maintain a record of the designated employees and any changes made in the list of designated employees.
- IV. 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 as amended from time to time and the company's code of conduct.

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

- I. All information shall be handled within the organization on a need-to-know basis.
- II. No Connected person or anyone who is in possession of or has access to unpublished price sensitive information relating to the Company shall communicate it to any other person except in furtherance of legitimate purposes, performance of his duties or discharge of his legal obligations.
- III. The Designated Employee and Connected persons shall maintain the confidentiality of all Unpublished Price Sensitive Information and shall not disclose or communicate or counsel or procure directly or indirectly the Unpublished Price Sensitive Information to

any person (except in furtherance of legitimate purposes, performance of his duties or discharge of his legal obligations) until the same is made available to the general public.

#### **4. Restriction on Trading while in Possession of UPSI**

The Promoters, Directors, KMPs, Designated Employees and Connected persons, when in possession of UPSI shall not trade in securities of the Company either on their own behalf or on behalf of any other person.

However, trades pursuant to a “Trading Plan” set up in accordance with Regulation 5 of the 2015 Regulations may be permitted subject to the approval of Trading Plan by the Compliance Officer and public disclosure of it on the Stock Exchanges.

Provided that the insider may prove his innocence by demonstrating the circumstances including the following : –

- I. The transaction is an off-market inter-se transfer between promoters who were in possession of the same unpublished price sensitive information without being in breach of regulation 3 of the 2015 Regulations and both parties had made a conscious and informed trade decision.
- II. In the case of non-individual insiders:-
  - a. the individuals who were in possession of such unpublished price sensitive information were different from the individuals taking trading decisions and such decision-making individuals were not in possession of such unpublished price sensitive information when they took the decision to trade; and
  - b. appropriate and adequate arrangements were in place to ensure that these regulations are not violated and no unpublished price sensitive information was communicated by the individuals possessing the information to the individuals taking trading decisions and there is no evidence of such arrangements having been breached;
  - c. the trades were pursuant to a trading plan set up in accordance with regulation.

#### **5. Notional Trading Window - Trading Period and Trading Limit**

The Promoters, Directors, KMPs, Designated persons and their immediate relatives shall not trade in securities when the (notional) trading window is closed. The trading window shall be closed when the Compliance Officer determines that these persons can reasonably be expected to have possession of UPSI.

The Trading Window shall be closed 7 days before the date of Board Meeting related with any item that may give rise to UPSI.

Trading window shall open 48 hours after the UPSI is made generally available.

When Trading Window is open, there is no restriction for trading of securities if the value of securities traded, whether in 1 transaction or a series of transaction, in a Trading period, aggregate to a traded value upto Rupees 5,00,000/- in value or 25,000 number of shares, whichever is lower.



Beyond these stipulated thresholds, trading by these persons shall be subject to pre-clearance (*as provided in 6 below*) by Compliance Officer, if the value of proposed trades is above the aforesaid thresholds.

However, no person shall be entitled to apply for pre-clearance of any proposed trade if such person is in possession of UPSI even if trading window is open.

## 6. Procedure for pre-clearance

- I. An Application may be made to the Compliance Officer or in case the applicant is Compliance Officer himself, to the Chairman in the prescribed format (**refer Annexure A**).
- II. An Undertaking shall be executed by these Person(s) in the format as prescribed by the Company from time to time (**refer Annexure B**).

## 7. Trading Plan

- I. An insider shall formulate a trading plan and present it to the compliance officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.
- II. Insider shall submit trading plan before six months from commencement of trading.
- III. Insider shall not inter into the transaction between the twentieth trading days prior to the last day of any financial period for which results are required to be announced by AHCL of the securities and the second trading day after the disclosure of such financial results.
- IV. If another trading plan is already in existence no other plan shall be accepted covering the same time period.
- V. Insider in his trading plan shall set out number of Securities to be traded along with the nature of the trade and time gap between the trade and dates on which such trade shall be effected.
- VI. Compliance officer shall review the trading plan, approve and monitor the implementation of the plan.
- VII. 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.
- VIII. The Insider shall not execute the aforesaid trading plan if any unpublished price sensitive information in possession of the insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation and in such event Insider shall execute trading plan when such information shall become public.
- IX. After approval the trading plan Compliance Officer shall inform the BSE/NSE about the approved trading plan and the same will be broadcast on Company's website.
- X. Insider shall submit trading plan alongwith the declaration and application in "**Annexure –“C”**" or any other format as may be specified by SEBI or BSE/NSE form time to time.

## 8. Restriction on Contra-Trade for 6 months

In all cases, designated person who is permitted to trade, shall not execute a contra-trade i.e. he/ she shall not enter into an opposite transaction within 6 months following a prior transaction.

Should a contra-trade be executed inadvertently or otherwise, in violation of the aforesaid restriction, the profits from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Education and Protection Fund administered by it.

In case of Employee Share Purchase Scheme, allotment of shares by the Company, to the Eligible Employees upon Exercise of Shares granted, may be allowed during the period when the Trading Window is closed. Sale of shares allotted on exercise of Shares granted under ESPS shall not however be allowed when the Trading Window is closed.

The Compliance Officer of the Company shall disclose the information regarding the closure and open of Trading Window to the concerns from time to time.

## DISCLOSURE

### 9. Initial Disclosures of Shareholding to the Company

- I. Every Promoter, KMP and Director of the Company, shall, disclose his/ her holding of securities of the Company as on the date of these Regulations taking effect i.e. as on 15th May, 2015, to the Company (**refer Annexure “D”**).

Timeline for disclosure – 30 days

- II. Upon becoming a Promoter or appointment as a KMP or Director of the Company, such person, shall, disclose his/ her holding of securities of the Company as on the date of becoming a promoter or appointment as a KMP or Director, to the Company (**refer Annexure “E”**).

Timeline for disclosure – 7 days

### 10. Continual Disclosures of Trading in shares to the Company

- I. Every Promoter, Employee and Director of the Company, shall, disclose the no. of securities acquired or disposed, if the value of securities traded, whether in 1 transaction or a series of transactions, over any calendar quarter, aggregates to a traded value exceeding Rs. 10 lakhs (**refer Annexure “F”**).

Timeline for disclosure – 2 trading days

- II. Disclosure of incremental transactions further to the above, shall be made as and when the transaction is effected (**refer Annexure “F”**).

Timeline for disclosure – 2 trading days

### 11. Notification of Continual Disclosures by the Company to Stock Exchanges

The Company shall notify the Stock Exchanges on receipt of continual disclosure (as above) or becoming aware of such information.

Timeline for disclosure – 2 trading days



## 12. Annual Disclosure of Shareholding

Every Promoter, Director, KMP and Designated Employee of the Company, shall, disclose his/ her holding of securities of the Company as on date of every financial year ending 31st March, to the Company (**refer Annexure “D”**).

Timeline for disclosure – 30 days

## 13. Disclosures by other connected persons

The company may require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the company in form placed at **Annexure “G”** of this Code at such frequency as may be determined by the company in order to monitor compliance with these regulations.

## 14. Code of Fair Disclosure

A code of practices and procedures for fair disclosure of unpublished price sensitive information for adhering each of the principles is set out below:

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

## PENALTIES

### 15. Penalty for Contravention

Every person, to whom the Code is applicable, shall be individually responsible for complying with the provisions of this Code (including to the extent the provisions hereof are applicable to his/ her immediate relatives).

Any person who violates the Code, shall, in addition to any other penal action that may be taken against him under any law, also be subject to disciplinary action of “AHCL”, including wage freeze, suspension etc.

**SEBI has powers in case of violation of the aforesaid regulations to order for Penalty which shall not be less than Rs. 5 Lakhs but may increase upto 25 Crores and or imprisonment upto 10 years or both.**

## Annexure "A"

Internal Use:

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

Recd Date and Time:

Sign:

The Compliance Officer  
 Ansal Housing & Construction Ltd.  
 15 UGF, Indra Prakash,  
 21 Barakhamba Road,  
 New Delhi - 110 001

Dear Sir,

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 for Purchase/Sale/ Subscription of the \_\_\_\_\_ Securities (give description) of the Company as per the details given below:

- a) Name \_\_\_\_\_
- b) State whether : (Tick whichever is applicable)
  - i. Director \_\_\_\_\_
  - ii. Officer \_\_\_\_\_
  - iii. Designated Employee \_\_\_\_\_
- c) Designation \_\_\_\_\_
- d) Department \_\_\_\_\_

Name of Transaction buy/sell	* Name of Proposed Buyer/Seller	Number of Securities	** Date of Purchase/ Allotment	***Previous approval No. and date for Purchase/allotment)	DP/BEN ID of the account where Securities will be credited/debited	No. of Securities held in such A/c /Folio No.

\* Applicable for off market transaction.

\*\* Applicable only if the application is in respect of sale of Securities.

\*\*\* Applicable only if the application is in respect of sale of Securities for which

An earlier purchase sanction was granted by the Compliance Officer.

I enclose herewith the form of undertaking signed by me.

Yours faithfully,

(Signature of Employee)

Note : This application has to be necessarily submitted either by hand or through electronic mail at the dedicated e-mail i.e. ahcl@ansals.com and followed by a hard copy.

**ANNEXURE "B"**

**FORMAT FOR UNDERTAKING TO BE ACCOMPANIED  
WITH THE APPLICATION FOR PRE-CLEARANCE**

To,  
Ansal Housing & Construction Ltd.,  
15 UGF, Indra Prakash,  
21 Barakhamba Road,  
New Delhi – 110 001

I, \_\_\_\_\_, resident of \_\_\_\_\_, hereby declare that I am Director/ Employee of Ansal Housing & Construction Ltd.

I further declare that I am not in possession of or otherwise privy to any unpublished price sensitive Information as defined in the Company's Code of Conduct for Prevention of Insider Trading (the Code) 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 dealing in the Securities of the company till the time such Price Sensitive Information becomes public.

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

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

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 any time.

I hereby agree to indemnify and keep the company and its Directors indemnified from and against all and any penalties/fines that may be imposed on them by the Securities and Exchange Board of India and/or any other statutory authorities as a result of violation by me of the SEBI (Prohibition of Insider Trading) Regulations 1992 and the Code prescribed by the company.

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

Date:

Signature of the Employee

**(Annexure-C)**  
**Trading Plan**  
**(Under Code of Conduct of the Company read with SEBI Insider Trading regulation, 2015)**

The Compliance Officer  
Ansal Housing & Construction Ltd.  
15 UGF, Indra Prakash,  
21 Barakhamba Road,  
New Delhi - 110 001

Dear Sir,

Ref: DP's name : .....  
DP ID : .....  
CLIENT ID : .....  
Name of insider : .....  
Address : .....

Your approval is solicited for proposed Trading Plan purchase & sale of securities of the Company in physical / demats form. I am furnishing details of trade to be made in six month after approval of the proposed trading plan:-

S. No.	Nature of Trade	Number of Securities to be trade	Time intervals between Two Trades	Date of propose Trade

***I hereby confirm***

- I. that I do not have access to the unpublished price sensitive information and also have not received unpublished price sensitive information till today;
- II. that in case I have access to the price sensitive information or receives it after approving the trading plan I shall inform the change and refrain from dealing in securities till the information becomes public;
- III. that I have not contravened the code of conduct for prevention of insider trading as notified by the Company;
- IV. that whatever is stated above is true and correct to the best of knowledge and nothing has been concealed.

Yours truly  
Signature  
Name.....  
Designation.....  
Employee Code no.....

## ANNEXURE "D"

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

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	Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option Contracts held as on the date of regulation coming into force	
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms

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

Signature:

Designation:

Date:

Place:



**ANNEXURE “E”**

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015  
[Regulation 7 (1) (b) read with Regulation 6(2)]

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 Share-holding	Open Interest of the Future contracts held at the time of becoming Promoter/ appointment of Director/KMP		Open Interest of the Option Contracts held at the time of becoming Promoter/appointment of Director/ KMP	
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No .		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4		5	6		7	

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

Signature:

Designation:

Date:

Place:

## ANNEXURE "F"

### Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (2) read with Regulation 6(2)]

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

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

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

Name, PAN No., CIN/DIN, & address of Promoter /Employee / Director with contact nos.	Category of Person (Promoters/ KMP / Directors/ immediate relatives/ others)	Securities held prior to acquisition /disposal		Securities Acquired /Disposed		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition (market purchase/public rights/ preferential offer / off market/ Inter-se transfer etc.	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
		Type of security (For eg. – Shares, Warrants, Convertible Debenture s etc.)	No.	Pre-Transaction	Post Transaction	From	To			Buy		Sell		
										Value	Number of units (contracts * lot size)	Value	Number of units (contracts * lot size)	

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

Name:

Signature:

Date:

Place:

## ANNEXURE "G"

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

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

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

Name:

Signature:

Date:

Place: