NICCO PARKS & RESORTS LIMITED

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSONS UNDER THE SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015

INTRODUCTION

Regulation 9(1) of Securities Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ('the Regulations') requires a listed company to formulate a Code of Conduct to regulate, monitor and report trading by its designated persons (as defined below) and immediate relatives of designated persons, towards achieving compliance with the said Regulations and adopting the minimum standards set out in Schedule B to the Regulations.

To be compliant with the Regulations, as amended, a revised Code to be effective from 1st April, 2019 to regulate, monitor and report trading by Insiders ('the Code') for the Company is hereby framed in substitution of the Company's earlier Code of Conduct.

This Code of Conduct may be modified by the Board of Directors from time to time to adopt the best practices and to comply with the requirements of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

DEFINITIONS:

In this Code, unless the context otherwise provides:

(i) "Act" means the Securities and Exchange Board of India Act, 1992, as amended from time to time and as applicable for the time being in force.

(ii) "Board" means the Board of Directors of Nicco Parks & Resorts Limited.

(iii) "Code" means this Code of Internal Procedures and Conduct for Prevention of Insider Trading including any modification(s) or amendment(s) made thereto from time-to-time or any replacement made thereof by the Company.

(iv) "Company" means NICCO PARKS & RESORTS LIMITED.

(v) "Compliance Officer" means the Company Secretary or such other person designated as such by the Board, who is financially literate and is capable of appreciating requirements for legal regulatory compliance under SEBI 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information, monitoring of trades and the implementation of this Code and report to Board of Directors and ensure the Compliance under the overall supervision of the Board of the Company.

(vi) "Connected Person" means 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.

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:

- an immediate relative of connected persons defined above; or
- a holding company or associate company or subsidiary company; or
- an intermediary as specified in section 12 of the Act or an employee or director thereof; or
- an investment company, trustee company, asset management company or an employee or director thereof; or
- an official of a stock exchange or of clearing house or corporation; or
- 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
- 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
- an official or an employee of a self-regulatory organization recognized or authorized by the Board; or
- a banker of the Company; or
- 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 percent of the holding or interest.

(vii) "Designated Employees" means

- All employees in the grade of General Manager and above of the Company;
- All Functional Heads of the Company;
- All Employees in the Department of Finance & Accounts, Share & Secretarial,
- Managing Director & Chief Executive Officer and employees upto two levels below Managing Director & Chief Executive Officer of the Company.

The aforesaid definition of "Designated Employees" shall also include any employee of the Company who is reasonably expected to have access to or could access Unpublished Price Sensitive Information about the Company by virtue of any connection that would put them in position to access the same.

(viii) "Designated Persons" means any person who is either:

- Designated Employee
- All Promoters of the Company
- Connected Person
- Any other employee who will have access to or possess Unpublished Price Sensitive Information.

Note 1: Depending on the change in the scope of responsibility of an employee, the Compliance Officer with the approval of the Managing Director & Chief Executive Officer of the Company may exclude or include any employee from the list of Designated Persons.

Note 2: In case any Designated Person separates from the services of the Company due to superannuation/ resignation/ termination etc. he/she shall continue to be considered as a Designated Person for a further period of 6 (six) months subsequent to the date of his/her separation from the Company as envisaged under the Regulations.

(ix) "Generally Available Information" means information that is accessible to the public on a non-discriminatory basis.

(x) "Immediate Relative" means spouse, parents, sibling, children who is either financially dependent on the Designated Persons / Connected Persons or consults such person for dealing in the securities.

(xi) "Insider" means any person who is:

- a connected person; or
- in possession of or having access to Unpublished Price Sensitive Information.

(xii) "Promoter" shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.

(xiii) "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.

(xiv) "Regulations" means the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendment made thereof.

(xv) "SEBI" means the Securities and Exchange Board of India.

(xvi) "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;

(xvii) "Specified" means specified by the Securities and Exchange Board of India in writing;

(xviii) "Trading" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;

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

(xx) "Trading Plan" is a plan formulated by an Insider and presented to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on behalf of the Insider in accordance with such plan as per Clause 5(1) of the SEBI Regulations.

(xxi) "Trading Window" means a period to be specified by the Company in which trading in securities can be done by the Designated Persons either directly or through their Immediate Relatives.

(xxii) "Unpublished Price Sensitive Information (UPSI)" means any information, relating to a Company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following:

a. financial results;
b. dividends;
c. issue of Securities of the Company or Buy-back of Securities by the Company or any type of change in capital structure of the Company;
d. mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
e. any significant changes in policies, plans or operations of the Company;
f. any proposed joint ventures / foreign collaboration; and
g. changes in key managerial personnel. Words and expressions used and not defined in this Code but defined in the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and the Rules and Regulations made thereunder shall have the meanings respectively assigned to them in those legislations.

POLICY:

1. No Designated Persons and immediate relatives of Designated Persons - when in possession of any UPSI about, or in relation to the Company or its securities shall: ¬

    - Trade or deal in the securities of the Company, either on his/her behalf or on behalf of any other person;
    - Communicate, provide or allow access to, or counsel, directly or indirectly, any unpublished information relating to the Company or any of its securities, to any other person, except on a need to know basis in furtherance of legitimate purposes in relation to the Company.
2. All designated persons and their immediate relatives shall conduct their trading in the securities of the Company only during or in a valid trading window strictly in compliance with this Code.

3. In case a person who has traded in securities has been in possession of UPSI, his trades would be presumed to have been motivated by the knowledge and awareness of such information in his possession.

ROLE OF THE COMPLIANCE OFFICER

The Compliance Officer shall report to the Board of Directors of the Company and shall provide reports on compliances of the SEBI (Prohibition of Insider Trading) Regulations, 2015 to the Audit Committee. The Reports shall be submitted to the Audit Committee at every quarterly meeting of the Committee.

The Compliance Officer shall provide clarifications sought for under the SEBI (Prohibition of Insider Trading) Regulations, 2015 to all concerned, to the extent possible.

The Compliance Officer shall preserve the disclosures received and submitted to the Stock Exchanges concerned for a minimum period of five years.

The Compliance Officer shall monitor and ensure compliance of this Code.

TRADING WINDOW

1. All Designated Persons shall deal in the equity shares of the Company only when the trading window is open. Designated Persons or immediate relatives of the designated persons shall not deal in equity shares of the Company when the Trading Window is closed. It is the duty of the Designated Persons to inform their immediate relatives about the closure of Trading Window and ensure that they do not deal in the equity shares of the Company.
2. The Trading Window shall remain closed from the end of every quarter till 48 hours after the declaration of financial results.
3. In addition to the above, the Trading Window may be closed when the Compliance Officer determines that a Designated / Connected Persons, or a class of Designated /Connected Persons are reasonably expected to be in possession of UPSI. The time for re-opening of the Trading Window shall be determined by the Compliance Officer after analyzing various factors including the fact that the Unpublished Price Sensitive Information has become accessible to the public on a non-discriminatory basis and being capable of assimilation by the market and such time for re-opening of the Trading Window shall not be in any event earlier than 48 (forty eight) hours after the Unpublished Price Sensitive Information has become accessible to the public on a non-discriminatory basis.
4. The Compliance officer will notify the Designated Persons and other persons, as applicable about closure and opening of Trading Window and also inform the Stock Exchanges simultaneously. •

The Trading Window to deal in equity shares of the Company shall also be applicable to any other person as may be specified by the Company.

RESTRICTIONS ON COMMUNICATION AND TRADING BY INSIDERS

1. No Insider shall communicate, provide or allow access to any Unpublished Price Sensitive Information relating to the Company to any person including other Insiders, except where such communication is in furtherance of legitimate purposes or performance of duties of legal obligations. However, the "Code of Practices and Procedures for fair disclosure of Unpublished Price Sensitive Information" need to be adhered.

2. An Unpublished Price Sensitive Information may be communicated, provided, allowed access to or procured, in connection with a transaction that would:

- 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;

- 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 UPSI is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the Board of Directors may determine to be adequate and fair to cover all relevant material facts.

TRADING WINDOW

- All Designated Persons shall deal in the equity shares of the Company only when the trading window is open. Designated Persons or immediate relatives of the designated persons shall not deal in equity shares of the Company when the Trading Window is closed. It is the duty of the Designated Persons to inform their immediate relatives about the closure of Trading Window and ensure that they do not deal in the equity shares of the Company.

- The Trading Window shall remain closed from the end of every quarter till 48 hours after the declaration of financial results.

- In addition to the above, the Trading Window may be closed when the Compliance Officer determines that a Designated / Connected Persons, or a class of Designated /Connected Persons are reasonably expected to be in possession of UPSI. The time for re-opening of the Trading Window shall be determined by the Compliance Officer after analyzing various factors including the fact that the Unpublished Price Sensitive Information has become accessible to the public on a non-discriminatory basis and being capable of assimilation by the market and such time for re-opening of the Trading Window shall not be in any event earlier than 48 (forty eight) hours after the Unpublished Price Sensitive Information has become accessible to the public on a non-discriminatory basis.

- The Compliance officer will notify the Designated Persons and other persons, as applicable about closure and opening of Trading Window and also inform the Stock Exchanges simultaneously.

- The Trading Window to deal in equity shares of the Company shall also be applicable to any other person as may be specified by the Company.

TRADING IN EQUITY SHARES BY DESIGNATED PERSONS:

The Designated Persons may trade in equity shares of the Company subject to compliance of the following procedure:

- The Designated Person (DP) may be of two types-

i. who possesses any Unpublished Price Sensitive Information; and
ii. who doesn't have any Unpublished Price Sensitive Information.

The DP who is in possession of any Unpublished Price Sensitive Information is prohibited from trading. In the event of DP not possessing any Unpublished Price Sensitive Information, trading is permitted. However, the DP shall require a pre-clearance from the Compliance Officer in case the quantum of trade exceeds Rs. 10,00,000/- (Rupees Ten Lac only).

The DP may submit an application in the prescribed format for pre-clearance to the Compliance Officer in compliance with the requirements of this Code and upon approval thereof may execute the trade within seven trading days from the date of receipt of such approval.

- The DP has to make an application to the Compliance officer asking for a pre-clearance, once received the Compliance officer needs to grant permission within two trading days.
- The DP has to inform the Company about his/her transaction after receiving the pre-clearance approval within three days of execution of transaction.
- In case the DP doesn't trade he/she has to submit a NIL report stating reasons as to why no transaction was executed.
- The DP can also trade without taking a pre-clearance from the Compliance Officer in case the trade value is below Rs. 10,00,000/- (Rupees Ten Lac only) but no contra trade shall be allowed in six months of the prior transaction. However, trading window norms and restriction on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan. The pre-clearance of trades shall not be required for a trade executed as per an approved trading plan.
- In the event a DP executes a contra trade as described hereinabove, inadvertently or otherwise, in violation of the restriction specified in this Code, the profits from such a Trade shall be liable to be disgorged for remittance to SEBI for credit to Investor Protection and Education Fund administered by SEBI under the Act. However, this shall not be applicable for trades pursuant to exercise of stock options.
- Specimen copies of Pre-Clearance Application form and the format of Undertaking to be submitted by the DP are attached as Annexure 1 and Annexure 2, respectively. Specimen copy of Disclosure of transaction, which needs to be furnished to the Compliance Officer within three trading days from the date of transaction, is attached as Annexure 3.

TRADING PLANS

- A Designated Person or an Insider shall be entitled to 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.

- Such Trading Plan shall:

i. not entail commencement of trading earlier than six months from the public disclosure of the plan;
ii. not entail trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced by the issuer of the securities and the second trading day after the disclosure of such financial results;
iii. entail trading for a period of not less than twelve months; (iv) not entail overlap of any period for which another trading plan is already in existence;

iv. 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
v. not entail trading in securities for market abuse.

- The Compliance Officer will review the Trading Plan to assess whether the Plan would have any potential for violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015. The Compliance Officer will 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.

- The Compliance Officer will endeavor to approve the trading plan within seven working days of receipt of the trading plan together with necessary undertakings and declarations.

- 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.

- Implementation of the Trading Plan shall not be commenced if any UPSI in possession of the Designated Person / 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 the Compliance Officer shall confirm that the commencement ought to be deferred until such UPSI becomes generally available information so as to avoid a violation of the Act.

- Upon approval of the Trading Plan, the Compliance Officer will notify the plan to the Stock Exchanges on which the equity shares of the Company are listed.

REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES

1. Initial Disclosure

Every Promoter or member of the promoter group/ Key Managerial Personnel / Director / Officer / Designated Employees of the Company, within thirty days from the date of this Code becoming operational, shall forward to the Company the details of the equity shares in the Company presently held by them including the statement of holdings of dependent family members within thirty days from May 15, 2015, in the prescribed Form (Form A). Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter or member of the promoter group shall disclose his holding of equity shares in the Company as on the date of appointment or becoming a Promoter or member of the promoter group, to the Company within seven days of such appointment or becoming a Promoter or member of the promoter group in the prescribed Form (Form B).

2. Continual Disclosure

Every Promoter, member of the promoter group, Designated Persons and Director of the Company shall disclose to the Company the number of equity shares acquired or disposed of within two trading days of such transaction if the value of the equity shares traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 1,000,000/- (Rupees Ten lac only) or such other value as may be specified in the prescribed Form (Form C).

The disclosure shall be made within two trading days of:

A. the receipt of intimation of allotment of shares, or
B. the acquisition or sale of shares or voting rights, as the case may be.

Note:

a. Transactions should be disclosed on incremental basis after the earlier transaction crossed the prescribed threshold limit.
b. Transactions relating to dealing in equity shares of the Company by way of Pledge / Revoke/ Invoke, etc. are covered.

3. Disclosures by other connected persons

The Company at its discretion may require any other connected person or class of connected persons to make disclosures of his holding and trading in equity shares of the Company in the prescribed Form (Form D) and at such frequency as determined by the Company.

OTHER DISCLOSURES

1. Designated persons shall disclose name and Permanent Account Number or any other identifier authorized by law of the following persons to the Company on an annual basis (by 30th April every year) and as and when the information changes: a. Immediate relatives; b. Persons with whom such designated person(s) shares a material financial relationship; c. Phone, Mobile and Cell Numbers or other contact details which are used by them.

2. In addition to the above, the educational institutions from which designated persons have graduated and names of their past employers shall also be disclosed on a one-time basis.

Note: The term "material financial relationship" shall 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.

INSTIUTIONAL MECHANISM FOR PREVENTION OF INSIDER TRADING

1. The Compliance Officer in consultation with the Managing Director & Chief Executive Officer of the Company shall put in place an adequate and effective system of internal controls to ensure compliance with the requirements given in these regulations to prevent insider trading.

2. The internal controls shall include, inter alia, the following:

a. Identification of the designated employees from time-to-time who may have UPSI.

b. Identification of UPSI from time-to-time and maintenance of its confidentiality.

c. Placement of adequate restrictions on communication or procurement of UPSI.

d. Maintenance of structured digital database containing the names of such persons or entities as the case may be with whom UPSI is shared along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available, with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.

e. Execution of confidentiality or non-disclosure agreements with all the persons with whom UPSI has been shared.

f. Process review at regular intervals to evaluate effectiveness of such internal controls.

3. The Board shall ensure the compliance of the provisions of the Code by the Compliance Officer from time-to-time.

4. The Audit Committee of the Company shall review compliance with the provisions of this Code at least once in a financial year and shall verify that the systems for internal control are adequate and are operating effectively.

VIOLATION OF THE CODE OF CONDUCT

i. Any contravention of this code would attract internal disciplinary actions by the Company including wage freeze, suspension, recovery and clawback etc., as may be imposed and decided by the Audit Committee.
ii. The action taken by the Company shall not preclude SEBI and other Regulatory authorities from taking any action in case of violation of this code / SEBI (Prohibition of Insider Trading) Regulations, 2015.
iii. In case of violation of this code, Penalty prescribed under SEBI Act, 1992 shall be levied by SEBI in addition to all such other action as may be taken.

CLARIFICATIONS

This Code has been formulated as per prevailing provisions of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (as amended). However, if, due to subsequent changes in the law, a particular part thereof may become inconsistent with the law, in such case the provisions of the law will prevail.

ANNEXURE 1

(Specimen of application for pre-clearance of trade)

Date:

To,
The Compliance Officer

Dear Sir/Madam,

Application for Pre-clearance of trade in equity shares of the Company

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's **Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons**, 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 with Employee Code (If any)	
3.	Number of Securities held as on date	
4.	Folio No. / DP ID/ Client ID	
5.	The Proposal is a) Purchase of Securities b) Subscription to Securities c) Sale of Securities	
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 (if off-market)	
9.	Current Market Price (as on date of application)	
10.	Whether the proposed transaction will be through stock exchange or off-market	
11.	Folio No/ DP ID/Client ID where the securities will be credited /debited - (applicable for off-market)	
12.	Whether having access to Unpublished Price Sensitive Information (Yes / No)	

I enclose herewith the form of Undertaking signed by me.

Yours faithfully,

(Name & Signature of Employee)

ANNEXURE 2

UNDERTAKING

(Format of undertaking to be accompanied with the application for pre-clearance)

To,
The Compliance Officer,

I, _____, _____ of the Company residing at _____, am desirous of dealing in_____* shares of the Company/ stock derivatives as mentioned in my application dated _____ for pre-clearance of the transaction.

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 to Regulate, Monitor and Report Trading by Designated Persons ("the Code of Conduct") up to the time of signing this Undertaking.

In the event that I have access to or received any information that could be construed as "Unpublished Price Sensitive Information" as defined in the Code of Conduct, after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public.

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

I undertake to submit the necessary report within **three** 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 **seven** trading days of the receipt of approval failing which I shall seek pre-clearance.

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

Date:

Name and Signature: ----------

* *Indicate number of shares*

ANNEXURE 3

(Format for pre- clearance order)

To,
Name: _____
Designation: _____
Place: _____

This is to inform you that your request for dealing in _____ (nos.) equity 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) i.e., within seven trading 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 three days from the date of transaction/deal. In case the transaction is not undertaken a 'Nil' report shall be filed with Company stating reasons as to why no transaction was executed.

Yours faithfully,

Company Secretary & Compliance Officer

Date: _____

Encl: Format for submission of details of transaction

ANNEXURE 4

(Format for disclosure of transaction)
(To be submitted within three days of transaction / dealing in securities of the Company)

To,
The Compliance Officer

I hereby inform that I

- have not bought / sold/ subscribed any securities of the Company
- have bought/sold/subscribed to _____ securities as mentioned below on _____ (date)

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 five 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 in advance. (*Applicable in case of purchase / subscription*).

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

Date:

Signature: ----------

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 (Promoters / KMP / Directors / immediate relatives / others, etc.)	Date of appointment of Director /KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP		% of Shareholding
			Type of Securities (For e.g., - Shares, Warrants, Convertible Debentures, etc.)	No.	
1	2	3	4	5	6

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

Details of Open Interest (OI) in derivatives of the company held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation 6(2)

Open Interest of the Future contracts held 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		
Contract Specification	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts* lot size)	Notional value in Rupee terms
7	8	9	10	11	12

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

Signature : _____
Name :
Designation :
Date :
Place :

FORM C

SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (2) read with Regulation 6(2) – Continual Disclosure]

Name of the Company:
ISIN of the Company:

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

Name, PAN, CIN/DIN, &address with contact nos.	Category of Person (Promoters/ KMP/ Directors/ immediate relative to / others etc.)	Securities held Prior to acquisition/ disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/ acquisition of shares/ sale of shares, specify		Date of intimation to company	Mode of acquisition/ disposal(on market/ Public/rights /preferential offer/off market/ Inter-se transfer, ESOPs etc.)
		Type of security (For eg.–Shares, Warrants, Convertible Debentures etc.)	No. and% of shareholding	Type of security (For eg.– Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge/ Revoke/Invoke)	Type of security (For eg.–Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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

Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc.)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts*lot size)	Notional Value	Number of units (contracts*lot size)	
15	16	17	18	19	20	21

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

Name & Signature:

Designation:

Date:

Place: