

CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING OF SECURITIES OF GUJARAT PIPAVAV PORT LIMITED

Introduction

The securities of Gujarat Pipavav Port Limited ("**GPPL**" or the "**Company**") were listed on the Bombay Stock Exchange Limited and the National Stock Exchange of India Limited on September 9, 2010. As a listed entity, the Company had its Code for prevention of Insider Trading in Securities of GPPL in accordance with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992 read with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015. The Code is updated in accordance with the Securities and Exchange Board of India (Prohibition of Insider Trading)(Amendment) Regulations, 2018 (the "**Regulations**") effective 1st April 2019.

Accordingly, the Company has revised the Code of Conduct for Prevention of Insider Trading of Securities of Gujarat Pipavav Port Limited (the "**Code**").

I. Definitions

- 1.1 "**Act**" means the Securities and Exchange Board of India Act, 1992;
- 1.2 "**Board**" means the Board of Directors of the Company;
- 1.3 "**Code**" or "**Code of Conduct for Prevention of Insider Trading of Securities**" shall mean the Code of Regulating, Monitoring and Reporting of trading and for preservation and communication of Unpublished Price Sensitive Information by insiders of GPPL as amended from time to time;
- 1.4 "**Company**" means Gujarat Pipavav Port Limited (GPPL);
- 1.5 "**Compliance Officer**" means Company Secretary and/or such other senior officer, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations designated so and reporting to the Chairman of Audit Committee and the Board of Directors 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board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 Company;

"Explanation–For the purpose of this regulation, "financially literate" shall mean a person who has the ability to read and understand basic financial statements i.e. balance sheet, profit and loss account, and statement of cash flows."

- 1.6 "**Connected Person**" means:
 - (i) any person who is or has, during the six months prior to the date of this code become effective, been associated with the Company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the Company or holds any position including a professional or business relationship between himself 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 the Company or his immediate relative or banker of the Company, has more than ten per cent, of the holding or interest;

1.7 **"Dealing in Securities"** means an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in the securities of the Company either as principal or agent;

1.8 **Designated Person(s) shall include:**

- (i) Managing Director;
- (ii) Every member of Executive team;
- (iii) Every Head of Department;
- (iv) Every employee in Commercial, Operations and Finance and Accounts;
- (v) Every employee forming part of the Maersk Group Shared Service Centre (GSC) assigned to GPPL; and
- (vi) Any other employee of the Company, intermediary or fiduciary designated on the basis of their functional role or access to Unpublished Price Sensitive Information in the Company as may be determined by the Board of Directors in consultation with the Compliance Officer
- (vii) All promoters of the Company and promoters who are individuals or investment companies for intermediaries or fiduciaries as applicable

1.9 **"Director"** means a member of the Board of Directors of the Company;

1.10 **"Employee"** means every employee of the Company including the Directors and Key Managerial Personnel in the employment of the Company;

1.11 **"Generally available Information"** means information that is accessible to the public on a non-discriminatory basis;

1.12 **"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;

- 1.13 **"Insider"** means any person who is,
(i) a connected person; or
(ii) is in possession of or having access to unpublished price sensitive information
- 1.14 **"Legitimate purpose"** shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.
- 1.15 **"Intermediary"** means persons as specified in section 12 of the Securities and Exchange Board of India Act, 1992 (15 of 1992) or an employee or director thereof
- 1.16 **"Key Managerial Personnel"** shall have the same meaning as defined under Section 2(51) of the Companies Act, 2013;
- 1.17 **"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;
- 1.18 **"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;
- 1.19 **"Takeover regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;
- 1.20 **"Trading Day"** means a day on which the recognized stock exchanges are open for trading;
- 1.21 **"Unpublished Price Sensitive Information"** means any information relating to the securities of the company, 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; and
(v) changes in key managerial personnel.
- 1.22 **"Regulations"** shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto

Words and expressions used and not defined in these regulations but defined in 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 rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation.

2. Compliance Officer

- 2.1 The Compliance Officer shall be the Company Secretary nominated by the Board of Directors and/or such other senior officer, who is financially literate and is capable of

appreciating requirements for legal and regulatory compliance under these regulations designated by and reports to the Board of Directors.

- 2.2 The Compliance Officer 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 Company.
- 2.3 The Compliance Officer shall report to the Board of Directors of the Company and in particular, shall provide reports to the Chairman of the Audit Committee or to the Chairman of the Board of Directors at such frequency as may be stipulated by the Board of Directors.
- 2.4 The Compliance Officer shall assist all employees in addressing any clarifications regarding the Regulations and the Company's Code.

3. Communication or Preservation of "Unpublished Price Sensitive Information"

- 3.1 All information shall be handled within the Company on a need-to-know basis and no unpublished price sensitive information shall be communicated to any person except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

The Company shall maintain a structured digital database of all persons and entities having access to UPSI including the Designated Persons and their immediate relatives, persons with whom the information is shared under the Regulations. The database shall include their name along with their Permanent Account Number (PAN) or any other identification document approved by the law in case of non-availability of PAN. These persons shall also be served notice to sensitise them about communication or preservation of a UPSI.

The Compliance Officer shall either by himself or through external experts carry out review of the effectiveness of the Company's internal control procedures for prevention of insider trading and for communication/ preservation of UPSI at least once in a year and the findings shall be presented to the Company's Audit Committee. The Committee shall evaluate the findings for adequacy of the internal controls.

Unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction which entails:

- an obligation to make an open offer under the takeover regulations or merger or acquisitions, where the Board of Directors of the Company is of informed opinion that sharing of such information is in the best interests of the listed company; or
- not attracting 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 sharing of such information is in the best interests of the listed 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 to be adequate and fair to cover all relevant and material facts.

However, the Board of Directors shall require the parties 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 limited

purpose and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information

3.2 Need to Know:

- (i) "need to know" basis means that Unpublished Price Sensitive Information should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.
- (ii) All non-public information directly received by any employee should immediately be reported to the Compliance Officer or to the head of department.

3.3 Policy for Determination of Legitimate Purposes for sharing of UPSI

Any UPSI regarding the Company that is not available in public domain or is not a common knowledge but it is required to be necessarily shared by the Company in the ordinary course of business with an external person and/or entity and such information would not have been otherwise shared with him/ her shall be deemed to be Legitimate Purpose for sharing of UPSI. Such person/entity shall be an Insider and shall have an obligation to maintain confidentiality of the information received until it becomes a public knowledge.

The external person and/or entity shall include partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals, advisors and consultants with whom the UPSI is shared by the Company.

The Company shall be sharing UPSI with its Promoters from time to time and in the ordinary course of business. Such sharing of UPSI with Promoters shall be deemed to be for legitimate purpose.

3.4 Limited access to confidential information

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password, etc.

4. **Prevention of misuse of "Unpublished Price Sensitive Information"**

All Connected Persons and Designated Persons shall be deemed to be Insiders and shall be governed by the Code.

No insider shall trade in the Company's securities listed on a Stock Exchange when in possession of a UPSI. When a person has traded in the Company's securities and has been in possession of a UPSI his trade would be presumed to have been motivated by the knowledge and awareness of such UPSI in his possession. Provided the insider may prove his innocence by demonstrating that:

- (i) the transaction is an off-market inter se transfer between the Insiders who had the same UPSI and that UPSI was not obtained in contravention of the Regulations. Such off-market transactions should be reported by the Insiders within two working days to the Company and the Company shall notify the stock exchanges within two trading days from receipt of the disclosure or from becoming aware of such transaction.
- (ii) the transaction was carried out through the block deal window mechanism between the Insiders who had the UPSI and that UPSI was not obtained in contravention of the Regulations.
- (iii) the transaction was carried out pursuant to a statutory or regulatory obligation to carry out a bona fide transaction, the transaction was done pursuant to exercising of

stock options, as applicable, at a pre-determined price as per the applicable Regulations

5. Policy and Procedures in case of leakage or suspected leakage of UPSI

Each Insider having access to UPSI has a binding obligation to maintain confidentiality of UPSI until the time it is made public. Whenever an Insider shares any UPSI with another person who is not an insider until he has received such UPSI, the insider providing the UPSI should categorically mention to the person receiving the information and shall make him/ her aware to maintain confidentiality until the information is made public. The person also needs to be informed about serious consequences in case of misuse of such information.

In case the Company receives any information about leakage or a suspected leakage of a UPSI through a whistle blower mechanism or otherwise, the Compliance Officer shall examine the details and in consultation with the Audit Committee appoint an external expert agency to carry out a thorough probe in the matter. The agency shall submit its report to the Audit Committee for its final decision in the matter.

6. Trading Plan

An insider shall formulate a trading plan for dealing in securities of the Company 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.

6.1 Trading Plan shall:

- (i) not entail commencement of trading on behalf of the insider 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 Company 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;
- (v) 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
- (vi) not entail trading in securities for market abuse.

6.2 The Compliance Officer shall consider the Trading Plan made as above and shall approve it forthwith. However, he shall be entitled to take express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per provisions of the Regulations.

Provided pre-clearance of trade shall not be required if it is executed as per the approved Trading Plan.

Provided further that the Trading Window norms and restrictions on contra trade shall not be applicable if the trade is carried out as per the approved Trading Plan.

6.3 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.

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.

7. Trading Window

- 7.1 The Compliance Officer shall intimate the closure of trading window to all 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 Designated persons and their immediate relatives shall not trade in the Company's securities when the trading window is closed.
- 7.2 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.
- 7.3 The trading window shall be closed for dealing in the securities of the Company from the end of every quarter till the expiry of forty-eight hours after the declaration of financial results.

8. Pre-clearance of trades

- 8.1 All Designated Persons and their Immediate Relatives, who intend to deal in the Company's securities when the trading window is open and if the value of the proposed trades is Rs. 10 lacs and above, they should take pre-clearance of the transaction from the Compliance Officer. The pre-clearance procedure shall be hereunder:
- (i) An application may be made in the prescribed Form (Annexure 1) to the Compliance officer indicating the estimated number of securities that the Designated Person intends to deal in.
 - (ii) An undertaking (Annexure 2) shall be executed in favour of the Company by such Designated Person incorporating, *inter alia*, the following clauses, as may be applicable:
 - (a) That the said person 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 Designated Person 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 Designated Persons and their dependents shall execute their order in respect of securities of the Company within one week after the approval of pre-clearance is given (Annexure 3). 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 be filed. (Annexure 4).

- (iv) If the order is not executed within one week after the approval is given, the Designated Person must pre-clear the transaction again.

All Designated 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. In case if any contra trade is 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. Provided further that trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan

- (v) All Designated Persons and Immediate Relatives shall also not take positions in derivative transactions in the shares of the Company at any time.

In case of subscription in the primary market, the Designated Persons shall hold their investments for a minimum period of 30 days. The holding period would commence when the securities are actually allotted.

- (vi) 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.

9. Reporting Requirements for transactions in securities

Initial Disclosure

- 9.1 Every promoter/ Key Managerial Personnel / Director / Officer / Designated Person 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 immediate family members in the prescribed Form (Annexure 5).
- 9.2 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. (Annexure 6)

Continual Disclosure

- 9.3 Every Promoter, Designated Person and Director of the Company shall disclose to the Company the number of such securities acquired or disposed off within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 10,00,000/- (Rupees Ten Lakhs only).

The disclosure shall be made within 2 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.

- 9.4 The disclosures required to be made under this Code by a Designated Person shall also include the disclosures regarding the trades by their Immediate Relatives.

10. Disclosure by the Company to the Stock Exchange(s)

- 10.1 Within 2 trading days of the receipt of intimation under Clause 9.3 or becoming aware of the information specified in Clause 9.3, the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received.
- 10.2 The Compliance officer shall maintain records of all the declarations in the appropriate form given by the directors / officers / designated persons for a minimum period of five years.

11. Dissemination of Price Sensitive Information

- 11.1 No information shall be passed by Designated Persons by way of making a recommendation for the purchase or sale of securities of the Company.
- 11.2 Disclosure/dissemination of Price Sensitive Information with special reference to analysts, media persons and institutional investors:

The following guidelines shall be followed while dealing with analysts and institutional investors

- Only public information to be provided.
- At least two Company representatives be present at meetings with analysts, media persons and institutional investors.
- Unanticipated questions may be taken on notice and a considered response given later. If the answer includes price sensitive information, a public announcement should be made before responding.
- Simultaneous release of information after every such meet.

12. Penalty for contravention of the code of conduct

- 12.1 Every Designated Person shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof applicable to his/her Immediate Relatives).
- 12.2 Any Designated Person or his/her Immediate Relative 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. Such contravention should also be promptly informed by the Compliance Officer to the Company's Board of Directors.
- 12.3 Persons who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, recovery, clawback, ineligibility for future participation in employee stock option plans if any, etc.
- 12.4 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.

13. Other Compliances

- 13.1 The Designated persons shall be required to disclose names and PAN or any other identification document approved by the law in case of non-availability of PAN and Phone, and Mobile numbers used by them and the following persons, to the Company on an annual basis and as and when the information changes:

- (a) Immediate Relatives
- (b) Persons with whom the designated person shares a material financial relationship in which one person is a recipient of any kind of payment by way of loan or gift during the

immediately preceding 12 months equivalent to 25% of the payer's annual income but it shall be excluded if the payment is based on arm's length basis

- 13.2 On a one-time basis the Designated Person shall also provide names of educational institutions from which they have graduated and names of their past employers.

ANNEXURE 1

SPECIMEN OF APPLICATION FOR PRE-DEALING APPROVAL

Date:

To,
The Compliance Officer,
Gujarat Pipavav Port Limited

Dear Sir/Madam,

Application for Pre-dealing 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.	The proposal is for		(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		
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.

Yours faithfully,

(Signature of Employee)

ANNEXURE 2

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

UNDERTAKING

To,

The Compliance Officer,
Gujarat Pipavav Port Limited

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

I further declare that I am not in possession of 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) 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 "Price Sensitive Information" as defined in the Code, 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 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 declare that I have made full and true disclosure in the matter.

Date :

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) 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 Gujarat Pipavav Port Limited

COMPLIANCE OFFICER

Date : _____

Encl: Format for submission of details of transaction

**ANNEXURE 4
FORM C**

**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, Designated Person or Director of a listed company and other such persons as mentioned in Regulation 6(2)

Name, PAN No., CIN/DIN & address of Promoter/ Designated Person/ Director with contact nos.	Category of Person (Promoters / KMP/ Directors/ immediate relatives/ others etc)	Securities held prior to acquisition/ disposal		Securities acquired/ Disposed		% of Shareholding		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 Debentures etc)	No	Type of security (For eg. Shares, Warrants, Convertible Debentures etc)	No.	Pre transaction	Post transaction	From	To			Buy	Sell	Value	Number of units (contracts* lot size)	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

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 5

FORM A

**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
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 6

FORM B

**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 as on the date of becoming Promoter/ appointment of Director/KMP		% of Shareholding	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	8	9	10

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 7

FORM D

**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 of the company:

ISIN of the company:

Name, PAN No., CIN/DIN & address of connected persons as identified by the company with contact nos.	Connect ion with Compan y	Securities held prior to acquisition/ disposal		Securities acquired/ Disposed		% of Sharehold ing		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimatio n to company	Mode of acquisi tion (mark et purcha se/ public /rights /preferential offer/ off market /inter-se transfe r etc	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchan ge on which the trade was execut ed
		Type of security (For eg. Shares, Warrant s, Converti ble Debentu res etc)	No	Type of security (For eg. Shares, Warrant s, Converti ble Debentu res etc)	No.	Pre trans action	Po st tra ns action	From	To			Buy	Sell	Val ue	Numbe r of units (contra cts* lot size)	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

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: