

## **INSIDER TRADING POLICY OF HERANBA INDUSTRIES LIMITED**

Heranba Industries Limited (the "**Company**") is a public limited company whose equity shares are to be listed on National Stock Exchange of India Limited and BSE Limited and subject to the rules and regulations issued by the Securities and Exchange Board of India ("**SEBI**").

The Board of Directors of the Company have adopted this Insider Trading Policy (the "**Policy**") to comply with the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("**SEBI PIT Regulations**").

The SEBI Regulations prohibit an Insider from Trading in the securities of a company listed on any stock exchange on the basis of any Unpublished Price Sensitive Information.

Unpublished Price Sensitive Information ("**UPSI**") means any information, which relates directly or indirectly, to the Company or its securities, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities of the Company.

"Generally available" information means information that is accessible to the public on a non-discriminatory basis.

UPSI includes, without limitation, information relating to the following:

- i. Financial results, financial condition, projections or forecasts of the Company;
- ii. Dividends (both interim and final);
- iii. Change in capital structure;
- iv. Mergers, de-mergers, acquisitions, de-listings, disposals and expansion of business and such other transactions;
- v. Changes in the Board of Directors or Key Managerial Personnel; and
- vi. Material events in accordance with the listing agreement and SEBI LODR Regulations as mentioned in the Annexure A.

The SEBI Regulations prohibit the communication of UPSI to any person except as required under law. Further, procuring any person to trade in the securities of any company on the basis of UPSI is also prohibited under the SEBI Regulations and the securities laws. Violations of the SEBI Regulations and the securities laws subject Insiders to severe penalties including fines and imprisonment.

### **Rules**

The rules shall be called 'Rules for Trading in the securities of Heranba Industries Limited by an Insider' ("**Rules**"). These Rules shall come into force with immediate effect.

### **Definitions**

"Compliance Officer" means the Company Secretary and Compliance Officer of the Company for the purpose of administration of the insider trading policy.

"Connected Person," includes -

- a. A director of the Company;
- b. A Key Managerial Personnel of the Company;
- c. An Officer of the Company;
- d. Any person who is or has been in a contractual or fiduciary or employment relationship at any time in the six month period prior to the date of determining whether that person, as a result of such relationship, was, directly or indirectly, allowed access to UPSI or reasonably expected to be allowed access to UPSI;

- e. Any person who is or has been in frequent communication with an Officer of the Company at any time in the six month period prior to the date of determining whether that person, as a result of such frequent communication, was, directly or indirectly, allowed access to UPSI or reasonably expected to be allowed access to UPSI;
- f. An employee of the Company who has access to UPSI or is reasonably expected to have access to UPSI; and
- g. Any person who has a professional or business relationship and that relationship that, directly or indirectly, allowed access to UPSI or is reasonably expected to allowed access to UPSI.

The persons enumerated below shall be deemed to be Connected Persons if such person has access to UPSI or is reasonably expected to have access to UPSI -

- a. An immediate relative of Connected Persons;
- b. A holding company or associate company or subsidiary company;
- c. An intermediary as specified in section 12 of the SEBI Act or an employee or director thereof;
- d. An investment company, trustee company, asset management company or an employee or director thereof;
- e. An official of a stock exchange or of clearing house or corporation;
- 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;
- 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;
- h. An official or an employee of a self-regulatory organization recognised or authorized by the SEBI;
- i. banker of the Company; and
- 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 percent of the holding or interest.

“Contra Trade” means a trade or transaction which involves buying or selling any number of shares of the Company and within 6 months trading or transacting in an opposite transaction involving sell or buy following the prior transaction.”

"Designated Person" shall consist of, Connected Persons who are:

- a. Promoters of the Company;
- b. Directors of the Company and its subsidiaries;
- c. Executive Officers of the Company;
- d. Employees named in the Corporate Organization Chart of the Company from time to time;
- e. All employees in the Finance and Accounts Department, Legal Department one level below Key Managerial Personnel (*defined below*);
- f. Executive Secretaries of Directors and Executive Officers of the Company;
- g. Any other Connected Person designated by the Company on the basis of their functional role; and
- h. Immediate Relatives of a to h above.

"Director" shall have the meaning assigned to it under the Companies Act, 2013.

"Immediate Relative" of a person means a spouse, or the parent, sibling or child of that person or his or her spouse, if they are either dependent financially on such person or consult such person in taking decisions relating to Trading in securities.

"Insider" means any person who is:

- a. a Connected Person or

b. in possession of or having access to UPSI

"Key Managerial Personnel" shall have the meaning assigned to it under the Companies Act, 2013.

"Officer" shall have the meaning assigned to it under the Companies Act, 2013.

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

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

"Promoter Group" shall have the meaning assigned to it under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.

"Securities" shall have the meaning assigned to it under the Securities Contracts (Regulations) Act, 1956 or any modification thereof except units of a mutual fund.

"SEBI LODR Regulations" means Securities And Exchange Board Of India (Listing Obligations And Disclosure Requirements) Regulations, 2015

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

Words and expressions used and not defined in these Rules but defined in the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislations.

### **Prohibition on communicating or procuring UPSI**

An Insider shall not –

- i. communicate, provide, or allow access to any UPSI, relating to the Company or its securities, to any person including other insiders, except to the extent allowed by these Rules;
- ii. procure from or cause the communication by an Insider of UPSI, relating to the Company or its securities;

Provided that nothing contained above shall be applicable when an UPSI is communicated, provided, allowed access to or procured:

- i. in furtherance of legitimate purposes, performance of duties or discharge of legal obligations pursuant to appropriate confidentiality and non-disclosure agreements being executed; or
- ii. in the event the Board of Directors direct or cause the public disclosure of UPSI in the best interest of the Company; or
- iii. within a group of persons if such persons have been identified and secluded within a "chinese wall" or information barrier by the Compliance Officer from the rest of the Company for a particular purpose or for a specified period of time in furtherance of legitimate purposes, performance of duties or discharge of legal obligations, and are subjected to, among other conditions, additional confidentiality obligations, information barriers designed to prevent exchanges of UPSI outside the "chinese wall", and the execution of an undertaking by such persons to abstain and / or forego Trading during such seclusion or till the UPSI no longer constitutes UPSI.

## **Prohibition on Insider Trading**

An Insider shall not, directly or indirectly,-

- I. Trade in securities that are listed or proposed to be listed when in possession of UPSI;
- II. Trade in securities of the Company except when the Trading Window is open and the Insider is not in possession of UPSI.

Provided the restriction in (I) above shall not apply to:

- a. a transaction that is an off-market inter-se transfer between Insiders who were in possession of the same UPSI without being in breach of these Rules and both parties had made a conscious and informed trade decision; and
- b. Trades pursuant to a Trading Plan set up in accordance with these Rules and SEBI PIT Regulations.

## **Trading Window**

The Company shall specify a trading period, to be called the "Trading Window", for trading in the Company's Securities. Insider shall not trade in any Securities of the Company during the period beginning two weeks before the date of Board meeting to be held to consider the quarterly/half yearly/annual financial results of the Company and ending 48 hours after the public release of earnings data for such quarter.

Additionally, the Board shall specify a time for commencement of closing of Trading Window at the time of material events as specified in the Annexure A

When the Trading Window is closed, the Insiders shall not trade in the Company's Securities. All the Insiders, after seeking pre-clearance from Compliance Officer can trade in Securities of the Company only in a valid Trading Window and shall not trade in the Company's Securities during the periods when Trading Window is closed.

The time for commencement of closing the Trading Window shall be decided by the Compliance Officer. The Trading Window shall be opened not earlier than 48 hours after the UPSI is made public.

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

## **Pre-clearance of Trading**

1. Designated Persons may Trade in the securities of the Company when the trading window is open, after obtaining approval of the Compliance Officer by submitting an application as per Annexure 1 and an undertaking as per Annexure 2.
2. The Compliance Officer shall not approve any proposed Trade by Designated Person if the Compliance Officer determines that such Designated Person is in possession of UPSI even though the trading window is open.
3. The Compliance Officer may, after being satisfied that the application and undertaking are true and accurate, approve Trading by a Designated Person, on the condition that the Trade so approved shall be executed within seven trading days following the date of approval.
4. The Designated Person shall, within two days of the execution of the Trade, submit the details of

such Trade to the Compliance Officer as per Annexure 3. In case the transaction is not undertaken, a report to that effect shall be filed in the said form.

5. If the pre-cleared Trade is not executed within seven trading days after the approval is given, the Designated Person must secure pre-clearance of the transaction again.
6. A Designated Person who Trades in securities without complying with the pre-clearance procedure as envisaged in these Rules or gives false undertakings and/ or makes misrepresentations in the undertakings executed by him/her while complying with the pre-clearance procedure shall be subjected to the penalties as envisaged in these Rules.

#### **Additional trading restrictions on Designated Persons**

1. No Director or Key Managerial Personnel shall enter into derivative transactions in respect of the securities of the Company.
2. All Designated Persons who Trade in the securities of the Company shall not enter into an Contra Trade during the next six months following the prior transaction except in case of buy back of securities, open offers, issue of shares by way of rights, further public offer, bonus issue, exit offers and Trade of securities by Designated Person. In case of any Contra Trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the SEBI for credit to the Investor Protection and Education Fund administered by SEBI.

#### **Trading Plan**

A Designated Person shall be entitled to formulate a Trading Plan that complies with the SEBI Regulations (a "Trading Plan") and present it to the Compliance Officer for approval and public disclosure pursuant to which Trades may be carried out in his behalf in accordance with such plan.

Such Trading Plan shall:

1. Not entail commencement of Trading earlier than six months from the public disclosure of the plan;
2. 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;
3. Entail trading for a period of not less than twelve months;
4. Not entail overlap of any period for which another Trading Plan is already in existence;
5. Set out either the value of trades to be effected or the number of Securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
6. Not entail trading in Securities for market abuse

The Trading Plan once approved shall be irrevocable and the Designated Person 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 Designated Person is in possession of UPSI and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Trading Plan shall be deferred until

such UPSI becomes generally available information. Further, the Designated Person shall also not be allowed to Trade in securities of the Company, if the date of Trading in securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.

### **Penalty for Insider Trading**

An Insider who acts in contravention of these Rules shall be liable to have his services or relationship with the Company, as the case may be, terminated.

1. Directors, Officers and employees of the Company who violate these rules shall be subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligibility for future participation in the Company's stock option plans or termination.
2. The SEBI or any other appropriate regulatory authority would also be informed of the violation of these Rules so that appropriate action may be taken.

### **Disclosure requirements**

#### 1. Initial Disclosure:

- a. Every Promoter, Key Managerial Personnel, director of the Company and each of their Immediate Relatives shall disclose his holding of securities of the Company within thirty days of these Rules taking effect as per Form A set out in Annexure 4.
- b. Every person on appointment as a Key Managerial Personnel or a director of the Company or upon becoming a Promoter shall disclose his / her and Immediate Relatives' 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, as per Form B set out in Annexure 5.

#### 2. Continual Disclosure:

- a. Every Promoter, employee, director of the Company and each of their Immediate Relatives shall disclose as per Form C set out in Annexure 6 to the Company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. Ten lakhs.
- b. The disclosure shall be made within two working days of:
  - i. the receipt of intimation of allotment of shares, or
  - ii. the acquisition or sale of shares or voting rights, as the case may be.

#### 3. Disclosure to the Stock Exchange:

The Compliance Officer shall notify the stock exchanges, particulars of the Trades, within two trading days of the receipt of the Continual Disclosure or from becoming aware of such information.

#### 4. Disclosures by other Connected Persons.

The Compliance Officer may, require any other Connected Person to disclose the holdings and trading in securities of the Company as per Form D set out in Annexure 7 at such frequency as he may determine.

## **Miscellaneous**

1. The Board of Directors shall be empowered to amend, modify, interpret these Rules and such Rules shall be effective from such date that the Board may notify in this behalf.
2. The Compliance Officer shall provide the Audit Committee of the Board, on a quarterly basis, all the details of Trading in securities by the Designated Persons including any violations of the Rules.
3. The Compliance Officer shall maintain (a) updated list of Designated Persons, (b) records of disclosures and pre-clearance applications and undertakings for a period of five years and (c) a confidential list of any 'restricted securities' to which the Compliance Officer may require Designated Persons to seek pre-clearance before Trading in such 'restricted securities'.
4. The Company shall require all Connected Persons to formulate and adhere to a code of conduct to achieve compliance with these Rules. In case such persons observe that there has been a violation of these Rules, then they shall inform the Board of Directors of the Company promptly.
5. The Company has adopted the amended 'Corporate Policy Statement on Investor Relations' available at [www.heranba.co.in](http://www.heranba.co.in) to regulate the Company's practices and procedures for fair disclosure of UPSI.

## Annexure A

### Material Events or Information that are to be disclosed based on Materiality Guidelines listed in the Materiality Policy

1. Commencement or any postponement in the date of commencement of commercial production or commercial operations of any unit/division.
2. Change in the general character or nature of business brought about by arrangements for strategic, technical, manufacturing, or marketing tie-up, adoption of new lines of business or closure of operations of any unit/division (*entirety or piecemeal*).
3. Capacity addition or product launch.
4. Awarding, bagging/receiving, amendment or termination of awarded/bagged orders/contracts not in the normal course of business.
5. Agreements (*viz. loan agreement(s) (as a borrower) or any other agreement(s) which are binding and not in normal course of business*) and revision(s) or amendment(s) or termination(s) thereof.
6. Disruption of operations of any one or more units or division of the Company due to natural calamity (*earthquake, flood, fire etc.*), force majeure or events such as strikes, lockouts etc.
7. Effect(s) arising out of change in the regulatory framework applicable to the Company.
8. Litigation(s) / dispute(s) / regulatory action(s) with impact.
9. Fraud/defaults etc. by directors (*other than key managerial personnel*) or employees of the Company.
10. Options to purchase securities including any ESOP/ESPS Scheme.
11. Giving of guarantees or indemnity or becoming a surety for any third party.
12. Granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.
13. Any other information/event *viz.* major development that is likely to affect business, e.g. emergence of new technologies, expiry of patents, any change of accounting policy that may have a significant impact on the accounts, etc. and brief details thereof and any other information which is exclusively known to the Company which may be necessary to enable the holders of securities of the Company to appraise its position and to avoid the establishment of a false market in such securities.



14. Acquisition(s) (including agreement to acquire), Scheme of Arrangement (*amalgamation/ merger/ demerger/ restructuring*), or sale or disposal of any unit(s), division(s) or subsidiary of the listed entity or any other restructuring.

Explanation: For the purpose of this sub-para, the word 'acquisition' shall mean:

- (i) acquiring control, whether directly or indirectly; or
  - (ii) acquiring or agreeing to acquire shares or voting rights in, a company, whether directly or indirectly, such that:
    - a. the Company holds shares or voting rights aggregating to five per cent or more of the shares or voting rights in the said company, or;
    - b. there has been a change in holding from the last disclosure made under sub-clause (a) of clause (ii) of the Explanation to this sub-para and such change exceeds two per cent of the total shareholding or voting rights in the said company.
15. Issuance or forfeiture of securities, split or consolidation of shares, buyback of securities, any restriction on transferability of securities or alteration in terms or structure of existing securities including forfeiture, reissue of forfeited securities, alteration of calls, redemption of securities etc.
16. Revision in Rating(s).
17. Outcome of meetings of the board of directors: The Company shall disclose to the Exchange(s), within thirty (30) minutes of the closure of the meeting, held to consider the following:
- a. dividends and/or cash bonuses recommended or declared or the decision to pass any dividend and the date on which dividend shall be paid/dispatched;
  - b. any cancellation of dividend with reasons thereof;
  - c. the decision on buyback of securities;
  - d. the decision with respect to fund raising proposed to be undertaken
  - e. increase in capital by issue of bonus shares through capitalization including the date on which such bonus shares shall be credited/dispatched;
  - f. reissue of forfeited shares or securities, or the issue of shares or securities held in reserve for future issue or the creation in any form or manner of new shares or securities or any other rights, privileges or benefits to subscribe to;
  - g. short particulars of any other alterations of capital, including calls;

- h. financial results;
  - i. decision on voluntary delisting by the Company from stock exchange(s).
18. Agreements (viz. shareholder agreement(s), joint venture agreement(s), family settlement agreement(s) (to the extent that it impacts management and control of the listed entity), agreement(s)/treaty(ies)/contract(s) with media companies) which are binding and not in normal course of business, revision(s) or amendment(s) and termination(s) thereof.
  19. Fraud/defaults by promoter or key managerial personnel or by the Company or arrest of key managerial personnel or promoter.
  20. Change in directors, key managerial personnel (*Managing Director, Chief Executive Officer, Chief Financial Officer, Company Secretary, etc.*), Auditor and Compliance Officer.
  21. Appointment or discontinuation of share transfer agent.
  22. Corporate debt restructuring.
  23. One-time settlement with a bank.
  24. Reference to BIFR and winding-up petition filed by any party / creditors.
  25. Issuance of notices, call letters, resolutions and circulars sent to shareholders, debenture holders or creditors or any class of them or advertised in the media by the Company.
  26. Proceedings of annual and extraordinary general meetings of the Company.
  27. Amendments to memorandum and articles of association of Company, in brief.
  28. Schedule of Analyst or institutional investor meet and presentations on financial results made by the Company to analysts or institutional investors

**Annexure 1****APPLICATION FOR PRE-TRADING APPROVAL**

To,

The Compliance Officer,  
Heranba Industries Limited.

Pursuant to SEBI (Prohibition of Insider Trading Regulations), 2015 and Company's Insider Trading Policy, I seek approval to purchase/ sell/ subscribe [●] equity shares of the Company as per the details given below:

Name of the applicant	[●]
Designation	[●]
Number of securities and type held in the Company as on the date	[●]
Folio No / DP ID / Client ID	[●]
The proposal is for	(a) Purchase of securities (b) Subscription to securities (c) Sale of securities
Proposed date of trading in securities	[●]
Estimated number of securities proposed to be purchased / subscribed / sold	[●]
Current market price (as on the date of this application)	[●]
Whether proposed transaction will be through stock exchange or off-market trade	[●]
Folio No / DP ID / Client ID where the securities will be credited	[●]

I enclose herewith the undertaking signed by me.

Signature

Name:

Date:

## **Annexure 2**

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

To,

The Compliance Officer,  
Heranba Industries Limited

I [●] of the Company residing at [●] desirous of trading 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 any unpublished price sensitive information up to the time of signing this Undertaking.

In the event that I have access to or receive any unpublished price sensitive information after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from trading in the securities of the Company until such information becomes public.

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

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

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

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

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

Signature

Name:

Date:

### Annexure 3

#### DISCLOSURE OF TRANSACTIONS

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

To,  
The Compliance Officer,  
Heranba Industries Limited.

Dear Sir / Madam,

I hereby report that, I have dealt in the securities of the company as tabulated below:

Sr. No.	DP ID / Client ID / Folio No. Name of holder	Date of Transaction	Name	Number of securities	Acquired/ Sold	Total Equity Shares as on reporting date
[●]	[●]	[●]	[●]	[●]	[●]	[●]
[●]	[●]	[●]	[●]	[●]	[●]	[●]

Or

I hereby report that I have not dealt in the Equity Shares of the Company as per my application of pre-clearance of trade dated [●] and as approved by you on [●] due to the below mentioned reasons:

1. [●]
2. [●]

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

Signature  
Name:  
Designation:  
Date:

**Annexure 4**

**FORM A**

SEBI (Prohibition of Insider Trading) Regulations, 2015  
 [Regulation 7(1) (a) read with Regulation 6(2) - Disclosure on becoming a directors/ KMP/ Promoter]

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, DIN/CIN & 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
		Type of security (e.g. Shares, Warrants, Convertible Debentures, etc)	Nos.	
[●]	[●]	[●]	[●]	[●]
[●]	[●]	[●]	[●]	[●]

*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 by Promoter, Key Managerial Personnel (KMP), Director and such other persons as mentioned in Regulation 6(2)**

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		
Contract specifications	Number of units (contracts* lot size)	Notional value in Rupee terms	Contract specifications	Number of units (contracts* lot size)	Notional value in Rupee terms
[●]	[●]	[●]	[●]	[●]	[●]
[●]	[●]	[●]	[●]	[●]	[●]

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

Name & Signature:  
Designation:  
Date:  
Place:

**Annexure 5**

**FORM B**

SEBI (Prohibition of Insider Trading) Regulations, 2015  
 [Regulation 7(1) (b) read with Regulation 6(2) - Disclosure on becoming a directors/ KMP/ Promoter]

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, DIN/CIN & address with contact nos	Category of Person (Promoters/ KMP/ Directors/ immediate relatives/ others, etc)	Securities held at the time of becoming Promoter/ appointment of Directors/ KMP		% of shareholding
		Type of security (e.g. Shares, Warrants, Convertible Debentures, etc)	Nos.	
[●]	[●]	[●]	[●]	[●]
[●]	[●]	[●]	[●]	[●]

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

Open interest of the Future contracts held at the time of becoming Promoter/ appointment of Directors/ KMP			Open interest of the Option contracts at the time of becoming Promoter/ appointment of Directors/ KMP		
Contract specifications	Number of units (contracts* lot size)	Notional value in Rupee terms	Contract specifications	Number of units (contracts* lot size)	Notional value in Rupee terms
[●]	[●]	[●]	[●]	[●]	[●]
[●]	[●]	[●]	[●]	[●]	[●]

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



Name & Signature:  
Designation:  
Date:  
Place:

**Annexure 6**

**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 changes 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, DIN/CIN & address with contact nos	Category of person (Promoters/ KMP/ Director/ 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		Date of intimation to company	Mode of acquisition/ disposal (on market/ public/ rights/ preferential offer/ off market, inter-se transfers/ ESOPs, etc )
		Type of security (e.g. Shares, Warrants, Convertible Debentures, etc)	No. & % of shareholding	Type of security (e.g. Shares, Warrants, Convertible Debentures, etc)	Nos.	Value	Type of security (e.g. Shares, Warrants, Convertible Debentures, etc)	No. & % of shareholding	From	To		
[●]	[●]	[●]		[●]			[●]		[●]		[●]	[●]
[●]	[●]	[●]		[●]			[●]		[●]		[●]	[●]

**Details of trading in the 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)	
[●]	[●]	[●]	[●]	[●]	[●]	[●]
[●]	[●]	[●]	[●]	[●]	[●]	[●]

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

Name & Signature:

Designation:

Date:

Place:

**Annexure 7**

**FORM D**

SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7(3) – Transactions by the other connected persons as identified by the company  
 Name of the company: [●]

ISIN of the company: [●]

**Details of trading in securities by the other connected persons as identified by the company**

Name, PAN, DIN/CIN & address with contact nos of other connected persons as identified by the company	Connection with the company	Securities held prior to acquisition/ disposal		Securities acquired/ disposed			Securities held post acquisition/ disposal		Date of allotment advice/ acquisition of shares/ sale of shares		Date of intimation to company	Mode of acquisition/ disposal (on market/ rights/ preferential offer/ off market, inter-se transfers/ ESOPs, etc )
		Type of security (e.g. Shares, Warrants, Convertible Debentures, etc)	No. & % of shareholding	Type of security (e.g. Shares, Warrants, Convertible Debentures, etc)	Nos.	Value	Type of security (e.g. Shares, Warrants, Convertible Debentures, etc)	No. & % of shareholding	From	To		
[●]	[●]	[●]	[●]	[●]	[●]	[●]	[●]	[●]	[●]	[●]	[●]	[●]
[●]	[●]	[●]	[●]	[●]	[●]	[●]	[●]	[●]	[●]	[●]	[●]	[●]

**Details of trading in the derivatives of the company by the other connected persons as identified by the company**

<b>Trading in derivatives (Specify type of contract, Futures or Options, etc)</b>	<b>Exchange on which the</b>
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						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)	
[●]	[●]	[●]	[●]	[●]	[●]	[●]
[●]	[●]	[●]	[●]	[●]	[●]	[●]

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

Name & Signature:

Designation:

Date:

Place: