

<i>Policy / Process Note Information</i>	
<i>Policy Name</i>	<i>Insider Trading Code - SEBI PIT, 2015: Code of Conduct of Intec Capital Limited for Regulating, Monitoring and Reporting of Trading by Insiders pursuant to regulation 9 of SEBI (Prohibition of Insider Trading), 2015, which shall for Members of the Board of Directors and designated employees of Intec Capital Limited</i>
<i>Last Recommended /Reviewed by Committee of Board (CoB), if any</i>	<i>Last Recommended / Reviewed by ACM on Friday February 09, 2018</i>
<i>Last Approved /Reviewed by Board of Directors, if any</i>	<i>Last Recommended / Reviewed by Board of Directors on Friday February 09, 2018</i>
<i>Recommended by Committee of Board (CoB), if any</i>	<i>Recommended by ACM Committee in its meeting scheduled on 10th June 2021</i>
<i>Approved by Board of Directors, if any</i>	<i>Approved by Board of Directors on 10th June 2021</i>
<i>Effective Date</i>	<i>10th June 2021</i>

1. Preamble and preface

- 1.1. The Securities and Exchange Board of India (SEBI), in its endeavor to protect the interests of investors in general, had introduced the SEBI (Prohibition of Insider Trading) Regulations, 2015 (**"PIT Regulations"**) under the powers conferred on it under the SEBI Act, 1992 to be effective from 15th May, 2015 (including any modification(s) / amendment(s) / re-enactment(s) thereof). ("Regulations") and the same have been made applicable to all companies whose shares were listed on Indian stock exchanges.
- 1.2. *The Company is required to amend its existing "Insider Trading Code of Conduct" and formulated the revised code viz. "Insider Trading Code of Conduct for Listed Company for Regulating, Monitoring and Reporting of Trading by Insiders / Designated Persons / Directors / KMP's of Intec Capital Limited or any other person as per Law" pursuant to regulation 9 read with Schedule – B of SEBI (Prohibition of Insider Trading), Regulations 2015 as amended from time to time towards achieving compliance with these regulations, adopting the minimum standards set out in Schedule – B to these PIT Regulations, without diluting the provisions of these PIT Regulations in any manner.*
- 1.3. This Code shall be applicable upon the Insiders / Designated Persons / Directors / KMP's of Intec Capital Limited or any other person as per Law with effect from 1st April 2019.
- 1.4. Any subsequent modification and / or amendments brought about by SEBI in the SEBI (Prohibition of Insider Trading) Regulation, 2015 shall automatically apply to this Code.

2. Objective of the Code of Conduct

This Code of Conduct has been prepared by adopting the standards set out in Schedule B of the Regulations in order to regulate, monitor and report trading by its employees and other connected persons towards achieving compliance with the regulations.

In order to fully understand the scope of restrictions on insider trading, it is useful to understand the following terms/definitions.

3. Definitions

- 3.1. **"Act"** means the Securities and Exchange Board of India Act, 1992.
- 3.2. **"Board"** means the Board of Directors of the Company.
- 3.3. **"Code" or "Code of Conduct"** shall mean ***"Insider Trading Code of Conduct for Listed Company for Regulating, Monitoring and Reporting of Trading by Insiders / Designated Persons / Directors / KMP's of Intec Capital Limited or any other person as per Law pursuant to regulation 9 read with Schedule – B of SEBI (Prohibition of Insider Trading), Regulations 2015"***
- 3.4. **"Company"** means Intec Capital Limited (ICL)
- 3.5. **"Compliance Officer"** means Company Secretary or such other senior officer authorized Board of

Directors to discharge the duties of Compliance Officer under the regulations, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations designated so and reporting to 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.

3.6. **“Chief Investors Relations Officer”** means Compliance Officer of the Company.

3.7. **“Connected Person”** means:

- (i) any person who is or has during the six months prior to the concerned act been associated with a company,, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the Company or holds any position including a professional or business relationship between himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.
- (ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established,
 - (a) an immediate relative of connected persons specified in clause (i); or
 - (b) a holding company or associate company or subsidiary company; or
 - (c) an intermediary as specified in Section 12 of the Act or an employee or director thereof; or
 - (d) an investment company, trustee company, asset management company or an employee or director thereof; or
 - (e) an official of a stock exchange or of clearing house or corporation; or
 - (f) a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company 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 recognized 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.

3.8. **“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.

3.9. **“Designated Persons”** shall include :

- (i) Head of department and above;
- (ii) every employee in the Compliance/Secretarial Department and Finance & Accounts Department

- (iii) any other Department / employee as may be determined and informed by the Compliance Officer from time to time.
- 3.10. **"Director"** means a member of the Board of Directors of the Company.
- 3.11. **"Employee"** means every employee of the Company including the Directors in the employment of the Company.
- 3.12. **"Generally available Information"** means information that is accessible to the public on a non-discriminatory basis.
- 3.13. **"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.
- 3.14. **"Insider"** means any person who, (i) a connected person; or (ii) in possession of or having access to unpublished price sensitive information.
- 3.15. **"Key Managerial Person"** means person as defined in Section 2(51) of the Companies Act, 2013
- 3.16. **"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.
- 3.17. **"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.
- 3.18. **"PIT Regulations"** shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.
- 3.19. **"Takeover regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;
- 3.20. **"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;
- 3.21. **"Specified Persons"** means the Directors, connected persons, the insiders, the Designated Employees and the promoters and immediate relatives are collectively referred to as Specified Persons.
- 3.22. **"Trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly
- 3.23. **"Trading Day"** means a day on which the recognized stock exchanges are open for trading;
- 3.24. **"Trading Window"** means a period of trading in Company's securities by the directors, officers and the designated persons and their immediate relative members.
- 3.25. **"Unpublished Price Sensitive Information"** means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following:
 - (i) financial results;

- (ii) dividends;
- (iii) change in capital structure;
- (iv) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
- (v) changes in key managerial personnel; and
- (vi) such other information as determined by the Board of Directors / Managing Director / Company Secretary / Chief Compliance Officer / Chief Financial Officer (CFO) from time to time. (Regulation 2(1)(n))

3.26. The Words and expressions used and not defined in these PIT 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.

4. Role of Compliance Officer:

- 4.1. The Compliance Officer shall report on insider trading to the Board of Directors of the Company and in particular, shall provide reports to the Chairman of the Audit Committee, if any, or to the Chairman of the Board of Directors at such frequency as may be stipulated by the Board of Directors.
- 4.2. The Compliance Officer shall assist all employees in addressing any clarifications regarding the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the Company's Insider Trading Code of Conduct.

5. Communication or procurement of UPSI

- 5.1.1. No insider shall communicate, provide, or allow access to any UPSI relating to ICL or securities listed or proposed to be listed by ICL, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- 5.1.2. No person shall procure from or cause the communication by any insider of UPSI, relating to ICL or securities listed or proposed to be listed by ICL, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- 5.1.3. Notwithstanding anything contained herein, UPSI may be communicated, provided, allowed access to or procured, in connection with a transaction that would:
 - (i) entail an obligation to make an open offer under the takeover regulations where the Board of Directors of ICL is of informed opinion that the proposed transaction is in the best interests of the Company;
 - (ii) not attract the obligation to make an open offer under the takeover regulations but where the Board of Directors of ICL is of informed opinion that sharing of such information is in the best interest of the Company and the information that constitutes UPSI is disseminated to be made generally available at least 2 (two) trading days prior to the proposed transaction being effected in such form as the ICL Board of Directors may determine to be adequate and fair to cover all relevant and material facts.

For purposes of point (3) above, the Board of Directors of ICL 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 purpose of the above point (3), and shall not otherwise trade in securities of GIL when in possession of UPSI.

5.2. Need to Know:

- 5.2.1. "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.
- 5.2.2. All non-public information directly received by any employee should immediately be reported to the head of the department.

5.3. Limited access to confidential information:

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

Chinese Wall

5.3.1. Chinese Wall approach

To prevent the misuse of confidential information, the **ICL** has laid down Chinese Walls procedures which separate those areas of **ICL** that routinely have access to confidential information, considered "inside areas" from those which deal with sale/marketing/investment advice or other departments providing support services, considered "public areas".

- (i) The employees in the inside area shall not communicate any Unpublished Price Sensitive Information to anyone in public area.
- (ii) The Company shall have process of maintaining securely, computer files containing confidential information and physical storage of documents relating to UPSI.
- (iii) All the unpublished price sensitive information is to be handled on "need to know basis", i.e., Unpublished Price Sensitive Information should be disclosed only to those within **ICL** 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.
- (iv) All the non- public information directly received by any employee should immediately be reported to the head of the department.
- (v) In exceptional circumstances employees from the public areas may be brought "over the wall" and given confidential information on the basis of "need to know" criteria, under intimation to the Compliance Officer.

5.3.2. Procedure for wall-crossing

- (i) In the event any person is required to be wall – crossed, i.e., brought over the Chinese wall in order to obtain access to the UPSI for a specific purpose, prior approval of the Compliance Officer must be sought. The Compliance Officer shall consider whether the person being wall – crossed, is being provided UPSI on a need – to – know basis. Further, UPSI shared with such wall – crosser should be limited to the specific transaction or purpose for which such person’s assistance is required.
- (ii) Persons who are wall – crossed / receive UPSI should be notified that they would be deemed to be ‘Designated Person’ and ‘Insider’ under this Code and that consequently, such persons will be required to comply with all applicable provisions of the Code and the SEBI Regulations, till such information remains UPSI.
- (iii) Appropriate records of all wall crossings will be maintained. Further, the Compliance Officer will be informed of all instances wherein a person has been wall-crossed (at the time of such wall – crossing), in accordance with the procedure set out above, so as to enable the Compliance Officer to maintain appropriate records in this regard.

Prevention of misuse of “Unpublished Price Sensitive Information”

Employees and connected persons designated on the basis of their functional role ("**designated persons**") in the Company shall be governed by an internal code of conduct governing dealing in securities.

5.4. Trading Plan

An insider shall be entitle to 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.

5.5. 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 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;
- (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.

- 5.6. 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.

- 5.7. 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.
- 5.8. However, the implementation of the trading plan shall not be commenced, if at the time of formulation of the plan, the Insider is in possession of any unpublished price sensitive information and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Plan shall be deferred until such unpublished price sensitive information becomes generally available information. Further, the Insider shall also not be allowed to deal in securities of the Company, if the date of trading in securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.
- 5.9. Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

Trading Window and its restrictions

5.10. Norms related to Trading Window

- 5.10.1. The “Trading Window” for the purpose of the Code shall mean the period during which trading is permitted.
- 5.10.2. All Insiders / Specified Persons / Designated Persons shall conduct all their dealings in the securities of the Company only in a valid Trading Window.
- 5.10.3. The pre-clearance of trades is not required for a trade executed as per an approved trading plan, and trading window norms and restrictions on contra trades do not apply to trades carried out in accordance with an approved trading plan.
- 5.10.4. In case of ESOPs, exercise of option may be allowed in the period when the trading window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when trading is closed.

5.11. Norms related to closure of Trading Window

- 5.11.1. 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.
- 5.11.2. All Insiders / Specified Persons / Designated Persons shall not deal in any transaction involving the purchase or sale of the Company’s securities during the periods when the Trading Window is closed or during any other period as may be specified by the Company from time to time.
- 5.11.3. The Compliance Officer shall intimate the closure of Trading Window to all the designated persons of the Company when he determines that a designated person or class of designated persons can reasonably be expected to have possession of unpublished price sensitive information. Such closure shall be imposed in relation to such securities to which such unpublished price sensitive information relates.

5.11.4. The Trading Window shall be closed when the Compliance Officer determines that Directors / Designated Persons / Insiders can reasonably be expected to have possession of UPSI as mentioned as mentioned in clause 3.24 of this Code.

5.11.5. The trading restriction period can also be made applicable from the end of every quarter till 48 hours after the declaration of financial results. The gap between clearance of accounts by audit committee and board meeting should be as narrow as possible and preferably on the same day to avoid leakage of material information.

5.12. The Trading Window shall be closed as under

5.12.1. The trading period during which ICL's securities can be traded is called trading window. The trading window shall be closed during the time the price sensitive information is un-published.

5.12.2. When the trading window is closed, the Designated Persons (including their immediate relatives) shall not trade in ICL's securities in such period.

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

- (a) Declaration of Financial results
- (b) Declaration of dividends (interim and final)
- (c) Change in capital structure
- (d) Mergers, de-mergers, acquisitions, delistings, disposals and expansion of business
- (e) Such other time as the compliance officer determines that a designated person or class of is reasonably expected to have possession of unpublished price sensitive information.

5.12.3. The Compliance Officer shall also close the trading window when he / she 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.

5.12.4. The Compliance Officer after taking into account various factors including the UPSI 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 48 (Forty Eight) hours after the information becomes generally available.

5.12.5. However, subject to the SEBI Act, Rules and Regulations, in case of ESGS, exercise of options shall be allowed during the period when the trading window is closed. However, sale of shares allotted on exercise of ESOP's shall not be allowed when the trading window is closed.

5.12.6. Creation of pledge is allowed when trading window is closed. However, the pledgor or pledgee may demonstrate that the creation of pledge was bona fide and prove their innocence under proviso to sub-regulation (1) of regulation 4 of the Regulations.

5.13. The Trading Window shall be re-opened as under

5.13.1. The Compliance Officer after taking into account various factors including the UPSI 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 (48) hours** after the information becomes generally available.

6. Pre-clearance of trades

- 6.1. All Designated Persons who intend to trade in the securities of ICL (either in their own name or in any immediate relative's name) i.e. buy or sell securities and if value of the securities likely to be traded, whether in one transaction or a series of transactions in calendar quarter, aggregates to a traded value in excess of Rs. 10,00,000 (Rupees Ten Lakh Only), shall make an application for pre-clearance in the format set out in **Annexure 1** to the Compliance Officer indicating the estimated number of units of securities that the designated person or immediate relative(s) intends to trade, the details as to the depository with which he / she has a security account, the details as to the securities in such depository mode and such other details as specified in the form and also declare that the applicant is not in possession of unpublished price sensitive information.
- 6.2. Provided that the pre-clearance is not applicable for subscription to the stock grants upon its vesting. However for any subsequent sale of shares acquired under ESGS scheme, pre-clearance shall be applicable as per limits prescribed as above.
- 6.3. No designated person shall apply for pre-clearance of any proposed trade if such designated person is in possession of unpublished price sensitive information even if the trading window is not closed.
- 6.4. The Compliance Officer shall also determine whether any such declaration is reasonably capable of being rendered inaccurate.
- 6.5. All Designated Persons of GIL and their immediate relatives shall execute their order in respect of securities of ICL within 7 (seven) trading days after the approval of pre-clearance is given. If the order is not executed within 7 (seven) trading days after the approval is given, the employee must obtain the pre-clearance for the transaction again.
- 6.6. In case the transaction is not undertaken, a report to that effect shall also be filed in the aforesaid **Annexure 2.**
- 6.7. If the order is not executed within seven days after the approval is given, the employee/director must again make "Application for seeking approval for Pre-clearance in securities of the Company".
- 6.8. All Specified Persons / Designated Persons shall submit the "Yearly statement of trades where pre-clearance was required" in the format as mentioned at **Annexure-3.**

7. Contra Trading restrictions and relaxation

- 7.1. All Specified Persons who buy or sell any number of shares of the Company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction. All Specified Persons shall also not take positions in derivative transactions in the shares of the Company at any time.
- 7.2. In case of subscription in the primary market (initial public offers), the aforesaid person shall hold their investments for a minimum period of 30 days. The holding period would commence when the securities are actually allotted.
- 7.3. The Compliance Officer may be empowered to grant relaxation from strict application of such restriction and waive off the holding period provided that such relaxation does not violate these

regulations and 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.

- 7.4. The Specified Employee who intends to dispose of securities as contra trade should make an application in the format as mentioned at **Annexure-4** to the Compliance officer indicating the estimated number of securities that intended to be disposed of with reasons of waiver / relaxation of minimum period of 6 months.
- 7.5. The Compliance officer needs to convey “Letter conveying decision either granting / rejecting waiver / relaxation of minimum holding period for doing Contra Trade” in the Format as mentioned at **Annexure-5**.
- 7.6. In case of any contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

Reporting Requirements for transactions in securities

8. Initial Disclosure

- 8.1. Every promoter/ Key Managerial Personnel / Director / Officers / Designated Employees of the Company, within thirty days of these regulations taking effect, shall forward to the Company the details of all holdings in securities of the Company presently held by them including the statement of holdings of dependent family members in the prescribed Form as mentioned at **Annexure-6**
- 8.2. 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 in the prescribed Form as mentioned at **Annexure-7**

9. Continual Disclosure

- 9.1. Every promoter, employee and director of the Company shall disclose to the Company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. Ten lakhs in the prescribed Form as mentioned at **Annexure-8**

The disclosure shall be made within two (2) working days of:

- (a) the receipt of intimation of allotment of shares, or
- (b) the acquisition or sale of shares or voting rights, as the case may be.

10. Disclosure by the Connected Person(s) as identified by the Company

- 10.1. The Transactions by Other connected persons as identified by the company shall be submitted as indicated at **Annexure-9** as per FORM D (Indicative Format) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 pursuant to Regulation 7 (3)

11. Annual Disclosure

- 11.1. Every promoter, Director and KMP, connected person of the Company shall disclose to the Company the number of such securities held as on 31st March every year preferably on or before 30th April every year respectively in the format as indicated at **Annexure-10**

12. Other Restrictions

- 12.1. The disclosures to be made by any person under this Code shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.
- 12.2. The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account for purposes of this Code.
- 12.3. The disclosures made under this Code shall be maintained for a period of five (5) years.

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

- 13.1. Within 2 days of the receipt of intimation under Clause 10, 11 and 12, the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received.
- 13.2. The Compliance officer shall maintain records of all the declarations in the appropriate form given by the directors / officers / designated employees for a minimum period of five years.

14. Dissemination of Price Sensitive Information

- 14.1. No information shall be passed by Specified Persons by way of making a recommendation for the purchase or sale of securities of the Company.
- 14.2. 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.

New “Policy for determination of legitimate purposes for sharing UPSI”

- 14.3. The Board of Directors of ICL shall formulate, approve and implement **“Policy for determination of Legitimate Purposes”** pursuant to Regulation 3 (2A) and 3(2B) read with Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended upto 21st January 2019.

- 14.4. The **“Policy for determination of Legitimate Purposes”** is effective from 1st April 2019 and is applicable to all those as per law.

15. New “Policy of procedure for enquiry in case of leak of UPSI”

- 15.1. The Board of Directors of ICL shall formulate **“Policy for procedure of Inquiry in Case of Leak of Unpublished Price Sensitive Information (“UPSI”)”** in terms of Regulation 9A of SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended upto 21st January 2019.
- 15.2. The written policies and procedures for inquiry in case of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information shall initiate appropriate inquiries on becoming aware of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information and inform the Board promptly of such leaks, inquiries and results of such inquiries.
- 15.3. The **“Policy for procedure of Inquiry in Case of Leak of Unpublished Price Sensitive Information (“UPSI”)”** is effective from 1st April 2019 and is applicable to all those as per law.
- 15.4. **Whistle Blower Policy requirement and its awareness to Employees to report Leak of UPSI:** The board of Directors of Company shall ensure that whistle-blower policy is in place and shall also ensure to make the employees aware of such policy to enable employees to report instances of leak of unpublished price sensitive information.

16. The New “Process for how and when people are brought ‘Inside’ on Sensitive Transactions”.

- 16.1. The Board of Directors of ICL shall formulate, approve and implement **“Process on how and when people are brought 'Inside' on Sensitive Transactions”** under clause 15 of Schedule – B SEBI (Prohibition of Insider Trading) Regulations, 2015.
- 16.2. The duties and responsibilities and the liability to the person(s) who has/have been brought inside’ on sensitive transaction(s) is also formulated separately on **“Process on how and when people are brought 'Inside' on Sensitive Transactions”** under clause 15 of Schedule – B SEBI (Prohibition of Insider
- 16.3. The **“Process on how and when people are brought 'Inside' on Sensitive Transactions”** is effective from 1st April 2019 and is applicable to all those as per law.

17. Identification of UPSI and maintaining its confidentiality and maintenance of Digital Database with whom UPSI is shared

- 17.1. All the unpublished price sensitive information shall be identified and its confidentiality shall be maintained as per the requirements of this **Code** and **PIT regulations**;
- 17.2. The Board of Directors shall ensure that a structured digital database is maintained containing the names such persons or entities as the case may be with whom information is shared under this regulation along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available.
- 17.3. Such databases shall be maintained with adequate internal controls and such as time stamping and audit trails to ensure non-tampering of the database.

18. Review of compliances of PIT Regulations code and verification of Internal Control System

- 18.1. The Managing Director/ Chief Executive Officer of ICL shall put in place adequate and effective system of internal controls to ensure compliance with the requirements given in these code and PIT regulations to prevent insider trading.
- 18.2. The Audit Committee of ICL shall review compliance with the provisions of these Code and PIT Regulations at least once in a Financial Year and shall verify that the systems for internal control are adequate and are operating effectively.

19. Penalty for contravention of the code of conduct

- 19.1. Every Specified Person shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her dependents).
- 19.2. Any Specified Person who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalized and appropriate action may be taken by the Company.
- 19.3. Specified Persons who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligibility for future participation in employee stock option plans, etc.
- 19.4. 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.

20. Applicability of the Code to certain persons

- 20.1. The Regulations apply to certain persons who by being in any contractual, fiduciary or employment relationship or holding any position including a professional or business relationship with the Company whether temporary or permanent have access, directly or indirectly, to unpublished price sensitive information or are reasonably expected to allow such access.
- 20.2. They are advised to adhere to the Regulations strictly. In case it is observed by such persons required to formulate a code of conduct under sub-regulation (1) and sub-regulation (2) of regulation 9, that there has been a violation of these Regulations, they shall inform SEBI promptly, with a copy to the Company.

21. Power of the Board of Directors

- 21.1. The Compliance Officer, subject to the approval of the Board of Directors, reserves the right to amend or modify this Code in whole or in part, at any time without assigning any reason whatsoever
- 21.2. The Board may also establish further rules and procedures, from time to time, to give effect to the intent of this Code and to further the objective of good corporate governance.
- 21.3. The decision of the Board of Directors of the Company with regard to any or all matters relating to this Code shall be final and binding on all concerned.

22. Disclosure of Code on Public Domain

- 22.1. This Code and any amendment thereof will be published on the Company's website www.inteccapital.com
- 22.2. Further, this Code and every subsequent amendment made thereto shall be promptly intimated to the Stock Exchange where the securities of the Company are listed.

23. Review / Amendment of the Code

- 23.1. The code shall be reviewed periodically in accordance with review of internal control and check as well as changes or any regulatory requirements from time to time.
- 23.2. The Board of Directors of the Company, subject to applicable laws, rules & Regulations, may amend / substitute any provision(s) with a new provision(s) or replace this entire Code with a new Code.
- 23.3. On behalf of Board of Directors, the Managing Director is allowed to change in case urgency of change and implementation of Code and subsequently get the Code ratified by the Board of directors.
- 23.4. In any circumstance where the terms of this Code differ from any law, rule, regulation etc. for the time being in force, the law, rule, regulation etc. shall take precedence over this Code.
- 23.5. This Code and any subsequent amendment(s) thereto, shall be promptly intimated to the Stock Exchanges, if required under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and/or SEBI (Prohibition of Insider Trading) Regulations, 2015 and any amendment, re-amendment or re-enactment thereto.

24. Penalties for non-compliance with the Securities & Exchange Board of India Act, 1992.

Chapter VI A provides for various penalties, extracts of which are:

15A. *If any person, who is required under this Act or any rules or regulations made thereunder –*

- a) to furnish any document, return or report to the Board, fails to furnish the same, he shall be liable to a penalty of one lakh rupees for each day during which such failure continues or one crore rupees, whichever is less;
- b) to file any return or furnish any information, books or other documents within the time specified therefore in the regulations, fails to file return or furnish the same within the time specified therefore in the regulations, he shall be liable to a penalty of one lakh rupees for each day during which such failure continues or one crore rupees, whichever is less;
- c) to maintain books of accounts or records, fails to maintain the same, he shall be liable to a penalty of one lakh rupees for each day during which such failure continues or one crore rupees, whichever is less.

15G. If any insider who -

- (i) either on his own behalf or on behalf of any other person, deals in securities of a body corporate listed on any stock exchange on the basis of any unpublished price sensitive information; or
- (ii) communicates any unpublished price sensitive information to any person, with or without his request for such information except as required in the ordinary course of business or under any law; or

(iii) counsels, or procures for any other person to deal in any securities of anybody corporate on the basis of unpublished price sensitive information, shall be liable to a penalty twenty-five crore rupees or three times the amount of profits made out of insider trading, whichever is higher.

Code of Conduct of Intec Capital Limited for Regulating, Monitoring and Reporting of Trading by Insiders pursuant to regulation 9 of SEBI (Prohibition of Insider Trading), 2015, which shall for Members of the Board of Directors and designated employees of Intec Capital Limited



ANNEXURE-1 (SPECIMEN OF APPLICATION FOR SEEKING APPROVAL FOR PRE- CLEARANCE E IN SECURITIES OF THE COMPANY)

To,
The Compliance Officer
Intec Capital Limited
708, Manjusha,
57 Nehru Place
New Delhi- 110019

Date:
From:
Designation:

With reference to the Code of Conduct of ICL for Prevention of Insider Trading, I hereby give notice that I propose to carry out the following transaction in ICL securities for Myself / As Joint Holder / My immediate relative.

Transaction (Sale/Purchase)	Type of Security	Number of Security

I hereby declare that:

- (a) I do not have any access nor have I received or possess "Unpublished Price Sensitive Information" upto the time of signing the undertaking.
- (b) That in case I have access to or receive "Unpublished Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction. I shall inform the Compliance Officer of the change in my position and that I would completely refrain from trading in the securities of ICL till the time such information becomes public.
- (c) That I have not contravened the code of conduct for prevention of insider trading as notified by ICL from time to time.
- (d) That I have made a full and true disclosure in the matter.

Signature of the Employee/Director _____

The above transaction has been authorised. Your trading must be completed within 7 trading days from_____.

Please confirm this by completing the section below and returning this Form to us within 7 days of completion of transaction.

Date: _____ Compliance Officer

The Compliance officer
Intec Capital Limited

I confirm the trading in the aforesaid securities was completed on_____.

Date: _____ Signature of the Employee/Director

ANNEXURE 2 (FORMAT FOR DISCLOSURE OF TRANSACTIONS)

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

To,
The Compliance Officer
Intec Capital Limited
708, Manjusha,
57 Nehru Place
New Delhi- 110019

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 3 years and produce to the Compliance officer / SEBI any of the following documents:

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

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

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

Date : _____

Signature : _____

Name :

Designation:

ANNEXURE 3 (YEARLY STATEMENT OF TRADES WHERE PRE-CLEARANCE WAS REQUIRED)

To,
The Compliance Officer
Intec Capital Limited
708, Manjusha,
57 Nehru Place
New Delhi- 110019

Dear Sir,

Pursuant to regulation 5.1(b) of Part A of Schedule I and/or regulation 6.1(b) of the Schedule I of The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992, I declare that I have dealt in the following securities during to _____ in respect of which approval was required and taken by me. The disclosure in respect of trades where pre-clearance was required is as under:

I) DETAILS OF THE SECURITIES TRADED BY DIRECTOR / MEMBER OF STAFF IN HIS OWN NAME

S. No	Name of Company(s)	Face Value per security	Number & Name of securities acquired	Consideration Paid
1	2	3	4	5

Number & Name of securities disposed of	Consideration Received	Folio No. / DP ID/ Client ID	Approval given on
6	7	8	9

II) DETAILS OF THE SECURITIES HELD BY DEPENDENT FAMILY MEMBERS

S. No	Name of Relative	Relationship	Name of Company (s)	Face Value per security	Number & Name of securities acquired
1	2	3	4	5	6

Consideration n Paid	Number & Name of securities disposed of	Consideration n Received	Folio No. / DP ID/ Client ID	Approval given on
7	8	9	10	11

I further declare that the above disclosure is true and correct and is in accordance with the previous disclosures given to the Company.

Signature:

Name: _____

Designation: Address:

Telephone No.:

ANNEXURE 4 (APPLICATION FOR WAIVER FOR DOING CONTRA TRADING WITHIN 6 MONTHS FROM THE DATE OF ALLOWED TRADING UNDER PRE-CLEARANCE APPROVAL)

To,
The Compliance Officer
Intec Capital Limited
708, Manjusha,
57 Nehru Place
New Delhi- 110019

Dear Sir/ Madam,

Pursuant to SEBI PIT Regulation, 2015 relating to waiving / relaxing of minimum period of 6 months for holding of the securities and for doing “Contra Trading” to the designated persons who were earlier allowed to trade under “Pre-clearance Approval”, I hereby request you to grant me permission for disposing of the securities in respect of the securities of the company due to the reason mentioned below:

I. DETAILS OF THE SECURITIES FOR WHICH WAIVER OF MINIMUM HOLDING PERIOD REQUESTED BY DIRECTOR / MEMBER OF STAFF HELD IN HIS OWN NAME

S. No	Name of Company (s)	Face Value per security	Date of acquisition	Number & Name of securities held
1	2	3	4	5

Consideration Paid	Folio No. / DP ID/ Client ID	Number & Name of securities proposed to be disposed of	Reason for waiver of minimum period for doing contra trade
6	7	8	9

II. DETAILS OF THE SECURITIES FOR WHICH WAIVER OF MINIMUM HOLDING PERIOD REQUESTED BY DEPENDENT FAMILY MEMBERS

S. No	Name of Relative	Relationship	Name of Company (s)	Face Value per security	Date of acquisition
1	2	3	4	5	6

Number & Name of securities held	Consideration Paid	Folio No. / DP ID/ Client ID	Number & Name of securities proposed to be disposed of	Reason for waiver of minimum period for doing contra trade
7	8	9	10	11

I declare that the above details are true and correct.

Signature:

Name :

Designation:

Res. Address :

Telephone No.:

ANNEXURE 5 (LETTER CONVEYING DECISION FOR WAIVER /RELAXATION OF MINIMUM HOLDING PERIOD FOR DOING THE CONTRA TRADE)

To,

.....

.....

This is in reference to the application dated_____ requesting for waiving / relaxing the minimum period of holding of securities and for dealing in “Contra Trade.

Your request has been considered by the Competent Authority and the decision on Dealings in purchase/sale / subscription of Equity Shares of the Company is conveyed as under.

Your request has been considered by the Competent Authority and the decision is conveyed as under:

S. No	Name of Company (s)	Face Value per security	Number & Name of securities held	Nature of transaction for which approval is sought (Purchase /Sale)	Number & Name of securities to be dealt	Approval accorded / not accorded	Remarks, if any
1	2	3	4	5	6	7	8

Please note that this approval is valid only for a period of seven days from the date of this approval and you are requested to proceed with the Dealings within the specified time i.e. on or before (date) .

In case you don’t execute the approved transaction or not able to proceed with the Dealings within the specified time, you would be required to re-submit your application and 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 Intec Capital Limited

Compliance Officer

ANNEXURE 6 (FORMAT FOR INITIAL DISCLOSURE OF SECURITIES i.e. Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2) of SEBI PIT 2015 as per FORM A of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 pursuant to Regulation 7 (1) (a) read with Regulation 6 (2)]

To,
The Compliance Officer
Intec Capital Limited
708, Manjusha,
57 Nehru Place
New Delhi- 110019

Dear Sir/ Madam,

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 (Promoter s/ KMP / Directors/immediate relatives/others etc)	Securities held as on the date of regulation coming into force		% of Share holding	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 e.g. – 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 7 (FORMAT FOR INITIAL DISCLOSURE OF SECURITIES i.e. 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) of SEBI PIT 2015 as per FORM B of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 pursuant to Regulation 7 (1) (b) read with Regulation 6 (2)]

To,
The Compliance Officer
Intec Capital Limited
708, Manjusha,
57 Nehru Place
New Delhi- 110019

Dear Sir/ Madam,

Name of the company:

ISIN of the company:

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

Name, PAN No., CIN/ DIN & Address with contact nos.	Category of Person (Promoters/ KMP / Directors /immediate relatives /others etc.)	Date of appointment of Director /KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP		% of 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 e.g. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contract s * lot size)	Notional value in Rupee terms	Number of units (contract s * lot size)	Notional value in Rupee terms
1	2	3	4	5	6	7		8	

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 8 (FORMAT FOR CONTINUAL DISCLOSURE OF SECURITIES i.e. 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) of SEBI PIT 2015 as per FORM C of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 pursuant to Regulation 7 (2) read with Regulation 6 (2))

To,
The Compliance Officer
Intec Capital Limited
708, Manjusha,
57 Nehru Place
New Delhi- 110019

Name of the company:
ISIN of the company:

Details of change in holding of Securities of Promoter, Member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Name , PAN, CIN/D IN, & address with contact nos.	Cate gory of Perso n (Pro mote r/m emb er of the prom oter grou p/de sig nate d perso n/ Direc tor s/im medi ate relati ve to/ot hers etc.)	Securities acqui sition/ dispos al		Securities acquired/Disposed				Securities		Date of allotment advice/ acquisition disposal of shares, specify		Date	Mode /disposal (on market/ public/ rights/ preferen tial offer/ off market/ Inter-se transfer, ESOPs, etc.)	Exchange on which the trade was executed
		Type of secur ities (For eg. – Shar es Warra nts, Conve rtible Deben tures, Rights entitle ment, etc.)	No. and % of share holding	Type of securit ies (For eg. – Shares , Warra nts, Conve rtible Deben tures, Rights entitle ment, etc.)	No.	Value	Trans ac tion Type (Purch a se/sal e Pledg e / Revoc ation / Invoc ation/ Other s- please specif y)	Type of securit ies (For eg. – Share s, Warra nts, Conve rtible Debe ntur es, Rights entitl eme nt, etc.)	No. and % of share hold ing	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

Note: (i) “Securities” shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015. **(ii)** Value of transaction excludes taxes/brokerage/any other charges

Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or Director of a listed company and immediate relatives of such persons 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)	
16	17	18	19	20	21	22

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

I hereby declare that the above details are true, correct and complete in all respects.

Signature:

Designation:

Date:

Place:

ANNEXURE 9 (Transactions by Other connected persons as identified by the company as per FORM D (Indicative Format) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 pursuant to Regulation 7 (3))

To,
The Compliance Officer
Intec Capital Limited
708, Manjusha,
57 Nehru Place
New Delhi- 110019

Dear Sir/ Madam,

Name of the company:

ISIN of the company:

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

Name , PAN, CIN/D IN, & address with contact nos.	Category of Person (Promoter/ member of the promoter group/designated person/ 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 disposal of shares, specify		Date	Mode /disposal (on market/ public / rights / preferential offer/ off market/ Inter-se transfer, ESOPs , etc.)	Exchange on which the trade was executed
		Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements etc.)	No. and % of share holding	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements, etc.)	No.	Value	Transaction Type (Purchase/sale/ Pledge / Revocation / Invocation/ Others- please specify)	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements, etc.)	No. and % of share holding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

Note: (i) “Securities” shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015. **(ii)** Value of transaction excludes taxes/brokerage/any other charges

Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or Director of a listed company and immediate relatives of such persons 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)	
16	17	18	19	20	21	22

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

Signature:

Designation:

Date:

Place:

ANNEXURE 10 (Annual Disclosure Format i.e. Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and Relatives of such persons as mentioned in Regulation 6(2) of SEBI PIT 2015

To,
The Compliance Officer
Intec Capital Limited
708, Manjusha,
57 Nehru Place
New Delhi- 110019

Dear Sir/ Madam,

ANNUAL DISCLOSURE OF SECURITIES HELD BY PROMOTER, KEY MANAGERIAL PERSONNEL (KMP), DIRECTOR

Name of the company:
ISIN of the company:

Annual Disclosure of Securities held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2) Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

I. STATEMENT OF THE SECURITIES HELD BY A DIRECTOR / MEMBER OF STAFF IN HIS OWN NAME

	Details of shareholders				Shareholding as at beginning of FY i.e. on 1 st April		Securities purchased /acquired /subscribed		Securities sold		Shareholding as at end of FY i.e. on 31 st March	
Sl. No	Name of the Director/ Employee	Category of Person (Promoters/ KMP / Directors/	Name, PAN No., CIN/DIN & addresses	Folio No / DP ID/Client ID	Number & Name of securities held in DEMAT / Physical as on the 1 st April	% of Share holding	Number & Name of securities acquired during the year	Consideration paid	Number & Name of securities sold during the year	Consideration received	Number & Name of securities held on March 31, 200____	% of Shareholding
1	2	3	4	5	6	7	8	9	10	11	12	13

II. STATEMENT OF THE SECURITIES HELD BY A DEPENDENT FAMILY MEMBERS

Details of shareholders					Shareholding as at beginning of FY i.e. on 1 st April		Securities purchased /acquired /subscribed		Securities sold		Shareholding as at end of FY i.e. on 31 st March	
Sl. No	Name of the Relatives	Relationship with Director and or employee	Name, PAN No., CIN/DIN & addresses	Folio No / DP ID/Client ID	Number & Name of securities held in DEMAT / Physical as on the 1 st April	% of Share holding	Number & Name of securities acquired during the year	Consideration paid	Number & Name of securities sold during the year	Consideration received	Number & Name of securities held on March 31, 200____	% of Shareholding
1	2	3	4	5	6	7	8	9	10	11	12	13

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

I further declare that the above disclosure is true and correct and is in accordance with the previous disclosures given to the Company.

Signature:

Designation:

Date:

Place: