



KIOCL Limited

(A Government of India Enterprise)

CIN: 13100KA1976GOI002974

Registered Office

II Block, Koramangala, Bangalore - 560 034

Ph. No - 080-25531461-70, 25535937 - 40

Fax No - 080-25532153, 25535941, 25630984

E-mail: cs@kioclltd.in

Website <http://www.kioclltd.in>

**CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF
UNPUBLISHED PRICE SENSITIVE INFORMATION**

AND

**CODE OF CONDUCT OF REGULATING, MONITORING & REPORTING OF
TRADING BY INSIDERS OF KIOCL LIMITED**

*(AS APPROVED BY THE BOARD OF DIRECTORS OF THE COMPANY IN ITS 237TH MEETING HELD
ON 13.01.2016 AND FURTHER AMENDED IN ITS 257TH BOARD MEETING HELD ON 26.03.2019 &
FURTHER AMENDED IN ITS 273RD BOARD MEETING HELD ON 29.06.2021)*

CHAPTER- I

1.0 Preliminary:

This Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information and Code of Conduct for Regulating, Monitoring & Reporting of Trading by Insiders of KIOCL Limited is framed pursuant to Regulations 8 & 9 of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015. This code shall be called the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information and Code of Conduct for Regulating, Monitoring & Reporting of Trading by Insiders of KIOCL Limited and are being framed with an aim that 'Designated Persons' shall not derive any benefit or assist others to derive any benefit from the access to and possession of Unpublished Price Sensitive Information about the Company which is not in the public domain and thus constitutes insider information.

It shall come into force with effect from 13.01.2016. Any amendments to the Code will come into force with effect from the approval of the Board of the Directors of the Company unless specified otherwise.

CHAPTER- II

2.0 Definitions:

2.1 "Act" means the Securities and Exchange Board of India Act, 1992.

2.2 "Associate Company" means Company as defined in Section 2 (6) of the Companies Act, 2013.

2.3 "Board" means the Securities and Exchange Board of India.

2.3(a) "BOD" means Board of Directors the Company

2.4 "Code" means this Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information and Code of Conduct for Regulating, Monitoring & Reporting of Trading by Insiders of KIOCL Limited including modifications made thereto from time-to-time by the Company.

2.5 "Company" means KIOCL Limited or KIOCL.

2.6 "Compliance Officer" means Company Secretary or such other senior officer, designated so and reporting to the Board of Directors, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation

of the codes specified in these regulations under the overall supervision of the Board of Directors of the Company.

2.7 "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 a company or his immediate relative or banker of the company, has more than ten percent of the holding or interest.

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

2.9 "Designated Persons" shall include a person occupying any of the following position in the Company: -

- i) Promoters
- ii) Chairman-cum-Managing Director & All Directors
- iii) Chief Vigilance Officer
- iv) All Executive Directors
- v) All employees in the rank of General Managers
- vi) All Heads of Departments
- vii) All executives working on permanent, temporary or contractual basis in: (1) CMD Secretariat (2) Office of Chief Vigilance Officer (3) Board & Coordination Dept., (4) Finance & Accounts Department, (5) Commercial Dept. (6) Corporate Communication Dept. (7) Personal Secretaries/ officials at the office of Functional Directors (8) office of General Managers and Head of Departments and supporting staff who have access to unpublished price sensitive information (9)
- viii) Fiduciary includes all professional firms such as auditors, accountancy firm, law firms, analyst, insolvency professional entities, consultants, banks etc. assisting or advising KIOCL
- ix) Such other Employee of the company that may be notified by the compliance officer from time to time with the approval of the Board of KIOCL; and
- x) Insider (which also includes Connected Person).

Note: In case any of designated employees as defined in the code separates from the services of the Company due to superannuation / resignation / termination etc. he/she shall continue to be considered as such for a further period of six months subsequent to the date of his separation from the Corporation.

2.10 "Director" means a member of the Board of Directors of the Company.

2.11 "Employee" means every employee of the Company including the Directors in the employment of the Company.

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

2.13 "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.

2.14 "Insider" means any person who is:

- i) a connected person; or
- ii) in possession of or having access to unpublished price sensitive information pursuant to a legitimate purpose

2.15 "Key Managerial Person" means person as defined in Section 2(51) of the Companies Act, 2013.

2.16 "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.

2.17 "Regulations" shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.

2.18 "Securities" shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund.

2.19 "Takeover Regulations" means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.

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

2.21 "Trading Day" means a day on which the recognized stock exchanges are open for trading.

2.22 "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, delisting, disposals and expansion of business and such other transactions;
- (v) changes in key managerial personnel; and

2.23 "Informant" means an individual(s), who voluntarily submits to the Board a Voluntary Information Disclosure Form relating to an alleged violation of insider trading laws that has occurred, is occurring or has a reasonable belief that it is about to occur, in a manner provided under these regulations, regardless of whether such individual(s) satisfies the requirements, procedures and conditions to qualify for a reward or not;

2.24 “voluntarily providing information” means providing the Board with information before receiving any request, inquiry, or demand from the Board, any other Central or State authorities or other statutory authority about a matter, to which the information is relevant;

Words and expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation.

CHAPTER- III

3.0 Applicability:

This Code shall be applicable to ‘Designated Person’ for dealing in Securities as described under Clause 2.9 hereinbefore.

CHAPTER- IIIA

3.(A) PROTECTION OF INFORMANT AGAINST RETALIATION AND VICTIMIZATION:

An employee who during employment becomes privy to information relating to violation of Insider Trading laws and files a Voluntary Information Disclosure Form (VIDF) as per Schedule D of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and/or testifies in and/or participates in and/or otherwise assists or aids the SEBI Board in any investigation, inquiry, audit, examination or proceeding instituted or amount to be instituted for an alleged violation of insider trading laws or in any manner aiding the enforcement action taken by the SEBI Board or breaches any confidentiality agreement or provisions of any terms and conditions of employment or engagement solely to prevent any employee from cooperating with the SEBI Board in any manner and is a director, partner, regular or contractual employee but does not include an advocate shall be subject to suitable protection under this Code against any discharge termination, demotion, suspension, threats, harassment directly or indirectly or discrimination against any such employee.

CHAPTER-IV

4.0 COMPLIANCE OFFICER:

The Company Secretary shall be the Compliance Officer for the purposes of this Code.

In order to discharge his/her functions effectively; the Compliance Officer shall be adequately empowered and provided with adequate manpower and infrastructure to

effectively discharge his/her functions. In the performance of his/her duties, the Compliance Officer shall have access to all information and documents relating to the Securities, Employees and Unpublished Price Sensitive Information of the Company.

The Compliance Officer shall act as the focal point for dealings with SEBI in connection with all matters relating to the compliance and effective implementation of the Regulations and this Code.

4.1 DUTIES OF THE COMPLIANCE OFFICER:

4.1.1. The Compliance Officer shall be responsible for:

- Reporting to the board of directors and in particular, shall provide reports to the Chairman of the Audit Committee and to the Chairman of the board of directors on quarterly basis of the compliance of this code.
- 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.

CHAPTER - V

5.0 RESTRICTIONS ON COMMUNICATION AND TRADING BY INSIDERS

5.1 Communication or procurement of unpublished price sensitive information

5.1.1 Except as provided in the Code or the Regulations no insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, 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 unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

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

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

- (a) entail an obligation to make an open offer under the takeover regulations where the Board of Directors of the listed Company is of informed opinion that the sharing of such information is in the best interests of the Company; or
- (b) not attract the obligation to make an open offer under the takeover regulations but where the Board of Directors of the listed Company is of informed opinion that the sharing of such information is in the best interests of the Company and the information that constitute unpublished price sensitive information is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the Board of Directors may determine to be adequate and fair to cover all relevant and material facts
 - 1. However, the Board of Directors shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the limited purpose and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information.
 - 2. The Board of Directors shall ensure that a structured digital database is maintained containing the nature of unpublished price sensitive information and the names of such persons who have shared the information and also the names of such persons 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. Such database shall not be outsourced and shall be maintained internally with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database. Further, the board of directors shall ensure that the structured digital database is preserved for a period of not less than eight years after completion of the relevant transactions and in the event of receipt of any information from the Board regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.

5.2 Policy for determination of “Legitimate Purpose”

“Legitimate Purpose” shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with Government Agencies/Authorities, partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, and such other persons as may be prescribed by the Chairman-cum-

Managing Director from time to time, provided that such sharing has not been carried out to evade or circumvent the prohibitions of this Code.

While deciding the legitimate purpose following shall be taken into consideration:

1. Nature of information being shared.
2. Person to whom the information is being given.
3. Whether information may be categorized under unpublished price sensitive information.
4. Whether confidentiality clause is added in the information.
5. Whether it is necessary to share such information with other persons.

5.3 Any person in receipt of unpublished price sensitive information pursuant to a “legitimate purpose” shall be considered an “insider” for purposes of these regulations and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with these regulations.

5.4 Limited access to confidential information:

All the Designated Persons who are privy to the confidential information shall, in preserving the confidentiality of information, and to prevent its wrongful dissemination, adopt among others but not limited to the following safeguards:

- To keep files containing confidential information secured.
- To keep computer files with adequate security of login through a password.

5.5 Need to know:

All the Designated Persons, who are privy to unpublished Price Sensitive Information, shall handle the same strictly on a “Need to Know” basis. This means the unpublished Price Sensitive Information shall be disclosed only to those persons within the Company who need to know the same in the course of performance or discharge of their respective professional duties and whose possession of unpublished Price Sensitive Information will not in any manner give rise to a conflict of interest or likelihood of misuse of the information.

6.0 TRADING WHEN IN POSSESSION OF UNPUBLISHED PRICE SENSITIVE INFORMATION.

6.1 Except as provided in the Code or the Regulations, no insider shall trade in securities that are listed or proposed to be listed on a stock exchange when in possession of unpublished price sensitive information. When a person who has traded in securities has been in possession of unpublished price sensitive information, his

trades would be presumed to have been motivated by the knowledge of and awareness of such information in his possession.

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

- (i) the transaction is an off-market inter-se transfer between insiders who were in possession of the same unpublished price sensitive information without being in breach of Clause 5.1 of this Code and both parties had made a conscious and informed trade decision; such off-market trades shall be reported by the insiders to the Company within two working days. Such trade particulars will be notified to the stock exchange on which the securities are listed within two trading days from receipt of disclosure or from becoming aware of such information.
- (ii) The transaction was carried out through the block deal window mechanism between persons who were in possession of the unpublished price sensitive information without being in breach of 5.1 and both parties had made a conscious and informed trade decision
- (iii) The transaction in question was undertaken pursuant to a statutory or regulatory obligation to carry out a bonafide transaction.
- (iv) in the case of non-individual insiders: -
 - (a) the individuals who were in possession of such unpublished price sensitive information were different from the individuals taking trading decisions and such decision-making individuals were not in possession of such unpublished price sensitive information when they took the decision to trade; and
 - (b) the provisions of this code were not violated and no unpublished price sensitive information was communicated by the individuals possessing the information to the individuals taking trading decisions and there is no evidence of such arrangements having been breached;
- (v) the trades were pursuant to a trading plan set up in accordance with Clause 7.1 of this Code.

6.2 In the case of connected persons the onus of establishing, that they were not in possession of unpublished price sensitive information, shall be on such connected persons and in other cases, the onus would be on the SEBI.

7.1. TRADING PLANS

7.1.1. An insider shall be entitled to formulate a trading plan and present it to the compliance officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.

7.1.2. Such 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 affected 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 affected; and
- (vi) not entail trading in securities for market abuse.

7.1.3 The compliance officer shall review the trading plan to assess whether the plan would have any potential for violation of this Code and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan. Provided that pre-clearance of trade shall not be required for a trade executed as per an approved plan. Provided further that trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

7.1.4. 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.

Provided that the implementation of the trading plan shall not be commenced if any unpublished price sensitive information in possession of the insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation and in such event the compliance officer shall confirm that the commencement ought to be deferred until such unpublished price sensitive information becomes generally available information so as to avoid a violation of Clause 6.1 of this Code.

7.1.5. Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

CHAPTER - VI

8.0 TRADING WINDOW:

8.0.1 The Compliance Officer shall specify a trading period, to be called "Trading Window", for trading in the Securities. The Compliance Officer shall intimate the

closure of trading window to all the designated persons of the Company 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. Designated persons and their immediate relatives shall not trade in securities when the trading window is closed. Trading window shall be closed on the last day of every quarter and shall only open 48 hours after the declaration of financial results for the said quarter. The trading window shall also be closed during the time the unpublished price sensitive information as referred to in clause 2.22 is published.

All the Designated Persons and their immediate relatives shall be subjected to trading restrictions enumerated in Clause 8.0.2.

8.0.2 The Trading Window shall be closed in the following events:

Sl. No.	Events / Particulars	Restricted Period From
(i)	Declaration of financial results (quarterly, half-yearly and annually)	Shall be notified by the Compliance Officer as and when the proposal is put up to the BOD with the approval of the Reporting Officer.
(ii)	Intended declaration of dividends (both interim and final)	
(iii)	Issue of Securities or buy-back of Securities	
(iv)	Any major expansion plans or execution of new projects.	
(v)	Disposal of the whole or a substantial part of the undertaking	
(vi)	Any significant changes in policies, plans or operations of the Company	
(vii)	Any proposed Joint Venture /Foreign Collaboration and major Consultancy work in India or broad	
(viii)	Any change in status of the Company	
(ix)	Any other event as may be notified by the Company from time to time including the Press Conferences	

The compliance officer shall determine the time for re-opening of the trading window, for which trading window is closed (i.e. the Price Sensitive Information as referred to in Clause 8.0.2), after taking into account of various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, which in any event shall not be earlier than forty-eight (48) hours after the information becomes generally available.

8.0.3 The remaining days of a year other than the days mentioned under Clause 8.0.1 and 8.0.2 above shall be called “**Valid Trading Window**”.

The Designated Persons and their immediate relatives shall conduct all their dealing in Securities either in their own name or in the name of their immediate relatives only in a “Valid Trading Window” and shall not deal in any transaction involving the purchase or sale of Securities when the Trading Window is closed.

8.0.4 The Compliance Officer shall maintain a register of the periods of “Closed Trading Window”, wherein he shall record the date of closure and opening of the trading window and the purpose for which trading window is closed. A Proforma of the register of periods of closure of Trading Window is given in **Form I**.

8.0.5 In case of Employee Stock Option Schemes (“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 the Trading Window is closed. Subject to the provisions of clause 8.0 of this Code, all the Designated Persons and their immediate relatives shall be eligible to conduct all their Dealing in Securities either in their own name or in the name of their immediate relatives on any day of the year other than the periods mentioned pursuant to clause 8.0.1 and 8.0.2 of this Code.

CHAPTER-VII

9.0 PRE-CLEARANCE OF DEALINGS IN SECURITIES

9.1 Applicability:

The Designated Persons and their immediate relatives who intend to deal in the Securities of the Company either in their own name or in the name of their immediate relatives, when the trading window is open, shall be subject to pre-clearance by the compliance officer, if the value of the proposed trades is above 10,000 equity shares to be traded in a single transaction or less than 30,000 equity shares to be traded in series of transactions within seven trading day. However, 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.

Application for pre-clearance shall be made only during Valid Trading Window period. Applications submitted during a period when the Trading Window is closed shall be invalid and will be deemed to have been automatically rejected.

9.2 The compliance officer shall confidentially maintain a list of such securities as a “restricted list” which shall be used as the basis for approving or rejecting applications for pre-clearance of trades.

9.3(i) Pre-clearance Procedure:

The Designated Person shall make pre-clearance application to the Compliance Officer. The application shall indicate the estimated number of Securities that the Designated Person intends to deal in, the details as to the depository with which he/she has a security account, the details as to Securities in such depository mode and such other details, as may be required by the Compliance Officer from time-to-time in this behalf. An undertaking shall be executed in favour of the Company by Designated persons incorporating, inter-alia, the following clauses, as may be applicable:

- (a) that he/she does not have any access or has not received "Unpublished Price Sensitive Information" up to the time of signing the undertaking;
- (b) that in case he/she has access to or receives "Unpublished Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction he/ she shall inform the Compliance Officer of the change in his/her position and that he/she would completely refrain from dealing in the Securities of the Company till the time such information becomes public;
- (c) that he/she has not contravened the Code of Practices & Procedures for Fair Disclosure of Unpublished Price Sensitive Information and Conduct for Regulating, Monitoring & Reporting of Trading by Insiders as notified by the Company from time to time;
- (d) that he/she shall hold their investments in Securities for a minimum period of six months as and when acquired;
- (e) that he/she undertakes to submit the necessary report within two trading days of execution of the transaction or a 'Nil' report if the transaction is not undertaken;
- (f) that he/she is aware that, he/she shall be liable to face penal consequences as set forth in the Code including disciplinary action, wage freeze, suspension, recovery, clawbacks etc. under the Code, in case the above declarations are found to be misleading or incorrect at any time;
- (g) that he/she hereby undertakes not to transact in Securities in the sanctioned period in case trading window is declared closed subsequently;
- (h) that he/she has made a full and true disclosure in the matter.

A combined proforma for **Application-cum-Undertaking** is annexed to this code as **FORM-II**.

All the Designated persons shall execute documents as may be prescribed by the Compliance Officer from time-to-time. Such application for pre-dealing approval with enclosures must necessarily be sent through electronic mail followed by hard copies of all the documents. The e-mail for this purpose should be **mail to: cs@kioclltd.com** or to such other e-mail ID as may be notified by the Compliance Officer from time to time.

9.3(ii) Approval:

- (b) Immediately on receipt of the pre-clearance application, the date and time of the receipt of the same shall be recorded thereon by the Compliance Officer. The

Compliance Officer shall process the pre-clearance applications and if pre-clearance application is in accordance and in compliance with provisions of this Code, the Compliance Officer shall endeavour to communicate the pre-clearance immediately but not later than within two trading days from the time of receiving the application. Dealing in Securities by the Compliance Officer shall require prior clearance from the Reporting Officer.

- (c) Every approval letter shall be issued in such format **(Form-III)** or as may be prescribed by the Company from time-to-time. Every approval shall be dated and shall be valid for a period of seven trading day from the date of approval, within which trades that have been pre-cleared have to be executed by the designated person, failing which fresh pre-clearance would be needed for the trades to be executed. However, if trading window is closed after pre-approval for trading of security, the pre-approval so granted is automatically deemed to be withdrawn if such period is superseded by closure of Trading Window.

9.4 Completion of Pre-cleared Dealing:

- (a) The Designated Person or their immediate relatives who intend to deal in the Securities either in their own name or in the name of their immediate relatives shall ensure that they complete execution of every pre-cleared deal in the Securities as prescribed above within seven trading days from the date of the approval. The Designated Employee shall file within two trading days of the execution of the transaction, the details of such transaction, with the Compliance Officer in the prescribed form. In the event of executing the transaction or not executing the transaction, a report to that effect shall be filed with the Compliance Officer **(Form-V)**.
- (b) If a deal is not executed by the Designated Employee pursuant to the approval granted by the Compliance Officer within seven trading days, within which trades that have been pre-cleared have to be executed by the designated person, failing which fresh pre-clearance would be needed for the trades to be executed.

9.5 Holding Period:

9.5.1. A designated person who is permitted to trade shall not execute a contra trade i.e. sell or buy any number of shares during the next six months following the prior transaction. The compliance officer may be empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate this Code. Should a 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 the SEBI under the Securities and Exchange Board of India Act, 1992 (15 of 1992).

9.5.2. The Compliance Officer shall maintain a Register of Pre-clearance of trading of Securities and record therein the name and designation of the designated person submitting the application, date of the application, date and time of receipt of the application, nature of the transaction, number of Securities, consideration value, name of immediate relatives, if the transaction is in the name of immediate relatives and date and details of the actual transaction. A proforma of the Register is given in **FORM- IV**.

9.5.3. The Compliance Officer shall also maintain a Register of "Waiver of restriction on holding investment in the Securities for minimum period of six months" and shall record thereon the Designated persons' details of Securities for which waiver is granted, date of waiver and the grounds of the waiver. A proforma of the Register is given in **FORM VI**.

9.6 Advice regarding Pre-Clearance:

In case of doubt, all the Designated Persons shall consult the Compliance Officer or such other officer designated by him/her from time-to-time whether the provisions relating to pre-clearance are applicable to any proposed transaction by the Designated Persons in the Securities.

CHAPTER-VIII

10.0 DISCLOSURE OF TRADING BY INSIDERS

10.1 Initial Disclosure:

Every promoter, member of the promoter group, key managerial personnel and director of the Company, shall disclose his/her holding of securities and trading in derivatives of securities of the Company as on the date of these regulations taking effect to the company within thirty days of these regulations taking effect in **Form-A**.

Every person on appointment as key managerial personnel or a director of the Company or upon becoming a promoter shall disclose his/her holding of securities and trading in derivatives 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 **Form-B**.

10.2 Continual Disclosure:

Every promoter, member of promoter group, designated person and director of every company shall disclose in **Form-C** 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 ten lakh rupees or such other value as may be specified.

The Company shall notify the particulars of trading under Clause 10.2 to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.

Explanation – It is clarified for the avoidance of doubts that the disclosure of the incremental transactions after any disclosure under this Clause, shall be made when the transactions effected after the prior disclosure cross the threshold specified in Clause 10.2.

10.3 Disclosure by other connected person:

The other connected person or class of connected persons may require making disclosures of holdings and trading in securities of the company in **Form-D** and at such frequency as may be determined by the company time to time.

10.4 The compliance officer shall maintain records of all the declarations viz. initial disclosure, continual disclosure and disclosure by other connected person received under sub-clauses 10.1, 10.2 & 10.3 above for a minimum period of five years. Proforma of the register to be maintained is given in **Form-VII**.

11.0 PENALTY FOR CONTRAVENTION:

11.1 The Designated Persons shall be individually responsible for complying with the provisions of this Code **(including to the extent the provisions hereof are applicable to his/her immediate relatives)**.

11.2 The Employees who violate this Code shall be subjected to disciplinary action by the Competent Authority as defined in the Employee (Conduct, Discipline and Appeal) Rules of the Company (CDA Rules) and appropriate penalty as stipulated under the CDA Rules including wage freeze, suspension, recovery, clawbacks etc. may be imposed on such employees.

11.3 In case, it is observed by the Board of Directors that there has been violation of this Code, the same shall be informed to the SEBI promptly.

11.4 In case of violation of this code, the disciplinary action taken by the Company shall not preclude SEBI and other authorities from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015. In case the SEBI Regulation or any Statutory Provisions are more stringent than those contained in the Code, the SEBI Regulations / Statutory Provisions will prevail.

12. CLARIFICATIONS:

- CMD may take necessary disciplinary action as per extant rules of the Company for violation of the code;
- In case the periodical information is Nil, a Nil report should be submitted in the said format;
- For any queries concerning this Code, please contact the Compliance Officer.

CHAPTER-IX

Policy and Procedure for Inquiry in case of Leak/suspected leak of Unpublished Price Sensitive Information

- (i) CMD will constitute a committee for inquiry of leakage/suspected leakage of unpublished price sensitive information (UPSI).
- (ii) CMD shall direct for inquiry of leakage/ may direct suspected leakage of UPSI.
- (iii) The Committee shall conduct an internal inquiry into the leakage/suspected leakage of UPSI to determine possible role of following persons in this regard:
 - a) Persons / members of committees involved in generation of the original data for the purpose of determination of key figures pertaining to financial figures.
 - b) Persons involved in the consolidation of the figures for the financial results.
 - c) Persons involved in the preparation of board notes and presentations.
 - d) Persons involved in dissemination of information relating to financial results in the public domain.
 - e) Any other persons who had access to the information.
- (iv) The inquiry shall be completed within a period of 3 months from the date of order of inquiry.
- (v) The Committee shall submit its report to the CMD within 3 days from the completion thereof.
- (vi) In accordance with this code and company's rules, as applicable, appropriate action shall be taken against those persons who are found responsible for the leakage of UPSI.
- (vii) The Compliance officer shall submit the findings in the report of inquiry committee to the SEBI promptly.

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

(PURSUANT TO SCHEDULE A & REGULATION 8 (1) OF SEBI (PROHIBITION OF INSIDER TRADING)
REGULATIONS - 2015)

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

1. Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. Uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. Company Secretary shall be designated as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.
7. Developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website i.e. www.kioclltd.in to ensure official confirmation and documentation of disclosures made.
8. Handling of all unpublished price sensitive information on a need-to-know basis.

MINIMUM STANDARDS FOR CODE OF CONDUCT FOR LISTED COMPANIES TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSON

(PURSUANT TO SCHEDULE B & REGULATION 9 (1) OF SEBI (PROHIBITION OF INSIDER TRADING REULATION-2015)

- (1) The compliance officer shall report to the Board of Directors and in particular, shall provide reports to the Chairman of the Audit Committee or to the Chairman of the Board of Directors if there is no chairman of audit committee, on annual basis. The Board of Directors shall be informed regarding compliances of the code on annual basis.
- (2) KIOCL will not communicate unpublished price sensitive information to any person except in furtherance of the legitimate purposes, performance of duties or discharge of legal obligations.
- (3) The company will follow Chinese Wall Policy to prevent the misuse of confidential information. A “Chinese Wall” policy separates people into two groups, one, the Insiders (referred as the “Designated Persons”) possessing the unpublished price sensitive information and second, the Outsiders (i.e. the Public or a person below designated person). As per “Chinese Wall” policy, the designated person (termed as person of Insider Area) is not allowed to communicate the unpublished price sensitive information to other person in organization (termed as person of Public Area). In order to comply with the policy, the Compliance Officer shall take declaration in the form of an Undertaking from the designated person on quarterly basis, to ensure that, they have not communicated any price sensitive information to any outsider. There will be a wall between all the departments of the company in sharing the price sensitive information.
- (4) Designated persons and immediate relatives of designated persons in the company shall be governed by this internal code of conduct governing dealing in securities of the company.
- (5) If a designated person, having possession of the price sensitive information, intends to communicate the same in order to fulfil his legal obligations, then, he must ensure that any provisions of the applicable acts/laws/regulations or guidelines of the Government are not violated and the information is not used for trading purpose in securities of KIOCL. He shall make a disclosure in this regard to the compliance officer.
- (6) Designated persons shall disclose names and Permanent Account Number or any other identifier authorized by law of the following persons
 - a) Immediate relatives
 - b) Person with whom such designated person(s) shares a material financial relationship

- c) Phone, mobile and cell numbers which are used by them
- d) Names of educational institutions from which designated persons have graduated and names of their past employers shall also be disclosed on one time basis.

(7) As present, KIOCL is having only one kind of security (i.e. equity shares); the trading in the shares shall be covered under the code. The compliance officer is entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any unpublished price sensitive information before approving any trade.

DETAILS OF THE COMPLIANCE OFFICER:

Any clarification with regard to the Code may be addressed to the Compliance Officer at the address given below:

Company Secretary
KIOCLLtd
II Block Koramangala,
Bengaluru 560034
Email - cs@kioclltd.in

KIOCL LIMITED

Bangalore

FORM - I

REGISTER OF PERIODS OF CLOSURE OF TRADING WINDOW

SI. No.	PURPOSE FOR WHICH TRADING WINDOW CLOSED	START DATE OF CLOSURE OF TRADING WINDOW	DATE OF NOTIFYING CLOSURE OF TRADING WINDOW, IF ANY	DATE OF OPENING OF TRADING WINDOW	DATE OF NOTIFYING OPENING OF TRADING WINDOW	REMARKS

KIOCL LIMITED

Bangalore
FORM - II

APPLICATION FOR PRE-CLEARANCE OF TRADES IN SECURITIES

To
The Compliance Officer
KIOCL Limited
II Block, Koramangala,
Bangalore - 560 034

Dear Sir,

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Practices & Procedures for Fair Disclosure of Unpublished Price Sensitive Information and Conduct for Regulating, Monitoring & Reporting of Trading by Insiders, I seek approval for purchase/sale/subscription of the Securities (give description) as per the details given below:

Name, Designation & Emp. No.:

Department:

Date of Joining/ becoming the Designated Employee:

SI. NO.	No. of Securities held (including the immediate relatives as on the date of application	Folio No. / DP ID & Client ID	Nature of new transaction for which approval is sought	Estimated number of Securities to be dealt
1	2	3	4	5
Estimated consideration value	Whether proposed transaction is in the self-name or in the name of immediate relatives	Name of the immediate relatives, if the transaction is in the name of the immediate relatives	Date of Purchase/allotment	Previous approval number and date of purchase/allotment
6	7	8	9	10

UNDERTAKING

In this connection I solemnly confirm and declare:

- a) that I do not have access and/or have not received any " Unpublished Price Sensitive Information" up to 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 any change in my position and that I shall refrain from Dealing in Securities till the time such information becomes public;
- c) that I have not contravened the Code of Practices & Procedures for Fair Disclosure of Unpublished Price Sensitive Information and Conduct for Regulating, Monitoring & Reporting of Trading by Insiders, as notified by the Company from time to time.
- d) that I shall hold the Securities for a minimum period of six months from the date of purchase/ that I have complied with the requirement of the minimum holding period of six months with respect to the Securities sold. (applicable only in respect of sale transaction).
- e) that I undertake to submit the necessary report within two trading days of execution of the transaction/a 'Nil' report, if the transaction is not undertaken.
- f) that I am aware that, I shall be liable to face penal consequences as set forth in the Code including disciplinary action, wage freeze, suspension, recovery, clawbacks etc. under the Code of the Company, in case the above declarations are found to be misleading or incorrect at any time.
- g) that I hereby undertake not to transact in Securities in the sanctioned period in case trading window is declared closed subsequently.
- h) that I hereby made a full and true disclosure in the matter.

Pre-clearance may kindly be accorded in terms of provisions of the Code of Practices & Procedures for Fair Disclosure of Unpublished Price Sensitive Information and Conduct for Regulating, Monitoring & Reporting of Trading by Insiders of KIOCL Limited.

Date _____ Place _____	Signature: _____ Name & Designation: _____ Department: _____ Official Address: _____ Telephone and e-mail: _____ MOBILE No.: _____
---------------------------	---

FOR OFFICE USE

Serial number of the application received:

Date & time of receipt of the Application:

Date & time of communication of the pre-clearance or otherwise:

Reasons for not giving pre-clearance:

Signature of the Compliance Officer/ Authorised Officer

KIOCL LIMITED
Bangalore
FORM - III
Letter of intimation of Pre-Clearance

Name: _____

Employee No: _____

Designation: _____

Dear Sir,

With reference to your above application seeking approval for undertaking certain transactions in Securities detailed therein please be informed that you are hereby authorized/not authorized to undertake the transaction(s) as detailed in your said application.

Kindly note that in terms of the Code of Practices & Procedures for Fair Disclosure of Unpublished Price Sensitive Information and Conduct for Regulating, Monitoring & Reporting of Trading by Insiders of KIOCL the above-mentioned transaction is to be completed within i.e., within seven trading days of the pre-clearance.

This approval is being issued to you based on the various declarations, representations and warranties made by you in your said application.

This approval letter is valid till _____ (i.e., for seven trading days). If you do not execute the approved transaction /deal on or before this date you would have to seek fresh pre-dealing approval before executing any transaction/deal in the Securities. Further, you are required to file the details of the executed transactions in the attached format **(Form V)** within two trading days from the date of transaction/deal. In case the transaction is not undertaken, a "Nil" report shall be given.

Kindly also note that in terms of the Code of Practices & Procedures for Fair Disclosure of Unpublished Price Sensitive Information and Conduct for Regulating, Monitoring & Reporting of Trading by Insiders of KIOCL the Securities to be bought shall be held for a minimum period of six months from the date of the purchase.

(Applicable only in respect of purchase transaction).

The above sanction automatically stands withdrawn if subsequently the trading window is declared closed involving the period of sanction therein.

For & on behalf of
KIOCL Limited

Compliance Officer/Authorised Officer

KIOCL LIMITED

Bangalore

FORM - IV

REGISTER OF PRE-CLEARANCE FOR TRADE IN SECURITIES

Sl. No	NAME	DESIGNATION	DEPARTMENT	DATE & TIME OF RECEIPT OF PRE-CLEARANCE APPLICATION	NATURE OF TRANSACTION (PURCHASE OR SALE)	ESTIMATED NUMBER OF SECURITIES INDICATED IN THE APPLICATION
1	2	3	4	5	6	7

ESTIMATED CONSIDERATION VALUE INDICATED IN THE APPLICATION	NAME OF THE IMMEDIATE RELATIVES IF THE TRANSACTION IS IN THE NAME OF THE IMMEDIATE RELATIVES	DATE OF COMMUNICATION OF THE CLEARANCE BY THE COMPLIANCE OFFICER	REASONS FOR NON CLEARANCE, IF NOT CLEARED	DATE OF PLACEMENT BEFORE GRIEVANCE COMMITTEE	NUMBER OF SECURITIES ACTUALLY TRADED, IF INTIMATED	REMARKS
8	9	10	11	12	13	14

KIOCL LIMITED

Bangalore

FORM - V

FORMAT FOR DISCLOSURE OF PRE-APPROVED TRANSACTIONS

(To be submitted within two trading days of transaction/dealing in Securities of the Company)

Date: _____

To
The Compliance Officer
KIOCL Limited
II Block, Koramangala,
Bangalore - 560 034

Dear Sir,

DETAILS OF PRE-APPROVED TRANSACTION

Ref: Your Approval letter No. _____ dated _____

I hereby inform you that I

- have not bought/sold/subscribed any Securities
- have bought/sold/subscribed to the _____ Securities (give description) as mentioned below on _____ (insert date)

Name of holder	First or joint holder	No. of Securities dealt with	Bought / Sold/ Subscribed	DP ID/CLIENT ID (electronic form) or Folio no. for physical where the Sec. will be debited or credited	Price (₹)

** "F" first holder "J" joint holder

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 5 (Five) years and produce to the Compliance Officer/SEBI any of the following documents:

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

I declare that the above information is correct and that no provisions of the Company's Code of Practices & Procedures for Fair Disclosure of Unpublished Price Sensitive Information and Conduct for Regulating, Monitoring & Reporting of Trading by Insiders and/or applicable laws/regulations have been contravened for effecting the above said transaction(s).

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 Company (Compliance Officer) for necessary approval (applicable in case of purchase / subscription).

Yours truly,

Signature: _____

Name: _____

Emp No: _____

Department

Official Address:

Telephone and e-mail

MOBILE No.

Strike off whichever is not applicable.

KIOCL LIMITED

Bangalore
FORM - VI

REGISTER OF WAIVER OF RESTRICTION FOR DISPOSAL OF SECURITIES WITHIN SIX MONTHS OF ACQUISITION

Sl. No.	NAME	DESIGNATION	DEPARTMENT	NAME OF THE IMMEDIATE RELATIVES, IF THE SECURITIES HELD IN THE NAME OF IMMEDIATE RELATIVES	NUMBER OF SECURITIES
1	2	3	4	5	6

CONSIDERATION VALUE	REASONS FOR WAIVER	DATE OF WAIVER	REMARKS
7	8	9	10

KIOCL LIMITED

Bangalore
FORM - VIII

REGISTER OF DISCLOSURE OF SHAREHOLDINGS

INITIAL DISCLOSURE							
NAME, DESIGNATION & EMP. NO	DEPARTMENT	DATE OF APPOINTMENT AS EMPLOYEE / KMP / DIRECTOR / BECOMING PROMOTER	DATE OF RECEIPT OF INFORMATION	NUMBER OF SECURITIES	DATE OF ACQUISITION	CONSIDERATION VALUE	NAME (IF SECURITIES HELD IN THE NAME OF IMMEDIATE RELATIVES)

CONTINUAL DISCLOSURE							
NAME, DESIGNATION & EMP. NO	DEPARTMENT	DATE OF APPOINTMENT AS EMPLOYEE / KMP / DIRECTOR / BECOMING PROMOTER	DATE OF RECEIPT OF INFORMATION	NUMBER OF SECURITIES	DATE OF ACQUISITION	CONSIDERATION VALUE	NAME (IF SECURITIES HELD IN THE NAME OF IMMEDIATE RELATIVES)

DISCLOSURE BY OTHER CONNECTED PERSON			
NAME	DATE OF RECEIPT OF INFORMATION	NUMBER OF SECURITIES	CONSIDERATION VALUE

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: **KIOCLIMITED**
 ISIN of the company: **INE880L01014**

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

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/KMP/Directors/immediate relatives/others etc.)	Securities held as on the date of regulation coming into force		% of Shareholding	Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option Contracts held as on the date of regulation coming into force	
		Type of security (For 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

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:

FORM B

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

Name of the company: **KIOCL LIMITED**
ISIN of the company: **INE880L01014**

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter or member of promoter group of a listed company & immediate relatives of such persons 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 or member of the promoter group or /immediate Relatives to / others etc.)	Date of appointment of Director /KMP OR Date of becoming Promoter / Member of Promoter Group	Securities held at the time of appointment of KMP/ Director or upon becoming Promoter or member of the promoter group		% of Shareholding
			Type of security (For e.g. – Shares, Warrants, Convertible Debentures, rights entitlement etc.)	No.	
1	2	3	4	5	6

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

Details of Open Interest (OI) in derivatives on the securities of the company held on appointment of KMP or Director or upon becoming a Promoter or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).

Open Interest of the Future contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group			Open Interest of the Option Contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group		
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
7	8	9	10	11	12

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

Name & Signature:

Designation:

Date:

Place:

FORM C

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

Name of the company: **KIOCL LIMITED**

ISIN of the company: **INE880L01014**

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/DIN, & address with contact nos.	Category of Person (Promoter/member of the promoter group/designated person/Director/s/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/disposal of shares, specify		Date of intimation to company	Mode of acquisition /disposal (on market/public/rights/preferential offer/off market/Inter-se transfer, ESOPs, etc.)	Exchange on which the trade was executed
		Type of securities (For e.g. - Shares, Warrant, Convertible Debentures, Rights entitlement etc.)	No. and % of share holding	Type of securities (For e.g. - Shares, Warrant, Convertible Debentures, Rights entitlement etc.)	No.	Value	Transaction Type (Purchase/sale Pledge / Revocation / Invocation / Others please specify)	Type of securities (For e.g. - Shares, Warrant, Convertible Debentures, Rights entitlement, 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.

Name & Signature:

Designation:

Date:

Place:

Form D

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

Name, PAN, CIN/DIN, & 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/disposal of shares, specify		Date of information to company	Mode of acquisition /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 e.g. - Shares, Warrants, Convertible Debentures, Rights entitlement etc.)	No. and % of share holding	Type of securities (For e.g. - Shares, Warrants, Convertible Debentures, Rights entitlement etc.)	No.	Value	Transaction Type (Purchase/sale Pledge / Revocation / Invocation / Others please specify)	Type of securities (For e.g. - Shares, Warrants, Convertible Debentures, Rights entitlement, 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 other connected persons as identified by the Company

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.

Name:

Signature:

Date:

Place: