



INDIA POWER CORPORATION LIMITED

CIN: L40105WB1919PLC003263

**CODE OF CONDUCT TO REGULATE, MONITOR
AND REPORT TRADING BY INSIDERS**

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**CODE OF CONDUCT TO REGULATE, MONITOR
AND REPORT TRADING BY INSIDERS**

In terms of Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as “Regulations”), the Board of Directors (hereinafter referred to as “the Board”) of India Power Corporation Limited (hereinafter referred to as “the Company”) has formulated a Code of Conduct to Regulate, Monitor and Report Trading by Insiders (hereinafter referred to as “the Insider Code”) for prevention of Insider Trading in relation to the Securities of the Company.

By this Code, the Company endeavors to preserve the confidentiality of Unpublished Price Sensitive Information and prevent misuse of such information. The Company is committed to transparency, fairness in dealing with all stakeholders at all times.

DEFINITIONS

“**Board**” means the Board of Directors of the Company as appointed from time to time.

“**Connected Person**” means:

- (i) any person who is or has during the six months prior to the concerned act been associated with the Company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the Company or holds any position including a professional or business relationship between himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to Unpublished Price Sensitive Information or is reasonably expected to allow such access.
- (ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be Connected Persons unless the contrary is established, -
 - an Immediate Relative of Connected Persons specified in clause (i); or
 - a holding company or associate company or subsidiary company; or
 - an intermediary as specified in section 12 of the Securities and Exchange Board of India Act, 1992 or an employee or director thereof; or
 - an investment company, trustee company, asset management company or an employee or director thereof; or
 - an official of a stock exchange or of clearing house or corporation; or
 - a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
 - a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
 - an official or an employee of a self-regulatory organization recognised or authorized by SEBI; or
 - a banker of the Company; or
 - 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.
- (iii) Designated Persons

“**Designated Employees**” shall cover the following:

- All Employees of the rank of General Manager and above of the Company;
- Such other Employee as may be designated by the Compliance Officer in consultation with the Managing Director of the Company from time to time.

“**Designated Persons**” shall cover all Promoters, Directors of the Company and the Designated Employees and their immediate relatives;

“**Immediate Relative**” of a person means a spouse, or the parent, sibling, and child of that person or of his / her spouse, if they are either dependent financially on such person, or consults such person in taking decisions relating to trading in securities.

“**Insider**” means any person who is:

- A Connected Person; or
- in possession of or have access to UPSI.

“**Trading**” means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities of the Company, and “trade” shall be construed accordingly ;

“**Trading day**” means a day on which the recognized stock exchanges are open for trading;

“**Unpublished Price Sensitive Information**” (UPSI) means any information which relates directly or indirectly to the Company, or its Securities, that is generally not available, and which in the opinion of the Compliance Officer and the Managing Director, on being generally available, is likely to materially affect the price of Securities of Company, including but not restricted to, information relating to the following:

- financial results;
- dividends;
- change in capital structure;
- mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
- changes in key managerial personnel; and
- material events in accordance with the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Words and expressions used but not defined in this Code shall have the same meaning assigned to them in the SEBI (Prohibition of Insider Trading) Regulations, 2015 or the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, or the Companies Act, 2013 and the rules / regulations made thereunder, as the case may be or in any amendment thereto.

COMPLIANCE OFFICER

1. The Company Secretary of the Company shall be the Compliance Officer for the purpose of the Code. In the absence of Compliance Officer, such person as may be authorised by the Managing Director of the Company shall discharge the duties of the Compliance Officer under the Code.
2. The Compliance Officer shall administer and monitor the compliance of the Code. It shall be responsibility of each Insider to ensure compliance of the Code and the Regulations.
3. Based on self – declaration, if any, given by Designated Persons, the Compliance Officer shall provide a report to the Audit Committee on an annual basis providing details of the trading in Securities of the Company by Designated Persons and violation(s) of the Code, if any.

PROHIBITION ON COMMUNICATING OR PROCURING UPSI

1. No Insider shall:
 - communicate, provide, or allow access to any UPSI, relating to the Company or its Securities listed or proposed to be listed, to any person including other Insiders;
 - procure from or cause the communication by an Insider of UPSI, relating to the Company or its Securities listed or proposed to be listed.

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

- in furtherance of legitimate purposes, performance of duties or discharge of legal obligations pursuant to appropriate confidentiality and non-disclosure agreements or contracts being executed; or
 - in the event the Board of Directors directs or cause the public disclosure of UPSI in the best interest of the Company.
2. The Company shall adopt a “Chinese Wall” approach (i.e. barrier within an organisation to prevent exchanges or communication that would lead to conflicts of interest) separating a group of persons who reasonably are expected to have in their possession UPSI. The employees of such departments shall not communicate any UPSI to any other department. In exceptional circumstances, any such employee may “cross the wall” and give confidential information on the basis of need to know basis by intimating the person heading each Department. It shall be the responsibility of the person heading each Department falling under the “Chinese Wall” to ensure that employee in the Department abide by this provision at all times.
 3. All information shall be handled by the Insiders on a need-to-know basis and no UPSI shall be communicated to any person except as mentioned hereinabove.

PROHIBITION TO TRADE WHEN IN POSSESSION OF UPSI

1. No Insider shall directly or indirectly trade in Securities of the Company, listed or proposed to be listed, when in possession of UPSI.
2. Provided that the restriction herein above shall not apply to:
 - a transaction that is an off-market inter-se transfer between Promoter(s) who are in possession of the same UPSI without being in breach of this Code and both parties had made a conscious and informed trade decision; and
 - trades pursuant to a Trading Plan set up in accordance with this Code.
3. In the case of connected persons the onus of establishing, that they were not in possession of UPSI, shall be on such connected persons.

TRADING WINDOW

1. Designated Persons and their immediate relatives shall not trade in Securities of the Company during closure of the “Trading Window”, i.e. the period during which trading in Securities of the Company is prohibited.
2. Trading Window shall generally be closed for a minimum period starting from 7 (seven) days before the meeting of the Board of Directors (inclusive of both days) at which the financial results are proposed to be considered.
3. In respect of any other material events in accordance with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time, the Compliance Officer after consultation with the Managing Director may close the Trading Window for such period as may be deemed fit.
4. The Trading Window shall open 48 (forty eight) hours after the UPSI is made generally available.
5. The communication related to closure and opening of the Trading Window shall be deemed to have been sent to all the Connected Persons once intimation of it has been sent to the Stock Exchanges where Securities of the Company are listed.
6. Additionally, the communication related to closure of the Trading Window may also be sent by the Compliance Officer to all the Directors in the form as set out in **Annexure - IA** and to the Designated

Employees of the Company in the form as set out in **Annexure – IB** or to any other Connected Person as the Compliance Officer may deem fit.

7. Ignorance of the closure of the Trading Window or non- receipt of communication of closure of Trading Window shall not justify any trades undertaken by the Designated Persons during such closure of Trading Window.
8. Trading Window shall also be applicable to any person having contractual or fiduciary relation with the Company, such as Auditors, Accountancy firms, law firms, Analysts, Consultants, etc assisting or advising the Company.

PRE-CLEARANCE OF TRADING

1. Designated Persons including their Immediate Relatives may trade in the Securities of the Company when the trading window is open. But it shall require pre-clearance from the Compliance Officer in respect of trading in Securities of the Company, where the value of the Securities to be traded, whether in one transaction or a series of transaction over any calendar quarter, aggregates to a traded value in excess of Rs. 10,00,000/- (Rupees Ten Lakhs). Trading in Securities over and above the said threshold by the Compliance Officer shall require pre-clearance from the Managing Director of the Company.
2. An application for pre-clearance of trades shall be made in **Form A** as set out in **Annexure II** along with an undertaking / declaration in **Form B** as set out in **Annexure II**.
3. No Designated Person shall apply for pre-clearance of any proposed trade if such Designated Person is in possession of UPSI even if the Trading Window is not closed.
4. The approval shall be granted within 5 (five) trading days from the application being received complete in all respect in **Form C** as set out in **Annexure II**. If the pre-clearance is not granted within the specified period, the request shall be deemed to have been rejected. There shall be no obligation to give reasons for withholding of approval.
5. Trades, for which pre-clearance has been obtained, shall be executed within 7 (seven) trading days from the date of the approval of pre-clearance or such shorter period as may be specified in the pre-clearance approval, failing which a fresh pre-clearance shall be required.
6. Designated Persons shall file the details of the transactions in **Form D** as set out in **Annexure II** with the Compliance Officer within 2 (two) trading days of the exercise of the trade. Even in cases where the transaction has not been undertaken, the same should be reported in the above format.
7. The Compliance Officer shall confidentially maintain a list of securities as a “restricted list” which shall be used as the basis for approving or rejecting applications for pre-clearance of trades.
8. Designated Person who is permitted to trade shall not execute a contra trade during next 6 (six) months following prior trade.
9. In case the contra trade is necessitated by personal emergency, 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 these regulations. 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 SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

TRADING PLAN

1. The Regulations contain provisions enabling an Insider to formulate trading plan(s) and present it to the Compliance Officer pursuant to which trades may be carried out on his behalf in accordance with such plan.
2. The provision intends to give an option to persons who may be perpetually in possession of UPSI and enabling them to trade in Securities in a compliant manner.
3. Insiders desiring to formulate Trading Plan(s) may do so in accordance with the provisions of the Regulations and the terms and Conditions as set out in **Annexure – III**.
4. The Compliance Officer shall review and approve the Trading Plan if it complies with the Regulations and shall disclose the Trading Plan to the Stock Exchange(s). The Trading Plan, if any of the Compliance Officer shall be reviewed and approved by the Managing Director of the Company.

DISCLOSURE AND REPORTING REQUIREMENTS**Initial Disclosure**

By whom	Disclosure Requirement	To whom	Time Period	Format
Every person <ul style="list-style-type: none"> • on appointment as Key Managerial Personnel • on appointment as Director • upon becoming a Promoter 	Holding of securities of the Company as on the date of appointment or becoming a Promoter	the Company	Within 7 (seven) days of appointment or becoming a Promoter	In Form B as set out in Annexure IV

Continual Disclosure

By whom	Disclosure Requirement	To whom	Time Period	Format
<ul style="list-style-type: none"> • Promoter • Designated Employee • Director 	Number of securities acquired or disposed if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 10,00,000 (Rupees Ten Lakhs)	the Company	within 2 (two) trading days of such transaction	In Form C as set out in Annexure IV
Company through its Compliance Officer	Particulars stated above as provided in Form C	to the Stock Exchange(s)	within 2 (two) trading days of receipt of the disclosure or from becoming aware of such information	No specified Format

Other Disclosure

By whom	Disclosure Requirement	To whom	Time Period	Format
Any other Connected Person as may be decided by the Compliance Officer	Holdings and trading of securities of the Company at such frequency as may be determined by the Compliance Officer	the Company	within 2 (two) trading days of such transaction	In Form D as set out in Annexure IV

The disclosures mentioned hereinabove shall be maintained by the Company for a period of 5 (five) years.

* Note: The disclosures mentioned hereinabove by any person shall include those relating to trading by such person's immediate relatives and by any other person for whom such person takes trading decisions.

PENALTIES FOR CONTRAVENTION

- Persons governed by this Code who trade in Securities or communicate any information for trading in Securities in contravention of the provisions of this Code and the Regulations and who violate any of the provisions of this Code and the Regulations shall be subject to penal/disciplinary action by the Company which may include monetary penalty, wage freeze, suspension, etc. as may be decided by the Managing Director of the Company and his absence by the Chairman of the Company.
- In case it is observed that there has been violation of the Regulations, the Compliance Officer shall promptly inform the Securities and Exchange Board of India.

SUPPLEMENTARY PROVISIONS

- The Code is subject to review by the Board of Directors as and when deemed necessary.
- The implementation of the Code shall be monitored by the Compliance Officer of the Company. The Board of Directors may review the Policy as and when deemed necessary and make any changes or modification as it may deem fit.
- In case of any subsequent changes in the provisions of the Regulations which make any of the provisions in the Code inconsistent with the Regulations, then the provisions of the Regulations would prevail over the Code and the provisions in the Code would be modified in due course to make it consistent with the Regulations.
- This Code, including any amendment thereto, shall be published on the Company's corporate website and shall be promptly intimated to the Stock Exchange(s) where the securities of the Company are listed.

Annexure – IA - For Directors

Sub: IPCL - Closure of Trading Window for dealing in Securities of the Company

To: All Directors of the Company

Dear All,

In compliance with the CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS, I request you and your immediate relatives to refrain from trading in the Company's Securities with immediate effect till the expiry of 48 hours after the public announcement of the _____ (UPSI for which Trading Window is proposed to be closed) is made.

Any contravention of the above will be an offence punishable with imprisonment and/or with penalty under the SEBI (Prohibition of Insider Trading) Regulations, 2015 and also under the Code.

I request all of you to review the above mentioned Code, which is available on the Company's Website.

You are receiving this email as a Director covered under the SEBI (Prohibition of Insider Trading) Regulations, 2015 and also under the Code. In case on any doubts, please feel free to contact the undersigned.

Thank you for your co-operation in this regard.

Annexure – IB - For Designated Employees

Sub: IPCL - Closure of Trading Window for dealing in Securities of the Company

To: All Designated Employees of the Company

Dear All,

In compliance with the CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS, I request you and your immediate relatives to refrain from trading in the Company's Securities with immediate effect till the expiry of 48 hours after the public announcement of the _____ (UPSI for which Trading Window is proposed to be closed) is made.

Any contravention of the above will be an offence punishable with imprisonment and/or with penalty under the SEBI (Prohibition of Insider Trading) Regulations, 2015 and also under the Code.

I request all of you to review the above mentioned Code, which is available on the Company's Website.

You are receiving this email as a Designated Employee covered under the SEBI (Prohibition of Insider Trading) Regulations, 2015 and also under the Code. In case on any doubts, please feel free to contact the undersigned.

You are also requested to inform the closure of the trading window to all the Employees of your Department who may be in possession any UPSI pertaining to the above purpose, to refrain from trading in the Company's securities during the close of the Trading Window and abide by the provisions of the Code.

Thank you for your co-operation in this regard.

Annexure - II**FORM A****APPLICATION FOR PRE-CLEARANCE OF TRADE IN SECURITIES**

To,
 The Compliance Officer/Managing Director
 India Power Corporation Limited
 Plot X1, 2 & 3, Block-EP
 Sector-V, Salt Lake City,
Kolkata- 700091

Dear Sir,

Sub: Application for pre-clearance of trade in Securities of the Company

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Insider Code, I seek approval to purchase / sale / subscribe to the Securities of the Company as per details given below:

1.	Name of the Applicant	
2.	Designation	
3.	The proposal is for a. Purchase of securities b. Subscription to securities c. Sale of securities	
4.	Name of the Immediate Relative and relation, if the transaction is in the name of the Immediate Relative	
5.	PAN of the Applicant and the Immediate Relative as stated in Point 4 above.	
6.	Folio No./DP ID/Client ID of the Applicant and the Immediate Relative as stated in Point 4 above.	
7.	Proposed date of dealing in Securities	
8.	Estimated number of Securities proposed to be dealt	
9.	Whether the proposed transaction will be through stock exchange or off-market deal	
10.	Number of Securities held as on date (including through Immediate Relatives)	
11.	Price at which the transaction is proposed	
12.	Folio No. / DP ID / Client ID where the securities will be credited / debited	

I enclose herewith the form of Undertaking signed by me.

Yours faithfully

Signature: _____

Name:

Date:

UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-CLEARANCE OF TRADE IN SECURITIES

FORM B

UNDERTAKING ACCOMPANING FORM A

In relation to the above trade(s), I undertake that:

I am not and do not expect to be in possession of or otherwise privy to any Unpublished Price Sensitive Information (as defined in the Company's Insider Code).

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

I shall hold the Securities for a minimum period of 6 months from the date of purchase and shall not enter into opposite transaction within 6 months/I have complied with the requirement of the minimum holding period of 6 months with respect to shares sold.

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

I shall submit the necessary report after execution of the transaction within such timeline and in such form as provide in the Code / a 'Nil' report if the transaction is not undertaken alongwith reasons for non-execution.

If approval is granted, I shall execute the deal within 7 trading days of the receipt of approval or such shorter period permitted in the approval failing which I shall seek fresh pre-clearance and shall not execute any order until such pre-clearance is obtained.

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

Yours faithfully

Signature: _____

Name:

Date:

FORM C**FORMAT FOR PRE-CLEARANCE ORDER**

Date:

To,

Name:

Designation:

Your application dated _____, seeking approval to deal in _____ securities of the Company is hereby acknowledged.

Having regard to the information furnished, consent is as under: (see ticked box)

REFUSED**GIVEN ON THE FOLLOWING CONDITIONS**

- (a) You are not and do not expect to be in possession of any Unpublished Price Sensitive Information at the time of the Trading.
 (b) You have not contravened the Rules or the SEBI (Prohibition of Insider Trading), Regulations, 2015
 (c) You have made full and true disclosure in the matter.

Designated Persons who trade in manner (i.e. buy/ sell or otherwise deal) in the securities of the Company shall not enter into an opposite transaction i.e. buy / sell/ or otherwise deal in securities of the Company during the next six months following the prior transaction.

In case you have received any "Unpublished Price Sensitive Information" after submission of your application for sale of securities, please inform the Compliance Officer of the change in the position and refrain from trading in the securities till such information is made generally available.

This approval has been granted for trading in securities within ____ trading days w.e.f. _____ failing which please seek pre-clearance again.

Further, you are required to submit necessary report after execution of the transaction within such timeline and in such form as provide in the Code. In case the transaction is not undertaken a 'Nil' report shall be necessary together with reasons for non execution of the trade.

Yours faithfully,
 for **India Power Corporation Limited**

COMPLIANCE OFFICER

Date: _____

Annexure D

FORMAT FOR DISCLOSURE OF TRANSACTIONS*(To be submitted within 2 (two) trading days of transaction / dealing in securities of the Company)*

To,
 The Compliance Officer,
 India Power Corporation Limited
 Plot X1, 2 & 3, Block-EP
 Sector-V, Salt Lake City,
Kolkata - 700091

I hereby inform that I (including through my Immediate Relative)

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

Name of holder	No of securities dealt with	Brought /Sold /Subscribe	DP ID /Client ID /Folio No.	Price (Rs.)	Value (Rs.)

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 along with reasons in writing. *(applicable in case of purchase/ subscription).*

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

Date: _____

Signature:

Name:

Designation

Annexure III

Terms and Conditions pertaining to Trading Plan

1. Trading Plan shall not entail commencement of trading on behalf of the Insider earlier than six months from the public disclosure of the plan;
2. Trading Plan shall not entail trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced by the Company and the second trading day after the disclosure of such financial results;
3. Trading Plan shall entail trading for a period of not less than twelve months;
4. Trading Plan shall not entail overlap of any period for which another trading plan is already in existence;
5. Trading Plan shall 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;
6. Trading Plan shall not entail trading in securities for market abuse;
7. 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;
8. The Trading Plan should not have any potential for violation of the Regulations. The Compliance Officer 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 ;
9. Provided that the implementation of the Trading Plan shall not be commenced if any UPSI 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. In such event the Compliance Officer shall confirm that the commencement ought to be deferred until such UPSI becomes generally available.

Annexure IV**FORM B**

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

Name of the Company: _____

ISIN of the Company: _____

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

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP /Directors/immediate relative to/others etc)	Securities held at the time of becoming Promoter/appointment of Directors/KMP		% of Shareholding
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No	
1	2	3	4	5

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

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

Open Interest of the Future contracts held at the time of becoming Promoter/appointment of Director/KMP			Open Interest of the Option Contracts held at the time of becoming Promoter/appointment of Director/KMP		
Contract 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
6	7	8	9	10	11

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

India Power Corporation Limited

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:

ISIN of the Company:

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

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

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

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

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

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

Name & Signature:

Designation:

Date:

Place:

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]

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

Name, PAN No., CIN/DIN, & address with contact nos. of other connected persons as identified by the company	Connection with company	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/acquisition of shares/sale of shares, specify		Date of intimation to company	Mode of acquisition /disposal (market purchase/public rights/ preferential offer / off market/ Inter-se transfer, ESOPs etc.
		Type of security (For eg. Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For eg. Shares, Warrants, Convertible Debentures etc.)	N o.	Value	Transaction Type (Buy/Sale/Pledge/ Revoke/Invoke)	Type of security (For eg. Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To		
										(11)	(12)		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)
-	-	-	-	-	-	-	-	-	-	-	-	-	-

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

Details of trading in derivatives 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)	
(15)	(16)	(17)	(18)	(19)	(20)	(21)

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

Name:

Signature

Place: