



RAM RATNA WIRES LIMITED

INSIDER TRADING - CODE OF CONDUCT

(Amended Code effective from 1st April, 2019)

This Policy is only an internal code of conduct and one of the measures to avoid Insider Trading. It will be the responsibility of each person covered under the SEBI Insider Trading Regulations to ensure compliance of the SEBI Act, Guidelines and other related statutes.

Table of Contents

Topic		Page No.
Chapter 1 - Preliminary and Restrictions on Insider Trading		
1.1	Background	3
1.2	Objective of this Code of Conduct	3
1.3	Definitions	3
1.4	Compliance Officer	6
1.5	Communication or procurement of UPSI	6
1.6	Trading when in possession of unpublished price sensitive information	7
1.7	Chinese Wall	8
1.8	Trading Plan	8
1.9	Pre clearance of trades	9
1.10	No Trading Period	10
1.11	Holding Period/Contra Trade	10
Chapter 2 - Disclosures & Reporting		
2.1	General	12
2.2	Initial Disclosure	12
2.3	Continual Disclosure	12
2.4	Disclosure by other connected persons	12
2.5	Documents to be shared by Designated Person with Company	12
2.6	Reporting to the Board and Maintenance of Disclosures	13
2.7	Amendment of this Code	13
Chapter 3		
3.1	Penalty for Contravention	14
Annexures		
	Annexure A	15
	Annexure B	18
	Annexure C	19
	Annexure D	20

Chapter 1- Preliminary and Restrictions on Insider Trading

1.1 *Background*

Securities and Exchange Board of India (“SEBI”) vide its Notification dated January 15, 2015, had issued the SEBI (Prohibition of Insider Trading) Regulations, 2015 and further amended the same vide its notification dated December 31, 2018, the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018, to put in place a framework for prohibition of insider trading in securities and to strengthen the legal framework thereof.

The Securities and Exchange Board (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time, (the “Regulations”) seek to govern the conduct of insiders, connected persons and persons who are deemed to be connected persons on matters relating to Insider Trading.

Insider Trading involves trading in the securities of a company listed or proposed to be listed, by connected or any persons in possession of or with access to unpublished price sensitive information not available to the general public, who can take advantage of or benefit from such unpublished price sensitive information. Trading in securities by an ‘insider’ is regarded unfair when it is predicated upon utilisation of ‘inside’ information to profit at the expense of other investors who do not have access to the same information.

1.2 *Objective of this Code of Conduct*

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

This Code is an internal code of conduct and one of the measures to avoid insider trading and to meet compliances stipulated under the SEBI Regulations. Employees, Insiders and Designated Persons are advised to understand and observe the spirit and the intent behind this document and the Regulations. It will be the responsibility of each employee, insider and designated person to ensure compliance of SEBI Regulations.

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

1.3 *Definitions*

(a) *“Act” means the Securities and Exchange Board of India Act, 1992.*

- (b) *“The Code” means this Code of Conduct formulated for Regulating, Monitoring and Reporting by Insiders under SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time.*
- (c) *“Company”* means Ram Ratna Wires Limited (“**RRWL**”).
- (d) *“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 recognised or authorised 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 per cent of the holding or interest;
- (e) *“Designated Persons”* means:
- (i) *Members of the Board* of Directors of RRWL;

- (ii) Promoters and members of Promoter Group of RRWL;
- (iii) Key Managerial Personnel (including Company Secretary, Chief Financial Officer and Chief Executive Officer, if any);
- (iv) Employees with designation "Vice President" and above;
- (v) All employees of the Finance Department (Manager and above);
- (vi) Employees (Manager and above) of Accounts, Secretarial and Legal Department;
- (vii) Secretaries/Executive Assistants reporting to the Chairman and/or the Managing Director/any Executive Director/CFO; and
- (viii) Such other persons as may be identified by the Compliance Officer.

The Compliance Officer shall maintain a list of Designated Persons and any changes thereto from time to time.

- (f) **"Generally available information"** means information that is accessible to the public on a non-discriminatory basis.
- (g) **"Immediate relative"** means a spouse of a person whether financially dependent or not, 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.

Note: Please note that the immediate relatives of a "connected person" too become connected persons for purposes of these regulations.

- (h) **"Insider"** means any person who is:
 - (i) a connected person; or
 - (ii) in possession of or having access to unpublished price sensitive information.
- (i) **"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.
- (j) **"Promoter group"** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof;]
- (k) **"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.
- (l) **"Trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities and "trade" shall be construed accordingly.

(m) *“Trading day”* means a day on which BSE Limited (BSE) is open for trading.

(n) *“Unpublished price sensitive information” (“UPSI”)* means any information, relating to RRWL 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 include but is not restricted to, information relating to the following: –

- (i) financial results;
- (ii) dividends;
- (iii) change in capital structure;
- (iv) mergers, de-mergers, acquisitions, de-listing, disposals and expansion of business and such other transactions;
- (v) changes in key managerial personnel;

Any other term not defined herein shall have the same meaning as defined in the Companies Act, 2013, the SEBI (Prohibition of Insider Trading) Regulations, 2015 or any other applicable law or regulation.

1.4 Compliance Officer

The Company Secretary of the Company shall act as the Compliance Officer for the purposes of the Regulations, who shall work subject to the guidance of the Chairman, Managing Director and the Board of Directors and shall be responsible for compliances as entrusted upon him under the overall supervision of the Board of Directors of the Company.

1.5 Communication or procurement of UPSI

- (1) No insider shall communicate, provide, or allow access to any UPSI relating to RRWL or securities listed or proposed to be listed by RRWL, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations
- (2) No person shall procure from or cause the communication by any insider of UPSI, relating to RRWL or securities listed or proposed to be listed by RRWL, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- (3) The board of directors of RRWL has made a policy for determination of “legitimate purposes” as a part of “Codes of Fair Disclosure and Conduct”.
- (4) Any person in receipt of UPSI pursuant to a “legitimate purpose” shall be considered an “insider” and due notice will be given to such persons to maintain confidentiality of such unpublished price sensitive information.

- (5) Notwithstanding anything contained herein, UPSI may be communicated, provided, allowed access to or procured, in connection with a transaction that would:
- (i) entail an obligation to make an open offer under the takeover regulations where the Board of Directors of RRWL is of informed opinion that the proposed transaction is in the best interests of the Company;
 - (ii) not attract the obligation to make an open offer under the takeover regulations but where the Board of Directors of RRWL is of informed opinion that sharing of such information is in the best interest of the Company and the information that constitutes UPSI is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the RRWL Board of Directors may determine to be adequate and fair to cover all relevant and material facts.
- (6) For purposes of point (5) above, the Board of Directors of RRWL shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the purpose of the above point (5), and shall not otherwise trade in securities of RRWL when in possession of UPSI.
- (7) The board of directors of RRWL will ensure that a structured digital database is maintained containing the names of such persons or entities as the case may be with whom information is shared under this regulation along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such databases shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.

1.6 Trading when in possession of unpublished price sensitive information

(i) Restriction on trading in RRWL Securities

No Insider shall trade in RRWL Securities at any time when he/she is in possession of any unpublished price sensitive information.

Note: 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 and awareness of such information in his possession.

(ii) Joint holding

The provisions of this code shall also be applicable for trading either as a first named shareholder or as a joint holder.

1.7 Chinese Wall

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

- (i) The employees in the inside area shall not communicate any UPSI to anyone in public area.
- (ii) The Company shall have process of maintaining securely, computer files containing confidential information and physical storage of documents relating to UPSI.
- (iii) All information shall be handled within the organisation on a need-to-know basis and no unpublished price sensitive information shall be communicated to any person except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations. All the non-public information directly received by any employee should immediately be reported to the head of the department. In exceptional circumstances employees from the public areas may be brought "over the wall" and given confidential information on the basis of "need to know" criteria, under intimation to the Compliance Officer.

1.8 TRADING PLAN:

- (i) 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.
- (ii) Such Trading Plan shall:–
 - i. not entail commencement of trading on behalf of the Insider earlier than six (6) months from the public disclosure of the plan;
 - ii. not entail trading for the period between the twentieth (20th) 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 (2nd) trading day after the disclosure of such financial results;
 - iii. entail trading for a period of not less than twelve (12) months;
 - iv. not entail overlap of any period for which another trading plan is already in existence;
 - v. set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
 - vi. not entail trading in securities for market abuse.

- (iii) The Compliance Officer shall review the Trading Plan to assess whether the plan would have any potential for violation of the Regulations 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.
- (iv) The pre-clearance of trades shall not be required for a trade executed as per the approved trading plan of the Company.
- (v) The trading window norms and restrictions on contra trade (as provided in paras 1.9 to 1.11 below) shall not be applicable for trades carried out in accordance with an approved trading plan.
- (vi) 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 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 and in such event the Compliance Officer shall confirm that the commencement ought to be deferred until such UPSI becomes generally available information so as to avoid a violation of sub-regulation (1) of regulation 4 of the SEBI (Prohibition of Insider Trading) Regulations 2015.
- (vii) Upon approval of the Trading Plan, the Compliance Officer shall notify the plan to the stock exchange on which the securities of the Company are listed.

1.9 Pre-clearance of trades

- (i) All designated persons who intend to trade in the securities of RRWL (either in their own name or in any immediate relative's name) i.e. buy or sell securities, shall make an application for pre-clearance in the format set out in **Annexure A** to the Compliance Officer indicating the estimated number of units of securities that the designated person or immediate relative(s) intends to trade, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as specified in the form and also declare that the applicant is not in possession of unpublished price sensitive information.
- (ii) 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.
- (iii) The Compliance Officer shall also determine whether any such declaration is reasonably capable of being rendered inaccurate.

- (iv) All designated persons of RRWL and their immediate relatives shall execute their order in respect of securities of RRWL within seven trading days after the approval of pre-clearance is given. If the order is not executed within seven trading days after the approval is given, the employee must obtain the pre-clearance for the transaction again.

1.10 No Trading Period

- (i) The trading period during which RRWL's securities can be traded is called trading window. The trading window shall be closed during the time the price sensitive information is un-published.
- (ii) When the trading window is closed, the Designated Persons (including their immediate relatives) shall not trade in RRWL's securities in such period.
- (iii) The trading window shall, *inter-alia*, be closed at the time of:
 - (a) Declaration of Financial results —from the end of every quarter till 48 hours after the declaration of financial results.
 - (b) Declaration of dividends (interim or final)
 - (c) Change in capital structure
 - (d) Mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions.
- (iv) The Compliance Officer shall also close the trading window when he determines that a designated person or class of designated persons can reasonably be expected to have possession of unpublished price sensitive information. Such closure shall be imposed in relation to such securities to which such unpublished price sensitive information relates.
- (v) The trading window shall be opened 48 hours after the unpublished price sensitive information becomes generally available.
- (vi) The trading window shall also be applicable to any person having contractual or fiduciary relation with RRWL, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising RRWL.

1.11 Holding Period/Contra Trade

- (i) Designated person (including their immediate relatives) who is permitted to trade shall not execute a contra trade i.e. enter into an opposite transaction during the next 6 months following the prior transaction ("contra trade").
- (ii) 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 SEBI Act, 1992.

- (iii) 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 the Regulations or this Code.

Chapter 2 - Disclosures & Reporting

2.1 General

Apart from the restrictions mentioned in Chapter 1, RRWL is required to obtain certain disclosures as and when deemed fit.

The disclosures to be made by any person under this Chapter shall also include those relating to such person's immediate relatives and any other person for whom such person takes trading decisions.

The Company shall maintain such disclosures for a minimum period of five years, in such forms as may be specified by SEBI from time to time.

2.2 Initial Disclosure

- (i) Every person on appointment as a key managerial personnel or a director of RRWL or upon becoming a promoter or member of the promoter group shall disclose his holding of securities of RRWL as on the date of appointment or becoming a promoter, to RRWL within seven days of such appointment or becoming a promoter in **Annexure B**.

2.3 Continual Disclosure

Every promoter, member of the promoter group, designated person and director of RRWL shall disclose to the company in the format set out in **Annexure C**, 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.

2.4 Disclosure by other connected persons

The Compliance Officer at his discretion may require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of RRWL as and when he deems fit in order to monitor compliance with these regulations in the format set out in **Annexure D**.

2.5 Documents to be shared by Designated Person with Company

Designated persons shall be required to disclose names and Permanent Account Number (PAN) or any other identifier authorized by law, of the following persons, to the Company on an annual basis and as and when the information changes:

- a) immediate relatives
- b) persons with whom such designated person(s) shares a material financial relationship and
- c) Phone, mobile and cell numbers which are used by them

In addition, the names of educational institutions from which designated persons have graduated and names of their past employers shall also be disclosed on a one time basis.

Note – The term “material financial relationship” shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding twelve months, equivalent to at least 25% of such payer’s annual income but shall exclude relationships in which the payment is based on arm’s length transactions.

2.6 Reporting to the Board and Maintenance of Disclosures

- (i) The Compliance Officer shall place before the Chairman of the Audit Committee on a yearly basis, details of trading in RRWL Securities by the Designated Persons and the accompanying documents that such persons had executed under the pre-clearance procedure as envisaged under this code.
- (ii) The Compliance Officer shall maintain records of all the declarations in appropriate forms given by the Designated Persons for a minimum period of five years.

2.7 Amendment of this Code

The Board of Directors is authorised to change/amend this Code from time to time at its sole discretion and/or in pursuance of any amendments made in the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Chapter 3 - - Penalty for Contravention

3.1 *Penalty for Contravention*

- A. Every Designated Person shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her dependents).
- B. Any Designated Person who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalized and appropriate action may be taken by the Company.
- C. Designated Persons who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, recovery clawback, etc.
- D. The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

ANNEXURE A

A. Application - Cum Undertaking for Pre Clearance of Trades

The Compliance Officer
 Ram Ratna Wires Limited
 Ram Ratna House, Oasis Complex
 P.B. Marg, Worli, Mumbai 400013

Date:
 From:
 Designation

With reference to SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Code of Conduct of RRWL for Prevention of Insider Trading, I hereby give notice that I propose to carry out the following transaction in RRWL securities for Myself / As Joint Holder / My immediate relative.

Name of Security	Name of the Investor (Employee / Relative/ Director)	Purchase / Sale / Subscription/Pledge/Revocation of Pledge	Quantity	Rate	Value	Transaction Type	DP ID	Client ID

I hereby declare that:

- (a) I do not have any access nor have I received or possess "Unpublished Price Sensitive Information" upto the time of signing the undertaking.
- (b) That in case I have access to or receive "Unpublished Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction. I shall inform the Compliance Officer of the change in my position and that I would completely refrain from trading in the securities of RRWL till the time such information becomes public.
- (c) That I have not contravened the code of conduct for prevention of insider trading as notified by RRWL from time to time.
- (d) If approval is granted, I shall execute the deal within 7 trading days of the receipt of approval failing which I shall seek pre-clearance.
- (e) I declare for my own and immediate relatives account that - In case of Buy, the securities have not been sold/pledged in previous 6 months and in case of sale/pledge, the said security has been held for a period of six months.
- (f) That I have made a full and true disclosure in the matter.

Signature of the Employee/Director _____

Employee Code: _____

B. Authorization to Trade

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

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

Date:

Compliance Officer

C. Confirmation of Trades

FORMAT FOR DISCLOSURE OF TRANSACTIONS

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

To
The Compliance Officer,
(Name of the Entity)

Dear Sir/Madam,

I hereby inform that I

- have not bought / Pledged/sold/ subscribed any securities of the Company
- have bought/Pledged/sold/subscribed to _____ securities as mentioned below on ____ (date)

Name of holder	Name of the Security	No. of securities dealt with	Bought/sold/subscribed	DP ID/Client ID / Folio No	Price (Rs.)

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 3 years and produce to the Compliance officer / SEBI any of the following documents:

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

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

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

Yours truly

Signature: _____

Name: _____

Designation: _____

Employee Code: _____

*Strike off whichever is not applicable.

ANNEXURE B

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

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/ Promoter Group/ KMP /Directors/immediate relative to/others etc)	Date of appointment of Director /KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP		% of Shareholding
			Type of security (For eg. – Shares, Warrants, Convertible Debentures 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.

Name & Signature:

Designation:

Date:

Place:

ANNEXURE 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: _____

ISIN of the company: _____

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

Name, PAN, CIN/DIN & addresses with contact nos. of other connected persons as identified by the company	Category of Person (Promoter/member of Promoter Group /Designated person/Directors/immediate relative to/others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/acquisition of shares/sale of shares specify		Date of Intimation to company	Mode of acquisition /disposal (on market/public/rights/preferential offer / off market/ Inter-se transfer, ESOPs etc.)
		Type of Security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of share holding	Type of security (For eg. – Share 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		
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.

ANNEXURE 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, 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 (on market/public/rights/preferential offer/off market/Inter-se transfer, ESOPs etc.)
		Type of Security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of share holding	Type of security (For eg. – Share 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		
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.