NAME OF THE STOCKBROKER

CODE OF CONDUCT FOR PREVENTATION OF INSIDER TRADING POLICY

POLICY CONTROL

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CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

(Internal Procedures and Conduct)

I. INTRODUCTION:

The Securities and Exchange Board of India (SEBI) has revised and notified the SEBI (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as "Regulations") dealing, inter alia, with buying and selling of securities of Listed Companies by its employees/directors and Market Intermediaries. To simplify the understanding and implementation of the Regulations, ("Name of the Stock Broker"), being a SEBI registered market intermediary, has formulated and adopted this Code of Conduct for Prevention of Insider Trading.

II. PURPOSE:

To establish a framework for prevention of insider trading and misuse of Unpublished Price Sensitive Information ("UPSI"), ensuring compliance with SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended, and to maintain market integrity and investor confidence.

III. OBJECTIVE:

The objective of this Code is not to discourage employees from buying or selling of shares, but to:

1) Ensure that the Employees do not take advantage of unpublished price-sensitive information which may be received by them during the regular course of their duties.
2) Ensure that Employees do not indulge in 'fraudulent' or 'manipulative' transactions or 'front running'.
3) Encourage long-term investments by Employees.
4) Ensure proper safeguards for various businesses of "Stock Broker".
5) Discourage employees from engaging in personal trading on a scale or of a kind that would distract them from their daily responsibilities.

IV. APPLICABILITY:

- This Code applies to all Directors, Key Managerial Personnel (KMP), employees, contractual staff, consultants, dealers, research staff, and connected persons of [Broker Name], as well as their Immediate Relatives.
- It applies to trading in securities in the secondary market, primary market, and off-market transactions. The Code does not apply to transactions in fixed deposits, life insurance policies, provident fund, government securities, money market

instruments, mutual fund units, ETFs, index derivatives, or non-financial assets such as gold and real estate.

- Failure to comply with any of these provisions shall constitute grounds for action, as deemed fit by the Board of Directors, including referral to the relevant Government/ Regulatory authorities.
- (Name of Stock Broker) may, from time to time, amend this Code or stipulate additional conditions, depending upon the situation and change its internal policies to get the same implemented. All will be bound by such changes/additions in the Code as and when they come into force.

V. DEFINITIONS:

"**Associate Company & Subsidiary Company**" shall have the same meaning as assigned under the Companies Act, 2013.

"Compliance Officer" means such senior officer of the Company who is designated as the compliance officer and who is financially literate, is capable of appreciating requirements for legal and regulatory compliance under these regulations designated so. The Compliance Officer 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 the regulations under the overall supervision of the Board of Directors of the Company.

Explanation: "Financially literate" shall mean a person who has the ability to read and understand basic financial statements i.e., balance sheet, profit and loss account, and statement of cash flows;

"Connected Person" means

a. any person who is or has been associated with (Name of Stockbroker) during the six months prior to any trading been associated with (Name of Stockbroker), 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 or officer or an Employee of (Name of Stockbroker) or holds any position including a professional or business relationship between himself and (Name of Stockbroker) 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.

b. 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 of (Name of Stockbroker); 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 authorized by the Board; or
(i). a banker of the company; or
(j) firm or its partner or its employee in which a connected person specified in sub-clause (k) of clause (d) is also a partner; or
(l). a person sharing household or residence with a connected person specified in sub-clause (i) of clause (d);]

iii. a concern, firm, Trust, Hindu undivided family, company, or association of persons wherein a director of (Name of Stockbroker) or his immediate relative has more than ten percent of the holding or interest ("Connected Entity").

"Designated Employee(s)" shall include:
(i) an employee of the organization who is closely dealing and aware of the Stock Broking Division only.
(ii) a director of the (Name of Stockbroker) who is directly dealing and aware of the working of the Stock Broking Division, any Employee in the finance, accounts, secretarial and legal department as may be determined and informed by the Compliance Officer to the Board of Directors;
(iii) Immediate relatives of all the above persons; and
(iv) any other Employee as may be determined and informed by the Compliance Officer to the Board of Directors from time to time.

"Director" means a member of the Board of Directors of the Company who is aware of the dealing of the Stock Broking division.

"Employee" means an employee of (Name of Stockbroker) – Stock Broking Division who is closely dealing in the Stock Broking Division only.

"Generally available Information" means information that is accessible to the public on a non-discriminatory basis and shall not include unverified event or information reported in print or electronic media.

"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.

"Insider" means any person who is:

i. a connected person; or
ii. in possession of or having access to unpublished price sensitive information;

"Insider Trading Regulations" means the Securities and Exchange Board of India (Prohibition of Insider Trading Regulations), 2015 as amended from time to time.

"Material Financial Relationship" means a relationship in which a person has received payment, by way of a loan or gift, from a Designated Person during the preceding 12 months, equivalent to at least 25% of such Designated Person's annual income, excluding arm's length transactions.

"Promoter" shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, or any modification thereof

"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.

"Proposed to be listed" has the meaning given to it in the Insider Trading Regulations.

"Relative" has the meaning given to it in the Insider Trading Regulations;

"Securities" has the meaning given to it in the Insider Trading Regulations;

"Trading" has the meaning given to it in the Insider Trading Regulations;

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

"Unpublished Price Sensitive Information" or **"UPSI"** has the meaning given to it in the Insider Trading Regulations

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

VI. ROLE OF COMPLIANCE OFFICER:

(Name of Stock Broker) has appointed a compliance officer. The Compliance Officer under this Code shall be responsible for:

- Framing policies and procedures for Prohibition of Insider Trading.

- Monitoring adherence to the rules for the preservation of UPSI.
- Pre-clearing of trades of Designated Employees
- Monitoring of trades and the implementation of the Code of Conduct under the overall supervision of the Board of Directors.
- Maintaining the Restricted List of Securities.
- Maintaining a record of the Designated Employees and any changes made therein.
- Addressing any clarifications regarding the Insider Trading Regulations and (Name of Stock Broker)'s Code of Conduct.
- Report to SEBI of any violation of the Code as may be necessary.

VII. PRESERVATION OF "UNPUBLISHED PRICE SENSITIVE INFORMATION":

All Directors/Officers/Employees shall maintain the confidentiality of any Unpublished Price Sensitive Information and shall not pass such UPSI to any person directly or indirectly, including but not limited to by way of making a recommendation for purchase or sale of securities.

However, such information may be disclosed only on a "need to know" basis, i.e., to such Employees who need the information to discharge their duty.

Need to Know:

1) "Need to know" basis means that Unpublished Price Sensitive Information should be disclosed only to those within (Name of Stock Broker) who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.
2) All UPSI directly or indirectly received by any Employee should immediately be reported to the Compliance Officer.

Limited access to confidential information

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

Chinese Wall Implementation

To prevent misuse of confidential information, (Name of the Stock Broker) shall adopt a "Chinese wall policy" to prevent misuse of UPSI by segregating departments into "inside areas" (which routinely handle UPSI, e.g., research or compliance) and "public areas" (which do not handle UPSI, e.g., client service, operations). Employees in inside areas shall not communicate UPSI to public areas or to third parties. However, in exceptional circumstances employees from one division may be brought over the wall and given confidential information on the basis of "need to know" criteria, with the approval of the Compliance Officer. Files, systems, and communication channels containing UPSI shall be protected with adequate security, including restricted access, login credentials, and encryption.

Except as permitted herein, no Employee shall communicate UPSI to any other person on a need-to-know basis for furtherance of the Employee's legitimate purposes by

permitting such other person to cross the Chinese Wall.

VIII. TRADING RESTRICTIONS:

Designated Persons and their Immediate Relatives shall not trade in securities while in possession of UPSI. The Compliance Officer shall maintain:

- Restricted List – securities about which the Company or its employees possess UPSI.
- Grey List – securities where client orders are pending or significant research activity is underway, to prevent front running.

The **Restricted List** shall comprise securities about which the Company, its Directors, or employees are in possession of Unpublished Price Sensitive Information (UPSI). Inclusion of securities in the Restricted List is a preventive measure to avoid even the appearance of insider trading. Trading in these securities shall remain prohibited until the UPSI becomes generally available information and, in any case, for a period of not less than 48 hours thereafter.

The **Grey List** shall comprise securities where (a) significant client orders are pending execution, (b) the Company's research team is in the process of preparing or updating a recommendation, or (c) the Company is engaged in any assignment or due diligence exercise relating to the issuer. The purpose of maintaining the Grey List is to prevent potential conflicts of interest, front running of client trades, or misuse of information that, while not amounting to UPSI, may still provide an undue advantage. Designated Persons are prohibited from trading in such securities unless the Compliance Officer has specifically cleared such trades after ensuring that no conflict of interest exists

Designated Persons shall not trade in Restricted List or Grey List securities until permitted by the Compliance Officer. The Lists shall be maintained by the Compliance Officer. As the restricted list/grey list is highly confidential information, it shall not be communicated directly or indirectly except with the approval of the Compliance Officer.

No Designated Employee shall trade in Cash or Derivative Segment or Corporate Bonds where the underlying securities are in the restricted list. This restriction shall also apply to all immediate relatives of Designated Employees. However, this does not apply to trades in Currency Derivatives, Index Derivatives i.e., Nifty, Bank Index, etc. Government Debt instruments, Bank Fixed Deposits, Commodities (including commodity derivatives), ETFs, and Mutual Funds.

IX. CONTRA TRADES:

Contra Trades—that is, buying and subsequently selling, or selling and subsequently buying, the same security within a period of six months—are strictly prohibited. The restriction applies irrespective of whether the securities were purchased or sold on the stock exchange, through block deals, or in off-market transactions. This requirement

seeks to discourage speculative trading and align the interests of Designated Persons with those of long-term investors.

In exceptional circumstances, where it is necessary for personal reasons (such as liquidity requirements, medical emergencies, or unforeseen financial obligations), the Compliance Officer may, after recording the reasons in writing, grant a waiver of the contra trade restriction. However, such waiver shall not be granted if it would contravene the Regulations. Any profits earned from inadvertent contra trades or from contra trades permitted under waiver shall be **disgorged** and credited to the Investor Protection and Education Fund (IPEF) administered by SEBI.

X. PRECLEARANCE OF TRADES:

Note that "Securities" as used in this paragraph exclude Currency Derivatives, Index Derivatives (i.e., Nifty, Bank Index, etc.), Government debt instruments, bank fixed deposits, Commodities (including commodity derivatives), ETFs, and Mutual Funds/exchange-traded funds (ETFs). However, stocks/stock derivatives and corporate bonds are included in the definition of Securities for this paragraph.

All Designated Persons and their Immediate Relatives must obtain **prior approval from the Compliance Officer** before executing any trade in securities that ***exceeds such threshold value as may be determined by the Board of Directors from time to time. The threshold limit shall be communicated to all Designated Persons and may be reviewed periodically.*** This requirement is intended to ensure that trades are not executed while in possession of Unpublished Price Sensitive Information (UPSI) and that there is adequate oversight of significant transactions.

The application for pre-clearance shall be made in the **prescribed form** (Annexure 1) and must be accompanied by an **undertaking** (Annexure 1) confirming that the applicant is not in possession of UPSI at the time of making the request. The Compliance Officer may, if necessary, seek additional declarations, supporting documents, or clarification to ensure compliance before granting approval.

The Compliance Officer shall process pre-clearance requests within **three working days** of receipt. Approval, once granted, shall be valid for a maximum of **seven trading days**, within which the trade must be executed. If the trade is not executed within this period, the Designated Person shall be required to seek **fresh pre-clearance**. If a Designated Person chooses not to execute the trade after obtaining approval, they must notify the Compliance Officer accordingly.

Pre-clearance shall not be granted for securities included in the **Restricted List** or **Grey List** maintained by the Compliance Officer. Further, pre-clearance may be denied if there is reason to believe that the applicant is in possession of UPSI, or if the trade is likely to result in a conflict of interest, front running, or reputational risk for the Company.

Designated Persons are also required to adhere to the **minimum holding period** prescribed by the Company (for example, six months in the case of contra trades, unless waived). In case of an **emergency or genuine hardship** (such as medical exigencies or urgent financial commitments), the Compliance Officer may grant a waiver of the holding period, provided that such waiver does not contravene the Regulations.

Inadvertent violations of the pre-clearance requirements must be reported immediately to the Compliance Officer, who shall determine the corrective action, including possible disgorgement of profits and reporting to SEBI, if necessary.

XI. DISCLOSURE AND REPORTING REQUIREMENTS:

All Designated Persons and their Immediate Relatives are required to make timely and accurate disclosures of their securities holdings and transactions to ensure transparency and compliance with the SEBI (Prohibition of Insider Trading) Regulations, 2015. These disclosures shall be submitted to the Compliance Officer in the prescribed formats and within the time limits set out below.

1. Initial Disclosures

- Every person who is identified as a Designated Person shall, within **30 days of being classified as such**, disclose the details of all securities held by them, their Immediate Relatives, and any entities controlled by them.
- At the time of joining the Company, each Designated Person shall provide details of their **Permanent Account Number (PAN), Aadhaar number, contact details, educational institutions attended, past employers, Immediate Relatives, and persons with whom they share a Material Financial Relationship**.
- Details of all demat and trading accounts held by them or their Immediate Relatives must also be disclosed within **30 days of joining**.

2. Continual Disclosures

- Every Designated Person shall disclose the details of any trade in securities executed by them or their Immediate Relatives where the value of such trade, either individually or cumulatively over a calendar quarter, exceeds the threshold prescribed under the Regulations.
- Such disclosure must be made to the Compliance Officer within **two trading days of execution** of the transaction.

3. Half-Yearly Disclosures

- All Designated Persons shall submit a **statement of holdings and transactions** in securities, both for themselves and their Immediate Relatives, as of **30th September** and **31st March** every year.
- These statements shall be furnished to the Compliance Officer within **30 days of the close of the half-year period**.

4. Annual Disclosures

- Every Designated Person shall submit an **annual disclosure** within **30 days of 31st March** each year, providing updated details of:
  - Securities held by them and their Immediate Relatives.
  - All demat and trading accounts.
  - Immediate Relatives and persons with whom they share a Material Financial Relationship.
- Any changes to personal information (such as contact details, PAN, Aadhaar, or Immediate Relatives) must be promptly reported to the Compliance Officer.

5. Event-Based Disclosures

- Any changes in trading/demat accounts must be reported within **five working days**.
- Any declaration of material financial relationships must be updated within **five working days** of such occurrence.

6. Record Keeping

- All disclosures, undertakings, applications for pre-clearance, approvals, and related correspondence shall be preserved by the Compliance Officer for a minimum period of **five years**.
- These records shall be maintained in both physical and electronic form with secure access, time-stamping, and audit trails, to ensure compliance and to facilitate regulatory inspection, if required.

7. Monitoring and Reporting to the Board

- The Compliance Officer shall review all disclosures, pre-clearance requests, and trades executed by Designated Persons.
- A consolidated report on insider trading compliance, violations (if any), and corrective actions taken shall be submitted to the Board of Directors on a periodic basis, and at least **once annually**.

XII. DIGITAL DATABASE:

In accordance with Regulation 3(5) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Company shall maintain a **structured digital database** of all persons and entities with whom Unpublished Price Sensitive Information (UPSI) is shared.

This database shall include, at a minimum, the following details:

- Name of the person or entity with whom UPSI has been shared.
- Permanent Account Number (PAN), or in case PAN is not available, any other authorized identifier.
- Name of the person or official who shared the UPSI and the date and time of such sharing.
- The purpose for which the information was shared and the mode of communication.

The database shall be maintained with **time-stamping, audit trails, and adequate internal controls** to ensure that entries cannot be tampered with and that there is a complete, verifiable record of access and modifications. To ensure data integrity and compliance:

- The database shall be **secured with appropriate access restrictions, login credentials, and encryption** to prevent unauthorized access.
- **Regular back-ups** shall be taken to ensure the information remains updated and retrievable at all times.
- The Company shall appoint a **responsible officer/employee** who will be accountable for maintaining, updating, and safeguarding the digital database.
- Entry of externally sourced information into the SDD may be done **not later than 2 calendar days** from the receipt of such information.
- The Compliance Officer shall periodically review the database to ensure accuracy, completeness, and compliance with SEBI requirements.

The information stored in the database shall be preserved for a **minimum of 8 years**. In the event of any ongoing investigation, inquiry, or enforcement proceedings initiated by SEBI or any other regulatory authority, the information shall be preserved until the conclusion of such proceedings, even if this period extends beyond 8 years. This mechanism ensures that the Company can **demonstrate compliance** with the Regulations and provide complete information to SEBI or regulators whenever required.

XIII. PENALTY FOR CONTRAVENTION OF CODE OF CONDUCT:

Every Employee and Designated Person shall be individually responsible for ensuring strict compliance with the provisions of this Code, including compliance by their Immediate Relatives to the extent applicable. Ignorance of the Code or the Regulations shall not be accepted as an excuse for any default.

Any Employee, Director, or Connected Person who trades in securities, communicates Unpublished Price Sensitive Information (UPSI), or facilitates trading in securities in contravention of this Code or the SEBI (Prohibition of Insider Trading) Regulations, 2015, shall be liable to disciplinary action by the Company, without prejudice to action by SEBI or other regulatory authorities under applicable law.

Disciplinary action by the Company may include, but shall not be limited to:

- Issue of a warning or censure letter.
- Salary freezes or withholding of increments and/or bonus.
- Disqualification from holding office or responsibilities involving sensitive functions.
- Suspension from employment.
- Termination of employment or contract.

Any Designated Person who trades in securities included in the **Restricted List** or executes trades without obtaining **pre-clearance approval** as required under this Code

shall indemnify and hold harmless the Company for any loss, liability, penalty, or reputational damage arising from such violation. Such Designated Person shall personally bear the consequences of default, whether monetary or otherwise.

Further, any profits made by a Designated Person or their Immediate Relatives through trades executed in violation of this Code or the Regulations shall be **liable to be disgorged** and credited to the Investor Protection and Education Fund (IPEF) administered by SEBI.

The disciplinary measures taken by the Company shall be **independent of and in addition to** any action that SEBI or any other regulatory/statutory authority may initiate under the SEBI Act, 1992, the Securities Contracts (Regulation) Act, 1956, or the Companies Act, 2013, including monetary penalties, disgorgement, prohibition orders, or imprisonment.

XIV. GENERAL:

Employees are advised to acquaint themselves with their obligations under the Insider Trading Regulations. The Compliance Officer may be contacted for any clarification/assistance that may be necessary. The Management reserves the right to add, alter or edit any of the above terms with or without prior intimation and the same shall be binding from time to time.

Any modifications, amendment or changes to this Code will be in accordance to any amendments to the SEBI (Insider Trading) Regulations, 2015 or any other circulars, guidelines or regulations issued by SEBI or other regulatory authorities.

XV. CLARIFICATION/INFORMATION:

In case of any clarification/information required on the implementation of the Policy, please contact the Compliance Officer on Email -_____, Tel No._____.

XVI. REVIEW:

The said policy shall be reviewed by the Board of the Directors on a yearly basis or as and when any update comes change in the Relevant Regulation/Circular comes or any change in the (Name of the Stock Broker)'s internal control or Structure.

The Compliance officer has the authority to give directions to undertake additions, changes, and modifications, etc. to this Policy, and the same shall be effective per the authority of the Compliance Officer and thereafter be ratified by the Board of the Directors at its next review.

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ANNEXURE 1

APPLICATION FOR PRE-DEALING / CLEARANCE APPROVAL

Date: _____

To,

The Compliance Officer,

_____

Dear Sir/Madam,

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct for Prevention of Insider Trading, I seek approval to purchase / sale/subscription of equity shares of the Company as per details given below:

Name of the applicant	
Designation	
Number of securities held as on date	
Folio No./DP ID / Client ID No.	
Name of the Securities	
The proposal is for : Purchase / Sale / Subscription of securities	
Proposed date of dealing in securities	
Estimated number of securities proposed to be acquired/subscribed/sold (Qty)	
Price at which the transaction is proposed	
Current market price (as on date of application)	
Whether the proposed transaction will be through Stock exchange or off-market deal	
Folio No. / DPID/ Client ID No. where the securities will be credited/debited	

UNDERTAKING

I declare that I am not in possession of or otherwise privy to any Unpublished Price Sensitive Information as defined in the Company's Code of Conduct for prevention of Insider Trading (the Code) up to the time of signing this Undertaking. In the event that I have access to or received 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 public.

I declare that I have not contravened the provisions of the Code as notified by the Company from time to time. 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. I declare that I have made full and true disclosure in the matter.

_____

(Signature of Employee)

APPROVAL

This is to inform you that your request for dealing in shares of the Company as mentioned in the above application is approved. Please note that the said transaction must be completed on or before _____ (date) that is **within 7 trading days from today**. In case you do not execute the approved transaction /deal on or before the aforesaid date you would have to seek fresh pre-clearance before executing any transaction/deal in the securities of the Company.

_____

(Signature of Compliance Officer)

Date: _____

ANNEXURE 2

FORMAT FOR INITIAL DISCLOSURE OF SECURITIES BY DESIGNATED EMPLOYEES

To,
The Compliance Officer,
_____

Name of the Director/Officer/Employee and Immediate Relatives	
Department	
Holding as on date (DD/MM/YYYY)	

Declaration

i. Details of securities held by Directors/Employee in their own Name:

Sr.no	Name of Security/Scrip	ISIN	No. of Securities Held	DP ID/Client ID

ii. Details of Immediate Relatives:

Pursuant to the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Procedures and Conduct for Prevention of Insider Trading, I hereby declare that the following persons are my Immediate Relatives dependents:

Sr. No	Name of the dependent	Relation with Designated Employee

iii. Details of securities held by my Immediate Relatives:

Sr.no	Name of Security/Scrip	ISIN	No. of Securities Held	DP ID/Client ID

Date :
Signature: _____

ANNEXURE 3

FORMAT OF HALF-YEARLY STATEMENTS OF HOLDINGS BY DESIGNATED EMPLOYEES AND THEIR IMMEDIATE RELATIVES.

To,
The Compliance Officer,
_____

Name of the Director/Officer/Employee and Immediate Relatives	
Department	
Holding as on date (DD/MM/YYYY)	

Declaration

i. **DETAILS OF SECURITIES HELD BY DESIGNATED EMPLOYEES IN THEIR OWN NAME**:

Name	**Name of the Security/Scrip**	**ISIN**	**No. of Shares Held**	**Date of Acquisition**	**DP ID/Client ID**

ii. DETAILS OF SECURITIES HELD BY IMMEDIATE RELATIVES:

Name	**Name of the Security/Scrip**	**ISIN**	**No. of Shares Held**	**Date of Acquisition**	**DP ID/Client ID**

Yours Truly,

Sign: _____

Name: _____

Date: _____

ANNEXURE 4

FORMAT OF ANNUAL DISCLOSURE BY DESIGNATED EMPLOYEES.

To,
The Compliance Officer,
_____

Name of the Director/ Officer/Employee			
Employee No.		**Grade**	
Department		**Location**	

Full Name as per PAN	**PAN Number**	**Aadhar Number**	**Residential Address along with Telephone Number**

Sr. No	**Name of the Educational Institutions**	**Name of their Past Employers**

I. **Details of Immediate Relatives:**
Pursuant to the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Procedures and Conduct for Prevention of Insider Trading, I hereby declare that I have the following dependents:

Sr. No	**Name of the Immediate Relative**	**Relation with Director / Officer / Designated Employee**

Full Name as per PAN	**PAN Number**	**Aadhar Number**	**Residential Address along with Telephone Number**

Yours Truly,

Sign: _____

Name: _____

Date: _____