

# SHELTER INFRA PROJECTS LIMITED

(formerly CCAP Limited)

REGD. AND HEAD OFFICE

ETERNITY, DN - 1, SECTOR -V, SALT LAKE CITY, KOLKATA - 700 091

PH.: 2357 - 6255 / 4003 2290

E-MAIL : info@ccaplttd.in, WEBSITE : www.ccaplttd.in, CIN - L45203WB1972PLC028349

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**Dated: 30.01.2025**

To,  
The Secretary  
**BSE Limited**  
Phiroze Jeejeebhoy Towers  
Dalal Street  
Mumbai-400001

To,  
The Secretary  
**The Calcutta Stock Exchange Limited**  
7, Lyons Range, Dalhousie  
Kolkata - 700001

**Scrip Code: BSE: 526839**

**Scrip Code: CSE: 13077**

Dear Sir,

**Sub: Code of conduct as per SEBI (PROHIBITION OF INSIDER TRADING) Regulations, 2015**

Please find the Code of conduct as per SEBI (PROHIBITION OF INSIDER TRADING) Regulations, 2015.

Note: Kindly ignore the clerical mistake duly made in previous uploading of same disclosure.

Kindly take the same on your records.

Thanking You,

Yours faithfully,  
For **Shelter Infra Projects Limited**

**Kamal Kishore Chowdhury**  
**(Whole Time Director)**  
**DIN: 06742937**

Encl: as above



**SHELTER INFRA PROJECTS LIMITED**

CIN: L45203WB1972PLC028349

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Salt Lake, Kolkata -700091

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

### **1. PRELIMINARY**

1.1 Pursuant to the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015, the Board of Directors of Shelter Infra Projects Limited has formulated the Code of Conduct to Regulate, Monitor and Report Trading by Insiders hereinafter called as **“the Code”**.

1.2 The Code has revised and shall come into force w.e.f. 30.01.2025 and the amendments to the code, if any, shall be effective from the date on which it is notified from time to time.

### **2. DEFINITIONS AND INTERPRETATION**

2.1 The Code has been formulated as per the standards envisaged in Schedule B to the SEBI (Prohibition of Insider Trading) Regulations, 2015 (hereinafter called as “SEBI Regulations”) and the terms or expressions used, unless explicitly defined herein shall have same meaning as defined, interpreted or construed in/for the purpose of the SEBI Regulations . In case of any contradiction the meaning as defined, interpreted or construed in SEBI Regulations shall prevail.

For the sake of convenience and easy reference the following words as defined in the SEBI Regulations are enumerated herein below:

a) **“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



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business relationship between himself and the company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.

(ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established, -

(a). an immediate relative of connected persons specified in clause (i); or

(b). a holding company or associate company or subsidiary company; or

(c). an intermediary as specified in section 12 of the Act or an employee or director thereof; or

(d). an investment company, trustee company, asset management company or an employee or director thereof; or

(e). an official of a stock exchange or of clearing house or corporation; or

(f). a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or

(g). a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or

(h). an official or an employee of a self-regulatory organization recognized or authorized by the Board; or

(i). a banker of the company; or

(j). a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten per cent. of the holding or interest

(k) a firm or its partner or its employee in which a connected person specified in sub-clause (i) 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);

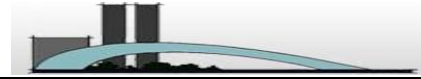


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- b) **“Designated Persons”** means designated employees and connected persons;
- c) **“Director”** means a member of the Board of Directors of the Company;
- d) **“Generally Available Information”** means information that is accessible to the public on a non-discriminatory basis; and shall not include unverified event or information reported in print or electronic media.
- e) **“Key Managerial Personnel”** or **“KMP”**, in relation to the company shall mean same as defined under Section 2(51) of the Companies Act, 2013 read with Section 203 of the Companies Act, 2013;
- f) **“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;
- g) **“Insider”** means any person who is:
  - a. a connected person; or
  - b. in possession of or having access to unpublished price sensitive information
- h) **Designated persons”** covers: -
  - (i) Employees of such listed company, intermediary or fiduciary designated on the basis of their functional role or access to unpublished price sensitive information in the organization by their board of directors or analogous body;
  - (ii) Employees of material subsidiaries of such listed companies designated on the basis of their functional role or access to unpublished price sensitive information in the organization by their board of directors;
  - (iii) All promoters of listed companies and promoters who are individuals or investment companies for intermediaries or fiduciaries;
  - (iv) Chief Executive Officer and employees upto two levels below Chief Executive Officer of such listed company, intermediary, fiduciary and its material subsidiaries irrespective of their functional role in the company or ability to have access to unpublished price sensitive information;
  - (v) Any support staff of listed company, intermediary or fiduciary such as IT staff or secretarial staff who have access to unpublished price sensitive information. Institutional Mechanism for Prevention of Insider trading.



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- i) **“Trading”** means and includes subscribing, redeeming, switching, buying, selling, dealing, or agreeing to subscribe, 22[redeem, switch, buy, sell, deal in any securities, and "trade" shall be construed accordingly.
- j) **“Trading Day”** means a day on which the recognized stock exchanges are open for trading where securities of the Company are listed;
- k) **“Trading Window”** means trading period for trading in the Company’s Securities. All days shall be the trading periods except when trading window is closed;
- l) **“Unpublished Price Sensitive Information”** or **“UPSI”** means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: –
  - (i) financial results;
  - (ii) dividends;
  - (iii) change in capital structure;
  - (iv) mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
  - (v) changes in key managerial personnel.
- m) **“Securities”** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 or any modification thereof.

### **3. APPLICABILITY**

This Code shall apply to all Designated Employees and other Connected Persons as mentioned in this Code.

### **4. OBJECTIVE OF THE CODE**

The objective of the Code is to regulate, monitor and report trading by Designated Employees and other Connected Persons towards achieving compliance with SEBI Regulations.

### **5. COMPLIANCE OFFICER**

The Company Secretary shall be the Compliance Officer for the purpose of the Code. The Compliance Officer shall be responsible for compliance of policies, procedures, monitoring adherence to the rules for the preservation of UPSI, pre-clearance of trades of Designated Persons, monitoring of trades and the implementation of the Code under the overall supervision of the Board of Directors of the Company.

The Compliance Officer shall maintain a record of the designated persons and any changes therein, in accordance with the provisions of the SEBI (PIT) Regulations.



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The Compliance Officer shall designate a Senior Official of the Company to act as Compliance officer in his absence.

**6.COMMUNICATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION.**

(1) No insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

(2) An unpublished price sensitive information 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 the listed company is of informed opinion that sharing of such information 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 the listed company is of informed opinion that sharing of such information is in the best interests of the company and the information that constitute unpublished price sensitive information is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the board of directors may determine to be adequate and fair to cover all relevant and material facts].

(3) 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 sub-regulation (3), and shall not otherwise trade in securities of the company when in possession of unpublished price sensitive information.

(4) The Compliance Officer shall be required to handle unpublished price sensitive information shall ensure that a structured digital database is maintained containing the nature of unpublished price sensitive information and the names of such persons who have shared the information and also the names of such persons with whom information is shared under this regulation along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such database shall not be outsourced and shall be maintained internally with adequate internal control. The structured digital database is preserved for a period of not less than eight years after completion of the relevant transactions and in the event of receipt of any information from the Board regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.



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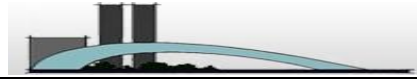
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**7. TRADING IN SECURITIES**

No Insider shall trade in securities of the Company when in possession of unpublished price sensitive information except otherwise provided under the SEBI Regulations and as per the Regulation 4.

All Designated persons shall conduct all their trading in the securities of the company only in a valid trading window and shall not trade in company's securities during the periods when trading window is closed or during any other period as may be specified by the Company from time to time.

Insider submitting the Trading Plan shall also adhere to the conditions as stated in Regulation 5.



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## **8. TRADING WINDOW**

8.1 The Trading Window shall be *inter-alia* closed prior to following events:

- (a) Board meeting for declaration of financial results;
- (b) Board meeting for declaration of interim dividend or final dividend;
- (c) Board meeting for change in capital structure like issue of securities by way of public/right/bonus, buy-back etc;
- (d) Board Meeting held to approve any mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
- (e) Any such other material event (in accordance with the listing Regulations) as may be deemed fit by the Compliance Officer;

However if the circumstances so warrants the time for closing the window may be increased or decreased with the approval of Compliance Officer and Chairman & Whole Time Director.

8.2 The trading window shall be opened 48 hours after information referred to in clause 4.2 of Schedule B becomes generally available.

8.3 The trading window restrictions 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.

## **9. PRE-CLEARANCE OF TRADES**

9.1 All Designated Persons who intend to trade in the Securities of the Company and the cumulative trading, whether in one transaction or a series of transactions during a calendar quarter exceeds Rs. 10 lakhs (market value), should seek pre-clearance for such transactions. These transactions shall take place only in period other than the Restricted/ Shut Period .All Designated Persons who intend to trade in the securities of the company should pre-clear the transactions as per the pre-trading procedure as described hereunder.

9.2 An application shall be made in "Form-G" to the Compliance Officer indicating the estimated number of securities that the Designated Persons intends to trade in, 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 may be required by any rule made by the company in this behalf.

9.3 All Designated Persons shall execute their order in respect of securities of the company within seven trading days after the approval of pre-clearance is given. If the order is not executed within the aforementioned specified period, the Designated person must pre-clear the transaction again by following the above procedure

9.4 In case the Designated Persons or his/ her immediate relative decides not to execute the trade after securing pre-clearance, he/ she shall inform the Compliance Officer of such decision alongwith reasons thereof immediately.





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9.5 No Designated Persons shall apply for pre-clearance of any proposed trade when the trading window is closed or if he/ she is in possession of unpublished price sensitive information.

9.6 Prior to approving any trades, the compliance officer shall be entitled to seek declarations to the effect that the application for pre-clearance is not in possession of any unpublished price sensitive information. He shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.

9.7 It shall be the responsibility of Designated Employees to ensure compliance of code in this respect as well as in case of their immediate relatives also.

9.8 All Designated Persons who buy or sell any number of securities of the company shall not execute a contra trade i.e. sell or buy any number of securities during the next six months following the prior transaction.

9.9 The Compliance Officer may grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate the SEBI Regulations.

9.10 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.



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## **10. Trading Plans**

10.1 An Insider shall be entitled to formulate a trading plan and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his / her behalf in accordance with such plan.

10.2 Such trading plan shall:—

- (i) not entail commencement of trading on behalf of the insider earlier than 120 days from the public disclosure of the plan;
- (ii) not entail overlap of any period for which another trading plan is already in existence;
- (iii) set out following parameters for each trade to be executed:

either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and either specific date or time period not exceeding five consecutive days and the price limit; and

- (iv) not entail trading in securities for market abuse.

10.3 The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of the SEBI 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. The pre-clearance of trades shall not be required for a trade executed as per an approved trading plan. The trading window norms shall not be applicable for trades carried out in accordance with an approved trading plan

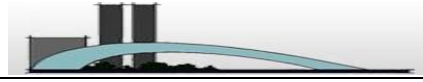
**10.4 The trading plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to either execute any trade in the securities outside the scope of the trading plan or to deviate from it except due to permanent incapacity or bankruptcy or operation of law.**

Provided that the implementation of the trading plan shall not be commenced if any unpublished price sensitive information in possession of the insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation.

Provided further that if the insider has set a price limit for a trade the insider shall execute the trade only if the execution price of the security is within such limit. If price of the security is outside the price limit set by the insider, the trade shall not be executed.

The insider shall intimate non implementation (full/partial) of trading plan to the compliance officer within two trading days of end of tenure of the trading plan with reasons thereof and supporting documents, if any.

Upon receipt of information from the insider, the compliance officer, shall place such information along with his recommendation to accept or reject the submissions of the insider, before the Audit Committee in the immediate next meeting. The Audit Committee shall decide whether such non -implementation (full/partial) was bona fide or not. The decision of the Audit Committee shall be notified by the compliance officer on the same day to the stock exchanges on which the securities are listed.



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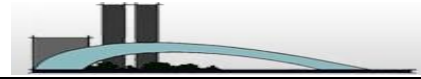
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In case the Audit Committee does not accept the submissions made by the insider, then the compliance officer shall take action as per the Code of Conduct.

The compliance officer shall approve or reject the trading plan within two trading days of receipt of the trading plan and notify the approved plan to the stock exchanges on which the securities are listed, on the day of approval.



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**11. REPORTING AND DISCLOSURE REQUIREMENTS**

**11.1 Disclosure Requirements**

**Initial Disclosures**

| By Whom to whom   | What to be disclosed  | When to be disclosed  | Form   |
|---|---|---|--------|
| On becoming Promoter/ appointed as Director/ KMP to the Company | Holding of securities of the Company as on date of appointment or becoming Promoter | Within seven days of such appointment or of becoming Promoter | Form B |

**Continual Disclosures**

| By Whom  | What to be disclosed  | When to be disclosed   | Form   |
|--|---|--|--------|
| Promoter/ Director/ KMP / designated persons (and also immediate Relatives of such) to the Company | Number of such securities acquired or disposed  | Within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 10 lakh or such other value as may be specified.<br><i>*disclosure of incremental transactions shall be made when transactions effected after the prior disclosure cross the threshold specified above.</i> | Form C |
| Company to Stock Exchange on which its security is listed  | Particulars of the trading disclosure received from the Promoter/Director/ KMP / Employee (and also immediate relatives of such person) | Within two trading days of receipt of disclosure or becoming aware of such information   | Form C |



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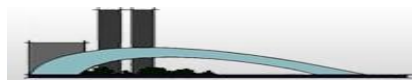
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**Disclosure by other Connected Persons**

| <b>By Whom</b>                         | <b>What to be disclosed</b>                       | <b>When to be disclosed</b>  | <b>Form</b> |
|--|---|--|-------------|
| other Connected Persons to the Company | Disclosures of holdings and trading in securities | Within 7 days of their attaining the status of other connected persons or 7 days of executing such trade | Form D      |

11.2 The Compliance Officer shall maintain records of all the disclosures/ declarations/ undertakings/ forms as mentioned in this Code, as received from time to time, for a period of five years.

11.3 The Compliance Officer shall report to the Board of Directors for the purpose of the Code and in particular, shall provide reports to the Chairman of the Audit Committee and to the Chairman of the Board annually.



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## **MISCELLANEOUS**

### **12. Penalty for Contravention of the Code**

12.1 All Designated Employees and Connected Persons who trades in securities or communicates any information for trading in securities in contravention of the code of conduct may be penalized and appropriate action may be taken by the Company.

12.2 All Designated Employees who violate this Code of Conduct shall also be subject to disciplinary action by the company, which may include wage, salary freeze, suspension, withholding of promotions etc.

12.3 In case it is observed by the Company and/or Compliance Officer that there has been violation of the SEBI Regulations, SEBI shall be informed by the Company.

### **13. Uploading of the Code on Company's Website**

This Code and any amendments thereto shall be available on the website of the Company.

### **14. Compliance with the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information**

Any communication, dissemination of unpublished price sensitive information by Designated Persons shall be disclosed only in adherence to the "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" except such communication, dissemination is required statutorily.

### **15. Submission of Original Information to the Board**

An Informant shall submit Original Information by furnishing the Voluntary Information Disclosure Form to the Office of Informant Protection of the Board in the format and manner set out in Schedule D.

### **16. Institutional Mechanism for Prevention of Insider trading.**

The Whole Time Director, The Compliance Officer of a listed company, intermediary or fiduciary shall put in place adequate and effective system of internal controls to ensure compliance with the requirements given in these regulations to prevent insider as per Regulation 9A.



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**Form PC-I**

**(Application for Pre-clearance)**

(For use by Designated persons in case of trading in the securities of Company)

Date:

To,  
The Compliance Officer,  
**M/S SHELTER INFRA PROJECTS LIMITED**  
ETERNITY BUILDING DN-1, SECTOR - V,  
SALT LAKE, KOLKATA -700091

Dear Sir,

I am desirous of trading in the below-mentioned securities of M/S SHELTER INFRA PROJECTS LIMITED in my own name or on behalf of my immediate relatives (write name of relative and relationship) and seek your approval as under:

| Type of Security | No. of Securities | Market Price | Mode of acquisition Purchase/Sale-physical/Demat/other | Date by which trade is proposed to be executed | Folio No./ DP ID No./Client ID No. alongwith the name of depository | Present Holding (No. of Securities) |       |
|------------------|-------------------|--------------|--|--|---|-------------------------------------|-------|
|                  |                   |              |  |  |   | Physical                            | Demat |
| 1                | 2                 | 3            | 4  | 5  | 6   | 7                                   | 8     |
|                  |                   |              |  |  |   |                                     |       |

In relation to the above, I undertake that:

a) I have no access to nor am I in possession of any unpublished price sensitive information at the time of signing this undertaking.

b) In case, I get access to or receive any "Unpublished Price Sensitive Information" after signing this application but before the execution of the transaction, I shall inform you of the change in position and shall refrain from trading in securities till such information is made public.

c) I have not contravened the Company's "Code of Conduct to Regulate, Monitor and Report trading by Insider" and "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" as notified by the Company from time to time.

d) In case the traded value exceeds Rs. 10 lakh or any such other value as may be specified, disclosures required under the "Code of Conduct to Regulate, Monitor and Report trading by Insider" will be immediately furnished by me.

e) I have made full and true disclosure in this application.

Signature:

Name:

Designation:

Department:

Place:



**भारतीय प्रतिभूति और विनिमय बोर्ड**  
**Securities and Exchange Board of India**

**FORM B**

**SEBI (Prohibition of Insider Trading) Regulations, 2015**  
**[Regulation 7 (1) (b) read with Regulation 6(2) – Disclosure on**  
**becoming a Key Managerial Personnel/Director/Promoter/Member of**  
**the promoter group]**

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 or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).**

| Name, PAN, CIN/DIN & Address with contact nos. | Category of Person (KMP / Director or Promoter or member of the promoter group/ Immediate relative to/others, etc.) | Date of appointment of KMP/Director / OR Date of becoming Promoter/ member of the promoter group | Securities held at the time of appointment of KMP/Director or upon becoming Promoter or member of the promoter group |     | % of Shareholding |
|--|---|--|--|-----|-------------------|
|  |   |  | Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements, etc.)                   | No. |                   |
| 1  | 2   | 3  | 4  | 5   | 6                 |
|  |   |  |  |     |                   |

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

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

| Open Interest of the Future contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group |  |                               | Open Interest of the Option Contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group |  |                               |
|--|--|-------------------------------|--|--|-------------------------------|
| Contract specifications  | Number of units (contracts * lot size) | Notional value in Rupee terms | Contract specifications  | Number of units (contracts * lot size) | Notional value in Rupee terms |
| 7  | 8                                      | 9                             | 10   | 11                                     | 12                            |
|  |  |                               |  |  |                               |

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

Name & Signature:  
Designation:  
Date:  
Place:



**FORM C**

**SEBI (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 the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).**

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

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

(ii) Value of transaction excludes taxes/brokerage/any other charges

Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

| Trading in derivatives (Specify type of contract, Futures or Options etc.) |                         |                |  |                |  | Exchange on which the trade was executed |
|--|-------------------------|----------------|--|----------------|--|--|
| Type of contract   | Contract specifications | Buy            |  | Sell           |  |  |
|  |                         | Notional Value | Number of units (contracts * lot size) | Notional Value | Number of units (contracts * lot size) |  |
| 16   | 17                      | 18             | 19                                     | 20             | 21                                     | 22                                       |

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

Name & Signature:

Designation:

Date:

Place:

**FORM D (Indicative format)**

**SEBI (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 | Connect ion with company | Securities held prior to acquisition/disposal   |                           | Securities acquired/Disposed  |     |       |   | Securities held post acquisition/disposal   |                            | Date of allotment advice/ acquisition of shares/ disposal of shares specify |    | Date of intimation to company | Mode of acquisition/ disposal (on market/ public/ rights/ Preferential offer / off market/ Inter-se transfer, ESOPs etc. ) | Exchange on which the trade was executed |
|---|--------------------------|---|---------------------------|---|-----|-------|---|---|----------------------------|---|----|-------------------------------|--|--|
|   |                          | Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.) | No. and % of shareholding | Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.) | No. | Value | Transaction Type (Purchase/Sale/ Pledge/ Revocation / Invocation/ Others- please specify) | Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.) | No. and % of share holding | From  | To |                               |  |  |
| 1   | 2                        | 3   | 4                         | 5   | 6   | 7     | 8   | 9   | 10                         | 11  | 12 | 13                            | 14   | 15                                       |

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

**(ii)** Value of transaction excludes taxes/brokerage/any other charges



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

| Trading in derivatives (Specify type of contract, Futures or Options etc.) |                         |                |  |                |  | Exchange on which the trade was executed |
|--|-------------------------|----------------|--|----------------|--|--|
| Type of Contract   | Contract specifications | Buy            |  | Sell           |  |  |
|  |                         | Notional Value | Number of units (contracts * lot size) | Notional Value | Number of units (contracts * lot size) |  |
| 16   | 17                      | 18             | 19                                     | 20             | 21                                     | 22                                       |

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

Name:

Signature:

Place:

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