



दि न्यू इन्डिया एश्योरन्स कंपनी लिमिटेड

THE NEW INDIA ASSURANCE COMPANY LTD.

पंजीकृत एवं प्रधान कार्यालय : न्यू इन्डिया एश्योरन्स बिल्डिंग, 87, महात्मा गांधी मार्ग, फोर्ट, मुंबई - 400 001.

Regd. & Head Office : New India Assurance Bldg., 87, M.G.Road, Fort, Mumbai - 400 001.

CIN No. L66000MH1919GOI000526

Phone : 022-22708100
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Website : www.newindia.co.in

Ref. No.: NIACL/CMD_Board Sectt/2020-21

July 10, 2020

To,

The Manager

Listing Department

BSE Limited

Phiroze Jeejeebhoy Tower

Dalal Street

Mumbai 400 001

The Manager

Listing Department

The National Stock Exchange of India Ltd.

Exchange Plaza, 5th floor, Plot C/1

G Block, Bandra-Kurla Complex

Mumbai 400 051

Scrip Code: (BSE 540769/ NSE-NIACL)

Dear Sir/Madam,

Re : Intimation of amendment to the NIACL Insider Trading Code including the Policy for inquiry of leak of UPSI

Pursuant to the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended ("Regulations") the Code of Internal Procedures and Conduct for Prohibition of Insider Trading in dealing with the Securities of The New India Assurance Co Ltd. (NIACL) ("NIACL Insider Trading Code") have been amended. Further, in line with the said Regulations, a Policy on procedures to be followed while conducting an enquiry in the event of leak of suspected leak of unpublished price sensitive information ("NIACL Policy for inquiry of leak of UPSI") forming part of Insider Trading code has also been adopted by the Company.

The said policies are effective from June 30, 2020.

The NIACL Insider Trading Code including the Policy for inquiry of leak of UPSI is attached herewith. The Above policies are made available on the Company's Website www.newindia.co.in.

Kindly take the same on record.

Thanking You,

Yours faithfully

For The New India Assurance Company Limited



Jayashree Nair

Company Secretary & Chief Compliance Officer

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT
TRADING BY INSIDERS OF THE NEW INDIA ASSURANCE
COMPANY LIMITED

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

1. PREFACE

The Securities and Exchange Board of India (SEBI), for protection of investors and to regulate the securities market, has formulated the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("the "PIT Regulations") under the powers conferred on it under the SEBI Act, 1992 and amended the same by SEBI from time to time. The PIT Regulations came into force w.e.f. May 15, 2015 and are applicable to all companies whose securities are listed on an Indian Stock Exchange.

The New India Assurance Company Limited (the "Company") endeavors to preserve the confidentiality of Unpublished Price Sensitive Information and prevents misuse of such information. We are committed to dealing with all stakeholders with full transparency and fairness, ensuring adherence to all laws and regulations and achieving highest standards of corporate governance.

In compliance with the Regulations, this The New India Assurance Company Limited - Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code") has been formulated, approved and adopted by the board of directors of The New India Assurance Company Limited at its meeting held on November 9th 2017.

Further, SEBI (Prohibition of Insider Trading) (Third Amendment) Regulations 2019 notified on September 17th, 2019 requires after Chapter III and before Chapter IV of the SEBI (Prohibition of Insider Trading) Regulations, 2015, Chapter III A shall be inserted which talks about the constitution of an "Informant Incentive Committee". Accordingly, the Board of Directors in their meeting held on 27th March 2020 adopted this new Code, inter alia, covering a policy for determination of 'Legitimate purpose'. This revised Code shall come into force on the 100th day from the date of their publication in the Official Gazette.

2. DEFINITION

For the purpose of the Code the following terms shall have the meanings assigned to them hereunder:

- i. "Act" means the Securities and Exchange Board of India Act, 1992;
- ii. "Board" means the board of directors of the Company;

- iii. "Calendar Quarter" means a period of 3 consecutive calendar months, ending with the last day of March, June, September or December.
- iv. "Code" shall mean The New India Assurance Co. Ltd. - Code of Conduct to Regulate, Monitor and Report Trading by Insiders, as amended from time to time;
- v. "Code of Fair Disclosure and Conduct" means the code of practices and procedures for fair disclosure of Unpublished Price Sensitive Information, as amended from time to time;
- vi. "Company" means The New India Assurance Company Limited
- vii. "Compliance Officer" means Company Secretary or in absence of Company Secretary, any senior officer, designated so and reporting to the board of directors or head of the organization in case board is not there, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board of directors of the listed company or the head of an organization, as the case may be.

Explanation - For the purpose of this regulation, "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.

- viii. "Connected Person" means:
 - a) any person who is or has during the six months prior to the concerned act been associated with the Company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the Company or holds any position including a professional or business relationship between himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to Unpublished Price Sensitive Information of the Company 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:
 - (i) an immediate relative of connected persons specified in Clause (a); or
 - (ii) a holding company or associate company or subsidiary company of the Company; or
 - (iii) an intermediary as specified in Section 12 of the Act or an employee or director thereof; or
 - (iv) an investment company, trustee company, asset management company or an employee or director thereof; or

- (v) an official of a stock exchange or of clearing house or corporation; or
 - (vi) 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
 - (vii) 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
 - (viii) an official or an employee of a self-regulatory organization recognized or authorized by the Board; or
 - (ix) a banker of the Company; or
 - (x) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of the Company or his immediate relative or banker of the Company, has more than ten per cent of the holding or interest.
- ix. "Director" means a member of the Board of Directors of the Company.
- x. Designated persons- shall have the meaning ascribed to such term in Clause 5 of this code.
- xi. "Generally Available Information" means information that is accessible to the public on a non-discriminatory basis.
- xii. "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;
- xiii. "Insider" means any person who is
- (a) a Connected Person; or
 - (b) in possession of or having access to Unpublished Price Sensitive Information;
 - (c) Any person who is in receipt of unpublished price sensitive information for legitimate.
- xiv. "Insider Trading Regulations" means the Securities and Exchange - Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time;
- xv. "Key Managerial Personnel" means person as defined in Section 2(51) of the Companies Act, 2013 and include Key Management Persons as defined under Corporate Governance Guidelines of Insurance Regulatory Development Authority of India (IRDAI) and other Laws, Rules and Regulations as may be applicable to the Company;
- xvi. "Legitimate purpose" shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partner(s), collaborator(s), lender(s), customer(s), supplier(s), merchant banker(s), legal adviser(s), auditors, insolvency professional(s) or other adviser(s) or consultant(s), provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.
- xvii. "Promoter" and "Promoter Group" shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations 2009 or any modification thereof.

- xviii. "proposed to be listed" shall include securities of an unlisted company:
- (i) if such unlisted company has filed offer documents or other documents, as the case may be, with the Board, stock exchange(s) or registrar of companies in connection with the listing or
 - (ii) if such unlisted company is getting listed pursuant to any merger or amalgamation and has filed a copy of such scheme of merger or amalgamation under the Companies Act, 2013
- xix. "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;
- xx. "Stock Exchanges" means the stock exchanges on which the Securities of the Company are listed or proposed to be listed;
- xxi. "Takeover Regulations" means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended from time to time;
- xxii. "Trading" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;
- xxiii. "Trading Day" means a day on which the recognized stock exchanges on which Securities of the Company are listed are open for trading and the word "Trade" shall be construed accordingly;
- xxiv. "Trading Window" means the period determined by the Compliance Officer, within which the Designated Persons are permitted to Trade;
- xxv. "Unpublished Price Sensitive Information" or "UPSI" means any information, relating to the Company or its Securities, listed or to be listed, that is not generally available which upon becoming generally available, is likely to materially affect the price of the Securities and shall, ordinarily include without limitation, information relating to the following:
- a) financial results;
 - b) dividends;
 - c) change in capital structure;
 - d) mergers, de-mergers, acquisitions, delisting, disposals, amalgamation, restructuring, arrangement, spin off and expansion of business and similar other transactions;
 - e) changes in Key Managerial Personnel;

- xxvi. "Working Day" means the working day when the regular trading is permitted on the concerned Stock Exchange.

Words and phrases used in the Code and not defined hereinabove shall have the same meaning as defined under the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made there under, as may be amended from time to time, shall have the meanings respectively assigned to them in those legislation.

The new definitions as given under Chapter III A of the new amendment given below:

In this Chapter, unless the context otherwise requires:-

- i. 'Investor Protection and Education Fund' means the Investor Protection and Education Fund created by the Board under section 11 of the Act;
- ii. 'Informant' means an individual(s), who voluntarily submits to the Board a Voluntary Information Disclosure Form relating to an alleged violation of insider trading laws that has occurred, is occurring or has a reasonable belief that it is about to occur, in a manner provided under these regulations, regardless of whether such individual(s) satisfies the requirements, procedures and conditions to qualify for a reward;
- iii. 'Informant Incentive Committee' means the High Powered Advisory Committee constituted by the Board in the manner as may be specified under regulation 11 of the Securities and Exchange Board of India (Settlement Proceedings) Regulations, 2018.
- iv. 'insider trading laws' means the following provisions of securities laws,-
 - a. Section 15G of the Act;
 - b. regulation 3 of these regulations;
 - c. regulation 4 of these regulations;
 - d. regulation 5 of these regulations; and
 - e. regulation 9 or regulation 9A of these regulations, in so far as they pertain to trading or communication of unpublished price sensitive information.
- v. 'irrelevant, vexatious and frivolous information' includes, reporting of information which in the opinion of the Board, -
 - a. Does not constitute a violation of insider trading laws; or
 - b. Is rendered solely for the purposes of malicious prosecution; or

c. Is rendered intentionally in an effort to waste the time and resource of the Board.

vi. 'Legal Representative' means a duly authorised individual who is admitted to the practice of law in India;

vii. 'Monetary Sanctions' shall mean any non-monetary settlement terms or any direction of the Board, in the nature of disgorgement under securities laws aggregating to at least Rupees one crore arising from the same operative facts contained in the original information.

viii. 'Original Information' means any relevant information submitted in accordance with these regulations pertaining to any violation of insider trading laws that is:-

a. derived from the independent knowledge and analysis of the Informant;

b. not known to the Board from any other source, except where the Informant is the original source of the information;

c. is sufficiently specific, credible and timely to - (1) commence an examination or inquiry or audit, (2) assist in an ongoing examination or investigation or inquiry or audit, (3) open or re-open an investigation or inquiry, or (4) inquire into a different conduct as part of an ongoing examination or investigation or inquiry or audit directed by the Board;

d. not exclusively derived from an allegation made in a judicial or administrative hearing, in a Governmental report, hearing, audit, or investigation, or from the news media, except where the Informant is the original source of the information; and

e. not irrelevant or frivolous or vexatious.

Explanation. -Information which does not in the opinion of the Board add to the information already possessed by the Board is not original information.

ix. 'own analysis' means the examination and evaluation of the relevant information by the Informant that may be publicly available, but which reveals analysis that is not known to SEBI:

Provided that such analysis is not derived from professional or confidential communication protected under the Indian Evidence Act, 1872 (1 of 1872);

x. 'own knowledge' means relevant information in the possession of the Informant not derived from publicly available sources:

Provided that such knowledge is not derived from professional or confidential communications protected under the Indian Evidence Act, 1872 (1 of 1872);

xi. 'Reward' means any gratuitous monetary amount for which an Informant is declared eligible as per the provisions of these regulations;

- xii. 'securities laws' means the Act, the Securities Contract (Regulations) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996), the relevant provisions of any other law to the extent it is administered by the Board and the relevant rules and regulations made thereunder;
- xiii. 'voluntarily providing information' means providing the Board with information before receiving any request, inquiry, or demand from the Board, any other Central or State authorities or other statutory authority about a matter, to which the information is relevant;

(2) Words and expressions used but not defined in these regulations but defined in securities laws, shall have the same meanings respectively assigned to them in those laws or any statutory modification or re-enactment thereto.

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. The Voluntary Information Disclosure Form may be submitted through informant's legal representative:

Provided that where the Informant does not submit the Voluntary Information Disclosure Form through a legal representative, the Board may require such Informant to appear in person to ascertain his/her identity and the veracity of the information so provided.

Explanation. - Where any information pertaining to any violation of the Securities Laws is received in a manner not in accordance with the manner provided under these regulations, the Board may require such information to be filed with it in accordance with these regulations or reject the same.

Receipt of Original Information by the Board

The Board may designate a division to function as the independent Office of Informant Protection. On receipt of the Voluntary Information Disclosure Form, the Office of Informant Protection shall communicate the substance of the information along with the evidence submitted by the informant to the relevant department or division of the Board for examination and initiation of necessary action, if any.

Informant Reward.

Upon collection or substantial recovery of the monetary sanctions amounting to at least twice the Reward, the Board may at its sole discretion, declare an Informant eligible for Reward and intimate the Informant or his or her legal representative to file an application in the format provided in Schedule- E for claiming such Reward:

Provided that the amount of Reward shall be ten percent of the monetary sanctions collected or recovered and shall not exceed Rupees One crore or such higher amount as the Board may specify from time to time:

Provided further that the Board may if deemed fit, out of the total Reward payable, grant an interim reward not exceeding Rupees Ten lacs or such higher amount as the Board may specify from time to time, on the issue of final order by the Board against the person directed to disgorge.

Rejection of claim for Reward.

No Reward shall be made to an Informant:-

- (1) who does not submit original information;
- (2) who has acquired the Original Information, through or as a member, officer, or an employee of:-
 - (i) any regulatory agency constituted by or under any law in India or outside India, including the Board;
 - (ii) any self-regulatory organization;
 - (iii) the surveillance or investigation wings of any recognised stock exchange or clearing corporation; or
 - (iv) any law enforcement organization including the police or any central or state revenue authorities.
- (3) against whom the Board may initiate or has initiated criminal proceedings under securities laws;
- (4) who wilfully refused to cooperate with the Board during its course of investigation, inquiry, audit, examination or other proceedings under securities laws;

(5) who:

- (i) knowingly makes any false, fictitious, or fraudulent statement or representation; or
- (ii) uses any false writing or document knowing that the writing or document contains any false, fictitious, or fraudulent statement or entry; or
- (iii) fails to furnish the complete information available with him or accessible by him in relation to the alleged violation.

(6) who is obligated, under any law or otherwise, to report such Original Information to the Board, including a compliance officer under securities laws.

Provided that the Board may if deemed fit, at its sole discretion, exempt a person from any of these disqualifications.

Informant confidentiality.

(1) Any information including Original Information may, at the discretion of the Board, be made available:

- (a) when it is required to be disclosed in connection with any legal proceedings in furtherance of the Board's legal position;
- (b) as permitted by these regulations; or
- (c) as may be otherwise required or permitted by law.

(2) Original Information may, at the discretion of the Board, be made available to -

- (i) any regulatory agency constituted by or under any law in India or outside India;
- (ii) any self-regulatory organization;
- (iii) the surveillance or investigation wings of any recognised stock exchange or clearing corporation; or
- (iv) any law enforcement organization including the police or any central or state revenue authorities; or

- (v) a public prosecutor in connection with any criminal proceedings.

Provided that sharing of information shall be in accordance with such assurances of confidentiality as the Board determines appropriate.

Explanation - Nothing in these regulations is intended to limit, or shall be construed to limit, the ability of the public prosecutor to share such evidence with potential witnesses or accused in connection with any criminal proceedings.

(3) The Original Information and identity provided by an Informant shall be held in confidence and exempted from disclosure under clauses (g) and (h) of sub-section (1) of section 8 of the Right to Information Act, 2005 (No. 22 of 2005).

(4) Subject to the law of evidence for the time being in force, nothing in these regulations shall prejudice the right of the Board to use or to rely on information received otherwise.

(5) No person shall have the right to compel disclosure of the identity, existence of an Informant or the information provided by an Informant, except to the extent relied upon in any proceeding initiated against such person by the Board. *Explanation 1.* - The confidentiality in respect of the identity and existence of the Informant shall be maintained throughout the process of investigation, inquiry and examination as well as during any proceedings before the Board and save where the evidence of the Informant is required during such proceedings, advance notice of such evidence may be provided to the noticee at least seven (7) working days prior to the date of the scheduled hearing for evidence.

Explanation 2. - In proceedings before any authority other than the Board, the Board may request maintenance of confidentiality of the identity and existence of an Informant in such proceeding.

Protection against retaliation and victimization

Every person required to have a Code of Conduct under these regulations shall ensure that such a Code of Conduct provides for suitable protection against any discharge, termination, demotion, suspension, threats, harassment, directly or indirectly or discrimination against any employee who files a Voluntary Information Disclosure Form

Functions of Informant Incentive Committee

(1) The Informant Incentive Committee shall be assisted by the Office of Informant Protection.

(2) The Informant Incentive Committee shall give its recommendations to the Board on the following matters,-

- i. Eligibility of Informant for reward;
- ii. Determination under regulations 7E and 7G; and
- iii. Such other issues relating to Informant as the Board may require from time to time.

(3) The Informant Incentive Committee shall conduct its meetings in the manner specified by the Board in this regard.

3. APPLICABILITY OF THE POLICY :

This Policy shall be applicable to all the insiders defined in 2(xiii) above including designated persons.

4. THE ESSENCE OF THE PIT REGULATIONS AND THIS CODE

The PIT Regulations and this Code, inter alia prohibit an insider: From communicating, providing, or allowing 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 as provided under Regulations 3(3) of the PIT Regulations. As per the PIT Regulations, Unpublished Price Sensitive Information may be communicated, provided, allowed access to or procured, in connection with transaction that would:

a) Entail an obligation to make an open offer under the SEBI (Substantial Acquisition of Shares & Takeovers) Regulations, 2011 where the Board of Directors of the Company is of informed opinion that the sharing of such information is in the best interest of the Company.

b) Not attract the obligation to make an open offer but where the Board of Directors of the Company is of informed opinion that the sharing of such information is in the best interests of the Company and the Unpublished Price Sensitive Information is disseminated to be made generally available at least 2 trading days prior to the proposed transaction being affected.

This prohibition does not apply where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligation.

5. DEALING IN SECURITIES BY DESIGNATED PERSONS AND THEIR IMMEDIATE RELATIVES

In addition to the prohibitions on insider described in Clause 4 above, this Code imposes certain additional responsibilities and restrictions on certain categories of persons, who are defined below as Designated Persons.

A "Designated Person" would include the following categories of Employees, for the purpose of this Code:

- i. Promoters of the Company
- ii. Directors of the Company;
- iii. General Managers of the Company;

- iv. All Employees who are attached to General Managers/Directors/CMD's Office of the Company
- v. Employees in the Corporate Finance and Accounts department;
- vi. Reinsurance Accounts, Foreign Accounts, Investment department, Actuarial department, Secretarial department, and employees who have access to UPSI;
- vii. Permanent invitees/invitees to the board meeting and committee meetings
- viii. Any other Connected Person designated by the Company on the basis of their functional role;
- ix. Immediate Relatives of I to VI above
- x. And such other persons as may be notified by the Compliance Officer as per direction of the Board.

Designated persons shall disclose names and PAN or other identifier authorized by law, of the following persons in the format annexed as "Annexure I" on annual basis and as and when the information changes;

- a) Designated person him/herself
- b) Immediate relatives of designated person
- c) Persons with whom such designated person(s) has a material financial relationship
- d) Phone/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.

Explanation: 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.

Special Responsibilities and Restrictions on Designated Persons

The special responsibilities and restrictions imposed on Designated Persons are:

- a) Furnish Initial Disclosure about the number of securities of the Company held by him/her and his / her immediate relatives, within 2 working days of implementation of this code or within 2 working days of joining the Company or becoming designated person.
- b) Obtain prior clearances of the Compliance Officer before dealing in securities exceeding such threshold limit as may be notified from time to time (refer to Clause 9.1 of this Code)
- c) Not to deal in securities, during certain closed periods as may be notified generally or from time to time.(refer to Clause 8.5 of this Code)
- d) Preserve Unpublished Price Sensitive Information.(refer to Clause 6.1 of this Code)
- e) Designated persons shall not communicate, provide or allow access to any unpublished price sensitive information, relating to the 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 obligation.
- f) Not to pass on any Price Sensitive Information to any person (including but not limited to his or her family members, friends, business associates etc.) directly or indirectly by way of making recommendation for trading in Company's securities.
- g) Not to communicate Price Sensitive Information in situation in which there would be an uncertainty as regards conflict of interest or the possibility of misuse of the information.
- h) Not to discuss or disclose Price Sensitive Information in public places.
- i) Not to disclose Price Sensitive Information to any Employee who does not need to know the information for discharging his or her duties or responsibilities.

j) Not to apply for pre-clearance and trade plan when in possession of Unpublished Price Sensitive Information even though the closed period is not notified till such time the Unpublished Price Sensitive Information becomes generally available.

k) Not to execute contra trade within a period of 6 months from the date of last transaction either by self or through immediate relatives. Provided that this restriction shall not be applicable for trades pursuant to exercise of stock options.

If the opposite transactions are executed in violation of this provision, 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.

Such persons may however apply to the Compliance Officer in for waiver of the restriction on contra trade, if there is a need to sell the said securities due to personal emergency.

Every Designated Person is required to maintain strict confidentiality of all Unpublished Price Sensitive Information and prohibited from passing on such information to any person directly or indirectly. Attention is specifically drawn to Regulation 3(i) of the PIT Regulations, which prohibits an insider to communicate, provide, or allow access to any Unpublished Price Sensitive Information relating to the Company or its securities listed or proposed to be listed. All data, documents, information, forms, records, files (physical as well as soft files) are required to be kept secure and confidential by all the designated persons. All information within the organization shall be handled on need to know basis.

When a person who has traded in securities has been in possession of unpublished price sensitive information, his/her trade would be presumed to have been motivated by the knowledge and awareness of such information in his possession.

6. Prevention of Misuse of Unpublished Price Sensitive Information

Preservation of "Price Sensitive Information"

The Directors, Designated Employees, Connected Person and concerned Advisers or Consultants or Retainers of the Company shall maintain the confidentiality of all price sensitive information and shall not communicate any Unpublished Price Sensitive Information to any person except on 'need to know basis' - i.e. that Unpublished price Sensitive Information should be disclosed only to those persons within the Company or persons connected with the Company who need the Information to discharge their duty or legal obligations and whose possession of such information will not give rise to a conflict of investor or appearance of misuse of the information. The Directors, Designated Employees, Connected Person and concerned Advisers or Consultants or Retainers of the Company shall not pass on any Price Sensitive Information to any person directly or indirectly by way of making a recommendation for the purchase or sale of Securities of the Company.

Limited access to confidential information

The Directors, Designated Persons, Connected Persons and concerned Advisers or Consultants or Retainers of the Company shall keep the files containing confidential Price Sensitive Information duly secured and computer files must be kept with adequate security of login and password, etc.

Receipt of UPSI for legitimate purpose

Receipt of Unpublished Price Sensitive Information for legitimate purpose shall be considered as insider for the purpose of this code. Accordingly, the person who shares UPSI shall give proper notice to the recipient of UPSI to maintain confidentiality of such UPSI in compliance with SEBI (PIT) Regulations, 2015.

7. TRADING PLANS : An Insider shall be entitled to formulate a trading plan ("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. This provision enables an insider who may be perpetually in possession of unpublished price sensitive information, to plan for trades to be executed in future and enable him to trade in securities in a compliant manner. By doing so, the possession of unpublished price sensitive information when a trade under a trading plan is actually executed would not prohibit the execution of such trades that had pre-decided even before the unpublished price sensitive information came into being.

Such Trading Plan shall:

- (i) not entail commencement of trading on behalf of the Insider earlier than six months from the public disclosure of the Trading Plan;
- (ii) not entail Trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced and the second Trading Day after the disclosure of such financial results;
- (iii) entail Trading for a period of not less than twelve months;
- (iv) not entail overlap of any period for which another Trading Plan is already in existence;
- (v) set out either the value of Trades to be 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.

The Compliance Officer shall review the Trading Plan to assess whether the Trading Plan would have any potential for violation of 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 Trading Plan.

. It is clarified that pre-clearance of trades shall not be required for a trade executed as per an approved trading plan. It is further clarified that trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

The Trading Plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the Trading 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 at the time of formulation of the plan, the insider is in possession of any UPSI and the said information 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 the Insider Trading Regulations.

Upon approval of the Trading Plan, the Compliance Officer shall notify the Trading Plan to the Stock Exchanges on which the Securities are listed.

8. TRADING RESTRICTIONS

The Company shall specify a Trading period for designated persons to be called "Trading Window", for trading in the Securities of the Company in compliance with the Insider Trading Regulations.

The Trading Window shall generally be closed, for designated persons, category of persons and immediate relatives of all such persons, from a date that is 7 days prior to the end of the financial period for which results are required to be announced by the Company and shall reopen 48 (Forty-Eight) hours after the announcement of financial results (quarterly, half-yearly and annually) by the Company.

In addition to the above, the Trading Window shall also be closed for the following purposes:

Declaration of dividends (interim and final);

Change in capital structure;

Amalgamation, mergers, de-mergers, takeovers, acquisitions, delisting and buy-back;

Changes in Key Managerial Personnel; and

The Trading Window for the aforesaid purposes shall be closed for a Designated Person or a class of Designated Persons for which the Compliance Officer determines that such Designated Person, or such class of Designated Persons are reasonably expected to be in possession of Unpublished Price Sensitive Information. The Trading Window shall reopen after closure, not earlier than 48 (forty-eight) hours after the Unpublished Price Sensitive Information in question becomes generally available.

The trading / dealings in Company's securities by all Designated Persons (including their immediate relatives) shall be conducted during the period when the trading window is open subject to pre-clearance by Compliance Officer as referred under Clause 9 of this Code, or as per approved trading plan and shall not deal in any transaction involving the purchase or sale of the Company's Securities during the periods when Trading Window is closed, or during any other period as may be specified by the Compliance Officer from time to time.

9. PRE-CLEARANCE OF TRADES

Categories of persons mentioned under the para named 'Applicability of the Policy' may Trade in the securities of the Company exceeding the minimum threshold limit of 10,000 shares or Rs. 5,00,000 in transaction value or 1% of total Share Capital or Voting Capital, whichever is lower, when the trading window is open, after obtaining approval of the Compliance Officer by submitting an application as per Annexure 2 and an undertaking as per Annexure 3.

If any person covered by the Code, obtained any Price Sensitive Information after executing the undertaking but prior to transacting in Securities of the Company, he/she shall inform the Compliance Officer and refrain from dealing in Securities of the Company.

The Compliance Officer may, after being satisfied that the application and undertaking are true and accurate, approve Trading by a Designated Person, on the condition that the Trade so approved shall be executed within seven trading days following the date of approval.

The Designated Person shall, within two days of the execution of the Trade, submit the details of such Trade to the Compliance Officer as per

Annexure 4. In case the transaction is not undertaken, a report to that effect shall be filed in the said form.

If the pre-cleared Trade is not executed within seven trading days after the approval is given, the Designated Person must secure pre-clearance for the intended transaction once again.

In case of subscription in the primary market, Categories of persons mentioned under the para named 'Applicability of the Policy' must hold their investments in Securities of the Company for a minimum period of 30 days. The holding period would commence when the Securities are actually allotted.

The Compliance Officer may waive off the holding period in case of sale of Securities in personal emergency after recording reasons for the same. However, no such sale will be permitted when the Trading Window is closed.

A Designated Person who Trades in securities without complying with the pre-clearance procedure as envisaged in these Rules or gives false undertakings and/or makes misrepresentations in the undertakings executed by him/her while complying with the pre-clearance procedure shall be subjected to the penalties as envisaged in these Rules.

CHINESE WALL

To prevent the misuse of confidential information, the Company has laid down Chinese Walls procedures which separate those areas of the Company 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".

1. The employees in the inside area shall not communicate any Unpublished Price Sensitive Information to anyone in public area.
2. The Company shall have process of maintaining securely, computer files containing confidential information and physical storage of documents relating to UPSI.
3. All the unpublished price sensitive information is to be handled on "need to know basis", i.e., Unpublished Price Sensitive Information should be disclosed only to those within the Company 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. 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.

Other restrictions :

The disclosures to be made by Categories of persons mentioned under the para named 'Applicability of the Policy' under this code shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.

The disclosures of trading in Securities of the Company shall also include trading in derivatives of Securities and the traded value of the derivatives shall be taken into account for purposes of this Code.

The disclosures made under this Code shall be maintained for a period of five years.

10 ROLE OF THE COMPLIANCE OFFICER

The Compliance Officer shall be responsible for :

- a) following the policies and procedures laid down by the Board or a committee thereof, monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information under the overall guidance and direction of the Board;
- b) pre-clearing of Trades done by Designated Person and their dependents;
- c) monitoring Trades and the implementation of this Code under the overall supervision of the Board.
- d) assist all Designated Person(s) in addressing any clarifications regarding the Insider Trading Regulations and the Code;
- e) report on insider trading to the Board and in particular, shall provide reports to the Chairman of the Board at such frequency as may be stipulated by the Board;
- f) seek such express undertakings from Designated Person(s) as may be necessary before approving Trading Plans and to monitor the implementation of Trading Plans;
- g) be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any UPSI;
- h) maintain a record of the disclosures made for a minimum period of 5 years.

11 DISCLOSURE REQUIREMENTS FOR TRANSACTIONS IN SECURITIES

Initial Disclosure

Every promoter, member of the promoter group, Key Managerial Personnel and Director of the Company, shall within 30 days of this Code taking effect, disclose to the Company in Form A the details of all holdings in Securities presently held by him including the statement of holdings of their Immediate Relatives in the prescribed form.

Every person, on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a promoter or member of the promoter group shall disclose (in the form prescribed in Form B his holding of Securities of the Company as on the date of appointment or becoming a promoter, to the Company within 7 days of such appointment or becoming a promoter.

Continual Disclosure

Every promoter, member of promoter group, designated person and Director of the Company shall disclose to the Company (in form prescribed in Form C the number of Securities acquired or disposed of within 2

trading days of such transaction if the value of the Securities traded of the Company, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 1,000,000 (Rupees Ten lakhs only).

Disclosures by other connected persons

The Company may, at its discretion require any other Connected Person or class of Connected Persons to make disclosures of holdings and trading in Securities in such form and at such frequency as may be determined by the Company in order to monitor compliance with the Code and the Insider Trading Regulations.

Disclosure by Company to Exchanges

Within 2 Working Days of the receipt of disclosure or becoming of aware of such information under 10.1, 10.2 and 10.3 above, the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed particulars of such Trades.

The Compliance Officer shall maintain records of all the disclosure for a minimum period of 5 years.

12. MAINTENANCE OF STRUCTURED DIGITAL DATABASE

The Company shall maintain a structured digital database containing the names of such persons or entities as the case may be with whom information is shared under this code read with PIT Regulations, along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available.

The said digital database shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.

13. MECHANISM FOR PREVENTION OF INSIDER TRADING

The Company has adopted system of internal controls which mainly consist of the following, to prevent dealing in securities by insiders with misuse of unpublished price sensitive information

All employees who have access to unpublished price sensitive information are identified as designated employee

All unpublished price sensitive information shall be identified and its confidentiality shall be maintained by designated employee and others who have knowledge of unpublished price sensitive information.

Adequate restriction shall be placed on procurement, communication and sharing of unpublished price sensitive information by designated employee and others who have knowledge of unpublished price sensitive information.

List of employees and other persons with whom unpublished price sensitive information is shared shall be maintained and confidentiality agreement shall be executed or notice shall be served to all such employees and persons

Audit Committee shall review once in a financial year, the process to evaluate effectiveness of the above said internal controls and shall verify that the system for internal control are adequate and are operating effectively.

Audit committee shall review at least once in a financial year, compliance with this code read with PIT Regulations.

14. DEALING IN CASE OF SUSPECTED LEAK OR LEAK OF UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI)

I. Duties of Compliance Officer:

The Compliance Officer shall be responsible to;

- (i) Oversee the Compliance of this policy.
- (ii) Report the incident of actual or suspected leak of UPSI to the Securities and Exchange Board of India.

- (iii) Intimate the incident of actual or suspected leak of UPSI to the Stock Exchanges.
- (iv) To co-ordinate with and disclose the relevant facts of the incident of actual or suspected leak of UPSI to the Enquiry committee.

II. Disclosure of actual of suspected leak of UPSI to Stock Exchanges:

On becoming aware of actual or suspected leak of Unpublished Price Sensitive Information of the Company, The Compliance Officer shall ensure that the same shall be promptly intimated to the Stock Exchanges on which the securities of the Company are listed in the format as set out in "Annexure 5" to this policy.

III. Report of actual of suspected leak of UPSI to SEBI:

On becoming aware of actual or suspected leak of Unpublished Price Sensitive Information of the Company, The Compliance Officer shall ensure that a report on such actual or suspect leak of UPSI, preliminary enquiry thereon and results thereof shall be promptly made to the SEBI in the format as set out in "Annexure 6" to this policy.

IV. Constitution of Enquiry Committee:

The Board of Directors or any Committee authorized by them in this behalf, shall constitute a committee to be called as "Enquiry Committee".

The Enquiry Committee shall consist of minimum 3 (three) Members which shall include Managing Director, Chief Financial Officer and Compliance Officer and any other officer of the Company as may be mutually decided by Managing Director, Chief Financial Officer and Compliance Officer of the Company.

V. Duties of Enquiry Committee:

The Enquiry Committee shall be responsible to

- (a) To conduct a preliminary enquiry to ascertain the truth contained in the information or complaint pertaining to actual or suspected leak of UPSI, if any; and
- (b) To authorize any person to collect necessary support material; and
- (c) To decide disciplinary action thereon.

VI. Procedure for enquiry in case of leak of UPSI:

On becoming aware of suo moto or otherwise, of actual or suspected leak of Unpublished Price Sensitive Information of the Company by any promoter, director, key managerial person, Insider, employee, designated person, support staff or any other known or un-known person, the Compliance Officer after informing the same to the Managing Director or Chief Financial Officer of the Company, shall follow the below mentioned procedure in order to enquire and/or investigate the matter to ensure.

(a) Preliminary Enquiry:

Preliminary enquiry is a fact-finding exercise. The object of preliminary enquiry is to ascertain the truth or otherwise of the allegations contained in the information or complaint, if any, and to collect necessary available material in support of the allegations, and thereafter to decide whether there is justification to embark any disciplinary action.

The Enquiry Committee shall appoint and / or authorize any person(s), as it may deem fit, to initiate/conduct an enquiry to collect the relevant fact, material substances on actual or suspected leak of UPSI.

(b) Report of Preliminary Enquiry to the Enquiry Committee:

The Person(s) appointed/authorized to enquire the matter of actual or suspected leak of UPSI submit his/her report to the Enquiry Committee within 7 days from the date of his appointment on this behalf.

(c) Disciplinary Action:

The Disciplinary action(s) shall include, wage freeze, suspension, recovery, claw back, termination etc., as may be decided by the Members of the Committee.

15. REPORTING TO AUDIT COMMITTEE AND BOARD OF DIRECTORS:

Reporting to Audit Committee and Board of Directors. The Compliance Officer shall provide a report to the Board of Directors through the Audit Committee with regard to implementation and operation of this Code periodically and at least once in every financial year.

16 DISSEMINATION OF SENSITIVE INFORMATION :

No information shall be passed by specified persons to whom this code Applies by way of making a recommendation for the purchase or sale of Securites of the Company.

Disclosure/dissemination of Price Sensitive Information with special reference to analysts, media persons and institutional investors :

The following guidelines shall be followed while dealing with analysts and institutional investors

- Only public information to be provided.
- At least two Company representatives be present at meeting with analysts, media persons and institutional investors.
- Unanticipated questions may be taken on notice and a considered response given later. If the answer includes Unpublished Price Sensitive Information, a public announcement should be made before responding.

Simultaneous release of information after every such meet.

17 TRADING WINDOW

In any case, the trading restriction period is required to commence not later than end of every quarter till 48 hours after the declaration of financial results.

18 PENALTY FOR CONTRAVENTION OF THE CODE

Every designated person/employee to whom this Code applies 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).

Designated persons/employee to whom this Code applies and who violate these rules shall be subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligibility for future participation in the Company's stock option plans or termination.

The SEBI or any other appropriate regulatory authority would also be informed of the violation of these Rules so that appropriate action may be taken.

19 MISCELLANEOUS

All Employees/Designated Persons/ are advised to read this Code and the SEBI Insider Trading Regulations carefully and acquaint themselves with the provisions contained therein ensure that their Immediate Relatives do not violate the Regulations / Code in letter or in spirit.

While a person may cease to be a Designated Person on retirement, resignation, etc. (and consequently would cease to be subject to this Code), he would continue to be a Connected Person for the purpose of the Regulations / Code for a period of 6 months from separation and consequently would continue to be subject to the Regulations / Code).

It is further re-iterated that the onus of providing necessary disclosure(s)/ intimation(s) shall be on the Insider, Designated Person, employee concerned and they themselves shall be personally liable to pay penalties/compensate the Company, if levied by Stock Exchanges / SEBI or other regulatory authorities.

The Company reserves all right to modify and/or amend this Code at any time. This Code and subsequent amendment(s) thereto, shall be published on the website of the Company.

If there are any queries or difficulties relating to the Regulations or this Code, please approach the Compliance Officer for assistance.

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 EMPLOYEE/DESIGNATED PERSON TO ENSURE COMPLIANCE OF THE INSIDER TRADING REGULATIONS, GUIDELINES AND OTHER RELATED STATUTES FULLY.

Code of Practices and Procedure for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)

The Code of Practices and Procedure for Fair Disclosure of Unpublished Price Sensitive Information is consistent with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations 2015.

The Principles of Fair Disclosure adopted by the Company are as follows:

1. The Chairman & Managing Director, the Chief Executive Officer, the Chief Financial officer, the Company Secretary of the Company or any person, which the Board may deem fit, are entitled to deal with dissemination of information and disclosure of unpublished price sensitive information.
2. The Company to make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
3. The Company would ensure uniform and universal dissemination of unpublished price sensitive information like publication of policy(s) related to dividend, if any, inorganic growth pursuits, etc. to avoid selective disclosure, thereby providing equality of access to such price sensitive information to all concerned.
4. Once the Unpublished Price Sensitive Information made public i.e. post dissemination to the stock Exchange(s), such information may be shared with media, analysts, investors etc.
5. The Company shall promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
6. The Chairman & Managing Director, The Director (Designated) - International Business, Chief Executive Officer, Chief Financial Officer, compliance officer and head corporate communications, (if any) shall jointly and/or severally give appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
7. The above said personnel of the Company to ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
8. The compliance officer shall ensure that the best practices are developed to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences and to host such transcripts, etc. on the official website of the Company to ensure official confirmation and documentation of disclosures made, within 15 working days of the event.
9. The Company to ensure that all Unpublished Price Sensitive Information to be handled and shared only on a need-to-know basis.

Annexure 1

Half Yearly Disclosure of Securities held by Promoter, Key Managerial Personnel, Director and Designated Persons and Immediate Relatives

New India Assurance Company Limited - Code of Conduct for Prevention of Insider Trading and Fair Disclosure of Unpublished Price Sensitive Information

Date: _____

To
The Compliance Officer
New India Assurance Company Limited

Sub: Disclosure of Trading in Securities of New India Assurance Company Limited during the half year ended _____ and holding of securities of the Company as on that date.

Dear Sir,

Pursuant to New India Assurance Company Limited Code of Conduct for Prevention of Insider Trading and Fair Disclosure of Unpublished Price Sensitive Information ("Code"), I hereby disclose trading in securities of the Company during the half year ended _____ and holding as on that date.

Name			Designated Person		Director
------	--	--	-------------------	--	----------

Disclosure of Securities by Director and Designated Employee					
Type of Securities	Number of securities held as on half year ended	Number of securities bought during the half year ended	Number of securities sold during the half year ended	Number of securities held as on half year ended	DP. ID & Client ID
Equity					

Details of my immediate relatives are as under. "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.

Sr.no	Name of Relative	PAN	DP ID & Client ID

Disclosure of Securities by Director and Designated Employee						
Name of Immediate Relatives	Type of Securities	Number of securities held as on half year ended	Number of securities bought during the half year ended	Number of securities sold during the half year ended	Number of securities held as on half year ended	DP. ID & Client ID
	Equity					

I hereby declare that the above details are complete and correct. I further declare that I have complied with the provisions of Code. I am fully aware about consequences in case of any non-compliance by me and shall be responsible for any action/inaction.

Full Name: _____ Signature: _____
 Designation: _____ Mobile No.: _____
 Department: _____ Emp. Code or DIN: _____

Annexure 2

APPLICATION FOR PRE-TRADING APPROVAL

To,

The Compliance Officer,
The New India Assurance Co. Ltd.

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Insider Trading Policy, I seek approval to purchase / sell / subscribe _____ equity shares of the Company as per details given below:

	Name of the applicant and Designation	
1	Approval seeking for (tick whichever applicable)	<ul style="list-style-type: none">• Self• Dependent Family Member (DFM)
2.	Number of securities held as on date	
3	Folio No. / DP ID / Client ID No.	
4	The proposal is for	Purchase of securities Sale of securities
5	Proposed date of trading in securities	
6	Number of Securities proposed to be transacted	
7	Current market price (as on date of application)	
8.	Price at which transaction is proposed	
9	Whether the proposed transaction will be through stock exchange or off-market trade	
10	Folio No. / DP ID / Client ID No. where the securities will be credited / debited	

I enclose herewith the Undertaking signed by me.

Signature: _____

Name:

Date:

Annexure 3

UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-CLEARANCE

To,

The Compliance Officer,
The New India Assurance Co. Ltd.

I, _____ of the Company residing at _____, am desirous of trading in ___ shares of the Company as mentioned in my application dated _____ for pre-clearance of the transaction.

I further declare that I am not in possession of any unpublished price sensitive information up to the time of signing this Undertaking.

In the event that I have access to or receive any unpublished price sensitive information 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 trading in the securities of the Company until such information becomes public.

I declare that I have not contravened the provisions of the Rules as notified by the Company from time to time.

In the event of this transaction being in violation of the Rules or the applicable laws, (a) I will, unconditionally, release, hold harmless and indemnify to the fullest extent, the Company and its directors and officers, (the 'indemnified persons') for all losses, damages, fines, expenses, suffered by the indemnified persons, (b) I will compensate the indemnified persons for all expenses incurred in any investigation, defense, crisis management or public relations activity in relation to this transaction and (c) I authorize the Company to recover from me, the profits arising from this transaction and remit the same to the SEBI for credit of the Investor Protection and Education Fund administered by the SEBI.

I undertake to submit the necessary report within two days of execution of the transaction / a 'Nil' report if the transaction is not undertaken.

If approval is granted, I shall execute the trade within seven days of the receipt of approval failing which I shall seek pre-clearance afresh.

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

Signature: _____

Name:

Date:

Annexure 4

DISCLOSURE OF TRANSACTIONS

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

The Compliance Officer,
The New India Assurance Co. Ltd.

I hereby inform that I

- have not bought / sold/ subscribed any securities of the Company
- have bought/sold/subscribed to _____ securities as mentioned below on _____

(date)

(strike out whichever is not applicable)

Name of holder	No. of securities traded	Bought / sold / subscribed	DP ID/Client ID/Folio No.	Price (Rs.)

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

Signature: _____

Name:

Date:

FORM A

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (1) (a) read with Regulation 6 (2) - Initial disclosure to the company]

Name of the company: The New India Assurance Co. Ltd.

ISIN of the company: INE470Y01017

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

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate Relative to/others etc)	Securities held as on the date of Regulation coming into force		% of Shareholding
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.	

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

Details of Open Interest (OI) in derivatives of the company held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

Open Interest of the Future contracts held as on the date of regulation coming into force			Open Interest of the Option Contracts held as on the date of regulation coming into force		
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

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

Name

Signature:

Designation:

Date:
Place:

FORM B

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

Name of the company: _____

ISIN of the company: _____

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

Name, PAN, CIN/DIN & Address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relative to/others etc.)	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.	

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

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

Open Interest of the Future contracts held at the time of becoming Promoter/ appointment of Director/KMP			Open Interest of the Option Contracts held at the time of becoming Promoter/ appointment of Director/KMP		
Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms

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

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoters/KMP/Directors/immediate relative to/others etc.)	Securities held prior to acquisition/disposal	Securities acquired/Disposed		Securities held Post acquisition/disposal	Date of allotment advice/acquisition on shares/sale of shares specify	Date of intimate to company	Mode of acquisition/disposal (on market/public rights/preferential offer/off market/Inter-transfer, ESOPs etc.)
			No. and % of security	Value				
		Type of security and % of (For eg. Shares, Warrants, Convertible Debentures etc.)	No. and % of security (For eg. Shares, Warrants, Convertible Debentures etc.)	Transaction Type (Buy/Sale/Pledge/Revoke/Invoke)	Type of security (For eg. Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From To	

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

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

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

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 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 acquisition/disposal
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/Sale/Pledge/Revoke/Invoke)	Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	

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

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

<i>Trading in derivatives (Specify type of contract, Futures or Options etc)</i>					<i>Exchange on which the trade was executed</i>
<i>Type of contract</i>	<i>Contract specifications</i>	<i>Buy</i>		<i>Sell</i>	
		<i>Notional Value</i>	<i>Number of units (contracts * lot size)</i>	<i>Notional Value</i>	<i>Number of units (contracts * lot size)</i>

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

*Name & Signature:
 Designation:
 Date:
 Place:*

Annexure 5

Format for Intimation of Actual or Suspected leak of UPSI to the Stock Exchanges
Pursuant to Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015.

To,
BSE Limited
P. J. Towers, Dalal Street, Fort,
Mumbai - 400 001.

To,
National Stock Exchange of India Limited
Exchange Plaza, Bandra Kurla Complex,
Bandra (East), Mumbai-400 051.

Ref.: BSE Scrip Code No. " _____ "

Ref: " _____ "

Dear Sir / Madam,

Sub: Intimation of actual or suspected leak of UPSI pursuant to Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015.

Pursuant to Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015, we are reporting actual or suspected leak of Unpublished Price Sensitive Information (UPSI) of the Company, as follows;

Name of Offender, if known.	
Name of Organization.	
Designation (Employee, Insider, Designated Person or any other)	
Nature of Information	
Whether any action initiated by the Company.	Yes/No
If yes, narration of the same	

Request you to kindly take the aforementioned on your records.

Thanking you,

Yours faithfully,
For New India Assurance Company Limited

Company Secretary & Compliance Officer

Annexure 6

Format for Reporting Actual or Suspected leak of UPSI to the SEBI Pursuant to Regulation 9A (5) of SEBI (Prohibition of Insider Trading) Regulation, 2015

To,
Securities and Exchange Board of India
Plot No. C 4-A, G Block,
Near Bank of India, Bandra Kurla Complex, Bandra East, Mumbai - 400 051,
Maharashtra
Ref.: BSE Scrip Code No. " _____ " Ref: " _____ "

Dear Sir / Madam,

Sub: Report of actual or suspected leak of UPSI pursuant to regulation 9A (5) of SEBI (Prohibition of Insider Trading) Regulation, 2015.
Pursuant to Regulation 9A (5) of SEBI (Prohibition of Insider Trading) Regulation, 2015, we are reporting actual or suspected leak of Unpublished Price Sensitive Information (UPSI) of the Company, as follows;

Name of Offender, if known.	
Name of Organization.	
Designation (Employee, Insider, or any other) Designated Person	
Nature of Information	
Whether any action initiated by the Company.	Yes/No
If yes, narration of the same	

Request you to kindly take the aforementioned on your records.

Thanking you,

Yours faithfully,

For New India Assurance Company Limited

Company Secretary & Compliance Officer