



ISO 9001 : 2008
Reg. No. RQ91/5487



JSL INDUSTRIES LTD.

Registered Office & Works

Village Mogar-388 340, Tal. & Dist. Anand, (Gujarat) (India)
Phones : 02692 - 280224, 280254, 326993, 326994, Fax : 02692 - 280227
E-Mail : jsl@jslmogar.com • Website : www.jslmogar.com
CIN NO. L31100GJ1966PLC001397

19th May, 2015

BY REGD. AD

To,
The Manager (DCS – CRD)
The Bombay Stock Exchange,
Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai – 400 001

SCRIP CODE No. 504080

Dear Sir,

Sub: Intimation of Codes adopted under the SEBI (Prohibition of Insider Trading) Regulations, 2015

We wish to inform that in compliance with the Notifications / Circulars by the Securities Exchange Board of India (SEBI) dated 15th January, 2015 and 11th May, 2015 respectively, the Company at its Board Meeting held on 09th March, 2015 had approved the following Codes(both enclosed herewith) effective from 15th May, 2015:-

- (i) Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information; and
- (ii) Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading by Insiders

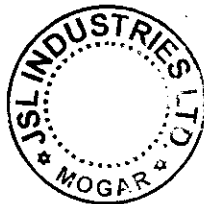
Further, as stipulated in the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Company has communicated the aforesaid Codes to all the eligible persons and they are uploaded on the Company's website at www.jslmogar.com

You are requested to take the same on your records.

Thanking you,

Yours faithfully,
For JSL Industries Limited

Bharat Patel
Company Secretary



Encl: as above.



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CODE OF PRACTICES AND PROCEDURES
FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE
INFORMATION
AS PER SEBI (PROHIBITION OF INSIDER TRADING)
REGULATION, 2015



Regd. Office: Village Mogar, Dist. Anand, Guajrat – 388340

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CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

[Under Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]
(Effective from 15th May, 2015)

1. The Company shall ensure prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
2. The Company shall ensure uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
3. The Company Secretary/Compliance Officer shall act as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. The Company shall develop and follow best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
8. The Company shall handle of all unpublished price sensitive information on a need-to-know basis.

The Board of Directors of the Company is authorized to amend or modify this Code in whole or in part.

The Board of Directors may stipulate further guidelines, procedures and rules, from time to time, to ensure fair disclosure of unpublished price sensitive information. This Code shall be published on the official web site of the Company. This Code and every subsequent modification, alteration or amendment made thereto, shall also be intimated to the Stock Exchange where the securities of the Company are listed.



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The Code has been adopted by the Board of Directors of JSL Industries Limited in its meeting held on 9th March, 2015 and shall be deemed to have come into force with effect from 15th May, 2015.

Subsequent modification(s)/amendment(s) to SEBI (Prevention of Insider Trading) Regulations, 2015 shall automatically apply to this Code.



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**CODE OF INTERNAL
PROCEDURES AND CONDUCT FOR
REGULATING, MONITORING AND
REPORTING OF TRADING BY INSIDERS**



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CODE OF INTERNAL PROCEDURES AND CONDUCT FOR REGULATING, MONITORING AND REPORTING OF TRADING BY INSIDERS

(Effective from 15th May, 2015)

This CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING in dealing with the Securities of the JSL INDUSTRIES LIMITED (hereinafter “Company”) by an Insider shall come into force *w.e.f.*, 15th May, 2015.

OBJECTIVE:

To define a set of rules to be followed by the Company and its Directors on Board, Officers and the designated Employees and to set forth policies, procedures and monitoring adherence to the rules for prevention of Insider Trading in the Securities of the Company.

1. Definitions

- 1.1 **“Act”** means the Securities and Exchange Board of India Act, 1992.
- 1.2 **“Board”** means the Board of Directors of the Company.
- 1.3 **“Code” or “Code of Conduct”** shall mean the Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of trading by insiders of **JSL INDUSTRIES LIMITED** as amended from time to time.
- 1.4 **“Company”** means JSL INDUSTRIES LIMITED.
- 1.5 **“Compliance Officer”** means Company Secretary or such other senior officer, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations designated so and reporting to the Board of Directors 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 Company.
- 1.6 **“Connected Person”** means:
 - (i) any person who is or has during the six months prior to the concerned act been associated with a company,, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the Company or holds any position including a professional or business relationship between himself and the Company



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whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.

- (ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established,-
- (a) an immediate relative of connected persons specified in clause (i); or
 - (b) a holding company or associate company or subsidiary company; or
 - (c) an intermediary as specified in Section 12 of the Act or an employee or director thereof; or
 - (d) an investment company, trustee company, asset management company or an employee or director thereof; or
 - (e) an official of a stock exchange or of clearing house or corporation; or
 - (f) a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
 - (g) a member of the Board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
 - (h) an official or an employee of a self-regulatory organization recognised or 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 the Company or his immediate relative or banker of the Company, has more than ten per cent, of the holding or interest.

1.7 **“Dealing in Securities”** means an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in the securities of the Company either as principal or agent.



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1.8 Designated Employee(s) shall include:

- (i) every employee in the grade of Assistant General Manager, Manager, Dy. Manager and above;
- (ii) every employee in the finance, accounts, secretarial and legal department as may be determined and informed by the Compliance Officer; and
- (iii) any other employee as may be determined and informed by the Compliance Officer from time to time.

1.9 "Director" means a member of the Board of Directors of the Company.

1.10 "Employee" means every employee of the Company including the Directors in the employment of the Company.

1.11 "Generally available Information" means information that is accessible to the public on a non-discriminatory basis.

1.12 "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

1.13 "Insider" means any person who,

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

1.14 "Key Managerial Person" means person as defined in Section 2(51) of the Companies Act, 2013

1.15 "Promoter" 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:

1.16 "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;

1.17 "Takeover regulations" means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;



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- 1.18 **"Trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly
- 1.19 **"Trading Day"** means a day on which the recognized stock exchanges are open for trading;
- 1.20 **"Unpublished Price Sensitive Information"** means: 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; and
 - (vi) material events in accordance with the listing agreement
- 1.21 **"Regulations"** shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.
- 1.22 **"Specified Persons"** means the Directors, connected persons, the insiders, the Designated Employees and the promoters and immediate relatives are collectively referred to as Specified Persons.

Words and expressions used and not defined in these regulations but defined in 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 thereunder shall have the meanings respectively assigned to them in those legislation.



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2. Role of Compliance Officer

2.1 The Compliance Officer shall report on insider trading to the Board of Directors of the Company and in particular, shall provide reports to the Chairman of the Audit Committee, if any, or to the Chairman of the Board of Directors at such frequency as may be stipulated by the Board of Directors. The Compliance officer shall be responsible for:

- Compliance of policies, procedures, maintenance of records
- Monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information as set forth in this Code and applicable laws
- Pre-clearing of the proposed trading in Securities of JSL by the Designated Persons and their immediate relatives
- Monitoring of Trading in Securities of JSL and the implementation of this Code under the overall supervision of the Board
- Determining of closing and reopening of Trading Window
- Approving and Monitoring of trading plan

2.2 The Compliance Officer shall assist all employees in addressing any clarifications regarding the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct.

3. Preservation of "Price Sensitive Information"

3.1 .1 Confidentiality of Price Sensitive Information and Chinese Walls:

The Designated Persons shall maintain the confidentiality of all Unpublished Price Sensitive Information. The Designated Persons shall not pass on such information to any person, directly or indirectly.

3.1.2 The Unpublished Price Sensitive Information is to be handled on a "need-to-know" basis, i.e. Unpublished Price Sensitive Information should be communicated only to those Designated Persons and/or to such other persons who need the information in furtherance of their legitimate purpose, performance of duties or discharge of their legal obligation and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information



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Chinese Walls:

- 3.2.1 To prevent the misuse of Unpublished Price Sensitive Information, JSL shall adopt a “Chinese Wall” policy which separates those areas of JSL which routinely have access to confidential information and considered to be “inside areas”, from other departments providing support services, considered to be ‘public areas’.
- 3.2.2 The Designated Persons in the inside areas shall not communicate any Unpublished Price Sensitive Information to anyone in the public areas.
- 3.2.3 In exceptional circumstances, the Designated Persons from the public areas may be brought to ‘cross the wall’ in furtherance of legitimate purpose, performance of duties or discharge of legal obligations and given the Unpublished Price Sensitive Information on a ‘need-to-know’ basis upon intimation to the Compliance Officer.

4. Prevention of misuse of “Unpublished Price Sensitive Information”

Employees and connected persons designated on the basis of their functional role ("designated persons") in the Company shall be governed by an internal code of conduct governing dealing in securities.

4.1 Trading Plan

An insider shall be entitle to formulate a trading plan for dealing in securities of the Company 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.

4.2 Trading Plan shall:

- (i) not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the 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 by the issuer of the securities 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;



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(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.

4.3 The Compliance Officer shall consider the Trading Plan made as above and shall approve it forthwith. However, he shall be entitled to take express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per provisions of the Regulations.

4.4 The Trading Plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.

However, 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 unpublished price sensitive information and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Plan shall be deferred until such unpublished price sensitive information becomes generally available information. Further, the Insider shall also not be allowed to deal in securities of the Company, if the date of trading in securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.

4.5 Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

5. Trading Window and Window Closure

5.1 (i) The trading period, i.e. the trading period of the stock exchanges, called 'trading window', is available for trading in the Company's securities.

(ii) The trading window shall be, *inter alia*, closed 7 days prior to and during the time the unpublished price sensitive information is published.

(iii) When the trading window is closed, the Specified Persons shall not trade in the Company's securities in such period.



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- (iv) All Specified Persons shall conduct all their dealings in the securities of the Company only in a valid trading window and shall not deal in any transaction involving the purchase or sale of the Company's securities during the periods when the trading window is closed, as referred to in Point No. (ii) above or during any other period as may be specified by the Company from time to time.
 - (vi) In case of ESOPs, exercise of option may be allowed in the period when the trading window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when trading is closed.
- 5.2 The Compliance Officer shall intimate the closure of trading window to all the designated employees of the Company when he determines that a designated person or class of designated persons can reasonably be expected to have possession of unpublished price sensitive information. Such closure shall be imposed in relation to such securities to which such unpublished price sensitive information relates.
- 5.3 The timing for reopening of the Trading Window shall not be earlier than 48 hours after the information becomes generally available.
- 5.4 The trading window shall also be applicable to any person having contractual or fiduciary relation with the Company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the Company.

6. Pre-clearance of trades

- 6.1 All Specified Persons, who intend to deal in the securities of the Company when the trading window is opened and the aggregate value in excess of Rs. 10,00,000/- (Rs. Ten Lakh Only) within calendar quarter then Designated Persons should ensure that he/she shall pre-clear the Trade as per the pre-clearance procedure described as under. For the purpose of computing limit of Rs. 10,00,000/-, the trading by the Designated Persons along with the immediate relatives shall be taken into consideration. However, no designated person shall be entitled to apply for pre-clearance of any proposed trade if such designated person is in possession of unpublished price sensitive information even if the trading window is not closed and hence he shall not be allowed to trade.



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- (i) An application may be made in the format, as attached (Annexure 1) to the Compliance officer indicating the estimated number of securities that the Specified Employee intends to deal 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.
- (ii) An undertaking shall be executed in favour of the Company by such Specified Employee as attached (Annexure 1) along with such application.
- (iii) All Specified Persons execute their order in respect of securities of the Company within one week after the approval of pre-clearance is given. If the order is not executed within seven days after the approval is given, the employee/director must pre-clear the transaction again.

7. Other Restrictions

- 7.1 The Designated Persons shall, within seven trading days after the pre-clearance is given, execute the Trade in respect of which the pre-clearance has been accorded. If the Trade is not executed within seven trading days after the pre-clearance is given, the Designated Persons, as the case may be, shall obtain pre-clearance again in accordance with the procedure detailed above.
- 7.2 The Designated Persons and their immediate relatives who have traded in accordance with the provisions of this code shall not execute a contra trade within 6 (six) months of such trade.
- 7.3 In case the sale of Securities of JSL is necessitated for reasons to be recorded in writing provided that such a regulation does not violate this Code, the minimum holding period as prescribed under paragraph 7.2 may be waived by the Compliance Officer.
- 7.4 Trading in Securities of JSL by the Designated Persons shall be exclusively on delivery basis and no short selling shall be undertaken by them.



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8. Reporting Requirements for transactions in securities

Initial Disclosure

- 8.1 Every promoter/ Key Managerial Personnel / Director / Officers / Designated Employees of the Company, within thirty days of these regulations taking effect, shall forward to the Company the details of all holdings in securities of the Company presently held by them including the statement of holdings of dependent family as per attached Annexure II (**Form – A**).
- 8.2 Every person on appointment as a key managerial personnel or a director of the Company or upon becoming a promoter shall disclose his holding of securities of the Company as on the date of appointment or becoming a promoter, to the Company within seven days of such appointment or becoming a promoter as per attached Annexure II (**Form – B**).

Continual Disclosure

- 8.3 Every promoter, employee and director of the Company shall disclose to the Company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. Ten lakhs or any other value as may be specified by SEBI insider Regulation as per attached Annexure II (**Form – C**).

The disclosure shall be made within 2 working days of:

- (a) the receipt of intimation of allotment of shares, or
- (b) the acquisition or sale of shares or voting rights, as the case may be.

Disclosures by other Connected Persons

- 8.4 JSL may, at its discretion require any other Connected Person or class of Connected Persons to make disclosures of holdings and trading in securities of the company in such form and at such frequency as may be determined by the company in order to monitor compliance with these regulations as per attached Annexure II (**Form D**)
- 8.5 The Compliance Officer shall maintain records of all the declarations given by the Designated Persons for a minimum period of 5 (five) years.
- 8.6 The Compliance Officer shall place before the Chairman of the Board on quarterly basis all the details of the trading in the Securities of JSL received



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from the Designated Persons and their immediate relatives and details of such persons who have submitted trading plans as envisaged in this Code.

9. Disclosure by the Company to the Stock Exchange(s)

9.1 Within 2 days of the receipt of intimation under Clause 8.3, the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received.

9.2 The Compliance officer shall maintain records of all the declarations in the appropriate form given by the directors / officers / designated employees for a minimum period of 5 (five) years.

10. Penalty for contravention of the code of conduct

11.1 In the event a Designated Person or his/her immediate relatives, trade in Securities or communicates any information for trading in Securities in contravention of this Code or otherwise violates the provisions of this Code, such Person shall be referred to the Audit Committee of Directors. The Board may, on the recommendations of the Audit Committee, decide on the appropriate disciplinary action (which may include salary freeze, suspension etc.).

11. Information to SEBI in case of violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015:

In case it is observed by Compliance Officer that there has been a violation of SEBI Insider Trading Regulations, Company shall inform SEBI of such violation.



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ANNEXURE - I

**[PROFORMA OF APPLICATION FORM TO BE SUBMITTED TO
COMPLIANCE OFFICER FOR PRE-CLEARANCE OF TRADE]**

To
The Compliance Officer
JSL Industries Ltd.
Mogar, Anand – 388 340

Sub: Approval for pre-clearance of trade

I _____, the undersigned Designated Person of the Company holding _____ Equity Shares (including Shares held by my immediate relatives) intend to deal in the Equity Shares of the Company exceeding the threshold limit as provided under the Code of Conduct to Regulate, Monitor and Reporting of Trading by Insiders.

I am having demat account with _____. My client ID No. is _____ and DPID No. is _____. I want to buy / sell _____ Equity Shares of JSL Industries Limited.

I hereby undertake that,

(a) I do not possess any “Unpublished Price Sensitive Information” in relation to the Securities of JSL Industries Limited.

(b) In the event that I have access to or receive Unpublished Price Sensitive Information after signing of this undertaking but before the execution of the transaction for which I have sought pre-clearance, I shall inform the Compliance Officer of JSL Industries Limited, about the change in my position and that I would refrain from trading in the Securities so pre-cleared, till the time such information becomes public.

(c) That I have not contravened the Code of Conduct to Regulate, Monitor and Report trading by Insiders as notified by JSL Industries Limited from time to time.

(d) That I have made a full and true disclosure in the matter.

(e) I hereby declare that I shall execute my order in respect of securities of JSL Industries Limited within seven trading days after the pre-clearance is given. If the order is not executed within seven trading days after the approval is given, I shall obtain pre-clearance for the transaction again.



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Please approve proposed trading in securities of JSL Industries Limited.

Thanking you,

Yours faithfully,

Signature :

Name :

Designation :

Date :



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FORMAT FOR PRE- CLEARANCE ORDER

To,

Name : _____

Designation : _____

Place : _____

This is to inform you that your request for trading in _____ (numbers) of shares of JSL Industries Limited as mentioned in your abovementioned application is approved. Please note that the said transaction must be completed on or before _____ (date), that is within seven trading days from today and pursuant to clause 7.2 of the Insider Code, you shall not enter in to the contra trade within the 6 months of such trade.

Yours faithfully,

For JSL INDUSTRIES LIMITED

COMPLIANCE OFFICER

Date : _____

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CONFIRMATION

To

The Compliance Officer

JSL Industries Ltd.

Mogar, Anand – 388 340

I confirm that the share trading for which approval was granted on _____ was completed on _____ to buying / selling _____ (numbers) securities of the Company and I shall not enter in to the contra trade within the 6 months of such trade.

Signature :

Name :

Designation :

Date :



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Annexure II

FORM A

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[[Regulation 7 (1) (a) read with Regulation 6 (2)]

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

1	Name, PAN No. CIN /DIN & Address with Contact Nos.		
2	Category of Person (Promoters/KMP/ Directors/immediate relatives/others etc)		
3	Securities held as on the date of regulation coming into force	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	
4		No.	
5	% of Shareholding		
6	Open Interest of the Future contracts held as on the date of regulation coming into force	Number of units (contracts* lot size)	
		Notional value in Rupee terms	
7	Open Interest of the Option contracts held as on the date of regulation coming into force	Number of units (contracts* lot size)	
		Notional value in Rupee terms	

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

Signature:

Designation:

Date:

Place:



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Annexure II

FORM B

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (b) read with Regulation 6 (2)]

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).

1	Name, PAN No. CIN /DIN & Address with Contact Nos.		
2	Category of Person (Promoters/KMP/ Directors/immediate relatives/others etc)		
3	Date of appointment of Director/KMP/OR date of becoming promoter		
4	Securities held at the time of becoming Promoters/appointment of Director/KMP	Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	
5		No.	
6	% of Shareholding		
7	Open Interest of the Future contracts held at the time of becoming promoter/appointment of Director /KMP	Number of units (contracts* lot size)	
		Notional value in Rupee terms	
8	Open Interest of the Option contracts held at the time of becoming promoter/appointment of Director /KMP	Number of units (contracts* lot size)	
		Notional value in Rupee terms	

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

Signature:

Designation:

Date:

Place:



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Annexure II

FORM C

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (2) read with Regulation 6 (2)]

Name of the Company: _____

ISIN of the Company: _____

Details of change in holding of Securities of Promotes, Employee or Director of a Listed Company and other such persons as mentioned in Regulation 6 (2).

1	Name, PAN No. CIN /DIN & Address with Contact Nos.		
2	Category of Person (Promoters/KMP/ Directors/immediate relatives/others etc)		
3	Securities held prior to acquisition / disposal	Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	
4		No.	
5	Securities held prior to acquisition / disposal	Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	
6		No.	
7	% of Shareholding	Pre Transaction	
8		Post Transaction	
9	Date of allotment advice / acquisition of shares / sale of share specify	From	
10		To	
11	Date of intimation to company		
12	Mode of acquisition (market purchase/ public/ rights/preferential offer/off market Inter-se transfer etc.)		
13	Trading in derivatives	Value	
14	(Specify type of contract, Futures or Options etc)	Number of units (Contracts* lot size)	
15		Value	



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16		Number of units (Contracts* lot size)	
17	Exchange on which trade was executed		

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

Signature:

Designation:

Date:

Place:



Regd. Office: Village Mogar, Dist. Anand, Guajrat – 388340

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Annexure II

FORM D (Indicative Form)

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
 [Regulation 7 (3) Transaction by other connected persons as identified by the company

Name of the Company: _____

ISIN of the Company: _____

1	Name, PAN No. CIN /DIN & Address with Contact Nos.		
2	Connection with the company		
3	Securities held prior to acquisition / disposal	Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	
4		No.	
5	Securities acquired / disposal	Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	
6		No.	
7	% of Shareholding	Pre Transaction	
8		Post Transaction	
9	Date of allotment advice / acquisition of shares / sale of share specify	From	
10		To	
11	Date of intimation to company		
12	Mode of acquisition (market purchase/ public/ rights/preferential offer/off market Inter-se transfer etc.)		
13	Trading in derivatives (Specify type of contract, Futures or Options etc)	Value	
14		Number of units (Contracts* lot size)	
15		Value	
16		Number of units (Contracts* lot size)	
17	Exchange on which trade was executed		



Regd. Office: Village Mogar, Dist. Anand, Guajrat – 388340

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Signature:

Designation:

Date:

Place: