

Bombay Stock Exchange Limited  
P J Towers  
Dalal Towers,  
Mumbai 400 023.

**Scrip Code : 500133**

Dear Sir,

**Sub: Formulation and Disclosure of codes under SEBI (Prohibition of Insider Trading) Regulations, 2015**

This is to inform you that pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 and in terms of SEBI circular no. CIR/ISD/01/2015 dated 11<sup>th</sup> May, 2015 the Company has formulated and adopted the Code of practices and procedures for fair disclosure of unpublished price sensitive information (Regulation 8) and Code of Conduct to regulate, monitor and report trading by insiders (Regulation 9) with effect from 15<sup>th</sup> May, 2015 duly approved by the Board of Directors at its meeting held on 26<sup>th</sup> May, 2015.

The Code of practices and procedures for fair disclosure of unpublished price sensitive information is enclosed and would be available for inspection in the Company's website [www.esabindia.com](http://www.esabindia.com) shortly.

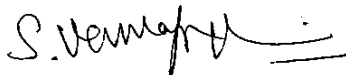
Any person/entity may contact the Compliance Officer of the Company with regard to the code of conduct to regulate, monitor and report trading by insiders.

The disclosures pursuant to Regulation 7 (1) (a) read with Regulation 6 (2) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 regarding the details of securities held by Promoters, Key Managerial Personnel and Directors are enclosed.

Kindly bring this to the attention of members and investors.

Thanking you,

Yours truly,  
**For ESAB India Limited**



**S. Venkatakrisnan**  
**Company Secretary**  
Encl: As above



## ESAB INDIA LIMITED

### B. CODE OF PRACTICES & PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

#### 1. Corporate Disclosure Policy

To ensure timely and adequate disclosure of 'Unpublished Price Sensitive Information' (UPSI), the following norms / principles shall be followed by the Company.

#### 2. Prompt public disclosure of UPSI

The Company shall make a prompt public disclosure of UPSI that would impact the price discovery, as soon as credible and concrete information comes into being, in order to make such information generally available.

3. The Board of Directors shall ensure that the price sensitive information that would impact price discovery no sooner than the information comes into being in order to make such information generally available to the public and authorize the Compliance Officer in this regard to take necessary action to make the information available to the general public.

4. The Board of Directors through the Chief Investor Relations Officer shall ensure that prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

5. The Chief Investor Relations Officer shall be responsible for ensuring that the Company complies with continuous disclosure requirements, overseeing and coordinating disclosure of UPSI to Stock Exchanges, analysts, shareholders and media, and educating staff on disclosure policies and procedures.

6. The Board of Directors shall ensure that uniform and universal dissemination of UPSI to avoid selective disclosure.

7. The Company secretary being the Compliance Officer is designated as the "Chief Investor Relations Officer" to deal with the dissemination of information and disclosure of UPSI.

8. Information disclosure/ dissemination may normally be approved in advance by the Chairman or in his absence, any Managing Director or Chief Executive Officer of the Company.



9. If information is accidentally disclosed without prior approval as aforesaid, the Chief Investor Relations Officer may inform the Chairman immediately, even if the information is not considered price sensitive.
10. The Company shall supplement the information released to Stock Exchanges either by public announcements and / or by simultaneously publishing information in the Company's website.
11. By a due process of authorization from the Board of Directors or the Chairman of the Board of Directors or the Managing Director of the Company, the Chief Investor Relations Officer shall give appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
12. The Board of Directors and the Key Managerial Personnel consisting of the Managing Director, Chief Financial Officer and the Company Secretary, shall ensure that information shared with analysts and research personnel is not UPSI.
13. The Board of Directors and the Management shall develop 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. The Company shall provide only generally available information, namely information that is accessible to the public on a nondiscriminatory basis, to analysts/research persons/large investors like institutions.
14. In order to avoid misquoting or misrepresentation, it is desirable that at least two representatives of the Company be present at meetings with analysts, brokers or Institutional Investors and discussion should preferably be recorded. It is also desirable that, if the meeting is a large gathering, the meeting may be video-graphed.
15. The Board of Directors and the Management shall ensure that all the UPSI shall be handled on a need-to-know basis.
16. Disclosure/dissemination of information may be done through various media such as publication of results or the Company's website and/ or press release so as to achieve maximum reach and quick dissemination. The Company shall ensure that disclosure of information to Stock Exchanges is made promptly.
17. The mail id of the Chief Investor Relations Officer is [venkatakrisnan.s@esab.co.in](mailto:venkatakrisnan.s@esab.co.in)

*S. Venkatesh*

**FORM A**

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

Name of the company: **ESAB India Limited**  
 ISIN of the company: **INE284A01012**

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

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relatives/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding	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	
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1 Exelvia Group India BV PAN: AABCE8539E Lansinkesweg 4, 7553, AE Hengelo, The Netherlands Contact No. +31 74 255 6003	2 Promoter	Equity	3 5604760	4 36.41	5 -	6 -	7 -	

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

Signature: 

Designation: *MANAGING DIRECTOR, EXELVIA GROUP INDIA B.V.*

Date: 14 May, 2015

Place: Hengelo, The Netherlands

**FORM A**

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

Name of the company: **ESAB India Limited**

ISIN of the company: **INE284A01012**

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

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relatives/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding	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	
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1 ESAB Holdings Limited PAN: AABCE6787C Hertford Road, Waltham cross, England EN87RP Contact No. 4402070926202	2 Promoter	3 Equity	4 5743200	5 37.31	6 -	7 -	8 -	

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

**Signature:**

**Designation:** Daniel A. Pryor, Director

**Date:** 14 May, 2015

**Place:** Annapolis Junction, MD, USA

**FORM A**

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

Name of the company: **ESAB India Limited**

ISIN of the company: **INE284A01012**

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

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relatives/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding	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	
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1 Rohit Gambhir PAN: AFRPG3341N DIN: 06686250 Flat No. A 3, III Floor, No. 94 Satyadev Avenue Jain Sagarika, MRC Nagar, Chennai, 600028, Tamil Nadu, INDIA Contact No.9840014755	2 Director	3	4	5	6	7		

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

Signature: 

Designation: Director

Date: 14 May, 2015

Place: Chennai

**FORM A**

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

Name of the company: **ESAB India Limited**

ISIN of the company: **INE284A01012**

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

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relatives/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding	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	
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1 Daniel Alexis Pryor DIN: 05305621 3630, Prospect Street, NW, Washington 20007, United States of America. Contact No.12025500056	2 Director	3	4	5	6	7		

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

**Signature:**

**Designation: Director**

**Date: 14 May, 2015**

**Place: Chennai**

FORM A

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

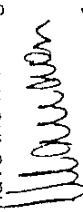
Name of the company: **ESAB India Limited**

ISIN of the company: **INE204A01012**

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

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relatives/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding	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	
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts lot size)	Notional value in Rupee terms	Number of units (contracts lot size)	Notional value in Rupee terms
					5	6	7	
Vikram Tandon PAN: AATPT8553C DIN: 01727251 57A Friends Colony East, New Delhi, 110065, Delhi, India Contact No. 9818780078	Director	-	-	-	-	-	-	-

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

Signature: 

Designation: **Director**

Date: **14 May, 2015**

Place: **New Delhi**



**FORM A**

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

Name of the company: **ESAB India Limited**  
 ISIN of the company: **INE284A01012**

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

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relatives/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding	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	
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1 Sudhir Chand PAN: ACRPC5866F DIN: 01385201 Flat No. 10, Belvedere Estate, 8/8 Alipore Road, Kolkata, 700027, West Bengal, India Contact No.9831478427	2 Director	3	4	5	6	7		

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

Signature: 

Designation: Director

Date: 14 May, 2015

Place: Chennai

**FORM A**

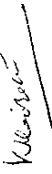
**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015  
[Regulation 7 (1)(a) read with Regulation 6 (2)]**

Name of the company: **ESAB India Limited**  
ISIN of the company: **INE284A01012**

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

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relatives/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding	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	
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1 K. Vaidyanathan PAN: AAPV9314N DIN: 00063692 "Bhaggyam Elegance", Flat 3A, III Floor, 29/10,, TTK Road, 1st Cross Street, Alwarpet, Chennai, 600018, Tamil Nadu, India Contact No.9840066404	2 Director	3	4	5	6	7		

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

Signature:   
Designation: **Director**

Date: **14 May, 2015**  
Place: **Chennai**

FORM A

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

Name of the company: **ESAB India Limited**

ISIN of the company: **INE284A01012**

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

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relatives/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding	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	
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1 Sabitha Rao PAN: ABQPS1936G DIN: 06908122 B-3, Shangrila Apartments, NO-136 Karpagam Avenue, Chennai, 600028, Tamilnadu, India Contact No.9884318186	2 Director	3	4	5	6	7		

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

Signature: 

Designation: **Director**

Date: **14 May, 2015**

Place: **Chennai**

**FORM A**

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

Name of the company: **ESAB India Limited**

ISIN of the company: **INE284A01012**

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

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relatives/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding	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	
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1 B Mohan PAN: AEYPM0517L Address: No.2, Park view Road, United India Colony, Kodambakkam, Chennai – 600 024 Contact No.9840904880	2 KMP		3	4	5	6	7	

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

Signature: 

Designation: Chief Financial Officer

Date: 14 May, 2015

Place: Chennai

**FORM A**

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


Name of the company: **ESAB India Limited**

ISIN of the company: **INE284A01012**

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1 S Venkatakrishnan PAN No. AADPV3150B Address: Sainivaas, G-1, Plot No.14, Door no.4, 3 <sup>rd</sup> Cross street, Old Bangaru colony, West KK Nagar, Chennai - 600078 Contact No.:9840922819	2 KMP	3 Equity	4 1	5 -	6 -	7 -	7 -	

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

Signature: 

Designation: **Company Secretary**

Date: **14 May, 2015**

Place: **Chennai**