



# PUNJAB CHEMICALS

AND CROP PROTECTION LTD.

Corporate Office :

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Date: 24.07.2018

The Manager  
Department of Corporate Services  
Bombay Stock Exchange Limited  
1<sup>st</sup> Floor, New Trading Wing, P.J Towers  
Dalal Street Fort  
**MUMBAI-400 001**

Scrip Code: 506618  
Tel No.: 022-22728073

The Manager  
Listing Department  
National Stock Exchange of India  
Limited  
Exchange Plaza, Bandra Kuria Complex  
Bandra (East)  
**MUMBAI-400 051**  
Scrip Symbol: PUNJABCHEM  
Tel No.: 022-26598235/26598458

**Sub: Outcome of Board Meeting - Amendment of Code of Conduct to Regulate, Monitor and Report Trading by Insiders.**

Dear Sirs

This is to inform you that the Board of Directors in their Meeting held today i.e on 24<sup>th</sup> July, 2018; the Company has amended the Code of Conduct to Regulate, Monitor and Report Trading by Insiders.

The amended Code is attached herewith.

Further the amended Code is being uploaded on the website of the Company at [punjabchemicals.com](http://punjabchemicals.com).

This is for your information and record please.

Thanking you,

Yours faithfully  
For **PUNJAB CHEMICALS AND  
CROP PROTECTION LIMITED**

  
**(CS PUNIT K ABROL)  
SR. V.P. (FINANCE) & SECRETARY**



**PUNJAB CHEMICALS  
AND CROP PROTECTION LTD.**

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

**Pursuant to Regulation 9(1) of SEBI (Prohibition of Insider Trading)  
Regulations, 2015**

CIN NO.: L24231PB1975PLC047063

Regd. Office: Milestone 18, Ambala Kalka Road, Village & P.O.: Bhankharpur,  
Derabassi, Distt. S.A.S. Nagar (Mohali), Punjab-140201  
Tel.: 01762-280086/ 280094 Fax: 01762-280070

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## **CHAPTER 1**

### **1.1 Introduction - Short Title**

Regulation 9(1) of the newly introduced SEBI (Prohibition of Insider Trading) Regulations, 2015 (the "Regulations") requires a listed company to formulate a Code of Conduct to Regulate, Monitor and Report Trading by its employees and other connected persons, towards achieving compliance with the said Regulations, adopting the minimum standards, set out in Schedule B to the Regulations.

Accordingly, in supersession of the previous Code dated 20.01.2009, a Code of Conduct to Regulate, Monitor and Report Trading by Insiders (the "Code") of the Company named "PCCPL Code of Conduct to Regulate, Monitor and Report Trading by Insiders" (hereinafter referred to as "PCCPL Code") are hereby framed as under.

### **1.2 The Policy and Obligations**

- i) The Company endeavours to preserve the confidentiality of unpublished price sensitive information and to prevent misuse of such information.
- ii) The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations.
- iii) Every Director and other Designated Employee of the Company has a duty to safeguard the confidentiality of all such information obtained in the course of his or her work at the Company.
- iv) No Director and other Designated Employee may use his or her position or knowledge of the Company to gain personal benefit or to provide benefit to any third party.

## **CHAPTER 2 - APPLICABILITY**

- 2.1 The PCCPL Code shall be applicable to the following Designated Persons:
- i) All Directors, Executive and Non-Executive on the Board of the Company.
  - ii) Key Managerial Personnel of the Company.
  - iii) Designated Employees (in the opinion of the Company who are reasonably expected to have access to the Un-published price sensitive information and are notified from time to time).
  - iv) Persons having contractual or fiduciary relation with the Company such as Auditors, Accounting Firms, Law Firm, Analysts, Consultant, etc. assisting or advising the Company.
- 2.2. These regulations will also apply in respect of dealings in securities of the Company by the immediate relatives of the Designated Persons.

## **CHAPTER 3 - DEFINITIONS**

- 3.1 "Act" means the Securities and Exchange Board of India Act, 1992 (15 of 1992).
- 3.2 "Board of Directors" means the Board of Directors of Punjab Chemicals and Crop Protection Limited.
- 3.3 "Body Corporate" means a body corporate as defined under the Companies Act, 2013.
- 3.4 "Companies Act" means the Companies Act, 2013.
- 3.5 "Committee" means a Committee, if any, constituted by the Company for implementation of these regulations.
- 3.6 "Company" means Punjab Chemicals and Crop Protection Limited.
- 3.7 "Connected person" shall generally include -
- Directors, Key Managerial Personnel, Specified Employees and Promoters (referred to as "Designated Persons") who may have access to unpublished

price sensitive information; and

- Immediate Relatives of the above;

3.8 “Compliance Officer” means any senior officer, designated so and appointed by the Board of Directors of the Company for the purposes of these regulations from time to time, and in the absence thereof, the Company Secretary.

3.9 “Concerned Advisor/Consultant/Retainers” of the Company means, such Advisors/ Consultants / Retainers, who in the opinion of the Company may have access to price sensitive information.

3.10 “Dealing in Securities”, means an act of subscribing, buying, selling or adding to subscribe or buy, sell or deal in any securities by any person either as principal or agent.

3.11 “Designated Employees” means:

- a. employees of the Company who are Head of the Departments or in the rank of General Manager and above and;
- b. employees in Finance, Accounts and Secretarial Department above Executive grade and directly concerned with the preparation of quarterly and annual financial statements and help in Auditing of the Accounts and;
- c. such other employees who may be so designated from time to time by the Company for the purpose of this Code.

3.12 “Immediate Relatives” means, with reference to any person, any one who is related to such person in the following manner:

- Spouse of the designated person and includes parents, sibling and child of such designated person or of the spouse, any of whom is either dependent financially on such person or consult such person in taking decisions relating to trading in securities.

3.13 “Insider” means any person who is:

- a. connected with the Company or is deemed to have been connected with the Company; or

- b. in possession of or having access to unpublished price sensitive information in respect of securities of the Company;

3.14 “Unpublished Price sensitive information” means any information relating to the Company or its securities, directly or indirectly that is not generally available and which upon becoming generally available is likely to affect the price of securities and shall, ordinarily include but not restricted to, information relating to the following:

- Periodical financial results of the Company.
- Dividends (both interim and final).
- Change in capital structure including information relating to Issue of securities including Bonus or buy-back of securities.
- Information relating to Mergers, Amalgamation, De-mergers, Acquisitions, Delisting or Takeovers, disposals and expansion of business and such other transactions.
- Material events in accordance with the Listing Agreement.
- Change in Key Managerial Personnel.

3.15 “Regulations” means the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended.

3.16 “Stock Exchange” means a stock exchange where the securities of the Company are listed for the time being.

3.17 “Securities” include:

- Shares, scrips, stocks, bonds, debentures, debenture stock or other marketable securities of the Company and;
- Derivatives thereof.

3.18 “Trading” means and includes subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell, deal in any securities of the Company.

3.19 “Trading Window” means the period when trading in Company’s Securities by the Designated persons is permitted.

3.20 "Trading Day" means a day on which the recognized stock exchanges are open for trading, where the securities of the Company are listed for the time being.

3.21 "Unpublished Informations" means information which is not published by the Company or its agent and is not specific in nature.

Explanation:

Speculative reports in print or electronic media shall not be considered as published information.

3.22 Other terms not specifically defined here shall have the same meaning as assigned under the SEBI (Prohibition of Insider Trading) Regulations, 2015.

#### **CHAPTER 4 - CODE OF CONDUCT**

##### **4.1 Reporting:**

- a. The Compliance Officer of the Company shall under the overall supervision of the Board of Directors, be responsible for compliance of policies, procedures, maintenance of records, monitoring, adherence to the rules for the preservation of unpublished Price Sensitive Information, Pre-clearance and maintenance of the list of designated persons.
- b. The Compliance Officer shall report to the Board of Directors and in particular to the Chairman of the Audit Committee a report on Compliance to the Code by the designated persons on quarterly basis.
- c. The Compliance Officer shall assist and guide all the designated persons in understanding and in complying with the provisions of this Code of Conduct.
- d. The Compliance Officer shall confidentially maintain a list of such securities as a "restricted list" which shall be used as the basis for approving or rejecting application for pre-clearance of trades.

#### 4.2 **Preservation of “Unpublish Price Sensitive Information”:**

- a. The Designated Employees shall maintain the confidentiality of all price sensitive information and shall not communicate any unpublished price sensitive information to any person directly or indirectly except on “need to know basis” i.e. such information can be disclosed only to those persons within the Company / outside the Company (e.g. Auditors, Internal Auditors, Consultants, Retainers, Advisors, their Employees and Representatives) who need the information to discharge their duties.
- b. The Designated Employees and Concerned Advisors/Consultants / Retainers shall keep the files containing confidential price sensitive information duly secured. Computer files must be kept with adequate security of login and password, etc.

Norms for Trading by Designated Persons and their immediate Relatives.

#### 4.3 **Trading Window and Trading Restrictions:**

All Directors, the Designated Employees, the Concerned Advisors/Consultants / Retainers and their immediate relatives shall be subject to the following trading rules and restrictions enumerated below:

- a. The Designated persons shall not take position in derivative transactions in the shares of the Company at any time.
- b. The Trading Window shall be closed during any period as may be specified by the Compliance Officer and trading shall be closed 5 (five) trading days before the happening of the following events and shall remain closed upto 48 hours after the publication of the concerned unpublished price sensitive information generally available to the Public.
  - i) Declaration of Financial Results (Quarterly, Half Yearly and Annual).
  - ii) Declaration of dividend (interim and final).



- iii) Change in Capital Structure including Bonus or buy-back of securities.
- iv) Any major expansion plans or execution of new projects.
- v) Acquisition, Amalgamation, mergers, demergers, delisting, disposals and expansion of business and such other information.
- vi) Change in Key Managerial Personnel.
- vii) Material events in accordance with the Listing Agreement.

#### 4.4 **Restriction on Trading:**

No Director, Designated Employee, Concerned Advisor / Consultant / Retainer or their immediate relative:

- (i) shall conduct any dealing in the securities of the Company during the closure of trading window.
- (ii) 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 window is closed.
- (iii) shall not enter into an opposite transaction i.e. sell or buy any shares of the Company during the **next six months following the prior transaction.**

4.5 In the case of subscription in the primary market (initial public offers), the above mentioned persons shall hold their investments for a minimum period of 30 days. The holding period would commence when the securities are actually allotted.

#### 4.6 **Pre-clearance of Trades:**

- a. When the trading window is open, trading by designated persons shall be subject to preclearance by the Compliance Officer, if the value of the

proposed trade(s) is above a minimum threshold limit of Rs. 10,00,000/- (Rupees Ten Lakh) in value over any calendar quarter, or such other limits as the Board may stipulate.

**No designated person shall 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.**

- b. The Compliance Officer shall confidentially maintain a list as a “restricted list” as may be specified in the SEBI regulations which shall be used as the basis for approving or rejecting applications for pre-clearance of trades.
- c. Prior to approving any trades, the Compliance Officer shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any unpublished price sensitive information. He shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.
- d. Order in respect of securities shall be executed within seven (7) trading days after approval is granted by the Compliance Officer, failing which fresh pre-clearance would be needed for the trades to be executed.
- e. A designated person who is permitted to trade shall not execute a contra trade within a period of six (6) months following the prior transaction. Relaxation may be given from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate these Regulations. In the event, any such contra trade is executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

#### **4.7 Disclosure Responsibilities & formats**

##### **a. Initial Disclosures of holdings**

- i). Every promoter, key managerial personnel, director and

designated employees and their immediate relatives and any other person for whom such person takes trading decisions of the Company shall disclose (as per **Form A**) his holding of securities of the Company as on the date of these Regulations taking effect, to the Company within thirty (30) days of these Regulations taking effect;

- ii) Every person on appointment as a key managerial personnel or a director of the Company or upon becoming a promoter shall disclose (as per **Form B**) his holding of securities of the Company as on the date of appointment or becoming a promoter, to the Company within seven (7) days of such appointment or becoming a promoter.

b. **Continual Disclosures of trades**

Every promoter, employee and director of the Company, designated employees and their immediate relatives shall disclose to the Company (as per **Form C**) the number of such securities acquired or disposed of within two (2) trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs.10,00,000/- (Rupees Ten lakh) or such other value as may be specified;

The Company shall within a period of two (2) working days from the date of receipt of such disclosures, inform the Stock Exchanges particulars of such trading.

c. **Disclosure by any Other Connected Person:**

Any connected person on close of the connected persons approved by the Board of Directors has to make disclosure of holdings and trading

in Securities of the Company in Form D.

- d. Other formats / disclosures, to monitor compliance with these Regulations would be as under –
- Application-cum-undertaking for pre-clearance (as per **Form C**).
  - Reporting of holdings in securities by Designated Persons as on 31 March, on an annual basis by 10 April (as per **Form D**)

#### **4.6 Penalty for contravention of Code of Conduct**

- a. Any Designated Person contravening the Code will be liable to penalty and appropriate disciplinary action including remuneration freeze, suspension, dismissal etc. as may be decided by the Chairman of the Board in consultation with the Compliance Officer.
- b. In case it is observed by the Company / Compliance Officer that there has been a violation of SEBI (Prohibition of Insider Trading) Regulations, 1992, SEBI shall be informed by the Company.
- c. The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 1992.



**ANNEXURE 2**  
**SPECIMEN OF APPLICATION FOR PRE-TRADING APPROVAL**

Date: \_\_\_\_\_

To,  
The Compliance Officer  
Punjab Chemicals and Crop Protection Limited  
DERABASSI.

**Internal use**

Recd date and  
time:

**Sign :**

Dear Sir/Madam,

**APPLICATION FOR PRE-TRADING APPROVAL IN SECURITIES OF THE  
COMPANY**

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct for Prevention of Insider Trading, I seek approval for purchase/ sale/subscription of the \_\_\_\_\_ Securities (including derivatives) (GIVE DESCRIPTION) of the Company as per the details given below:

NAME \_\_\_\_\_

State whether

- Director
- Designated Person
- Immediate Relative

**#EMPL NO.** \_\_\_\_\_

**DESIGNATION** \_\_\_\_\_

**#DEPARTMENT** \_\_\_\_\_

**LOCATION** \_\_\_\_\_

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Nature of transaction	*Name of Proposed Buyer / Seller	No. of Securities	**Date of purchase/ allotment	***Previous approval no. and date for purchase/ allotment	DP Beneficiary ID or Folio No. where the securities will be credited / debited	No. of Securities held in such Account / Folio No.

\* applicable for off market transaction

\*\* applicable only if the application is in respect of sale of Securities (including derivatives)

\*\*\* applicable only if the application is in respect of sale of Securities (including derivatives) for which an earlier purchase sanction was granted by the Compliance Officer

**# to be filled in only by Employees**

I enclose herewith the form of Undertaking signed by me.

Yours faithfully,

\_\_\_\_\_

**(Signature of Applicant)**

**Note:** This application has to be necessarily submitted through electronic mail at the dedicated e-mail id \_\_\_\_\_ and followed by a hard copy.

### ANNEXURE 3

#### FORMAT OF UNDERTAKING/DECLARATION TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-TRADING UNDERTAKING / DECLARATION

To,  
The Compliance Officer  
Punjab Chemicals and Crop Protection Limited  
DERABASSI.

With reference to Punjab Chemicals and Crop Protection Limited Code of Conduct for Prevention of Insider Trading, I seek your approval for me/ my immediate relative i.e Mr./ Mrs./ Miss \_\_\_\_\_ to purchase/ sell/ trade in the equity shares of the Company for an amount of Rs. \_\_\_\_\_.

I further declare that I am not in possession of or otherwise privy to any Unpublished Price Sensitive Information [as defined in the Company's Code of Conduct for Prevention of Insider Trading (the Code) upto and at the time of signing this Undertaking / Declaration.

In case I have access to or I receive any Unpublished Price Sensitive Information after signing this Undertaking/Declaration but before execution of the transaction, I shall inform the Compliance Officer of the change in my position and I would, and ensure that my Immediate Relatives would completely refrain from Trading in the Securities (including derivatives) of the Company till the time such Unpublished Price Sensitive Information becomes generally available.

I declare that I have not contravened the Code as notified by the Company from time to time.

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

I further undertake that I or any of my immediate relative will not execute a contra trade within 6 months from the date of purchase/ sell of the security pursuant to this application.

I am aware that, I shall be liable to face penal consequences as set forth in the Code including disciplinary action under the Code of the Company, in case the above declarations are found to be misleading or incorrect at any time.



I agree to comply with the provisions of the Code and provide any information relating to the trade as may be required by the Compliance Officer and permit the Company to disclose such detail to SEBI, if so required by SEBI.

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

\_\_\_\_\_

(Signature of the Applicant)

Date:

**ANNEXURE 4**  
**FORMAT FOR PRE-TRADING APPROVAL LETTER**

Date: \_\_\_\_\_  
Approval No. \_\_\_\_\_ of \_\_\_\_\_

To

Mr. / Mrs. \_\_\_\_\_  
Employee No. \_\_\_\_\_  
Designation: \_\_\_\_\_

PRE-TRADING APPROVAL / DISAPPROVAL - Your application  
dated \_\_\_\_\_.

Dear Mr. / Mrs.

With reference to your above application seeking approval for undertaking certain transactions in Securities (including derivatives) of the Company detailed therein, please be informed that you are / your Immediate Relative \_\_\_\_\_ is hereby authorised/not authorised to undertake the transaction(s) as detailed in your said application.

This approval is being issued to you based on the various declarations, representations and warranties made by you in your said application.

This approval letter is valid till \_\_\_\_\_ (i.e. for {7} trading days from date hereof). If you / your Immediate Relative \_\_\_\_\_ do (es) not execute the approved transaction /trade on or before this date you would have to seek fresh pre-trading approval before executing any transaction/deal in the Securities (including derivatives) of the Company. Further, you are required to file the details of the executed transactions in the attached format within two {2} Trading Days from the date of transaction/deal. In case the transaction is not undertaken a –Nill report shall be necessary.

Yours truly,

**Compliance Officer**

*Encl: Format for submission of details of transaction (Annexure 5)*

## ANNEXURE 5

### FORMAT FOR DISCLOSURE OF PRE-APPROVED TRANSACTIONS [To be submitted within 2 Trading Days of transaction / Trading in Securities (including derivatives) of the Company]

Date: \_\_\_\_\_

To

The Compliance Officer  
Punjab Chemicals and Crop Protection Limited  
DERABASSI.

Dear Sir,

#### DETAILS OF PRE-APPROVED TRANSACTION.

Ref: Your approval letter no. \_\_\_\_\_ dated \_\_\_\_\_

I hereby inform you that I / my \_\_\_\_\_

- have not bought/sold/subscribed any Securities (including derivatives) of the Company
- have bought/sold/subscribed to the \_\_\_\_\_ Securities (including derivatives) (GIVE DESCRIPTION) as mentioned below on \_\_\_\_\_ (INSERT DATE)

Name of Holder	**First or joint holder	No. of Securities (including derivatives) dealt with	Bought / Sold / Subscribed	DPID / Client ID (electronic form) or Folio No. for physical where the Shares will be debited or credited	Price (Rs.)

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 5 (Five) years and produce to the Compliance Officer/SEBI any of the following documents:

1. Broker's contract note
2. Proof of payment to/from brokers
3. Extract of bank passbook/statement (to be submitted in case of demat transactions).
4. Copy of Delivery instruction slip (applicable in case of sale transaction)

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

I agree not to buy/sell • the Securities (including derivatives) for a period of [six months] from the date of the aforesaid transaction (applicable in case of purchase / sale transaction by Designated Persons only).

In case there is any urgent need to sell these Securities (including derivatives) within the said period, I shall approach the Company (Compliance Officer) for necessary approval (applicable in case of purchase / subscription).

Yours truly,

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

#Emp No: \_\_\_\_\_

#Dept/ Div. \_\_\_\_\_

#to be filled in only by Employees.

**ANNEXURE 6**

**FORMAT OF ANNUAL STATEMENT OF HOLDINGS BY PROMOTER/  
DIRECTOR/ KEY MANAGERIAL PERSONNEL /DESIGNATED PERSON  
AND THEIR IMMEDIATE RELATIVES**

Date:

To

The Compliance Officer  
Punjab Chemicals and Crop Protection Limited  
DERABASSI.

Dear Sir,

**STATEMENT OF SHAREHOLDINGS IN THE COMPANY**

As on March 31, \_\_\_\_\_, I along with my Immediate Relatives hold the Securities (including derivatives) of the Company, details whereof are as under:

**Details of Shares Held:**

Name of Holder	No. of Shares bought during the year	No. of Shares sold during the year	No. of Shares held in Physical Form as on March 31_____			No. of Shares held in Electronic Form as on March 31_____		
			Folio No.	Total Holdings	DPID	Client ID	Total Holdings	Folio No.

Yours truly,

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

#Emp No: \_\_\_\_\_

#Dept/ Div. \_\_\_\_\_

APPLICATION OF WAIVER OF MINIMUM HOLDING PERIOD

Date:  
The Compliance Officer  
Punjab Chemicals and Crop Protection Limited  
DERABASSI.

Dear Sir,

I request you to grant me waiver of the minimum holding period of 6 months as required under Code of Conduct for Prevention of Insider Trading with respect to \_\_\_\_\_ shares of the Company held by me/ \_\_\_\_\_ (name of the immediate relative) singly/ jointly acquired by me on \_\_\_\_ (date). I/ Mr../Mrs./ Miss \_\_\_\_\_ desire(s) to sell the said shares on account of

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_ (give reasons) .

Thanking you

Yours faithfully

Name:  
(Designation)  
(Department)

**FORM A**  
**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015**  
**[Regulation 7 (1) (a) read with Regulation 6 (2)-Initial disclosure to the Company]**

Name of the Company		:		
ISIN of the Company		:		
<b>Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6 (2)</b>				
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
		Type of Security (for e.g. shares, warrants, convertible debentures, etc.)	No.	

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

<b>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)</b>					
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	No. of units (Contracts * lot size)	Notional value in Rupee terms	Contract Specifications	No. 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**

**Securities and Exchange Board of India (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		:			
<b>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)</b>					
Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP/ Directors/ immediate relatives/ 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 same meaning as defined under regulation 2 (l) (i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

<b>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)</b>					
Open interest of the Future contracts held as 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	No. of units (Contracts * lot size)	Notional value in Rupee terms	Contract specifications	No. 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**  
**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		:											
<b>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)</b>													
Name, PAN No., CIN/DIN & address with contact nos	Category of Person (Promoters/ KMP/ Directors/ immediate relatives/ others, etc.)	Securities held prior to acquisition / disposal		Securities acquired / disposed				Securities held post acquisition / disposal		Date of allotment advice / acquisition of shares/ sale of shares specify		Date of intimation to Company	Mode of acquisition / disposal (market purchase/ rights/ preferential offer/ off market / inter-se transfer, ESOPs, etc)
		Type of Security (for eg.- shares, warrants, convertible debentures, etc.)	No. & % 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. & % of share holding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

**Note:** "Securities" shall have the same meaning as defined under regulation 2 (l) (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)	
15	16	17	18	19	20	21

CIN NO.: L24231PB1975PLC047063

Regd. Office: Milestone 18, Ambala Kalka Road, Village & P.O.: Bhankharpur,  
Derabassi, Distt. S.A.S. Nagar (Mohali), Punjab-140201  
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**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)**  
**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015**

**Regulation 7 (3)- Transactions by other Connected persons as identified by the Company**

**Details of trading in securities by other connected person as identified by the Company**

Name, PAN No., 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 allotment advice / acquisition of shares/ sale of shares specify		Date of intimation to Company	Mode of acquisition (market purchase/ public / rights/ preferential offer/ off market / interse transfer, ESOPs, etc)
		Type of Security (for eg.- shares, warrants, convertible debentures, etc.)	No. & % of share-holding	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. & % of share-holding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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

**Details of trading in derivatives by other connected persons as identified by the Company**

Trading in derivatives (Specify type of contract, Futures or options, etc.)						Exchange on which the trade was executed
Type of Contract	Contract Specifications	Buy		Sell		
		Notional Value	Number of Units (Contracts *lot size)	Notional Value	Number of Units (Contracts *lot size)	
15	16	17	18	19	20	21

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

Name & Signature:

Designation :

Date:

Place: