

**Fullerton India Home Finance Company Ltd**

**Code of Conduct to Regulate, Monitor and Report Trading  
by Designated Persons**

November 2020

**INDEX**

<b>S. No.</b>	<b>Particular</b>	<b>Page</b>
1	APPLICABILITY	3
2	DEFINITIONS	3
3	COMPLIANCE OFFICER	4
4	PROHIBITION ON TRADING IN SECURITIES OF THE COMPANY BY DESIGNATED PERSONS	5
5	TRADING RESTRICTION	6
6	CIRCUMSTANCES AND PROCEDURE FOR BRINGING PEOPLE 'INSIDE'	6
7	INTERNAL CONTROL TO BE ENSURED UNDER THE REGULATIONS	7
8	CHINESE WALL	8
9	TRADING WINDOW AND TRADING RESTRICTION	8
10	DISCLOSURES	10
11	RECORDS	10
12	PENALTIES FOR CONTRAVENTION	10
13	AUTHORITY TO REVIEW	11

## **SCOPE AND PURPOSE:**

The Securities and Exchange Board of India repealed the erstwhile SEBI (Prohibition of Insider Trading) Regulations, 1992 and replaced it with the SEBI (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as the “Regulations”) in terms of Regulation 9 read with Schedule B of which Fullerton India Credit Company Limited (hereinafter referred to as “Company”) is required, inter alia, to frame a Code of Conduct for Prevention of Insider Trading (hereinafter referred to as (“Insider Code”) by Designated Persons of the Company, including the Directors and other connected persons, in relation to the securities of the Company.

This policy is revised pursuant to amendment of SEBI (Prohibition of Insider Trading) Regulations, 2015.

### **1. APPLICABILITY**

This Insider Code is applicable to all Designated Persons and their immediate relatives.

### **2. DEFINITIONS**

“**Designated Persons**” shall mean and include the following:

- a. All Directors of the Company;
- b. Chief Executive Officer (CEO), Chief Financial Officer (CFO), Chief Operating Officer (COO) or any such equivalent position, Company Secretary and Functional Heads;
- c. employees up to two levels below CEO;
- d. Such other employees working in the inside areas or having access to UPSI, as may be determined by the Compliance Officer from time to time;
- e. Promoters of the Company

“**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.

“**Promoter**” and “**Promoter group**” shall have the same meaning assigned to them in the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018.

“**SEBI**” means Securities and Exchange Board of India

“**Trading day**” means a day on which NSEIL are open for trading

“**Material Financial Relationship**” shall mean a relationship that the Designated Person shares with another person by virtue of such person being 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

Designated Person's annual income but shall exclude relationships in which the payment is based on arm's length transactions."

**"Immediate Relatives"** of all the Designated Persons as above are also considered as Designated Persons for the purpose of compliance with the Code.

**'Informant'** shall mean an individual(s), who voluntarily submits to the SEBI, 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;

**'Irrelevant, vexatious and frivolous information'** includes, reporting of information which in the opinion of the SEBI, -

- (i) Does not constitute a violation of insider trading laws; or
- (ii) Is rendered solely for the purposes of malicious prosecution; or
- (iii) Is rendered intentionally in an effort to waste the time and resource of the Board.

**'Legal Representative'** means a duly authorized individual who is admitted to the practice of law in India

All the other terms used in the Insider Code shall have the same meaning as assigned to them under the Regulations.

**"Other Listed Company (ies)"** means any company (ies) (other than the Company), which has its securities listed or proposed to be listed on a recognized stock exchange in India.

### **3. COMPLIANCE OFFICER**

The Company Secretary shall be deemed to be the Compliance Officer for the purpose of this Code.

Functions of the Compliance Officer shall be as under:

- Maintaining record of Designated Persons and immediate relatives in the format provided in **Annexure**.
- Monitoring adherence to the Regulations and the Insider Trading Code;
- Grant of pre-trading clearance to the Designated Persons for dealings in the Company's Securities and monitoring of such trade;

- Approving Trading Plan as may be formulated by any Insider in terms of the Regulations;
- Determination of period of Trading Window closure and Intimation of closure of Trading Window to the Designated Persons;
- Implementation of this Code of Conduct under the general supervision of the Board;
- Placing status reports before the Chairman of Audit Committee, detailing any trading in the Securities by the Designated Persons along with the documents that such persons had executed in accordance with the pre-clearance procedure prescribed under the Code of Conduct at regular intervals but not less than once in a year;
- Assisting all the Employees in addressing any clarifications regarding the Regulations and this Insider Trading Code;
- Maintaining a record of instances where the requirement of holding the Securities during the holding period is waived for emergency reasons;
- Sensitizing the employees of the manner and circumstances in which people may be brought “inside” on sensitive transactions, duties and responsibilities attached to the receipt of inside information, and the liability that attaches to misuse or unwarranted use of such information
- Maintaining a structured digital database containing the nature of the UPSI, the names of such persons who have shared the information and also the names of such persons or entities as the case may be with whom information is shared under this Regulation for legitimate purpose, along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available and giving of due notice to such insiders to maintain confidentiality of such unpublished price sensitive information in compliance with the Regulations.
- Confidentially maintaining a list of Other Listed Company (ies) as a “restricted list” which shall be used as the basis for approving or rejecting applications for pre-clearance of trades;
- In the absence of the Compliance Officer due to leave etc., the Officer designated by him/her from time-to-time, eligible to act as Compliance Officer under the Regulations, shall discharge the functions referred above.
- Ensuring that the structured digital database is preserved for a period of at least eight years after completion of the relevant transactions and in the event of receipt of any information from the SEBI regarding any investigation or enforcement proceedings, the relevant information is preserved till the completion of such proceedings.
-

#### **4. PROHIBITION ON TRADING IN SECURITIES OF THE COMPANY BY DESIGNATED PERSONS**

Designated Persons of the Company when in possession of any Unpublished Price Sensitive Information (UPSI), as defined in the Regulations, pertaining to the Company, shall not:

- Trade in securities of the Company, either on their own behalf or on behalf of any other person, except provided otherwise.
- Communicate, counsel, procure or allow access to any unpublished price sensitive information to/from any person, except in furtherance of a legitimate purpose, as explained in Code of Fair Disclosure, or performance of duties.

Designated Persons shall maintain the confidentiality of all UPSI and shall not pass on such information to any person directly or indirectly by way of making a recommendation for the trading in securities.

All information shall be handled within the organisation on a need-to-know basis and no UPSI shall be communicated to any person except in furtherance of the insider's legitimate purposes, performance of duties or discharge of his legal obligations.

#### **5. TRADING RESTRICTION**

The debt securities of the Company are listed on Stock Exchange. The trading by designated persons shall be subject to pre-clearance by Compliance Officer. Designated persons and their immediate relatives cannot trade in securities when the trading window is closed. Designated person who is permitted to trade shall not execute a contra trade within six months.

The trading restriction period shall be made applicable from the end of the half year till 48 hours after the declaration of financial results. In addition, the Compliance Officer shall have power to determine period for closure of Trading Window as per the requirement under the Regulations.

Trading window restriction shall not apply in case of situations as provided under the Regulations and as may be specified by SEBI from time to time.

The communication related to closure and opening of the trading window shall be sent to all Designated Persons by electronic means and where such electronic means are not available, the same will be sent by means of hand delivery/ by post. Irrespective of whether such communication has been received or not, persons governed by this Code shall mandatorily verify with the Compliance Officer on the status of the trading window before undertaking any trades in the listed securities of the Company.

#### **6. CIRCUMSTANCES AND PROCEDURE FOR BRINGING PEOPLE 'INSIDE'**

- **Circumstances:** People may be brought inside in following situations:
  - Availing of consultancy from professionals for confidential matters;

- Availing of assistance within the organization from another team/ department for a corporate action viz. merger, demerger, restructuring etc., information whereof is not a generally available information;
- Availing finance from banks, financial institutions for end-use, information whereof is not generally available information;
- In the course of conduct of due diligence under any provision of law;
- Other situations arising in the ordinary course of business which shall be documented by the Compliance Officer based on the inputs received from Managing Director and other Designated Persons handling UPSI from time to time.

➤ **Procedure:**

- An employee of the Company can be brought 'inside' only if he/she is conversant with their obligation to preserve confidentiality and after obtaining approval of the Managing Director or other Designated Persons handling the said UPSI. The need for the person to know the UPSI shall also be stated while seeking approval;
- The information about sharing of UPSI shall be promptly informed to the Compliance Officer for updating in the digital database;
- A person other than an employee of the Company can be brought 'inside' only after ensuring that the organization represented by such person has appropriate code in place covering the compliance to be ensured by the fiduciary/ intermediary under the Regulations.
- Confidentiality agreements shall be entered into with the person other than employees of the Company, before sharing of UPSI.
- Once a person is brought 'inside', Permanent Account Number or any other identifier authorized by law, where Permanent Account Number is not available, shall be promptly shared to the Compliance Officer for updating the digital database.
- The Company shall not outsource the database and shall internally maintain it with adequate internal controls. Ensure non-tampering of the database.
- The Compliance Officer may require the person brought 'inside' to make disclosure of holdings and trading in securities of the Company in Form D prescribed by SEBI, in order to monitor compliance with the Regulations.

**7. INTERNAL CONTROL TO BE ENSURED UNDER THE REGULATIONS**

- The list of Designated Persons along with requisite information, prescribed under the Regulations, shall be maintained and timely updated by the Compliance Officer;
- Files/ documents/ papers in relation to UPSI shall be kept secure. Computer files shall have adequate security of login and password and the security administrators shall restrict the amount of database access that is given to the users. The insiders should not accidentally access UPSI on account of inadequate or improper account rights or inadequate permission/ access control. The extent of access to be granted to the employees of respective department should be determined in consultation with respective head of the department.

- In the event there is a need for any sharing of information across the departments/ to any other Designated Person or employee, prior consent of the Managing Director or concerned Designated Person handling UPSI to be obtained stating that such sharing of information is not in violation of the Regulations and is for legitimate purpose.
- The Compliance Officer shall be timely informed about sharing of UPSI for legitimate person along with other details required to be given to the Compliance Officer under the Regulations.
- Where UPSI is required to be shared with any other person other than the Designated Persons/ employees of the Company, such person shall be required to execute agreements to contract confidentiality and non-disclosure obligations on the part of such person and such person shall keep information so received confidential and shall not otherwise trade in securities of the company when in possession of UPSI.
- The Compliance Officer shall maintain, list of persons other than Designated Persons with whom UPSI has been shared and contract for confidentiality has been duly executed, based on the information received from the Managing Director or Designated Person handling UPSI.
- The Compliance Officer shall monitor trading activity, especially around important events such as earnings announcements, acquisitions and other events material to a Company's value that are in the nature of UPSI, for the persons referred above.
- Any breach suspected by any Designated Person, employees or persons other than the Designated Persons/ employees of the Company shall be promptly brought to the notice of Compliance Officer in the manner provided in Whistle Blower and Vigil Mechanism Policy of the Company and in case of an instance of leakage of UPSI, an inquiry to be initiated in the manner approved by the Board of Directors of the Company.
- The Managing Director and CEO of the Company shall be responsible to review and evaluate effectiveness of the internal control measures and update the Audit Committee on the same at least once in a year to enable the verify the adequacy and effectiveness of the internal controls.
- The Compliance Officer shall report to the board of directors 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, but not less than once in a year.
- The gap between clearance of financial results/ financial statements by Audit Committee and Board Meeting should be as narrow as possible and preferably on the same day to avoid leakage of material information.
- The timing for re-opening of the trading window shall be determined by the Compliance Officer taking into account various factors including the UPSI in question becoming generally available and

being capable of assimilation by the market, which in any event shall not be earlier than forty-eight hours after the information becomes generally available.

## **8. CHINESE WALL**

To prevent the misuse of confidential information, the Company shall adopt a “Chinese Wall” policy wherein, employees having access to UPSI shall be physically segregated from rest of the employees to the extent practicable and shall share the said information only on need-to-know basis or for legitimate purpose.

## **9. DISCLOSURES**

### **➤ PERSONAL INFORMATION**

All the Designated Persons shall be required to submit the following details of the transactions in the Securities of the Company either in their own name or in the name of their Immediate Relatives to the Compliance Officer:

- Permanent Account Number or any other identifier authorized by law of the following persons to the company on an annual basis and as and when the information changes:
  - (a) immediate relatives;
  - (b) persons with whom such designated person(s) shares a Material Financial Relationship;
- Phone, mobile and cell numbers which are used by Designated Persons;
- Names of educational institutions from which designated persons have graduated (*to be granted on one-time basis*);
- Names of their past employers (*to be granted on one-time basis*)

### **➤ INITIAL DISCLOSURE**

- Members of Promoter Group shall disclose holding of securities of the company as on the date of the amendment in the Regulations taking effect i.e. January 21, 2019, to the company within thirty days in the format prescribed by SEBI (Form A).
- Any person on becoming a Designated Person or member of Promoter Group shall disclose all holdings Securities of the Company including that of his/her Immediate Relatives within 7 (seven) days of becoming a Designated Person/ member of Promoter Group. The disclosure shall be given in the format prescribed by SEBI (Form B).

### **➤ CONTINUAL DISCLOSURE**

- Every Designated Person or their immediate relatives or member of Promoter Group acquiring or trading in securities of the Company subsequent to the initial disclosure, shall disclose such acquisition and every subsequent Trade to the Compliance Officer within 2 (two) trading days of such transaction or receipt of intimation of allotment of securities, 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 Rupees ten lakhs, in the format prescribed by SEBI (Form C);
- The Compliance Officer shall notify the particulars of such trading to the stock exchange on which the securities are listed within two working days of receipt of disclosure or from becoming aware of such information. The above disclosures shall be made in such form and such manner as may be specified by the SEBI from time to time.
- Upon resignation from service of designated person, the Company shall maintain the updated address and contact details of such designated person. The Compliance Officer shall make efforts to maintain updated address and contact details of such persons for one year after resignation from service. Such data will be preserved as per record retention policy or for a period of 5 years whichever is higher.

➤ **OFF-MARKET TRADES BY INSIDER**

- Every Insider shall disclose to the Company in the format prescribed by SEBI (Form C), off-market trades done by him/her within 2 (two) working days of such transaction.
- The Compliance Officer shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days from receipt of disclosure or from becoming aware of such information.

**10. Protection to the Employee filing Voluntary Information Disclosure Form:**

For the purpose of this para, “Employee” means any individual who during employment may become privy to information relating to violation of insider trading laws and files a Voluntary Information Disclosure Form under these regulations and is a director, partner, regular or contractual employee, but does not include an advocate.

The Company shall ensure that suitable protection is provided against any discharge, termination, demotion, suspension, threats, harassment, directly or indirectly or discrimination to an Employee who files a Voluntary Information Disclosure Form, irrespective of whether the information is considered or rejected by the SEBI or he or she is eligible for a Reward under the Regulations, by reason of:

- (i) filing a Voluntary Information Disclosure Form with SEBI, in the format prescribed by SEBI from time to time;
- (ii) testifying in, participating in, or otherwise assisting or aiding SEBI in any investigation, inquiry,

audit, examination or proceeding instituted or about to be instituted for an alleged violation of insider trading laws or in any manner aiding the enforcement action taken by SEBI; or

(iii) breaching any confidentiality agreement or provisions of any terms and conditions of employment or engagement solely to prevent any Employee from cooperating with SEBI in any manner.

## **11. RECORDS**

The Compliance Officer shall maintain records of all the declarations made in the appropriate form for a minimum period of 5 years.

The Compliance Officer shall also maintain a record of the Designated Persons and any changes made in the list of the Designated Persons.

## **12. PENALTIES FOR CONTRAVENTION**

All Designated Persons shall be individually responsible for complying with the provisions of this Insider Trading Code including to the extent the provisions hereof are applicable to his/her Immediate Relatives. Any Designated Person who trades in securities or communicates any information for trading in securities, in contravention of this Code shall be subject to disciplinary action by the Company and liable to be penalized. Appropriate disciplinary action which may be taken by the Company may include wage-freeze, suspension from employment, ineligibility for future participation in employee stock option plans, recovery, etc., as may be decided by the Board. Actions, if any by the Company for such violations shall not preclude SEBI from taking any action under the Regulations or the SEBI Act 1992.

Any amount collected by Company under this clause shall be remitted to SEBI by way of credit to the Investor Protection and Education Fund administered by SEBI.

Under Section 15G of the Securities and Exchange Board of India Act, 1992 ("the SEBI Act") any Insider who indulges in insider trading in contravention of the Regulations is liable to a penalty which shall not be less than ten lakh rupees but which may extend to twenty-five crore rupees or three times the amount of profits made out of insider trading, whichever is higher. Under Section 24 of the SEBI Act, anyone who contravenes or abets the contraventions of the provisions of the Act or of any Rules or Regulations made thereunder, he shall be punishable with imprisonment for a term which may extend to ten years, or with fine, which may extend to twenty five crore rupees or both. If any person fails to pay the penalty imposed he shall be punishable with imprisonment for a term which shall not be less than one month, but which may extend to ten years or with fine, which may extend to twenty-five crore rupees or with both.

In case it is observed by the Compliance Officer that there has been a violation of the SEBI Regulations by the Designated Person including that of his/her Immediate Relatives, the Compliance Officer shall promptly inform the stock exchange(s) where the concerned securities are traded, in Annexure A.

The Designated Person against whom information has been furnished by the Company/Compliance Officer to SEBI for violations of the Regulations/Code, shall provide all information and render necessary co-operation as may be required by the Company/Compliance Officer or SEBI in this connection.

### **13. AUTHORITY TO REVIEW**

The Policy should be subjected to an annual review by the management and modifications, if any warranted, should be taken up for the approval of the Board. If there are any amendments in the regulations, revision in the policy should be staged for Board's approval in the immediately ensuing Board Meeting, after the amendments are notified by the regulator.

The Board of Directors are authorized to make such alterations to this Code as considered appropriate, subject, however, to the condition that such alterations shall not be inconsistent with the provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015.



**Form for Informant's Voluntary Information Disclosure to be submitted to the Board.**

**Note:** For submission of information through a legal representative, the redacted copy of the Form expunging information that may identify the Informant shall be submitted by the legal representative without expunging any information relating to the legal representative and the details relating to the violation of "insider trading laws".

\*Indicates that the required field is non-mandatorily, remaining fields are mandatory

<b>I. PERSONAL INFORMATION OF THE INFORMANT</b>		
A.INDIVIDUAL 1: Last Name:.....	First Name:.....	Title:.....
Address:	City / State:	PIN:
Telephone (with State Code):	Mobile:	E-Mail address:
Employment Details*:	Permanent Account Number, if available:	
<b>II. LEGAL REPRESENTATIVE (where applicable)</b>		
A.INDIVIDUAL 1: Last Name:.....	First Name:.....	Title:.....
Firm Name (if not self-employed):		
Contact address :	City / State:	PIN:
Residence address:	City / State:	PIN:
Telephone (with State Code):	Mobile:	E-Mail address:
Bar Council Enrolment Number:		
<b>III SUBMISSION OF ORIGINAL INFORMATION</b>		

1. Is it a violation of insider trading laws ? Yes / No

2. If yes to question (1), please describe the type of violation:

3. Has the violation: Occurred / Occurring / Potential to occur in future

4. If the violation has occurred, date of occurrence: dd/mm/yy

*(in case exact date is not known, an approximate period may be entered)*

5. Have the individual(s) or their representatives had any prior communication(s) or representations with the Board concerning this matter?

Yes (Details thereof) / No

6. Does this violation relate to an entity of which the individual is or was an officer, director, counsel, employee, consultant or contractor? Yes (Details thereof) / No

7. If yes to question (6), was the original information submitted first to your Head or internal legal and compliance office? Yes / No

8. If yes question (7), then please provide,

Date of submission of original information: dd/mm/yy

9. Please describe in detail how the information submitted by you constitutes a violation of insider trading laws. The details must include specific information with respect to:  
(i) details of the securities in which insider trading is alleged;  
(ii) the unpublished price sensitive information based on which insider trading is alleged;  
(iii) date on which the unpublished price sensitive information was made public;  
(iv) details of circumstances/evidence leading to possession of unpublished price sensitive information by the alleged violator(s);  
(v) details of insiders/suspects and their trades (i.e. purchase/sale and quantity purchased/sold) along with dates/period of trades."

10. What facts or supporting material is your allegation based on? Please include self-certified copies of all the relevant documents

Please attach any additional documents to this form, if necessary.

11. Identify any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents were disclosed to a third party.

12. Provide details of connection amongst the Informant, the company whose securities are involved and the person against whom information is being provided:

#### **IV. DECLARATION**

I/we hereby declare that,-

A. I/we have read and understood the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

B. I/we accept that mere furnishing of information by me/us does not by itself confer on me/us right to get reward and that I/we may not get any Reward at all. I/we would be bound by the decisions that the authority competent to grant reward may take;

C. I/we accept that the Securities and Exchange Board of India is under no obligation to enter into any correspondence regarding action or inaction taken as a result of my/our information.

D. I/we accept that the reward would be an ex-gratia payment which, subject to the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, shall be granted at the absolute discretion of the competent authority. The decision of the authority shall be acceptable to me/us and I/we shall not challenge it in any litigation, appeal, adjudication, etc.

E. In the event of my/our death before the reward is paid to me/us, it may be paid to .....  
(Details of nominee)

F. I/we declare that the information contained herein is true, correct and complete to the best of my/our knowledge and belief and not obtained from the categories of persons indicated in sub-regulation (2) and sub-regulation (6) of regulation 7G of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and agree to indemnify the Board in case it is not so found. I/we fully understand that I/we may be subject to action under securities laws as well as Section 182 of the Indian Penal Code, 1860 (45 of 1860) and ineligible for Reward if, in my/our submission of information or in any other dealings with the Board, I/we knowingly and wilfully make any false, fictitious, or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious, or fraudulent statement.

Signature:.....

Date: dd/mm/yy

Place:

**V. CERTIFICATE BY LEGAL REPRESENTATIVE (where the information is submitted through legal representative)**

I hereby certify as follows,-

(a) I have reviewed the completed and signed Voluntary Information Disclosure Form for completeness and accuracy and the information contained therein is true, correct and complete to the best of my knowledge;

(b) I have irrevocable consent from the Declarant, to provide to the Securities and Exchange Board of India, the original Voluntary Information Disclosure Form in the event of a request for it from the Securities and Exchange Board of India due to concerns that the Informant has not complied with these regulations or where the Securities and Exchange Board of India requires the said information for the purpose of verification for declaring any gratuitous reward to the Informant or where the Securities and Exchange Board of India determines that it is necessary to seek such information to accomplish the purpose of the Securities and Exchange Board of India Act including for the protection of investors, sharing with foreign securities regulators and foreign and Indian law enforcement agencies, etc.;

(c) I am and shall continue to be legally obligated to provide the original Voluntary Information Disclosure Form without demur within seven (7) calendar days of receiving such request from the Securities and Exchange Board of India.

Signature:.....

Date: dd/mm/yy

Place:

**Annexure A**

**Report by (Name of the listed company/ Intermediary/Fiduciary) for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.**

[For listed companies: Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015

For Intermediaries/ Fiduciaries: Schedule C read with Regulation 9(1) and 9(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

Sr. No	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	
2	Please tick appropriate checkbox Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	
3	<b>A. Details of Designated Person (DP)</b>	
	i. Name of the DP	
	ii. PAN of the DP	
	iii. Designation of DP	
	iv. Functional Role of DP	
	v. Whether DP is Promoter or belongs to Promoter Group	
	<b>B. If Reporting is for immediate relative of DP</b>	
	i. Name of the immediate relative of DP	
	ii. PAN of the immediate relative of DP	
	<b>C. Details of transaction(s)</b>	
	i. Name of the scrip	
	ii. No of shares traded and value (Rs.) (Date- wise)	
	<b>D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter</b>	
	i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	
4	Details of violations observed under Code of Conduct	
5	Action taken by Listed company/ Intermediary/ Fiduciary	
6	Reasons recorded in writing for taking action stated above	

7	Details of the previous instances of violations, if any, since last financial year																							
8	If any amount collected for Code of Conduct violation(s)																							
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)																							
	ii. Details of transfer/payment  In case of Online: <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Name of the transferor</td> <td></td> </tr> <tr> <td>Bank Name, branch and Account number</td> <td></td> </tr> <tr> <td>UTR/Transaction reference Number</td> <td></td> </tr> <tr> <td>Transaction date</td> <td></td> </tr> <tr> <td>Transaction Amount (in Rs.)</td> <td></td> </tr> </tbody> </table> In case of Demand Draft (DD): <table border="1" style="margin-left: 20px;"> <thead> <tr> <th>Particulars</th> <th>Details</th> </tr> </thead> <tbody> <tr> <td>Bank Name and branch</td> <td></td> </tr> <tr> <td>DD Number</td> <td></td> </tr> <tr> <td>DD date</td> <td></td> </tr> <tr> <td>DD amount (in Rs.)</td> <td></td> </tr> </tbody> </table>	Particulars	Details	Name of the transferor		Bank Name, branch and Account number		UTR/Transaction reference Number		Transaction date		Transaction Amount (in Rs.)		Particulars	Details	Bank Name and branch		DD Number		DD date		DD amount (in Rs.)		
Particulars	Details																							
Name of the transferor																								
Bank Name, branch and Account number																								
UTR/Transaction reference Number																								
Transaction date																								
Transaction Amount (in Rs.)																								
Particulars	Details																							
Bank Name and branch																								
DD Number																								
DD date																								
DD amount (in Rs.)																								
<u>9</u>	<u>Any other relevant information</u>																							

Yours faithfully,

**Date and Place**

**Name and Signature of Compliance Officer**

**PAN:**

**Email ID:**