



Code of Conduct

For Regulation and Monitoring of Trading by Designated Persons and Immediate Relatives of Designated Persons

[In accordance with SEBI (Insider Trading) Regulations, 2015]



Anjani Portland Cement Limited

(Effective from May 15, 2015)

Amended on December 24, 2019



ANJANI PORTLAND CEMENT LIMITED

Code of Conduct for Regulation and Monitoring of Designated Persons and Immediate Relatives of Designated Persons

INTRODUCTION:

The objective of the Code is to prevent dealing in securities of the Company by an Insider either on his own behalf or on behalf of any other person, on the basis of unpublished price sensitive information.

All companies must have their internal code "which should not dilute the minimum standards set for the Regulation, Monitoring and Reporting of Trading by Insiders, as provided in Schedule B of the Insider Trading Regulations in any manner (Regulation 9(1) and 9(2) of the Insider Trading Regulations).

In substitution of the code and in order to find tune it in line with the amendments as prescribed by SEBI in the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation 2015, the Code of Conduct is reviewed from time to time.

1. THE PRINCIPLES AND OBLIGATION:

The Company endeavors to preserve the confidentiality of un-published price sensitive information and to prevent misuse of such information. The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations.

Every Promoter and Person who is part of Promoter Group, Director and Designated Employees 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. No Promoter and Person who is part of Promoter Group, Director/Chief Executive Officer/Chief Financial Officer/Senior Management Personnel/ other designated employees and their immediate relatives shall use his or her position or knowledge of the Company to gain personal benefit or to provide benefit to any third party.

To achieve these objectives, Anjani Portland Cement Limited (*hereinafter referred to as "The Company"*) hereby notifies that this code of conduct is to be followed by all Promoter and Persons who are part of Promoter Group, Directors/ other designated employees and their immediate relatives of the company

3. APPLICABILITY:

This Code shall be applicable to Promoters/Directors/ designated persons and their immediate relatives of the Company.

4. DEFINITIONS:

In this Code unless the context otherwise requires:



- (a) **'Act'** means the Securities and Exchange Board of India Act, 1992 (15of1992).
- (b) **"Board"** means the Board of Directors.
- (c) **"Companies Act"** means the Companies Act, 1956(1 of 1956) and the Companies Act, 2013.
- (d) **"Compliance Officer"** means the officer appointed by the Board for the purpose of compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for preservation of unpublished price sensitive information, monitoring of trades and the implementation of this Code of Conduct as well as the provisions of SEBI (Prohibition of Insider Trading) Regulation, 2015 as amended from time to time, under the overall supervision of the Board.
- (e) **"connected person"** means 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 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.
- (f) **"Deemed to be connected persons"** shall mean the persons falling within the following categories unless the contrary is established, -
 - (i). an immediate relative of connected persons specified in clause (i); or
 - (ii). a holding Company or associate Company or subsidiary Company; or
 - (iii). an intermediary as specified in section 12 of the Act or an employee or director thereof; or
 - (iv). an investment Company, trustee Company, asset management Company or an employee or director thereof; or
 - (v). an official of a stock exchange or of clearing house or corporation; or
 - (vi). a member of board of trustees of a mutual fund or a member of the board of directors of the asset management Company of a mutual fund or is an employee thereof; or
 - (vii). a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
 - (viii). an official or an employee of a self-regulatory organization recognised or authorized by the Board; or
 - (ix). a banker of the Company; or
 - (x). a concern, firm, trust, Hindu undivided family, Company or association of persons wherein a director of a Company or his immediate relative or banker of the Company, has more than ten per cent of the holding or interest



- (g) **"generally available information"** means information that is accessible to the public on a non-discriminatory basis;
- (h) **"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;
- (i) **"Insider"** means any person who is
 - i) a connected person; or
 - ii) in possession of or having access to unpublished price sensitive information;
- (j) **"promoter"** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof;
- (k) **"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;
- (l) **"trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;
- (m) **"trading day"** means a day on which the recognized stock exchanges are open for trading;
- (n) **"unpublished price sensitive information"** means any information, relating to the 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



The words and/or phrases which are not defined in this code but are defined under the SEBI Act, 1992 or SEBI (Prohibition of Insider Trading) Regulations, 2015 or Companies Act, 1956, or Companies Act, 2013 as amended from time to time, shall have the same meaning as defined under the said Act and/or Regulations.

5. COMPLIANCE OFFICER:

The Company Secretary of the Company shall be the Compliance Officer for setting forth the policies and procedures and to implement and monitor adherence to this 'Code of Conduct' and applicable laws and regulations and policies and procedures. The Compliance Officer shall report to the Board.

The Compliance Officer under this Code shall be responsible for:

- (i) compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for preservation of unpublished price sensitive information;
- (ii) pre-clearing of Designated Employees' trades in the company ;
- (iii) monitoring of trades in Company and the implementation of this Code of Conduct as well as the provisions of SEBI (Prohibition of Insider Trading) Regulation, 2015 as amended from time to time, under the overall supervision of the Board.
- (iv) The Compliance Officer shall maintain a record of the Designated Employees and any changes made in the list of Designated Employees.
- (v) The Compliance Officer shall place before the Chairman of the Audit Committee on a quarterly basis, all the details of dealing in securities by the Directors / Designated Employees and the accompanying documents that such persons had executed under the pre-dealing procedure envisaged in this code of conduct.
- (vi) The Compliance Officer shall assist all the employees in addressing any clarifications regarding the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct.

6. NEED TO KNOW:

Unpublished price sensitive information is to be handled on a "need to know" basis, Unpublished price sensitive information should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not rise to a conflict of interest or appearance of misuse of the



information. He, being in the inside area, shall not communicate any price sensitive information to anyone in public area. All non-public information directly received by him should immediately be reported to the head of the department and the compliance officer.

If, in the performance of duties, it becomes necessary for the Employee to disclose any price sensitive information to any person outside the Company, e.g., Advisors, Auditors, Consultants, Merchant Bankers, Share Transfer agent etc., the Employee shall inform the Compliance Officer of the Price Sensitive Information proposed to be disclosed and shall ensure that the concerned Advisor, Auditor, Consultant, Merchant Banker, Share transfer agent, etc., executes an Agreement with the Company in such format as may be prescribed by the Company.

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password etc.

7. PRESERVATION OF PRICE SENSITIVE INFORMATION:

No person shall either on his own behalf or on behalf of any other person, deal in the securities of the Company when in possession of any unpublished price sensitive information.

No person shall communicate, counsel or procure directly or indirectly any unpublished price sensitive information to any person who while in possession of such unpublished price sensitive information shall not deal in the securities of the company.

Designated Employees shall maintain the confidentiality of all Price Sensitive Information. They shall not pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sale of the securities of the company.

8. PREVENTION OF MISUSE OF "PRICE SENSITIVE INFORMATION

All directors/designated employees of the Company shall be subject to trading restrictions as enumerated below:

- i. **All directors / Designated Employees and their immediate relatives** shall trade in the securities of The Company only during a specific trading period called **"Trading Window"** to be specified by the Company. **All directors / designated employees and their immediate relatives** shall be prohibited to trade in the securities of the Company during the time the information referred to in sub-clause (iii) below is unpublished and during the period the trading window is closed.
- ii. The trading window shall be, *inter alia*, closed at the time of:—



- (a) Declaration of financial results (quarterly, half-yearly and annually).
 - (b) Declaration of dividends (interim and final).
 - (c) Issue of securities by way of public/rights/bonus etc.
 - (d) Any major expansion plans or execution of new projects.
 - (e) Amalgamation, mergers, takeovers and buy-back.
 - (f) Disposal of whole or substantially whole of the undertaking.
 - (g) Any changes in policies, plans or operations of the Company.
 - (h) Such other information as specified by various law, rules and regulations and ascertained by the Compliance Officer for this purpose.
- iii. The Trading Window shall remain closed from the last day of every quarter and shall be opened 48 hours after the information referred to in sub-clause (ii) above is made public.

9. PRE-CLEARANCE OF TRADES :

All Directors / Designated Employees/ who intend to deal in the securities of the Company should pre-clear the transactions, by making an application in the prescribed form and containing the prescribed undertaking to the Compliance Officer (Annexure 1)

While seeking Pre clearance all Directors / Designated Employees shall submit a declaration in Annexure 1 to the Compliance Officer confirming that he does not stand in possession of any UPSI. In case the Director or the designated employee has access to or receives "Price Sensitive Information" after the signing of the undertaking, but before the execution of the transaction he or she shall inform the Compliance Officer of the change in his position and that he or she would completely refrain from dealing in the securities of the Company till the time such information becomes generally available. He or She shall further undertake that he or she has not contravened the Code of Conduct for Prevention of Insider Trading as notified by the Company from time to time and that he or she has made a full and true disclosure in the matter.

In case the Compliance Officer wishes to deal in the securities of the Company, he/she would have to make the application in the prescribed (Annexure 1) to the Managing Director of the Company. The remaining provisions of this section, as applicable to Designated Employees, would also apply to the Compliance Officer.

10. OTHER RESTRICTIONS:

- i. All directors/designated employees and their immediate relatives shall execute their order in respect of securities of the Company within seven trading days after the approval of pre-clearance is given. If the order is not



executed within seven trading days after the approval is given, the employee/director must pre-clear the transaction again.

- ii. All Directors / designated employees and their immediate relatives who buys or sells any number of shares of the Company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction
- iii. He shall also not take positions in derivative transactions in the shares of the Company at any time.
- iv. In case the sale of securities is necessitated by personal emergency, the holding period may be waived by the compliance officer. (Application for Waiver is at Annexure IV.)

11. REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES:

All designated employees / persons connected with the Company will have to forward details of their securities transactions including the statement of their dependent family members to the Compliance Officer in the following manner:-

- (i) Every promoter, key managerial personnel and director of The Company shall disclose his holding of securities of the Company and that of his immediate relatives as on the date of the Insider Trading regulations taking effect i.e. 15.05.2015, to the Company within thirty days of these regulations taking effect i.e. by June 15, 2015 in Form A at Annexure V;
- (ii) 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 and that of his immediate relatives as on the date of appointment or becoming a promoter, to the Company within seven days of such appointment or becoming a promoter in Form B at Annexure VI.
- (iii) Statement(s) in Annexure VIII disclosing the total number of shares or voting rights held, by him and / or immediate relative(s) as at the end of the financial year of the Company, within 2 working days the end of the financial year. This is irrespective of whether there is any change in the holdings.
- (iv) Every promoter, employee and director of every Company shall disclose to the Compliance officer in Form C at Annexure VII the details of securities of the Company acquired or disposed of within two trading days of such transaction either by himself or by his immediate relatives 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 Ten Lakh Rupees.



- (v) The compliance Officer shall maintain records of all declarations in the form given by the Directors / Officers / Designated Employees for a minimum period of five years.

The disclosures are summarized below:

I. Initial Disclosures

By whom	What to be disclosed	When to be Disclosed	Form
Promoter/ Directors/KMPs	Number of shares or voting rights held as on 15.5.2015 by self and immediate relatives	By 15.06.2015	A
Promoter/ Directors/KMPs	Number of shares or voting rights held on the date of becoming a Promoter / Director / KMP by self and immediate relatives	Within seven days of such appointment	B
All Designated Employees	Statement of Holdings of self and immediate relatives	Within 7 working days of March 31	Annexure VIII

II. Continual Disclosures

By whom	What to be disclosed	When to be disclosed	Form
Promoter/Director/Designated Employee of the Company	The details of securities of Company acquired or disposed of either by himself or by his immediate relatives 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 Ten Lakh Rupees.	Within 2 trading days of Acquisition or sale of Shares or voting rights, as the case may be	C

12. DISCLOSURE OF INFORMATION BY COMPANY:

The Company shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure under Clause 11(iv) above or from the date of becoming aware of such information.



The Disclosure of the incremental transactions after any disclosure under this Clause shall be made when the transactions effected after the prior disclosure cross the threshold specified in Clause 11(iv) above.

13. TRADING PLAN:

- (i) An insider may formulate a Trading Plan and present it to the compliance officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.
- (ii) Such Trading Plan shall
 - (a) not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
 - (b) 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;
 - (c) entail trading for a period of less than 12 months;
 - (d) not entail overlap for any period for which another trading plan is already in existence submitted.
 - (e) not entail trading for market abuse
- (iii) Such Trading Plan shall 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;
- (iv) The compliance officer shall review the trading plan to assess whether the plan would have any potential for violation of these regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.
- (v) 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.
- (vi) Upon approval, the Compliance Officer shall notify the Trading Plan to the stock exchanges on which the securities of the Company are listed.

14. SUBMISSION OF INFORMATION:

- (i) All Designated persons shall be required to disclose names and Permanent Account Number of the following persons to the Compliance Officer 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
- (c) Phone, mobile and cell numbers which are used by them

Explanation—The term “material financial relationship” shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding twelve months, equivalent to at least 25% of such payer’s annual income but shall exclude relationships in which the payment is based on arm’s length transactions.”

(ii) In addition, the names of educational institutions from which designated persons have graduated and names of their past employers shall also be disclosed within 30 days of April 01, 2019 on a one time basis.

15. CHINESE WALL:

No Insider shall communicate Unpublished Price Sensitive Information to any other person except on a need-to-know basis for furtherance of the Insider’s legitimate purposes by permitting such other person to cross the Chinese Wall.

****On September 17, 2019 SEBI notified the SEBI (Prohibition of Insider Trading) (Third Amendment) Regulations, 2019 (mainly on informant), this notification is effective from 26th December 2019.***

16. PROTECTION AGAINST RETALIATION AND VICTIMISATION (Regulation 7I of SEBI PIT Third Amendment Regulations, 2019)

Employee who reports any alleged violations of insider trading laws in accordance with the Informant mechanism introduced vide SEBI (Prohibition of Insider Trading) (Third Amendment) Regulations, 2019 dated 17 September 2019, will be protected against any discharge, termination, demotion, suspension, threats, harassment, directly or indirectly or discrimination.

Further, any employee can voluntary submit original information relating to alleged violation of the insider trading code that has occurred, is occurring or has a reasonable belief that it is about to occur, to the Office of Informant Protection of SEBI in the format and manner set out in Schedule D to SEBI (Prohibition of Insider Trading) (Third Amendment) Regulations, 2019. Format of the same is enclosed.

***Amended by Board of Directors by way of passing Circular Resolution dated 24.12.2019**

17. PENALTY FOR CONTRAVENTION:

(i) Persons connected with the Company who trade in securities or communicate any information for trading in securities in contravention of this Code of Conduct will be penalized and appropriate action will be taken by the Board or any other Authority



appointed by the Board after giving reasonable opportunity to show-cause and adherence to the principles of natural justice. The penalty may include wage freeze, suspension, ineligibility for future participation in employee stock option plans, recovery , clawback etc.

- (ii) In addition to the action which may be taken by Company, the persons violating or contravening this Code of Conduct shall also be subject to action by SEBI as per SEBI Act. In case of any violation, the Company shall inform SEBI accordingly.

18. AMENDMENT TO CODE OF CONDUCT:

The Board of Directors of the Company reserves the right to add, amend, modify this Code of Conduct as and when it deems appropriate.

19. SAVINGS CLAUSE:

If any rules under the code are in conflict with or inconsistent with the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time, then the SEBI (Prohibition of Insider Trading) Regulations, 2015 as modified/ amended from time to time, shall prevail and shall deemed to have been included in this code.



Annexure 1
Application for Pre-clearance

(For use by Promoters / Directors/ Designated Persons to deal in the securities of Company)

To,
The Compliance Officer
..... Limited

Dear Sir,

I / my immediate relative am desirous of dealing in the below-mentioned securities of the Company in my own name or on behalf of my immediate relative(write name of family member and relationship) and seek your approval to acquire/ purchase/ sell them

Type of Security	No. of Shares	Market Price on date of Application (To give last trading day's closing price)	Nature of Trade Buy / Sell	Date by which trade is proposed to be executed	Folio No./ DP ID No./Client ID No. Along with the name of depository	Present Holding (No. of Shares)	
Equity shares						Physical	Demat

My undertaking for the purpose of pre-clearance is attached herewith. I/ my immediate relative is aware that if the order is not executed within seven trading days after the approval is given, I would have to pre-clear the transaction again.

I have made full and true disclosure in this application.

Signature:

Name:

Designation:

Department:



Annexure I

FORMAT OF UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-DEALING UNDERTAKING

Undertaking

In compliance of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the Code for Prohibition of Insider Trading, I, _____ (Name of the Designated Person) hereby undertake/declare that:

1. I do not have any access to or have not received any “Price Sensitive Information” upto the time of signing this undertaking.
2. In case I have access to or receive any “Price Sensitive Information” after the signing of this undertaking but before the execution of the deal, I shall inform the Compliance Office of the change in the position and that I would completely refrain from dealing in Securities till the time such information is made available to public by Company.
3. I have not contravened the Code as notified by the company from time to time.
4. I have made full and true disclosure in the matter.

Signed this _____ day of _____, 20__

Signature:

Name:

Designation:

Department:



ANNEXURE II

FORMAT FOR PRE-DEALING APPROVAL LETTER

Date: _____

Approval No: __ of __

To,
Mr. /Mrs. _____
Emp No. : _____
Designation: _____

PRE-DEALING APPROVAL/DISAPPROVAL -Your application Dtd. _____

Dear Mr. /Mrs. _____

With reference to your above application seeking approval for undertaking certain transactions in Securities of the Company detailed therein, please be informed that you are 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}). If you do not execute the approved transaction /deal on or before this date you would have to seek fresh pre-dealing approval before executing any transaction/deal in the Securities of the Company. Further, you are required to file the details of the executed transactions in the attached format within four {4} days from the date of transaction/deal. In case the transaction is not undertaken a "Nil" report shall be necessary.

Yours truly,

Compliance Officer



Annexure III

Format for Confirmation of Trades executed, pursuant to pre clearance

From:
Name:
Designation:

To
The Compliance Officer
.....Limited

Dear Sir,

Pursuant to your pre clearance datedI / my immediate relative have dealt in the below-mentioned securities of the Company in my own name or on behalf of my immediate relative(write name of family member and relationship)

Type of Security	No. of Shares	Price at which transacted	Nature of Trade Buy / Sell	Date on which executed	Folio No./ DP ID No./Client ID No. Along with the name of depository	Present Holding (No. of Shares)	
Equity shares						Physical	Demat

I hereby confirm that I did not have have any access to or have not received any "Price Sensitive Information" upto the time of execution of this transaction.

I have made full and true disclosure in the matter.

Signature:

Name:

Designation:

Department:



Annexure V

Form A as specified by SEBI

Annexure VI

Form B as specified by SEBI

Annexure VII

Form C as specified by SEBI



Annexure VIII

**ANNUAL STATEMENT OF HOLDINGS OF DIRECTORS / OFFICERS/ DESIGNATED PERSONS
AND THEIR IMMEDIATE RELATIVES**

Date:

To,
The Compliance Officer
..... Limited

STATEMENT OF SHAREHOLDINGS IN

As on _____, I along with my immediate relatives, hold the Securities of the Company, details whereof are as under:

Description of Security:

Name of the Holder	Physical Holdings		Electronic Holdings		
	Folio No	Total Holdings	DP ID	Client ID	Total Holdings

Yours truly,

Signature: _____

Name: _____



SCHEDULE D

[See regulation 7B]

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 securities laws.

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

I. PERSONAL INFORMATION OF THE INFORMANT		
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:
II. LEGAL REPRESENTATIVE (where applicable)		
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:		
III SUBMISSION OF ORIGINAL INFORMATION		
1. Is it a violation of securities 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 <i>(in case exact date is not known, an approximate period may be entered)</i>		
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 why you think the information submitted is a violation?		
10. What facts or supporting material is your allegation based on? 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 willfully 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: