

TECIL CHEMICALS AND HYDRO POWER LIMITED

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

(Amended by the Board of Directors at the Meeting held on 26.05.2025)

1. INTRODUCTION

Securities and Exchange Board of India (“SEBI”) has, in order to protect the interests of investors in general and to put in place a framework for prohibition of insider trading in securities and to strengthen the legal framework thereof, has issued the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“the PIT Regulations”) pursuant to the powers conferred on it under Section 30 of Securities and Exchange Board of India Act, 1992 which is effective from 15th May, 2015.

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015, and recent amendments, the Board of Directors of the Company in their Meeting held on 26th May, 2025 reviewed the existing policy and approved the amended “TECIL CHEMICALS AND HYDRO POWER LIMITED-Code of Conduct Policy for prevention of Insider Trading and Fair disclosures”. The code shall be effective from 1st April, 2025.

2. OBJECTIVE AND PURPOSE

The Code has been prepared by adopting the standards set out in Schedule B of the Regulations in order to regulate, monitor and report trading by its designated persons and immediate relatives of designated persons towards achieving compliance with the Regulations.

3. APPLICABILITY

The Code is applicable to the following persons:

- Directors
- Designated Persons
- Concerned Advisers/Consultants/Retainers of the Company
- Connected Persons as defined in Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and in this Code of Conduct.

4. DEFINITIONS

In this Code unless the context otherwise requires, the following words, expression and derivations there from shall have the meanings assigned to them as under:

“Act” means Securities and Exchange Board of India Act, 1992;

“Board” means the Board of Directors of the Company;

“Code” or “Code of Conduct” shall mean this Code for Regulating, Monitoring and Reporting of trades for prohibition of Securities and Exchange Board India (Prohibition of Insider Trading) Regulations, 2015 (the PIT Regulations) as amended from time to time;

“Company” means Tecil Chemicals and Hydro Power Limited;

“Compliance Officer” means the Company Secretary of the Company, who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information (UPSI), monitoring of trades and implementation of the Code under the overall supervision of the Board.

“Concerned Adviser / Consultants / Retainers” of the Company means such advisers or consultants or retainers or professionals who in the opinion of the Company may have access to unpublished price sensitive information;

“Connected Person” means:

- i. any person who is or has during the six months prior to the concerned act been associated with a company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the Company or holds any position including a professional or business relationship between himself and the Company, whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access;
- ii. Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established -
 - (a) a immediate Relative of Connected Persons specified in clause (i); or
 - (b) a holding company or associate company or subsidiary company; or
 - (c) an intermediary as specified in Section 12 of the SEBI Act or an employee or director thereof; or
 - (d) an investment company, trustee company, asset management company or an employee or director thereof; or
 - (e) an official of a stock exchange or of clearing house or corporation; or
 - (f) a member of board of trustees of a mutual fund or a member of the Board of Directors of the asset management company of a mutual fund or is an employee thereof; or
 - (g) a member of the Board or an employee, of a public financial institution as defined in Section 2(72) of the Companies Act, 2013; or
 - (h) an official or an employee of a self-regulatory organization recognized or authorized by Board; or
 - (i) a banker of the company; or
 - (j) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his Relative or banker of the company, has more than ten percent of the holding or interest; or
 - (k) a firm or its partner or its employee in which a connected person specified in sub-clause (i) of clause (d) of Reg 2(1) of PIT Regulations is also a partner; or
 - (l) a person sharing household or residence with a connected person specified in sub-clause (i) of clause (d) of Reg 2(1) of PIT Regulations

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

“Designated Person(s)” shall mean and include person identified by the Board of Directors in consultation with the Compliance Officer based on his/her role and function in the organization and the access to UPSI and shall also include:

- i. All Directors of the Company and their secretaries;
- ii. The promoters of the Company;
- iii. Members of the Board of Directors of the Company;
- iv. Key Managerial Personnel of the Company;
- v. Auditors of the Company;
- vi. All employees, support staff of the Accounts, Finance, Legal, Internal audit, Information technology and Secretarial Department of the Company at the Corporate Office;
- vii. Key Managerial Personnel of the material subsidiary of the Company;
- viii. Secretaries/Executive Assistants reporting to the Directors and the Key Managerial Personnel;
- ix. All Departmental Heads of the Company;
- x. Employees of other Departments/Divisions on a case-to-case basis, who could be reasonably expected to have access to UPSI(s) relating to the Company, to be decided by the Chairman/Managing Director/ Compliance Officer/Chief Financial Officer, on a case-to-case basis; and
- xi. Employees of material subsidiaries of the Company designated on the basis of their functional role or access to UPSI in the organisation by their Board of Directors;
- xii. Employees upto two levels below the Managing Director;
- xiii. Employees upto two levels below the Board of Directors of the Company irrespective of their functional role in the company or ability to have access to UPSI;
- xiv. Any support staff of the Company, such as IT staff or secretarial staff Legal Staff, Finance Staff, Strategy Staff who have access to UPSI;
- xv. Such other persons as may be identified by the Compliance Officer.

“Derivative” includes-

- (a) a right to call or delivery or a right to make a delivery at a specified price and within a specified time of a specified number of shares / debentures or other securities of the Company;
- (b) a contract which derives its value from the prices, or index of prices, of underlying securities.

“Employee” means every employee of the Company (whether working in India or abroad), including the Directors in the employment of the Company.

“Generally Available Information” means information that is accessible to the public on a non-discriminatory basis and shall not include unverified event or information reported in print or electronic media.

“Director” means a member of the Board of Directors of the Company;

“Relative” shall mean the following:

- (i) spouse of the person;
- (ii) parent of the person and parent of its spouse;
- (iii) sibling of the person and sibling of its spouse;
- (iv) child of the person and child of its spouse;
- (v) spouse of the person listed at sub-clause (iii); and
- (vi) spouse of the person listed at sub-clause (iv)

“Immediate Relative” means 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.

“Insider” means any person who is:

- i. a Connected Person; or
- ii. in possession of or having access to Unpublished Price Sensitive Information(UPSI).

Any person in receipt of unpublished price sensitive information pursuant to a “legitimate purpose” and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with these regulations.

“Key Managerial Personnel” means the person as defined in Section 2(51) of the Companies Act, 2013 including any amendment or modification thereto and such other officer(s) named in the offer documents to be filed or filed with Securities and Exchange Board of India and other persons as may be designated by the Board of Directors of the Company from time to time;

“Legitimate purpose” shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partner(s), collaborator(s), lender(s), customer(s), supplier(s), Merchant Banker(s), bankers, legal adviser(s), auditors, staff members of the audit firm conducting the audit, insolvency professional(s) or other adviser(s) or consultant(s), and such other person as may be decided by the Audit Committee, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these Regulations;

The Legitimate Purpose shall also inter alia include sharing of the UPSI in relation to the following: a) Sharing the information upon an action, subpoena or order of a court of competent jurisdiction; b) Sharing the information for any requirement of legal process, regulation or governmental order, decree or as per applicable laws, rules and regulations; c) Sharing of information for the purposes of obtaining regulatory licenses and approvals etc.; d) Sharing of such information as may be determined by the Chief Executive Officer from time to time.

“Non-Trading Period” means:

- i. the period, i.e., the number of Trading Days, before and after the date of a meeting of the Board or shareholders of the Company where ‘UPSI’ is to be considered as provided under Clause 5 of the Code; or
- ii. such other period(s) as may be decided and notified by the Compliance Officer.

“Promoter” shall have the meaning assigned to it under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.

“Promoter Group” shall have the meaning assigned to it under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.

“Securities Exchange Board of India” or “SEBI” means Securities and Exchange Board of India constituted under Securities and Exchange Board of India Act, 1992;

“Securities” shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof.

“Specified” means specified by SEBI in writing.

“Stock Exchanges” shall include BSE Limited (BSE) and the National Stock Exchange of India Limited (NSE) where the securities of the Company are currently listed.

“Takeover Regulations” means the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.

“Listing Regulations” means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time;

“Need to know” means the Price Sensitive Information shall be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information;

“Non-public Information” Information is “non-public” if it is not available to the general public. In order for information to be considered public, it must be widely disseminated in a manner making it generally available to investors by distribution to Stock Exchanges where Company’s shares are listed or through such media as press and television, journals or similar broad distribution channels or the press media in India and abroad. The circulation of rumors, even if accurate and reported in the media, does not constitute effective public dissemination;

“Trading” means and includes subscribing, redeeming, switching, buying, selling, dealing, or agreeing to subscribe, redeem, switch, buy, sell, deal in any securities and “trade” shall be construed accordingly. Trading shall also include pledging or agreeing to pledge, as explained below;

Explanation: Under the PIT Regulations, the term “trading” is intended to be widely used to include dealing. Such a construction is intended to curb the activities based on Unpublished Price Sensitive Information which are strictly not buying, selling or subscribing, such as pledging, etc.,

“Trading Day” means a day on which the recognized stock exchanges are open for Trading.

“Trading Plan” shall mean a plan for trades to be executed in the future by persons who have

perpetual access to the UPSI.

“Trading Window” shall mean the window available for trading in the securities of the Company.

“Unpublished Price Sensitive Information” or “UPSI” 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 include 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 other than due to superannuation or end of term, and resignation of Statutory Auditor or Secretarial Auditor;
- (vi) Change in rating(s) other than ESG rating(s);
- (vii) fund raising proposed to be undertaken;
- (viii) agreements, by whatever name called, which may impact the management or control of the company;
- (ix) fraud or defaults by the company, its promoter, director, key managerial personnel, or subsidiary or arrest of key managerial personnel, promoter or director of the company, whether occurred within India or abroad;
- (x) resolution plan/ restructuring or one-time settlement in relation to loans/borrowings from banks/financial institutions;
- (xi) admission of winding-up petition filed by any party /creditors and admission of application by the Tribunal filed by the corporate applicant or financial creditors for initiation of corporate insolvency resolution process against the company as a corporate debtor, approval of resolution plan or rejection thereof under the Insolvency and Bankruptcy Code, 2016;
- (xii) initiation of forensic audit, by whatever name called, by the company or any other entity for detecting mis-statement in financials, misappropriation/ siphoning or diversion of funds and receipt of final forensic audit report;
- (xiii) action(s) initiated or orders passed within India or abroad, by any regulatory, statutory, enforcement authority or judicial body against the company or its directors, key managerial personnel, promoter or subsidiary, in relation to the company;
- (xiv) outcome of any litigation(s) or dispute(s) which may have an impact on the company;
- (xv) giving of guarantees or indemnity or becoming a surety, by whatever named called, for any third party, by the company not in the normal course of business;
- (xvi) granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.

Explanation 1- For the purpose of this definition of UPSI:

a. ‘Fraud’ shall have the same meaning as referred to in Regulation 2(1)(c) of Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003.

b. 'Default' shall have the same meaning as referred to in Clause 6 of paragraph A of Part A of Schedule III of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Explanation 2- For identification of events enumerated in this clause as unpublished price sensitive information, the guidelines for materiality referred at paragraph A of Part A of Schedule III of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as may be specified by the Board from time to time and materiality as referred at paragraph B of Part A of Schedule III of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 shall be applicable.

Words and expressions used and not defined in this Code but defined in the PIT Regulations, the Listing Regulations, SEBI Act, 1992 (15 of 1992), Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made there under (including any statutory modifications or re- enactment thereof) shall have the meanings respectively assigned to them in those legislation.

In this Code unless there is anything repugnant in the subject or context words importing the masculine gender shall be taken to include females and vice versa. In addition, words in the singular shall include the plural and vice versa.

5. PURPOSE AND SCOPE

Communication of UPSI:

No Insider shall communicate, provide or allow access to UPSI, relating to the Company or its securities, to any person including other Insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

No person shall procure from or cause the communication by any Insider of UPSI, relating to the Company or its Securities, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

The Insiders who are in possession of UPSI are required to handle such information with care and to deal with the information with them when transacting their business strictly on a need-to-know basis.

Uniform and Universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure

The UPSI shall be disseminated uniformly and universally to all stakeholders through Stock Exchanges and by posting the same on official website of the Company i.e. www.tecilchemicals.com. The Company shall use its best endeavors to avoid selective disclosure of price sensitive information. However, if any information gets disclosed selectively or inadvertently or otherwise, endeavor shall be made to make generally available the above information through dissemination of the same to Stock Exchanges and/or by posting the same on the official website of the Company as soon as practicable.

Prompt public disclosure of Unpublished Price Sensitive Information

UPSI shall be disclosed to the Stock Exchanges and disseminated promptly on a continuous basis as soon as credible and concrete information comes into being in order to make such information generally available.

Procedures for responding to any queries on news reports and/or requests for verification of market rumours by regulatory authorities

Appropriate, fair and prompt response shall be submitted to all queries on news reports and/or requests for verification of market rumours received from regulatory authorities.

Such replies shall be signed by the Compliance Officer / Chief Executive Officer. In their absence, such replies shall be signed by The Chief Financial Officer.

In case the query/request has been received from any Stock Exchange, a copy of such reply shall be sent to other stock exchange(s) also where equity shares of the Company are listed, if any.

The Compliance Officer shall oversee corporate disclosure. He / She shall be responsible for deciding whether a public announcement is necessary for verifying or denying rumours and then making the disclosure.

Procedures for Disclosure / dissemination of Information with reference to analysts, Institutional Investors and research personnel

Only public information will be provided to analysts, research personnel and institutional investors. Alternatively, any Unpublished Price Sensitive Information given to analysts, research personnel and institutional investors should be simultaneously made public at the earliest.

In order to avoid misquoting or misrepresenting it is desirable that two Company representatives be present at the meeting with analysts, research personnel and institutional investors and the discussion should be recorded and transcripts should be made and disseminated on the official website of the Company.

Extra caution will be taken while dealing with analysts' questions that raise issues outside the intended scope of discussion. Unanticipated questions will be taken on notice and a considered response shall be furnished later. If the answer includes Unpublished Price Sensitive Information, a public announcement should be made before responding.

The Company shall develop best practices to make adequate disclosures on the official website to ensure that official confirmation and documentation of disclosures is made.

Need to know

Unpublished Price Sensitive Information shall be handled on a "need to know" basis. All non-public information directly received by any employee should immediately be reported to the head of the department.

Limited access to confidential information:

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

No information shall be passed by designated persons by way of making a recommendation for the purchase or sale of securities of the Company.

Disclosure/dissemination of Price Sensitive Information with special reference to analysts, media persons and institutional investors:

The following guidelines shall be followed while dealing with analysts and institutional investors:

- i. Only public information to be provided.
- i. At least two Company representatives be present at meetings with analysts, media persons and institutional investors.
- i. Unanticipated questions may be taken on notice and a considered response given later. If the answer includes price sensitive information, a public announcement should be made before responding.
- iii. Simultaneous release of information after every such meet.

Communication and procurement of Unpublished Price Sensitive Information

~~The determination of 'legitimate purposes' in relation to communication or procurement of Unpublished Price Sensitive Information under regulation 3 of the Insider Trading Regulations, shall be made by the Board or the Authorised Personnel basis the 'Operating Guidelines for Determination of Legitimate Purpose & Approval for Sharing of UPSI.~~

Exemptions to communicate the UPSI:

UPSI may be communicated, provided, allowed access to or procured, in the following cases:

Open Offer as per the Takeover Regulations where the Board is of the informed opinion that sharing of such an offer is in the best interests of the Company.

Not an Open Offer as per the SEBI (Substantial Acquisition of Shares and Takeover) Regulations, 2011 ("SEBI Takeover Regulations") but where the Board is of the informed opinion that sharing of the information the proposed transaction is in the best interests of the Company.

If the information that constitutes UPSI is disseminated to be made generally available at least 2 (two) Trading Days prior to the proposed transaction being effected in such form as the Board may determine. However, the Board would cause public disclosures of such UPSI well before the proposed transaction to rule out any information asymmetry in the market.

For the purpose of the aforementioned exemptions, the parties involved shall execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential and shall not otherwise trade in securities of the Company when in possession of UPSI.

6. TRADING WINDOW

- a) All Designated Persons including their immediate relatives shall deal in the securities of the Company only when the trading window is open. No Designated Persons including their immediate relatives shall deal in the securities when the trading window is closed. It is the duty of the Designated Persons to inform the immediate relative regarding the closure of trading window and ensure that they do not deal in the securities of the Company;
- b) The trading window will remain closed during the following periods:

Sl.No.	Details of Unpublished Information	Period of Closure of Window	
		Commencing From	Ending on
1.	Declaration of Financial Results (quarterly/ half yearly/ annual)	The close of the quarter/ half year/ year.	48 hours after the declaration of Financial Results for the respective quarter/ half year/ year as the case may be.
2.	Proposal on any matter which has a bearing on the price of security is considered. Example: Recommendation of Dividend / Interim Dividend / Bonus Shares / Right Shares/ Further Issue of Shares/ Amalgamation/Merger /Takeover, proposal in respect of significant expansion plans, any changes in policies, plans or operations etc.	Seven (7) days prior to the date of the Board Meeting at which the proposal is made.	24 hours after the date of the Board meeting.
3.	Proposal on buyback of shares is considered.	Two (2) days prior to the date of the Board Meeting at which the proposal is made.	24 hours after the date of the Board meeting.

In addition to the above, the Compliance Officer may in consultation with the Chief Executive Officer and/or Chief Compliance Officer, declare the Trading Window closed, on an “as-needed” basis for any reason.

Trading Window shall be also closed for the Designated Person or class of Designated Persons when the Compliance Officer determines that the Designated Persons or class of Designated Persons can reasonably be expected to have possession of unpublished price sensitive information either due to being part of any special project or otherwise.

The Trading Window shall be opened not earlier than 48 hours after the information becomes generally available or when it is finally decided to abandon the project.

- c) The Compliance Officer or any other employee from the Company Secretarial department of the Company will notify the Designated Persons about closure and opening of trading window and also inform the Stock Exchanges;
- d) The trading window shall also be applicable to any person having contractual or fiduciary relation with the Company such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the Company;

6. PRE-CLEARANCE OF TRADE:

All Designated Persons who intend to deal in the Securities of the Company directly or indirectly or through their Immediate Relatives when the trading window is open and where the proposed value of trades, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value is above INR. 10,00,000/-, or any other threshold as may be specified by the Board from time to time, should take pre-clearances of the transaction from the Compliance Officer by sending the request for approval in Annexure I (Form No. I) indicating the estimated number of units of securities that the designated person or immediate relative(s) intends to trade, the details as to the depository with which he/she has a security account, the details as to the securities in such depository mode and such other details as specified in the form and also declare that the applicant is not in possession of UPSI.

The request can be sent by email to tecilchingavanam@gmail.com. No Designated Person shall apply for pre-clearance of any proposed trade if such Designated Person is in possession of UPSI even if the Trading Window is not closed.

The Trading Window shall also be applicable to any person having contractual or fiduciary relation with the Company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the Company.

The requirement of obtaining Pre-Clearance Approval will also be applicable where the Designated Person intends to pledge the shares of the Company as a collateral security for any purpose including but not limited to loans & guarantee.

The Whole-Time Directors and KMPs of the Company are prohibited under Section 194 of the Companies Act, 2013 from taking positions in derivatives.

- a) The aggregate of number of shares of the Company dealt (i.e., purchase and sale) by the designated person shall not exceed INR. 10,00,000/- without obtaining pre-clearance;

However, no Designated Person including for dealings through their immediate relatives or Portfolio Managers shall be entitled to apply for pre-clearance of any proposed trade, if such designated person is in possession of Unpublished Price Sensitive Information even if the trading window is not closed. The pre-dealing procedure shall be as given below:

I An application complete in all respects should be made in the prescribed Form in Form NO.I

II An undertaking as per Annexure I.I shall be executed in favor of the Company by the Designated Person forming part of the Application Form as mentioned hereinabove, shall incorporate, inter alia, the following clauses:

a. That the Designated Person(s) and their immediate relative(s) does not have any access or has not received "Price Sensitive Information" upto the time of signing the undertaking.

b. That in case the Designated Person(s) and their immediate relative(s) has access to or receives "Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction, he/she shall inform the Compliance Officer of the fact and that he/she would completely refrain from dealing in the securities of the Company till the time such information becomes public.

c. That he/she has not contravened the Code of Conduct for prevention of Insider Trading as notified by the Company/SEBI from time to time.

That he/she has made a full and true disclosure in the matter.

The Compliance Officer shall also determine whether any such declaration is reasonably capable of being rendered inaccurate.

III The Compliance Officer after satisfying himself that the application and undertaking are in order and the proposed trade will not breach the SEBI (PIT) Regulations or this Code of Conduct shall pre-clear the trades within two (2) trading days from receipt of application and undertaking complete in all respects. Annexure II.

IV The Designated Persons shall execute their trade in respect of securities of the Company within seven (7) Trading days after the approval of pre-clearance is given.

V If the trade is not executed within the aforesaid seven (7) days, the designated person must obtain fresh pre-clearance by following the aforesaid procedure above.

VI The designated persons must report to the Compliance Officer the details of the trade executed within three (3) working days of the execution of the trade. In case the transaction is not undertaken a Nil Report must be submitted to the Compliance Officer within three (3) working days from the expiry of the aforesaid seven (7) trading days whichever is later- Annexure III.

VII The Designated Person shall not execute / deal in a contra trade for any number of securities (even when the value of securities to be dealt is less than INR. 10,00,000/-) for a period of six (6) months from the execution of the trade in point (iv) & (v) above.

Contra trade means: In case the Designated Person pre-clears for buying Shares of the Company, he cannot enter into a sale of securities of the Company for a period of Six (6) months from the date of execution of buy order and *vice-versa*.

IT MAY BE NOTED THAT SHOULD A CONTRA TRADE BE 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 INVESTOR PROTECTION AND EDUCATION FUND SET UP BY SEBI.

VIII The Compliance Officer may waive at his discretion the sale of securities necessitated due to personal emergency before the six months period mentioned above. The Compliance Officer may take necessary undertakings and declarations and seek appropriate information as he deems necessary from the designated person before granting the relaxation;

In case of other circumstances, the Compliance Officer in consultation with CEO / Managing Director on a case-to-case basis may grant relaxation from the strict application of the holding period of Six (6) months. The Compliance Officer may take necessary undertakings and declarations and seek appropriate information as he deems necessary from the designated person before granting the relaxation.

IX The waiver from the strict application under clause (viii) will have to be in writing giving reasons thereof;

7. Disclosures Under SEBI (PIT) Regulations and This Code

- a) The disclosure to be made by any person under this code shall include those relating to trading by immediate relative(s) of such person and by any other person for whom such person takes trading decisions. This disclosure of trading in securities shall also include trading in derivatives and traded value of the derivatives shall be taken into account for the purpose of this code.

Every public disclosure under this Clause shall be made in the Form as may applicable, which is attached as Annexure II to this Code.

- b) Initial Disclosure

Every person on appointment as a KMP or a Director of the Company shall disclose his holding of securities of the Company as on the date of appointment to the Company within Seven (7) days of such appointment.

- c) Continual Disclosures

Every Designated Person and Director shall furnish in the prescribed form C which is attached as Annexures III to this code, the details of their holding of securities and transactions in the securities of the Company on a half yearly and annual basis.

If the value of the securities traded, whether in one transaction or series of transaction over any calendar quarter, aggregates to a traded value in excess of INR. 10,00,000/- (Rupees Ten Lakhs only), the Designated Person and Director shall disclose to the Company the number of such securities acquired or disposed of within Two (2) trading days of such transaction in the form prescribed by SEBI. It is clarified that any incremental transactions after any disclosure under this clause shall be made when the transactions effected after the prior disclosure cross the threshold specified herein. The Company shall notify the particulars of such trading to the Stock Exchanges within Two (2) days of receipt of the disclosure or from becoming aware of such information.

d) Disclosure by Designated Persons

(a) The Designated persons shall disclose the following information, on one-time basis, to the Company within 15 (fifteen) days from the date on which this code shall become effective; i. his/her Phone, mobile and cell numbers. ii. his/her Permanent Account Number or any other identifier authorised by law.

(b) The Designated person shall disclose the following information, on annual basis, to the Company within 30 (thirty) days from the end of the financial year and on continual disclosure basis, as and when the information changes within fifteen days of such change; i. Name of Immediate Relatives;

ii. persons with whom such designated person(s) shares a material financial relationship;

iii. Permanent Account Number or any other identifier authorized by law of (i); and

iv. Phone, mobile and cell numbers of (i) & (ii).

The Compliance Officer may after considering the facts, circumstances and appropriateness, require the connected person or class of connected persons to whom the Company has to provide unpublished price sensitive information in the course of its business, to furnish the details of holdings and trading in securities of the Company.

Each Designated Person and connected person shall ensure that their respective wealth managers, portfolio managers or similar persons do not trade in the securities of the Company on behalf of any Designated Person or connected person, unless such Designated Person or connected person is permitted to trade in the securities of the Company in accordance with this Code.

8. Confidential Information and Unpublished Price Sensitive Information

- a) Directors and employees shall maintain strict confidentiality of business information and all Unpublished Price Sensitive Information of the Company;
- b) The business information and all Unpublished Price Sensitive information should not be communicated to any person except in the course of performance of duties or discharge of legal obligations;
- c) The Unpublished Price Sensitive Information shall be handled on a “need to know” basis i.e., price sensitive information shall be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information;
- d) Files containing confidential information shall be kept secure. Computer files shall have adequate security of login and password as per the Company’s IT Policy;
- e) All employees must consult the Marketing Department of the Company and/or the Compliance Officer and /or Legal Department before communicating with the media or public. The Company’s communication policy with the public will have to be adhered to at all times.

9. Trading Plans

- A) A Designated Person or an insider shall be entitled to 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 and Complete all formalities as stated above Clause No.6 to this code.

Prior to approving any trade, the Compliance Officer shall be entitled to seek declaration to the effect that the applicant for pre-clearance is not in possession of any UPSI. He/she shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.

The trades that have been pre-cleared shall be executed in not more than 7 (Seven) Trading Days from the date of approval by the Designated Person, failing which fresh pre-clearance would be needed for the trades to be executed.

Designated Persons who have obtained the pre- clearance are required to submit a report of the transactions done (including a NIL report, if no transaction is done) within 4 (four) days from the expiry of the specified time- period to Compliance Officer.

The Pre-clearance of trades shall not be required for a trade executed as per an approved trading plan. Provided trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

- B) Such Trading Plan shall:

- a) Not entail commencement of trading earlier than one hundred and twenty calendar days from the public disclosure of the plan;
- b) not entail overlap of any period for which another trading plan is already in existence;
- c) set out following parameters for each trade to be executed:
 - either the value of trade to be effected or the number of securities to be traded;
 - nature of the trade;
 - either specific date or time period not exceeding five consecutive trading days;
 - price limit, that is an upper price limit for a buy trade and a lower price limit for a sell trade, subject to the range as specified below:
 - for a buy trade: the upper price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent higher than such closing price;
 - for a sell trade: the lower price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent lower than such closing price.
- d) not entail trading in securities for market abuse;

- C) The Compliance Officer upon receipt of Trading Plan will review the trading plan to assess whether the plan would have any potential for violation of these Regulations provided that

pre- clearance of trades shall not be required for a trade executed as per an approved trading plan, provided further that the trading window norms shall not be applicable for trades carried out in accordance with an approved trading plan. The Compliance Officer will 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;

- D) The compliance officer shall approve or reject the trading plan within two trading days of receipt of the trading plan and notify the approved plan to the stock exchanges on which the securities are listed, on the day of approval.
- E) The trading plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to either execute any trade in the securities outside the scope of the trading plan or to deviate from it except due to permanent incapacity or bankruptcy or operation of law;
- F) The implementation of the Trading Plan shall not be commenced, if any Unpublished Price Sensitive Information in possession of the designated person/insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation;
- G) if the insider has set a price limit for a trade, the insider shall execute the trade only if the execution price of the security is within such limit. If price of the security is outside the price limit set by the insider, the trade shall not be executed.
- H) In case of non-implementation (full/partial) of trading plan due to permanent incapacity or bankruptcy or operation of law or failure of execution of trade due to inadequate liquidity in the scrip, the following procedure shall be adopted:
 - (i) The insider shall intimate non-implementation (full/partial) of trading plan to the compliance officer within two trading days of end of tenure of the trading plan with reasons thereof and supporting documents, if any.
 - (ii) Upon receipt of information from the insider, the compliance officer, shall place such information along with his recommendation to accept or reject the submissions of the insider, before the Audit Committee in the immediate next meeting. The Audit Committee shall decide whether such non-implementation (full/partial) was bona fide or not.
 - (iii) The decision of the Audit Committee shall be notified by the compliance officer on the same day to the stock exchanges on which the securities are listed.
 - (iv) In case the Audit Committee does not accept the submissions made by the insider, then the compliance officer shall take action as per the Code of Conduct
- I) Upon approval of the Trading Plan, the Compliance Officer will notify the plan to the Stock Exchange(s) on which the securities are listed;
- J) If the insider has set a price limit for a trade, the insider shall execute the trade only if the execution price of the security is within such limit. If price of the security is outside the price limit set by the insider, the trade shall not be executed.

CONTRA TRADE:

All Designated Persons who buy or sell Securities of the Company shall not enter into an opposite transaction (contra trade) i.e. sell or buy Securities during the six months period post the previous buy/sell.

The Compliance Officer may be empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing, provided that such relaxation does not violate the Regulations.

If an opposite transaction (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.

10. Disclosure of Trading by Designated Persons or Insiders

- a. All Designated Persons or Insiders including such person's immediate relatives and by any other person for whom such person takes trading decisions must disclose to the Compliance Officer of the Company;
- b. The Disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of derivatives shall be taken into account, provided that trading in derivatives of securities is permitted by any law for the time being in force;
- c. The disclosures shall be maintained by the Company for a minimum period of Five (5) years from the date of the filing thereof.

11. Dealing In Case of Suspected Leak or Leak of Unpublished Price Sensitive Information (UPSI)

a. Inquiry for Leakage of UPSI

All UPSI shall be handled on a need to know basis only. In case of any UPSI is proposed to be provided, the person proposing to provide the information shall consult Chief Financial Officer/Company Secretary /Chairman and Managing Director in advance.

In case any UPSI is leaked or is suspected to be leaked by any insider, the Ethics & Compliance Task Team consisting of Company Secretary, Chief Financial Officer and Whole- time Director of the Company will investigate the matter and collect / gather the evidences and will report to the chairperson of Audit Committee. chairperson of the Audit Committee will thereafter convene the Meeting of the Audit Committee depending on severity of the matter.

b. Process for inquiry

All the matters concerning leak of UPSI or suspected leak of UPSI, will be thoroughly investigated by the Company Officer and may at his discretion, consider involving external investigators for the purpose of the investigation.

The Compliance Officer may ask the concerned insider to remain present for investigation,

discussion etc. and for such investigation, he may ask for personal Bank Account Statement or such other details or documents as it deems fit.

c. Powers of the Compliance Officer

The powers of Compliance Officer for inquiry under this clause are as under.

- To investigate the matter
- To ask concerned insider for personal presence, examination, cross examination etc.
- To call for personal information/documents from insider
- To file complaint, if required, before police authority / Designated cell under Information Technology Act, 2000
- To retain the documents gathered during investigation
- To report to the Audit Committee

d. Report to the Audit Committee for appropriate action

The Compliance Officer will report to the Chairperson of the Audit Committee and upon receipt of report by Chairperson, he will convene Meeting of the Audit Committee, depending on severity of the matter. The Audit Committee based on such report decides the suitable action including but not limited to withholding of salary /termination of employment / monetary penalty.

12. Digital Database of Recipient of UPSI

- a. The Compliance Officer shall be responsible to maintain a Structured Digital Database of such persons or entities as the case may be with whom information is shared under this Regulation, which shall contain the following information:
 - Name of such recipient of UPSI;
 - Name of the Organization or entity to whom the recipient represent
 - Postal Address and E-mail ID of such recipient
 - Permanent Account Number (PAN) or any other identifier authorized by law, if PAN is not available.
 - Nature of UPSI
- b. The Compliance Officer shall also be responsible to ensure that such databases shall be maintained internally with adequate internal controls and checks such as time stamping and audit trials to ensure non-tampering of such database;
- c. Designated Persons shall disclose names and PAN or other identifier authorized by law, of the following persons on annual basis and as and when the information changes:
 - Designated person him/herself
 - Immediate relatives of Designated Person
 - Persons with whom such Designated Person(s) has a material financial relationship
 - Phone/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 (12) 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.

The Board shall ensure that the structured digital database is preserved for a period of not less than eight (8) years after completion of the relevant transactions and in the event of receipt of any information from the Board regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.

13. Consequences of Default /Penalties for Contravention

- a. Every Designated Person shall be individually responsible for complying with the provisions of this Code (including to the extent the provisions hereof are applicable to his / her immediate Relatives).
- b. The Designated Person, who violates this Code shall, in addition to any other penal action that may be taken by the Company pursuant to the law, also be subject to disciplinary action including termination of employment, suspension, wage freeze, non-participation in future employee stock option or any other appropriate action as may be imposed by the Audit Committee / Board.
- c. In any non-adherence is observed, the Compliance Officer shall cause an internal enquiry and if non-compliance is established, he shall report to the Chairman/ Managing Director / Chief Executive Officer ("CEO") and after further inquiry or investigation or direction, the Chairman / Managing Director / CEO will decide further course of action including reporting to the Board of Directors.
- d. In case of any non-observance of this code by any Director, the same shall be decided by the Board.
- e. Action taken by the Company for violation of this code against any Designated Person will not preclude the SEBI from initiating any action for violation of the Regulations or any other applicable laws, rules, directions, etc. Accordingly, in addition to the action taken by the Company, the person violating this Code and Regulations will also be subject to action by SEBI.
- f. In case the Board of Directors of the Company observed and determined that there has been violation of this code and Regulations, it is mandatory for the Board to promptly inform the stock exchange(s) where the Company's securities are traded, in such form and such manner as may be specified by the SEBI from time to time, about such violation, as per the Regulations and any amount collected for such violation shall be remitted to SEBI to the Investor Protection and Education Fund (IPEF) administered by SEBI under the Act.

- g. As per the Section 15G and 24 of the Act, Insider, who violate the PIT Regulations, are liable to a penalty that may be imposed by SEBI which shall not be less than Rs. 10 Lakhs but which may extend to INR 25 Crores or 3 times the amount of profit made out of the Insider Trading, whichever is higher and shall also punishable with imprisonment for a term extending to 10 years or a fine up to INR 25 Crores or with both.
- h. As per Section 11(C) (6) of the Act, if any person without justifiable reason, refuse to co-operate in any investigation by SEBI with respect to Insider Trading, then he shall be punishable with an imprisonment for a term extending up to one year, or with fine up Rs. 1 Crore or with both, and also with further fine up to Rs. 5 Lakhs for every day of such non-co-operation after the first during which the failure or refusal continues.
- i. As per Section 11(4) (b) of the Act, SEBI is also empowered to pass directions to such insider not to deal in the concerned securities in any particular manner and/or prohibit him from disposing of the concerned securities and/or declaring the concerned transaction(s) of securities as null and void, restraining the insider from communicating or counseling any person to deal in Securities.
- j. When a person who was traded in securities has been in possession of Unpublished Price Sensitive Information, his trades would be presumed to have been motivated by the knowledge and awareness of such information in his possession. This onus is on the insider to prove that they are innocent.
- k. Any violations under the PIT Regulations and this Code will be reported by the Compliance Officer to SEBI.

14. Amendments

The Board may, at any time, modify, alter and amend the provisions of this Code by giving notice of such modification, alteration and amendment to the Designated Persons. All provisions of this Policy would be subject to revision / amendment in accordance with applicable laws as may be issued by relevant statutory, governmental and regulatory authorities, from time to time. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant statutory, governmental and regulatory authorities are not consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder.

Cautionary Statement: The Code is the internal policy of the Company to prevent Designated Persons and Connected Persons who are considered by the Company to be insiders of the Company for the purposes of the Regulations, for prevention of insider trading. It is however the responsibility of each Designated Person and Connected Person to ensure compliance with the provisions of the Regulations and other related laws. The Company shall not be responsible or liable for any violation or contravention by any Designated Person or Connected Person, of the Regulations or other related laws.

Annexure I**FORM - I
APPLICATION FOR PRE-CLEARANCE****Date:**

To
The Compliance Officer,
Tecil Chemicals and Hydro Power Limited
1st Floor, Anjana Complex,
Vytilla Aroor Bye Pass Road, Kundannor, Kochi, Kerala - 682 304.

Dear Sir/Madam,

Application for Pre-dealing approval in securities of the Company

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Code of Conduct to Regulate, Monitor and Report Trading by Insiders of Tecil Chemicals and Hydro Power Limited ("**Code**"), I seek approval to purchase / sale / subscription of ____ equity shares of the Company as per details given below:

1.	Name of the applicant	
2.	Designation	
3.	Number of securities held as on date	
4.	Folio No. / DP ID / Client ID No.)	
5.	The proposal is for (a) Purchase of securities (b) Subscription to securities (c) Sale of securities	
6.	Proposed date of dealing in securities	
7.	Estimated number of securities proposed to be acquired/subscribed/sold	
8.	Price at which the transaction is proposed	
9.	Current market price (as on date of application)	
10.	Whether the proposed transaction will be through stock exchange or off-market deal	
11.	Folio No. / DP ID / Client ID No. where the securities will be credited / debited	

I enclose herewith the form of Undertaking signed by me.

Yours faithfully,

(Signature)

Annexure I.I

UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-CLEARANCE

To

The Compliance Officer,
Tecil Chemicals and Hydro Power Limited
1st Floor, Anjana Complex,
Vytilla Arror Bye Pass Road, Kundannor, Kochi, Kerala - 682 304.

I, _____, _____ of the Company residing at _____, am desirous of dealing in _____ shares of the Company as mentioned in my application dated _____ for pre-clearance of the transaction.

I further declare that I and my immediate relative(s) are not in possession of or otherwise privy to any unpublished Price Sensitive Information (as defined in the Code of Conduct to Regulate, Monitor and Report Trading by Insiders ("**Code**"), up to the time of signing this Undertaking.

In the event that I and my immediate relative(s) have access to or received any information that could be construed as "Unpublished Price Sensitive Information" as defined in the Code, after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public.

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

In the event of this transaction being in violation of the Code or the applicable Laws and Regulations,

- a) I will, unconditionally, release, hold harmless and indemnify to the fullest extent, the Company and its directors and officers, (the 'indemnified persons') for all losses, damages, fines, expenses, suffered by the indemnified persons,
- b) I will compensate the indemnified persons for all expenses incurred in any investigation, defense, crisis management or public relations activity in relation to this transaction and
- c) I authorise the Company to recover from me, the profits arising from this transaction and remit the same to the SEBI for credit of the Investor Protection and Education Fund administered by the SEBI.

If approval is granted, I shall execute the deal within 7 (seven) days of the receipt of approval failing which I shall seek pre-clearance.

I undertake to submit the necessary report within 4 (four) days of execution of the transaction / a 'Nil' report if the transaction is not undertaken.

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

Signature :

Name :

Date :

Annexure II

DISCLOSURE OF TRANSACTIONS

(To be submitted within 2 days of transaction / trading in securities of the Company)

To

The Compliance Officer,

Tecil Chemicals and Hydro Power Limited

1st Floor, Anjana Complex,

Vytilla Arror Bye Pass Road, Kundannor, Kochi, Kerala - 682 304.

I hereby inform that I,

(a) have not bought / sold/ subscribed the securities of the Company

(b) have bought/sold/subscribed to _____ securities as mentioned below on _____(date) (strike out whichever is not applicable)

Name of holder	No. of securities traded	Bought / sold / subscribed	DP ID/Client ID/Folio No.	Price (Rs.)

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

Signature:

Name:

Date:

Annexure III**FORM A****Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (a) read with Regulation 6 (2)]****NAME OF THE COMPANY: TECIL CHEMICALS AND HYDRO POWER LIMITED****ISIN OF THE COMPANY: INE014B01011****Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)**

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person Promoters/ KMP / Directors/immediate relatives/others, etc.)	Securities held as on the date of regulation coming into force		% of Shareholding	Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option Contracts held as on the date of regulation coming into force	
		Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	6	7	8	9

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

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

NAME OF THE COMPANY: TECIL CHEMICALS AND HYDRO POWER LIMITED

ISIN OF THE COMPANY: INE014B01011

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).

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	Open Interest of the Future contracts held at 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	
			Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	6	7	8	9	10

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

Signature:

Designation:

Date:

Place:

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: TECIL CHEMICALS AND HYDRO POWER LIMITED
ISIN OF THE COMPANY: INE014B01011

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).

Name, PAN No., CIN/DIN, & address Of Promoter/ Employee / Director with contact nos.	Category of Person (Promoters/ KMP /Directors/ immediate relatives/ others etc.)	Securities held prior to acquisition /disposal		Securities Acquired /Disposed		% of shareholding		Date of allotment advice/ acquisitio n of shares/ sale of shares specify		Date of intimatio n to company	Mode of acquisition (market Purchase /public rights/pref erential offer / off market/ Inter-se transfer etc.	Trading in derivatives (Specify type of contract, Futures or Options etc.)				Exchange on which the trade was executed
														Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

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

Signature:

Designation:

Date:

Place:

Form D
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

Name, PAN No., CIN/DIN & address Of connected persons, as identified by the company with contact nos.	Connection with company)	Securities held prior to acquisition/disposal		Securities acquired/Disposed		% of shareholding		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/ Inter-se transfer etc.)	Trading in derivatives (Specify type of contract, Futures or Options etc.)				Exchange on which the trade was executed
		Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	No.	Pre-transa ction	Post transa ction	From	To			Buy		Sell		
												Valu e	Number of units (contrac ts * lot size)	Valu e	Number of units (contrac ts * lot size)	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

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

Signature:

Designation:

Date:

Place: