

INDIA TOURISM DEVELOPMENT CORPORATION LIMITED CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

1.0 Introduction and Applicability

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 issued by SEBI on 15th January, 2015, the following Code of Conduct (hereinafter referred to as the "Code") has been approved by Board of Directors in their meeting held on 29th May, 2015 and shall be effective from 15th May, 2015.

The Earlier Code of Conduct for prevention of Insider Trading issued pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 1992 shall cease to operate as soon as the revised code is approved and made effective.

2.0 Definitions

2.1 "Act" means the Securities and Exchange Board of India Act, 1992

2.2 "Board" means the Securities and Exchange Board of India

2.3 "Regulations" mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto

2.4 "Company" means India Tourism Development Corporation Limited.

2.5 "Code" means this ITDC Code of conduct for regulating & reporting trading by insiders and for fair disclosure, as modified from time to time.

2.6 "Connected Person"--- means

i) any person who is or has been 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himself and the company whether temporary or permanent, that allows such person directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.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 person falling with the following categories shall be deemed to be connected persons unless the contrary is established :-

a) an immediate relative of connected person 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 Act or an employee or director thereof; or

d) an investment company, trustee company, asset management company or an employee or director thereof;

- 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 of directors 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 the 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 immediate relative or banker of the company, has more than ten percent of the holding or interest;

2.7 “Designated Employees” means a person occupying any of the following position in the Company :

- a) All Directors
- b) Key Managerial Personnel
- c) Chief Vigilance Officer
- d) All Sr. VP/VP
- e) All GMs and Heads of the Departments
- f) All employees working in Finance & Accounts Division of the Head Quarter
- g) All employees working in C&MD Secretariat
- h) All employees working in the CVO’s Secretariat
- i) All employees working in Company Secretariat
- j) All other key persons who in the opinion of Compliance Officer be covered in the “designated employee”;

2.8 “Generally Available Information” means information that is accessible to the public on a non-discriminatory basis; (Information published on the website of the Stock Exchange and the Information displayed on the website of the company are generally available information)

2.9 “Key Managerial Personnel” in relation to ITDC means :-

- a) The Chairman & the Managing Director
- b) All whole time Functional Directors;
- c) Company Secretary; and

d) such other officer as may be prescribed under the Companies Act, 2013.

2.10 "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;

2.11 "Insider" means any person who is :

i) a connected person; or

ii) in possession of or having access to unpublished price sensitive information;

2.12 "Securities" shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 or any modification thereof except units of a mutual fund;

2.13 "Stock Exchange" means :

i) Bombay Stock Exchange; and

ii) Delhi Stock Exchange.

2.14 " Trading" means and includes subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell, deal in any securities and "trade" shall be construed accordingly.

2.15 "Trading Day" means a day on which the recognized stock exchanges are open for trading where securities of the company are listed.

2.16 "Trading Window" means trading period for trading in the Company's Securities. All days shall be the trading periods except when trading window is closed.

2.17 "Unpublished Price Sensitive Information" or "UPSI" means any information, relating to a 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 related to the following : -

i) financial results;

ii) dividends;

iii) change in capital structure;

iv) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;

v) changes in key managerial personnel; and

vi) material events in accordance with the 36 of the listing agreement.

Compliance Officer may decide any other matter also as Price Sensitive Information.

All other words and phrases will have the same meaning as defined under the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time. Words and expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules & regulations made thereunder shall have the meaning respectively assigned to them in that legislation.

3.0 Compliance Officer

3.1 Director (Finance) shall be the Compliance Officer for the purpose of the Code. In the absence of the Director (Finance), Director (C&M) shall be the Compliance Officer for the purpose of the Code.

3.2 A Record of Designated Employees shall be maintained by the HR Division under the overall supervision and control of the Compliance Officer and changes taking place in the list from time to time shall be incorporated therein.

3.3 The Compliance Officer shall provide any clarifications with regard to the implementation of this Code. The Company Secretary will assist the Compliance Officer in discharging this function.

4. Preservation of “Unpublished Price Sensitive Information”

4.1 All Designated Employees and Connected Persons shall maintain the confidentiality of price sensitive information. All information shall be handled within the organization on a need-to-know basis and no unpublished price sensitive information shall be communicated to any person except in furtherance of the insider’s legitimate purposes, performance of duties or discharge of his legal obligations.

4.2 No insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to the company or its securities to any person including other insiders except where such communication is in further of legitimate purposes, performance of duties or discharge of legal obligations.

4.3 No person shall procure from the insider any unpublished price sensitive information relating to the company or its securities except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations

Provided that the information/document relating to the company or its securities whether in the nature of unpublished price sensitive information or not, shall be communicated to the Administrative Ministry and other Ministries, Government Departments, Department of Public Enterprises, Directors on the Board etc in response to their communication received in writing;

Provided further the information/documents relating to the company or its securities whether in the nature of unpublished price sensitive information or not, shall be communicated by the Central Public Information Officers (CPIOs) to the Applicants pursuant to their application under the Right to Information Act, 2005.

4.4 Notwithstanding anything contained in this Code, unpublished price sensitive information may be communicated, provided, allowed access to or procured in terms of the provisions of Regulation 3(3) and 3(4) of the “Regulations”.

4.5 Any material event having bearing on the performance of operations of the company as well as price sensitive information relating to any specific unit/division shall be promptly reported to the Compliance Officer. The Compliance Officer, upon receipt of information and having reason to believe the same to be price sensitive information, shall order in writing to the Company Secretary to communicate the information to the Stock Exchange.

5.0 Trading in securities of the Company

5.1 No insider shall trade in securities of the Company when in possession of Unpublished Price Sensitive Information. Trading by the Insiders shall be governed by Regulation 4 of the Regulations.

5.2 All dealing in the securities of the Company by the Designated employees and other immediate relatives shall be governed by this Code.

6.0 Trading Plan

6.1 An insider shall be entitled to formulate a trading plan and present 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.

6.2 Trading Plan shall :

- i) not entail commencement of trading on behalf of insider earlier than six months from the public disclosure of the plan;
- ii) 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 company and the second trading day after the disclosure of such financial results;
- iii) entail trading for a period of not less than twelve months;
- iv) not entail overlap of any period for which another trading plan is already in existence;
- v) 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; and
- vi) not entail trading in securities for market abuse.

6.3 The Compliance Officer shall consider the Trading Plan and shall approve it. While approving the Trading Plan, the Compliance Officer shall assess that the Trading Plan does not have potential for violation of the Code. The Compliance Officer 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.

6.4 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.

However, the implementation of the trading plan shall not be commenced if at the time of formulation of the plan, the Insider is in possession of any unpublished price sensitive information and the said information has not become generally available at the time of the commencement of the implementation of the plan. The commencement of the implementation of the plan shall be deferred until such unpublished price sensitive information becomes generally available information. Further, the Insider shall also not be allowed to deal in securities of the company, if the date of trading in the securities of the company, as per approved Trading Plan, coincides with the date of the closure of the Trading Window announced by the Compliance Officer.

6.5 Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

7.0 Trading Window

7.1 Trading Window shall remain closed during the period the information referred to in clause 7.2 are not generally available.

7.2 Trading Window shall be closed :-

- a) One week prior to the Board Meeting for declaration of quarterly financial results and Thirty days prior to the Board Meeting in case of annual financial results;
- b) One week prior to the Board meeting for declaration of dividend (interim & final)
- c) One week prior to the Board meeting for change in capital structure like issue of securities by way of public/right/bonus, buy-back etc.
- d) One week prior to the Board Meeting held to approve any mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions.
- e) For such period and for such other material event as may be deemed fit by the Compliance Officer.

The time for closure of the Trading Window may be increased or decreased by the Compliance Officer with the approval of the Chairman & the Managing Director.

7.3 The trading window shall be opened 48 hours after information referred to in clause 7.2 becomes generally available.

7.4 All Designated Employees and their immediate relatives shall not trade in the securities of the Company when the trading window is closed.

7.5 The notice of closure of Trading window shall be intimated to the Stock Exchange and uploaded on the website of the Company.

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

7.7 The Designated persons shall conduct all their dealings in the securities of the Company only when the trading window is opened and subject to the pre-clearance obtained if the trading exceeds the threshold which is 10,000 shares or a value of Rs.10 lakh whichever is less.

8.0 Pre-clearance of Trades

8.1 The Designated person including his dependents who intends to deal in the securities of the company during the period when the trading window is opened and if the value of the proposed trade is above 10,000 shares or up to Rs.10 Lakh in a calendar quarter, whichever is less, should pre-clear the transaction. However, no designated person shall be entitled to apply for pre-clearance of any proposed trade if such designated person are in possession of unpublished price sensitive information even if the trading window is not closed and therefore he shall not be allowed to trade. The preclearance procedure shall be as under :

i) An application may be made in the prescribed Form **(Appendix-I)** to the Compliance Officer indicating the estimated number of securities that the Designated person intends to deal in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by the Company in this behalf.

ii) An undertaking shall be executed in favour of the Company by such Designated person. The undertaking, inter alia, incorporates :-

a) That the designated person does not have any access or has not received “Unpublished Price Sensitive Information” up to the time of signing of the undertaking.

b) That in case the designated person has access to or receives “Unpublished 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 change in his position and that he/she would completely refrain from dealing in the securities of the Company till the time such information becomes generally available.

c) That he/she has not contravened the code of conduct for prevention of Insider Trading as notified by the Company from time to time.

d) That he/she has made a full and true disclosure in this regard.

iii) Upon receipt of Pre-clearance application, the Compliance Officer shall process the application and shall give the pre-clearance.

iv) The designated person, in pursuance of the approval granted of the pre-clearance application, 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, the designated person shall obtain fresh preclearance. If the order is executed, the designated person shall file within 2 days of the execution of the deal, the details of such deal with

the Compliance Officer in the prescribed form. **(Appendix-II)** In case the order is not executed, a intimation to that effect shall be filed.

v) All designated persons who buy or sell any number of shares of the company shall not execute a contra trade i.e. sell or buy any number of shares during the next six months following the prior transaction.

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

vii) In case of any 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 the Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund administered by SEBI.

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

ix) In case the sale of securities is necessitated by personal emergency, the holding period may be waived by the Compliance Officer after recording in writing the reasons in this regard provided that such relaxation does not violate the Regulations.

x) The designated person shall also not take positions in derivative transactions in the shares of the company at any time.

9.0 Disclosures/Reporting Requirements for transaction in securities

9.1 The disclosures to be made by any person under this Code shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.

9.2 The disclosure of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account for the purpose of disclosure.

9.3 The Disclosures required to be given under this Code shall be in the format prescribed by SEBI SEBI through its Circular No. CIR/ISD/01/2015 dated 11th May, 2015 and have been appended to these Code.

9.3 Initial Disclosure :a) Every promoter/Key Managerial Personnel/Director/Designated Employees of the Company, within thirty days of applicability of these Regulations, shall disclose his holding of securities of the company as on the date of these regulations to the Company in the prescribed format.

b) Every person on appointment as a Key Managerial Personnel or a director or on becoming a promoter or becoming a Designated Employee shall disclose his holding of securities as on the date of appointment or becoming a promoter or becoming a Designated Employee, to the company within seven days of such appointment or becoming a promoter or becoming a Designated Employee.

9.4 Continual Disclosure : a) Every promoter, employee and director of every company shall disclose in the prescribed format to the company the number of such securities acquired or disposed off within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of ten lakh rupees.

b) The Compliance officer of the Company shall notify the particulars of such trading to the Stock Exchange within two trading day of receipt of the disclosure or from becoming aware of such information.

9.5 Disclosure by other connected persons : The Company may, at its discretion require any other connected person or class of connected persons to make disclosures of holding and trading in securities of the company in such form and at such frequency as may be determined by the company in order to monitor compliance with these Regulations.

9.6 The disclosures made under these Regulations shall be maintained for a period of five years.

10.0 PRINCIPLES OF FAIR DISCLOSURE ON UNPUBLISHED PRICE SENSITIVE INFORMATION

10.1 ITDC shall

a) make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available

b) ensure uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.

c) Director (F)/Director (C&M) will be Compliance Officer of the Company under this code to deal with the dissemination of information and disclosure of Unpublished Price Sensitive Information.

d) ensure prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

e) endeavour appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.

f) ensure that information shared with analysts and research personnel are not unpublished price sensitive information.

g) make transcripts or records of proceedings of meeting with analysts and other investor relation conferences on the official website to ensure official confirmation and documentation of disclosures made.

h) ensure that all unpublished price sensitive information are handled on a need-to-know basis.

11.0 Penalty for Contravention of Code of Conduct

11.1 Any director/officer/designated employees who trades in securities of the Company in contravention of this code or communicates any information for trading in securities of the company

in contravention of this Code may be penalized and appropriate action may be taken by the Competent Authority as defined under Conduct, Discipline and Appeal Rules of ITDC.

11.2 In case it is observed by the Company and/or Compliance officer that there has been violation of the Regulations, SEBI shall be informed by the company.

11.3 The Action by the Company shall not preclude SEBI from taking any action in case of violation of the Regulations.

12.0 The Code and any amendments thereto shall be displayed on the website of the company.

INDIA TOURISM DEVELOPMENT CORPORATION LIMITED

APPLICATION FOR PRE-CLERANCE OF TRADING IN SECURITIES

To

The Compliance Officer INDIA TOURISM DEVELOPMENT CORPORATION LIMITED
Scope Complex, Core 8,
7 Lodhi Road,
New Delhi- 110003

Dear Sir,

I, Shri/Smt a Designated Person as per the Code of Conduct for Prevention of Insider Trading issued by India Tourism Development Corporation Limited, intend to carry out transactions in the shares of India Tourism Development Corporation Limited as per the details given below:-

Name & designation of the
Designated person:

Department of designated person:

Date of joining/becoming
Designated person:

S.No.	Particulars	Information/Data
1.	No. Of shares held (including by dependant members) as on the date of application	
2.	Folio no. /DPID & client ID	
3.	Nature of transaction for which approval is sought	
4.	Estimated number of securities to be dealt	
5.	Estimated consideration value	
6.	Whether proposed transactions is in the name of self or in the name of dependant family member	
7.	Name of dependant/relationship, if the transaction is in the name(s) of dependent(s)	

Note : The Designated Officer shall also include particulars with regard to trading which he proposed to take up in derivatives in the aforesaid application.

UNDERTAKING

In this connection I solemnly confirm and declare:

- a) **THAT** I do not have access and/ or have not received any " Price Sensitive Information up to the time of signing the undertaking;
- b) **THAT** in case I have access to or to receive " Price Sensitive Information" after the signing of the undertaking but before the execution of the transactions, I shall inform the Compliance Officer of any change in my position and that I shall completely refrain from dealing in the securities of the corporation till the time such information becomes public
- c) **THAT** I have not contravened the Code of Conduct for prohibition of insider trading as notified by the Corporation from time to time.
- d) **THAT I hereby confirm that I abide by the provisions of Clause.8.1 (v) and Clause 8.1 (viii) of the code with regard to norms for holding/buying/selling securities**

I hereby solemnly declare that I have made full and true disclosure in this regard to best of my knowledge and belief.

Pre –clearance may kindly be accorded in terms of clause-8 of the code of conduct for prohibition of insider trading in dealing with the securities of India Tourism Development Corporation Limited.

Signature:

Date:

Name:

Place:

Designation:

OFFICE USE

Serial number of the application received:

Date & time of receipt of the application:

Date & time of communication of the pre-clearance or otherwise:

Reasons for not giving Pre-clearance:

Signature of the compliance officer/
Authorised officer

INDIA TOURISM DEVELOPMENT CORPORATION LTD.

FORMAT FOR DISCLOSURE OF TRANSACTIONS

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

To
The Compliance Officer,
INDIA TOURISM DEVELOPMENT CORPORATION LIMITED,
Scope Complex, Core '8'
7 Lodhi Road,
New Delhi – 110 003

I hereby inform that I

- have not bought/sold/securities of the Company
- have bought /sold to _____ securities as mentioned below on _____ (date)

Name of Holder	No. of Securities Dealt with	Bought/sold	DP ID/Client ID/ Folio No.	Price (Rs.)

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 3 years and produce to the Compliance officer/SEBI any of the following documents:

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

I agree to hold the above securities for a minimum period of six months. In case there is any urgent need to sell these securities within the said period, I shall approach the Compliance Officer for necessary approval (applicable in case of purchase/sale).

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 transactions(s).

Date _____

Signature _____

Name:

Designation:



CIRCULAR

CIR/ISD/01/2015

May 11, 2015

To,

All Recognised Stock Exchanges

Dear Sir/Madam,

Sub: Disclosures under SEBI (Prohibition of Insider Trading) Regulations, 2015

1. With reference to the requirements of regulation 6 of SEBI (Prohibition of Insider trading) Regulations 2015 ("the Regulations"),:-
 - i. Formats for disclosures are as **Annexed**.
 - ii. Such disclosures may be maintained by the company in physical/electronic mode.

2. With reference to the requirements of the regulation 8 (Code of Fair Disclosure) and regulation 9 (Code of Conduct) of the Regulations, the companies shall also ensure that:
 - i. Formulated and published (on its official website), code of practices and procedures for fair disclosure of Unpublished Price Sensitive Information (UPSI), is confirmed to the stock exchanges, immediately.
 - ii. Formulated code of conduct is confirmed to the stock exchanges, immediately.
 - iii. a company deals with only such market intermediary / every other person, who is required to handle UPSI, who have formulated a code of conduct as per the requirements of the Regulations.

3. The Stock Exchanges are advised to:
 - a. Put in place the adequate systems and issue the necessary guidelines for implementing the above decision.
 - b. Make necessary amendments to the relevant bye-laws, rules and regulations as applicable for the implementation of the above decision immediately.
 - c. Bring the provisions of this circular to the notice of the listed companies/issuers and also to disseminate the same on the website immediately.



भारतीय प्रतिभूति और विनिमय बोर्ड
Securities and Exchange Board of India

4. This circular is being issued in exercise of the powers conferred under Section 11 (1) of the Securities and Exchange Board of India Act 1992 and under regulations 4(3) and 11 of the Regulations and, to protect the interests of investors in securities and to promote the development of, and to regulate the securities market.

Yours faithfully,

Manoj Kumar
General Manager
Integrated Surveillance Department
022-26449260
manojk@sebi.gov.in

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: _____

ISIN of the company: _____

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

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

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

Signature:

Designation:

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: _____

ISIN of the company: _____

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 eg. - Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	5	6	7	7	7

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

Signature:

Designation:

Date:

Place:

FORM C

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (2) read with Regulation 6(2)]

Name of the company: _____

ISIN of the company: _____

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/ 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				
								Buy	Sell	Value	Number of units (contracts * lot size)					
		No. Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	Pre transaction	Post transaction	From	To	Value	Number of units (contracts * lot size)	Value	Number of units (contracts * 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:

Form D (Indicative format)

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

Regulation 7(3) – Transactions by Other connected persons as identified by the company

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 eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.					Buy	Sell	Value	Number of units (contracts * lot size)		Value	Number of units (contracts * 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.

Name:

Signature:

Date:

Place:
