



Twamev Construction and Infrastructure Limited

(Formerly known as Tantia Constructions Limited)

Registered Office

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Salt Lake City, Kolkata - 700064
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CODE OF CONDUCT FOR PROHIBITION OF INSIDER TRADING

The Securities and Exchange Board of India repealed the erstwhile SEBI (Prohibition of Insider Trading) Regulations, 1992 and replaced it with the SEBI (Prohibition of Insider Trading) Regulations, 2015, on 15th January, 2015, as amended from time to time (hereinafter referred to as the “**Regulations**”) in terms of which Twamev Construction and Infrastructure Limited (the “**Company**”) is required, *inter alia*, to frame a code of conduct for prevention of insider trading (hereinafter referred to as “**TCIL Insider Code**”/ “**Code**”) by employees of the Company, including the Directors (*as defined hereinafter*) and other Connected Persons (*as defined hereinafter*), in relation to the securities of the Company. In line with the said Regulations, the following “TCIL Insider Code” has been adopted by the board of Directors of the Company (hereinafter referred to as “**Board**”) at its meeting held on May 30, 2015. Compliance to the TCIL Insider Code will be applicable from the day when the Regulations become effective.

1) APPLICABILITY

This Code is applicable to the following:

- i. Directors including their Immediate Relative (*as defined hereinafter*),
- ii. Connected Persons including their Immediate Relative,
- iii. Officers (*as defined hereinafter*) of the Company including their Immediate Relative
- iv. Designated Employees (*as defined hereinafter*) including their Immediate Relative

2) DEFINITIONS, under point no. 2 of Chapter I of the Regulations, shall apply and forms part of this Code:

“**Act**” means the Securities and Exchange Board of India Act, 1992.

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

“**Company**” means Twamev Construction and Infrastructure Limited

“**Companies Act**” means Companies Act 2013 and rules thereunder

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“Compliance Officer” means the company secretary for the time being of the Company or the Officer appointed by the Board of Directors of the Company for the purpose of this Code and the Regulations.

“Connected Person” shall have the meaning ascribed to such term under the Regulations;

“Contra Trade” means a Trade or transaction which involves buying or selling securities of the

Company and within six months Trading or transacting in an opposite transaction involving sell or buy following the prior transaction.

“Directors” means and include a director, as defined under Section 2(34) of the Companies Act, 2013.

“Designated Employee” shall include:

- All Directors, whether executive, non-executive or independent and Officers of the Company;
- Chief Executive Officer (CEO), Chief Financial Officer (CFO), Chief Internal Auditor (CIA) of the Company and its material subsidiaries and employees up to two levels below such officer, irrespective of their functional role or ability to have access to Unpublished Price Sensitive Information;
- Company secretary;
- Heads, senior vice presidents, vice presidents and associate vice presidents;
- Executive assistants to Key Managerial Personnel (KMPs);
- Employees of the Company having access to Unpublished Price Sensitive Information;
- Employees of material subsidiaries of the Company having access to Unpublished Price Sensitive Information;
- Promoters of the Company;
- Any support staff of the Company such as IT staff or secretarial staff who have access to Unpublished Price Sensitive Information; and
- Any other person designated on the basis of their functional role and such function would provide him/her access to Unpublished Price Sensitive Information.

“Immediate Relative” shall mean 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,

- i. is a Connected Person, or
- ii. is or was connected with the Company or is deemed to have been connected with the Company and is reasonably expected to have access to unpublished price sensitive information in respect of securities of company, or

iii. has received or has had access to such unpublished price sensitive information ;

“Officers” means any person as defined under Section 2 (59) of the Companies Act, 2013;

“Relative” shall have the meaning ascribed to it under the Regulations;

"Threshold Limit" means the minimum number of securities as decided by the Board of Directors of the Company from time to time. The threshold limit is Rs. 5 lakhs in value or 25,000 shares or 1% of total shareholding or voting rights, whichever is lower.

“Trading” or “Trade” means and includes subscribing, redeeming, switching, buying, selling, dealing, or agreeing to subscribe, redeem, switch, buy, sell, pledge (including revocation or invocation thereof), deal in the Company’s securities either directly or through portfolio management services.

"Trading Window" - means a trading period for trading in the Company's securities as specified by the Company from time to time. All days shall be the trading period except those days specified in Clause 9 hereunder.

“Unpublished Price Sensitive Information” shall have the meaning ascribed to such term in regulation 2(1)(n) of the Regulations.

Words and phrases not specifically defined herein shall have the same meaning as defined under the Act and the Regulations as amended from time to time.

3) COMPLIANCE OFFICER

- a. The Company has appointed the company secretary as Compliance Officer who shall report to the Board of Directors of the Company and in particular, shall provide reports to the chairman of the audit committee of the Company or to the chairman of the Board of Directors at such frequency as may be stipulated by the Board of Directors but not less than once in a year.
- b. The Compliance Officer shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information, pre-clearance of trades of Directors, Officers and Designated Employees and their Immediate Relative and monitoring of trades and the implementation of this Code under the overall supervision of the Board of Directors of the Company.

- c. The Compliance Officer shall maintain a record of the Designated Employees and any changes made in the list of Designated Employees.
- d. The Compliance Officer shall assist all the Employees in addressing any clarifications regarding the Regulations and the TCIL Insider Code.
- e. The Compliance Officer shall intimate to the Directors, Officers and Designated Employee about the closure of Trading Window and inform them to conduct their dealings only when the Trading Window is open.
- f. The Compliance Officer shall regularly intimate the Directors, Officers Designated Employee and Connected Persons to furnish the details of transactions in the securities of the Company in the prescribed forms and maintain a record of all the intimations received for a period of at least three years from that date.
- g. The Compliance Officer shall obtain such disclosures and report the same to the stock exchange where the securities of the Company are listed as is detailed in clause 9 of the Code.

4) PROHIBITION TO TRADE IN SECURITIES OF THE COMPANY BY DESIGNATED EMPLOYEES

- Designated Employees of the Company when in possession of any Unpublished Price Sensitive Information pertaining to the Company, shall not:
 - Trade in securities of the Company, either on their own behalf or on behalf of any other person, except provided otherwise.
 - Communicate, counsel, procure or allow access to any Unpublished Price Sensitive Information to/from any person, except in furtherance of a legitimate purpose, performance of duties or discharge of legal obligations. The term 'legitimate purpose' shall have the meaning ascribed to it in the code of practices and procedures for fair disclosure of UPSI, as framed and amended by the Company from time to time.
- Designated Employees shall maintain the confidentiality of all Unpublished Price Sensitive Information. Designated Employees shall not pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sale of securities.

- 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 legitimate purposes, performance of duties or discharge of legal obligations.
- Designated Employees shall be required to disclose names and Permanent Account Number or any other identifier authorized by law of the following persons to the Company on an annual basis and as and when the information changes: a) Immediate Relatives b) persons with whom such Designated Employee shares a material financial relationship c) phone, mobile and cell numbers which are used by them. In addition, the names of educational institutions from which Designated Employee has graduated and names of their past employers shall also be disclosed on a one-time basis. 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 from a designated person during the immediately preceding twelve months, equivalent to at least 25% of the annual income of such designated person but shall exclude relationships in which the payment is based on arm’s length transactions.

5) CHINESE WALL

- In order to prevent the misuse of Unpublished Price Sensitive Information, the Company shall adopt a ‘Chinese wall’ policy which separates those areas of the Company which routinely have access to Unpublished Price Sensitive Information, viz. finance, strategy, secretarial, investor relations departments regarded as ‘insider areas’ from those areas which deal with sale/marketing/investment advice or other departments providing support services, considered ‘public areas’.
- Any Unpublished Price Sensitive Information should not be communicated by the employees in the inside areas to any one in public area.
- As far as practical, the employees in inside area may be physically segregated from employees in public area. Demarcation of the various departments as inside area may be implemented by the Company.
- In exceptional circumstances, employees from the public areas may be brought ‘over the wall’ and be given access to Unpublished Price Sensitive Information on the basis of ‘need to know’ criteria, under intimation to the Compliance Officer. Exceptions permitted under the Regulations will also be applicable in the present case.

6) PRESERVATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION

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

Need to know basis

Unpublished Price Sensitive Information is to be handled on a “need to know” basis, i.e., Unpublished Price Sensitive Information should be disclosed only to those within the Company who need the information to discharge their duty

Limited access to Unpublished Price Sensitive Information

Files containing Unpublished Price Sensitive Information shall be kept secure. Computer files must have adequate security of login and password etc.

7) PREVENTION OF MISUSE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

All Directors/Officers and Designated Employees of the Company shall be subject to Trading restrictions as enumerated below:

Trading window

- ❖ Trading Window is the period notified by the Compliance Officer during which the Directors/ Officers / Designated Employees of the Company can Trade in the securities of the Company after securing pre-clearance from the Compliance Officer in accordance with this Code. However, the term “Closure of Trading Window” is the period from which the intimation is sent to the Directors/Officers Designated Employees for not Trading in the securities of the Company till the date of publication of such information. The Trading Window shall be closed during the time the information referred hereinbelow is unpublished.
- ❖ When the Trading Window is closed, the Directors / Officers / Designated Employee and their Immediate Relative shall not Trade in the Company’s securities in such period.

- ❖ The "Trading Window " shall, inter-alia, be closed from the end of quarter until 48 (Forty-Eight) hours from the date of declaration /publication of the Annual /Half Yearly /Quarterly results as the case may be:

- a. Declaration of financial results (quarterly, half-yearly and annually).
- b. Declaration of dividends (interim and final).
- c. Issue of securities by way of public/rights/bonus etc.
- d. Any major expansion plans or execution of new projects.
- e. Amalgamation, mergers, takeovers and buy-back.
- f. Disposal of whole or substantially whole of the undertaking.
- g. Any changes in policies, plans or operations of the Company.

Additionally, the Trading Window shall be closed in particular for a Officer/Director/Designated Employee or class of Officer/Director/Designated Employee when the Compliance Officer determines that a Designated Person or class of Designated Persons can reasonably be expected to have possession of Unpublished Price Sensitive Information, for such periods as determined by the Compliance Officer. Designated Person or class of Designated Persons will receive a notification on such special blackout periods.

- ❖ The Trading Window shall be opened not earlier than 48 hours after the Unpublished Price Sensitive Information in question or as referred above is made public or generally available or is no longer classified as an Unpublished Price Sensitive Information.
- ❖ All Directors/Officers/Designated Employees of the Company shall conduct their Dealings in Securities of the Company only in a valid Trading Window and shall not deal in any transaction involving the purchase or sale of the Company's securities during the periods when Trading Window is closed, as referred above or during any other period as may be specified by the Company from time to time.
- ❖ The Trading Window restriction shall not apply for below cases:
 - a. off-market *inter-se* transfer between insiders who were in possession of the same Unpublished Price Sensitive Information without violating the Code and both parties had made a conscious and informed trade decision;
 - b. transaction carried out through the block deal window mechanism between persons who were in possession of the Unpublished Price Sensitive

Information without violating the Code and both parties had made a conscious and informed trade decision;

- c. transaction carried out pursuant to a statutory or regulatory obligation to carry out a bona fide transaction;
- d. transaction undertaken pursuant to the exercise of stock options in respect of which the exercise price was pre-determined in compliance with applicable regulations. However, sale of shares allotted on exercise of stock options shall not be allowed when Trading Window is closed;
- e. Trades executed as per the Trading Plan set up in accordance with the Code;
- f. pledge of shares for a bona fide purpose such as raising of funds, subject to pre-clearance by the Compliance Officer;
- g. transactions undertaken in accordance with respective regulations made by SEBI, such as acquisition by conversion of warrants or debentures, subscribing to rights issue, further public issue, preferential allotment or tendering of shares in a buy-back offer, open offer, delisting offer or transactions which are undertaken through such other mechanism as may be specified by SEBI from time to time; and
- h. transmission of securities.

Pre-clearance of Trades

- ❖ All Directors/Officers/Designated Employees of the Company and their Immediate Relative intending to deal in the securities of the Company up to the Threshold Limit fixed, as defined and provided hereinbefore, may do so without any pre-clearance from the Compliance Officer.
- ❖ An application for pre-clearance may be made, in such form as is annexed to this Code as Annexure A, to the Compliance Officer indicating the estimated number of securities that the Designated Employee/Officer/Director or Immediate Relative 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 any rule made by the Company in this behalf and also declare that the applicant is not in possession of Unpublished Price Sensitive Information.
- ❖ The Compliance Officer shall not approve any proposed Trade by Directors/Officers/Designated Employees if the Compliance Officer determines that such Directors/Officers/Designated Employees is in possession of Unpublished Price Sensitive Information even though the Trading Window is open.
- ❖ An undertaking shall be executed in favor of the Company by such Directors/Officers/Designated Employees incorporating, inter alia, the following clauses, as may be applicable:

- a) That the Directors/Officers/Designated Employees do not have any access or have not received Unpublished Price Sensitive Information up to the time of signing the undertaking.
 - b) That in case the Directors/Officers/Designated Employees have 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 / her position 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 this Code.
 - d) That he/she has made a full and true disclosure in the matter.
- ❖ The Compliance Officer may, after being satisfied that the application and undertaking are true and accurate, approve Trading by Directors/Officers/Designated Employees, on the condition that the Trade so approved shall be executed within 7 (seven) trading days following the date of approval. If the order is not executed within 7 (Seven) days after the approval is given, the Directors/Officers/Designated Employees must pre-clear the transaction again.
 - ❖ The Board shall be the approving authority for the pre-clearance application of Compliance Officer.
 - ❖ The Directors/Officers/Designated Employees shall, within two days of the execution of the Trade, submit the details of such Trade to the Compliance Officer as per Annexure 2. In case the transaction is not undertaken, a report to that effect shall be filed in the said form.
 - ❖ Pre-clearance of Trades shall not be required for a Trade executed as per an approved Trading Plan or pursuant to transmission of securities.
 - ❖ Any Director/Officer/Designated Employee who Trades in securities of the Company without complying with the pre-clearance procedure as envisaged in this Code or gives false undertakings and/or makes misrepresentations in the undertakings executed by him/her while complying with the pre-clearance procedure shall be subjected to the penalties as envisaged in this Code.

8) OTHER RESTRICTIONS

- ❖ All Directors/Officers/Designated Employees who Trade in securities of the Company shall not enter into a Contra Trade during the next six months following the prior transaction. In case any Contra Trade is executed, inadvertently or otherwise, in violation of such restriction, the profits from such trade shall be liable to be disgorged for remittance to SEBI for credit to investor protection and education fund administered by SEBI. All Directors/Officers/Designated

Employees shall also not take positions in derivative transactions in the shares of the Company at any time.

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

- ❖ The above restriction on Contra Trade shall not apply in case of: (a) exercise/sale of employee stock option plan securities provided the Designated Employee does not possess Unpublished Price Sensitive Information; and (b) transmission of securities.

9) REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES

Directors/Officers/Designated Employees

- ❖ **Initial Disclosure:** Any person upon being appointed as a key managerial personnel, Director or Officer of the Company shall disclose to the Company in Form A of Annexure 3 the number of shares held and positions taken in derivatives by him/her and Immediate Relatives as on the date of appointment, within seven days of such appointment.
- ❖ **Continual Disclosures:** All Designated Employees, including Immediate Relatives, of the Company shall disclose to the Company in Form B of Annexure 3 about the number of securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transaction over any calendar quarter aggregates to a traded value in excess of ten lakh rupees or such other value as may be specified..

The Company shall notify the particulars of such Trading to the stock exchange, in such form as notified from time to time, where its securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.

By Promoters or persons belonging to Promoters Group

- ❖ **Initial Disclosure:** Every person upon becoming a Promoters or a member of the Promoters Group shall disclose to the Company in Form A of Annexure 3 the number of shares held by him/her and Immediate Relatives, within seven days of becoming a promoter or member of the promoter group.

- ❖ **Continuous Disclosure:** Any person who is a promoter or part of promoter group, including Immediate Relative, shall disclose to the Company and the stock exchange where the securities are listed in Form B of Annexure 3, about the number of securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transaction over any calendar quarter aggregates to a traded value in excess of ten lakh rupees or such other value as may be specified..

The Company shall notify the particulars of such Trading to the stock exchange, in such form as notified from time to time, where its securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.

By Connected Person

- ❖ The Company may, at its discretion, require any Connected Person or a class of Connected Person to make disclosures of holdings and Trading in securities of the Company in Form C of Annexure 3 in order to monitor compliance with the Regulations.
- ❖ The Compliance Officer shall maintain records of all the declarations given by the directors/officers/designated employees in such form as may be specified for a minimum period of five years.

10) TRADING PLAN

- a. A Designated Employee shall be entitled to formulate a trading plan that complies with the Regulations (“**Trading Plan**”) and present it to the Compliance Officer for approval and public disclosure. The Trading Plan may be executed only after the plan is approved by the Compliance officer and disclosed to the stock exchanges on which the securities of the Company are listed.
- b. Designated Employee may delegate discretionary authority to his/her broker, but in no event Designated Employee may consult with the broker regarding executing transactions, or otherwise disclose information to the broker concerning the Company that might influence the execution of transactions, under the Trading Plan after it commences.
- c. The Trading Plan once approved shall be irrevocable and the Designated Employee 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 as otherwise provided under the Regulations. However, the implementation of the Trading

Plan shall not be commenced, if at the time of formulation of the plan, the Designated Employee is in possession of Unpublished Price Sensitive Information and the said information has not become generally available information at the time of the commencement of implementation. The commencement of the Trading Plan shall be deferred until such Unpublished Price Sensitive Information becomes generally available information.

11) PENALTY FOR CONTRAVENTION OF CODE OF CONDUCT

- ❖ Any Directors/Officers/Designated Employees who trades in securities or communicates any information for Trading in securities in contravention of the Code may be penalized and appropriate action may be taken by the Company.
- ❖ Directors/Officers/Designated Employees of the Company who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligible for future participation in employee stock option plans, recovery, etc.
- ❖ The action by the Company shall not preclude SEBI from taking any action in case of violation of Regulations.

12) INFORMATION TO SEBI IN CASE OF VIOLATION OF SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015

In case it is observed by the Company that there has been a violation of the Regulations, it shall inform the stock exchanges where the concerned securities are traded, in such form and manner as may be specified by SEBI from time to time.

13) GENERAL

The decision of the Board of Directors of the Company with regard to any or all matters relating to this Code shall be final and binding on all concerned. The Board of Directors of the Company shall have the power to modify, amend or replace this Code in part or full as may be thought fit from time to time in their absolute discretion.

In case of any inconsistency between any of the provisions of the Regulations and this Code or in case of any omission of any of the provisions of the Regulations in this Code, the provisions of the Regulations shall prevail or be applicable, as the case may be.

This Code has been duly approved by the Board of Directors at their meeting held on 12th August, 2025 and this Code shall be deemed to have come into force with effect from the said date.

ANNEXURE 1

Application for pre-clearance

To,
[•]
Compliance Officer
Twamev Construction and Infrastructure Limited

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's internal code of conduct for prohibition of insider trading, I seek approval to purchase / sell / subscribe equity shares/ American depositary shares of the Company as per details given below:

1.	Name of the applicant	
2.	Designation	
2A	Relationship with the Applicant (Self/Immediate Relative)	
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 d. Pledge e. Un-pledge
6.	Proposed date of trading in securities	
7.	Estimated number of securities proposed to be purchased/subscribed/sold/pledge	
8.	Current market price (as on date of application)	
9.	Whether the proposed transaction will be through stock exchange or off market trade	
10.	Folio No./ DP ID/ Client ID No. where the securities will be credited/debited	

I enclose herewith the undertaking signed by me.

Signature: _____

Name:

Date:

ANNEXURE 2

Disclosure of transactions

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

To,
[•]
Compliance Officer
Twamev Construction and Infrastructure Limited

I, hereby, inform that I

- a. have not have not bought / sold/ subscribed any securities of the Company
b. have bought/sold/subscribed to _____ securities as mentioned below
on ([•])
(*strike out whichever is not applicable*)

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

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

Signature: _____

Name:

Date:

ANNEXURE 3

FORM A

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7(1)(b) read together with regulation 6(2): Initial Disclosure]

Name of the Company: _____

ISIN of the Company: _____

Details of securities held on appointment of Director or Officer or key managerial personnel or upon becoming a promoter or member of the promoter group of a listed company and immediate relatives of such persons and by such other persons as mentioned in regulation 6(2)

Name, PAN No, CIN/DI N Address Contact	Category of Person (Promoter or Member of promoter group/KMP/Director / immediate relative to/others etc.)	Date of appointment of Director/ KMP OR Date of becoming Promoter/ member of the promoter group	Securities held at the time of becoming Promoter or member of the promoter group/appointm ent of Director/KMP		% of shareholding
			Type of security (For eg: Shares, Warrants, Convertible - debentures etc.)	No	

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

Details of Open Interest (OI) in derivatives of the company held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).

Open interest of the future contracts held at the time of becoming Promoter/member of the promoter group/appointment of Director/KMP			Open interest of the option contracts held at the time of becoming Promoter/member of the promoter group/appointment of Director/KMP		
Contract specifications	Number of units (contracts*lot size)	Notional value (in Rs.)	Contract specifications	Number of units (contracts*lot size)	Notional value (in Rs.)

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

Name & Signature:

Designation:

Date:

Place:

FORM B

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7(2) and 6(2):
Continuous Disclosure]

Name of the Company: _____

ISIN of the Company: _____

Name, PAN No, CIN /DIN Address Contact	Category of Person (Promoter or Member of promoter group/KMP/Director/immediate relative to/others etc.)	Securities held prior to acquisition/disposal		Securities acquired/disposed			Securities held post acquisition/disposal		Date of allotment/advance/acquisition of shares	date of intimation to the Company	Mode of acquisition/disposal (on market/public/rights/Preferential offer/off market/Inter se transfer, ESOPs etc.)	Exchange on which the trade was executed
		Type of security (For e.g.- Share, Warrants, Conv	No. and % of shareholding	Type of security (For e.g.- Share, Warrants, Conv	No. and % of shareholding	Value	Transaction type (Buy/Sale/Pledge / Revoke	Type of security (For e.g.- Share, Warrants, Conv				
									From	To		

	ertibl e Debe ntures , Right s Entitl ement etc.)	ertibl e Debe ntures , Right s Entitl ement etc.)	/Invo ke / others)	ertibl e Debe ntures , Right s Entitl ement etc.)							

Details of change in holding of securities of promoter, member of the promoter group, Officer, key managerial personnel or Director of the Company and immediate relatives of such person and and such other person as mentioned in regulatin 6(2)

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

FORM C

SEBI (Prohibition of Insider Trading) Regulations, 2015 Regulation 7(3) – Transactions by other connected persons as identified by the Company

Details of trading in securities by other connected persons as identified by the company

Name, PAN No., CIN/ DIN Address Contact	Connection with Company	Securities held prior to acquisition/disposal		Securities acquired/disposed			Securities held post acquisition/disposal		Date of allotment/advance/acquisition of shares/disposal of shares	date of intimation to the Company	Mode of acquisition/disposal (on market/public rights/Preferential offer market/Inter se transfer, ESOPs etc.)	Exchange on which the trade was executed
		Type of security (For e.g. - Share, Warrants, Convertible)	No. and % of shareholding	Type of security (For e.g. - Share, Warrants, Convertible)	No. and % of shareholding	Value	Transaction type (Buy/Sale/Pledge / Revoke)	Type of security (For e.g. - Share, Warrants, Convertible)				
									From	To		

	rtible Deben tures, Rights Entitl ement etc.)	rtible Deben tures, Rights Entitl ement etc.)		/Invo ke / others)	rtible Deben tures, Rights Entitl ement etc.)						

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

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

Trading in derivatives (specify type of contract, futures or options etc)					Exchange on which the trade was executed
Type of Contract	Contract specifications	Buy		Sell	
		Number of units (contracts*lot size)	Notional value (in Rs.)		
			Number of units (contracts*lot size)	Notional value (in Rs.)	

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

Name & Signature:

Date:

Place: