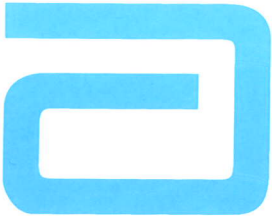


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Abbott India Limited

Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading by Insiders

The Company adopted Code of Conduct for Prohibition of Insider Trading on April 30, 2002, in compliance with requirements under the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992. This Code was amended on December 23, 2008, in line with the amendments made by SEBI in the said Regulations in 2008.

SEBI, in its endeavor to put in place the framework for prohibition of insider trading in securities and to strengthen the legal framework thereof, introduced SEBI (Prohibition of Insider Trading) Regulations, 2015 and required all listed companies to formulate a new Code for fair disclosure and conduct to regulate, monitor and report Trading by Insiders.

Accordingly, the new Code of internal procedures and conduct for regulating, monitoring and reporting of trading by Insiders is framed under the provisions of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015. This Code will replace the earlier Code of Conduct for Prohibition of Insider Trading.

This Code was adopted by the Board at its meeting held on May 27, 2015.

1. Definitions

- 1.1 "Act" means the Securities and Exchange Board of India Act, 1992 (15 of 1992).
- 1.2 "Board of Directors" or "Board" means the Board of Directors of the Company.
- 1.3 "Code" or "Code of Conduct" shall mean the Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading by Insiders of Abbott India Limited, as amended from time to time.
- 1.4 "Company" means Abbott India Limited

1.5 "Compliance Officer" means any senior officer, designated as so and reporting to the Board, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board of directors of the listed company or the head of an organization, as the case may be.

1.6 "Connected Person" means:

- (i) any person who is or has during the six months prior to the concerned act been associated with the company, directly or indirectly, in any capacity including by reason of frequent communication with 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 be allowed 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) an immediate relative of connected persons specified in clause (i); or
 - (b) a holding company or associate company or subsidiary company of the 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; or
 - (e) an official of a stock exchange or of clearing house or corporation; or
 - (f) a member of board of trustees of mutual fund or a member of the board; 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 Security and Exchange Board of India; 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 the Company or his immediate relative or banker of the Company, has more than ten per cent, of the holding or interest.

- 1.7 "Dealings in Securities" means an act of subscribing, buying, selling, or agreeing to subscribe, buy or sell or deal in any listed securities of the Company by any person either as a principal or as an agent whether singly or jointly with any other person.
- 1.8 "Designated Persons" shall include –
- i) Board Directors and Officer of the Company
 - ii) Senior Management Personnel i.e. direct reports to the Managing Director
 - iii) Functional/Divisional Heads, who do not fall in (ii) above
 - iv) Managers and those employees in the Financial Planning & Operations, Finance, Treasury, Legal & Secretarial, Public Affairs, PMO, MD's Office or any other employee/persons, who may have access to Unpublished Price Sensitive Information and are notified by the Compliance officer to be considered as Designated Persons.
 - vi) Auditors, Accountancy Firms, Law Firms and such other person assisting or advising the Company and having access to Unpublished Price Sensitive Information.
 - iii) Any other employees/person as may be determined and informed by the Board of Directors in consultation with the Compliance Officer on the basis of their role and function in the Company providing access to Unpublished Price Sensitive Information.
- 1.9 "Director" shall mean a member of the Board of Directors of the Company.
- 1.10 "Employee" means any employee of the Company
- 1.11 "Generally available information" means information that is accessible to the public on a non-discriminatory basis.
- 1.12 "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
- 1.13 "Insider" means any person who is connected or was connected with Abbott India Limited or is deemed to have been connected with Abbott India Limited and who is reasonably expected to have access, by virtue of such connection, to Unpublished Price Sensitive Information in respect of securities of the Company, or who has received or had access to such Unpublished Price Sensitive Information
- 1.14 "Key Managerial Person" means person as defined in Section 2(51) of the Companies Act, 2013
- 1.15 "Promoter" shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof

1.16 "Securities" include-

- i) Shares, scrips, stocks, bonds, debenture, debenture stock or other marketable securities of a like nature in or of the Company;
- ii). Derivatives; and
- iii). Rights or interest in securities of the Company

1.17 "Takeover regulations" means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;

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

1.19 "Trading Day" means a day on which the recognized stock exchanges are open for trading;

1.20 "Officers" shall mean any person as defined in clause (59) of Section 2 of the Companies Act, 2013.

1.21 "Unpublished Price Sensitive Information" means any information, relating to the Company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall ordinarily include, but not restricted to, information relating to the following:

- 1). Periodical financial results of the Company;
- 2). Intended declaration of dividends (both interim and final);
- 3). Change in capital structure;
- 4). Issue of securities or buy-back of securities;
- 5). Any major expansion plans or execution of new projects;
- 6). Amalgamation, mergers, de-mergers, acquisitions, takeovers, delistings, disposals and expansion of business and such other transactions;
- 7). Disposal of the whole or substantial part of the undertaking;
- 8). Any significant changes in policies, plans or operations of the Company.
- 9). Changes in Key Managerial Personnel;
- 10). Material events in accordance with the listing agreement.

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

1.23 "Specified Persons" means the Promoters, Directors, Key Managerial Personnel, Designated Persons and their immediate relatives and are collectively referred to as Specified Persons.

1.24 "Trading Window" means the period during which the trading of Company securities can be done.

Words and expressions used and not defined in this Code shall have the same meanings defined in the Securities and Exchange Board of India Act, 1992 (15 of 1992), the 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 thereunder shall have the meanings respectively assigned to them in those legislations.

2. **Compliance Officer**

The Board has designated Company Secretary as the Compliance Officer. He/she shall report to the Managing Director for the purpose of this Code. The Compliance Officer shall :

- 2.1 Administer the Code of Conduct and other requirements under these regulations.
- 2.2 Notify in consultation with the Board Designated Persons from time to time;
- 2.3 Maintain record of such Designated Employees and any changes made in the list of Designated Persons;
- 2.4 Be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board of Directors of the Company.
- 2.5 Communicate and assist all employees in addressing any clarifications regarding the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended and the Company's Code of Conduct.
- 2.6 Implement and oversee the Principles of Fair Disclosure for purposes of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information for Prevention of Insider Trading as adopted by the Company.
- 2.7 Report to the Board and in particular, shall provide reports to the Chairman of the Audit Committee, if any, or to the Chairman of the Board at such frequency as may be stipulated by the Board.

3. **Restrictions**

No Insider shall

- i) deal or speculate in the securities of the Company listed on any Stock Exchange either on his own behalf or on behalf of any other person on the basis of Unpublished Price Sensitive Information or when the trading window is closed;
- ii) directly or indirectly communicate, provide, or allow access to any Unpublished Price Sensitive Information to any person or procure from or cause the communication by any insider of Unpublished Price Sensitive Information, relating to the Company or securities listed except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

The Company shall not deal in the securities of another company or associate of that other company while in the possession of any Unpublished Price Sensitive Information.

4. **Preservation of "Price Sensitive Information"**

- 4.1 Price Sensitive Information shall be handled within the Company 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 Unpublished Price Sensitive Information may be communicated, provided, allowed access to or procured, in connection with a transaction that would –
 - (i) Entail an obligation to make an open offer under the takeover regulations where the Board of Directors of the Company is of the informed opinion that the proposed transaction is in the best interest of the Company; or
 - (ii) Not attract the obligations to make an open offer under the takeover regulations but where the Board of Directors of the Company is of the informed opinion that the proposed transaction is in the best interest of the Company and the information that constitutes Unpublished Price Sensitive Information is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the Board of Directors may determine.

For this, Board of Directors shall require the parties to 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 Unpublished Price Sensitive Information.

4.3 Need-to-Know :

- (i) Unpublished Price Sensitive Information should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or apprehension of misuse of the information.
- (ii) All non-public information directly received by any employee should immediately be reported to the respective Head of the Department.

4.4 Limited access to confidential information

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

5. **Prevention of misuse of “Price Sensitive Information”**

All Directors, Officers and Designated Persons of the Company shall be subject to trading restrictions as enumerated below:

Trading Plan

5.1 An Insider, who intends to trade, shall be entitled to formulate a trading plan for dealing in securities of the Company 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.

5.2 Trading Plan shall:

- (i) not entail commencement of trading on behalf of the 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.

5.3 The Compliance Officer shall consider and review the Trading Plan made as above and shall approve it forthwith. However, he shall be entitled to take express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per provisions of the Regulations.

- 5.4 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 implementation. The commencement 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 securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.

- 5.5 Upon approval of the trading plan, the Compliance Officer shall notify the plan to the stock exchanges on which the securities of the Company are listed.

Trading window

- 5.7 **The Company shall specify a trading period, to be called “Trading Window”, for trading in the Company’s securities.**

5.7.1 When the trading window is closed, the Designated Persons and their immediate relatives shall not trade in the Company’s securities during such period.

5.7.2 The Trading Window shall be, inter alia, closed at the time of :

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

5.7.3 The time for commencement of closing of Trading Window shall be decided by the Compliance Officer.

5.7.3 The Trading Window shall open 48 hours after the information referred to in para 5.7.2 is made generally available.

5.7.4 All Designated Persons or their immediate relatives shall conduct all their dealings in the securities of the Company only when Trading Window is open and shall not trade in the Company’s securities during the periods when the Trading Window is closed, as referred to in para 5.7.3. or during any other period as may be specified by the Company from time to time.

Pre-clearance of Trades

- 6.1 All Designated Persons and their immediate relatives, who intend to deal in the securities of the Company above the threshold limit of the value of Rs 10 lakhs (market value) or 500 in number or 1% of the total shareholding or voting rights of the Company, whichever is lower, should pre-clear the transactions as per the pre-dealing procedure described hereunder.

However, no Designated Person 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 and hence he shall not be allowed to trade.

The Compliance Officer shall confidentially maintain a list of such securities as a "restricted list" which shall be used as the basis for approving or rejecting applications for pre-clearance of trades.

- 6.2 An application may be made in the prescribed form in this regard to the Compliance Officer indicating the estimated number of securities that the Designated Persons and their immediate relatives intend 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.

- 6.3 An Undertaking shall be executed in favour of the Company in the prescribed form by all Designated Persons and their immediate relatives and submitted along with the application to the Compliance Officer.

- 6.4 All Designated Persons and their immediate relatives shall execute their order in respect of securities of the Company within 7 Trading Days after the approval of pre-clearance is given. If the order is not executed within 7 Trading Days after the approval is given, the approval would lapse and the concerned Designated Person or their immediate relatives shall pre clear the transaction again.

In case the transaction is not undertaken, a report to that effect shall be filed by the concerned Designated Person and their immediate relatives with the Company.

6.5 Designated Persons or their immediate relatives who buy or sell any number of securities of the Company shall not enter into any opposite transaction i.e. sell or buy any number of securities during the next six months following the prior transaction. Designated Persons or their immediate relatives shall not take positions in derivative transactions in the securities of the Company at any time. 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 the Securities and Exchange Board of India for credit to the Investor Protection and Education Fund administered by the Securities and Exchange Board of India under the Act.

In case of subscription in the primary market (further public offers), Designated Persons or their immediate relatives shall hold their investments in securities for a minimum period of 30 days. The holding period would commence when the securities are actually allotted.

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 his/her reasons in this regard. However no such sale is permitted when Trading Window is closed.

7. Disclosure requirements

Initial Disclosure

- 7.1 Every Specified Person shall, within 30 days from the date when Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 comes into effect i.e. on or before June 14, 2015, forward their holding of securities as on May 15, 2015, including the statement of holding by immediate relatives, to the Compliance Officer in the prescribed Form A.
- 7.2 Every person, on appointment as a Key Managerial Personnel or a Director or upon becoming a Promoter, shall disclose his holding (along with holding of immediate relatives) of securities of the Company as on the date of appointment or becoming a promoter, to the Company within seven days of such appointment or becoming a promoter in the prescribed Form B.

Continued Disclosure

- 7.3 Every Promoter, Employee and Director of the Company shall disclose to the Company the number of such securities acquired or disposed of within 2 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 Rs. Ten lakhs.

The disclosure shall be made in the prescribed Form C within 2 trading days of:

- (a) the receipt of intimation of allotment of shares, or
- (b) the acquisition or sale of shares or voting rights, as the case may be.

Explanation :

Disclosure of the incremental transactions after any disclosure under these sub-regulations shall be made when the transactions effected after the prior disclosure cross the threshold specified in clause (a) of sub-regulation (2).

- 7.4 Compliance officer shall, at its discretion require any other Connected Person to make disclosures of holdings 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 the Regulations.

Information by the Company to Stock Exchange

- 7.4 The Company shall, within 2 trading days of the receipt of intimation from the designated person of their holding of securities/change in the holdings in the Company, disclose the same to the stock exchange.

In case of Clause 7.3, the Company shall notify the particulars of such trading to the stock exchange within 2 trading days of receipt of the disclosure or becoming aware of such information.

- 7.5 The Compliance Officer shall maintain records of all statements/declarations in the appropriate form given by Directors / Designated employees for a minimum period of 5 years.

- 7.6 The Compliance Officer shall place before the Managing Director or a Committee, if any, appointed by the Company, on a monthly basis all details of dealing in securities by Directors/ Designated employees of the Company and the accompanying documents that such persons have executed under the pre-dealing procedure as envisaged in this Code.

8. Dissemination of Price Sensitive Information

- 8.1 No information shall be passed by Specified Persons by way of making a recommendation for the purchase or sale of securities of the Company.

9. Penalty for contravention of Code of Conduct

- 9.1 Every Designated Person who trades in securities or communicates any information for trading in securities, in contravention of this Code of Conduct is liable to be penalised and appropriate action may be taken by the Company.

- 9.2 Directors/Employees of the Company who violate the Code of Conduct shall also be subject to disciplinary action by the Company, which may include wage freeze and suspension.

- 9.3 The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

10. Information to SEBI in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015

- 10.1 In case it is observed by the Company / Compliance Officer that there has been a violation of SEBI (Prohibition of Insider Trading) Regulations, 2015, SEBI shall be informed by the Company.

11. The Board shall have absolute power to amend, modify, rescind, substitute this Code and shall also have the power to remove difficulty or settle any question that may arise under this Code or any re-enactment thereof in consultation with the Compliance Officer of the Company.

12. Decision of the Compliance Officer shall be final and binding and shall not be questioned in any forum.

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

To ensure timely and adequate disclosure of Price Sensitive Information, the following norms shall be followed:

1. Prompt disclosure of Price Sensitive Information

- 1.1 Price Sensitive Information shall be given to stock exchanges and disseminated on a continuous and immediate basis.
- 1.2 The Company may also consider ways of supplementing information released to stock exchanges by improving investor access to their public announcements.
- 1.3 In the event Unpublished Price Sensitive information gets disclosed selectively, inadvertently or otherwise, the Company shall ensure to promptly disseminate the same stock exchanges.

2. Medium of disclosure / dissemination

- 2.1 Disclosure / dissemination of information may be done through various media so as to achieve maximum reach and quick dissemination.
- 2.2 The Company shall ensure that disclosure to stock exchanges is made promptly.
- 2.3 The Company may also facilitate disclosure through the use of its dedicated Internet website.
- 2.4 The Company websites may provide a means of giving investors a direct access to analyst briefing material, significant background information and questions and answers.
- 2.5 The information filed by the Company with stock exchanges under continuous disclosure requirement may be made available on the company website.

3. Overseeing and coordinating disclosure

- 3.1 The Company shall designate a Senior Official as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
- 3.2 This Official shall be responsible for ensuring that the company complies with continuous disclosure requirements, overseeing and co-coordinating disclosure of price sensitive information to stock exchanges, analysts, shareholders and media and educating staff on disclosure policies and procedure.
- 3.3 Information disclosure / dissemination may normally be approved in advance by the Official designated for the purpose.
- 3.4 If information is accidentally disclosed without prior approval, the person responsible may inform the designated officer immediately, even if the information is not considered price sensitive.

4. Responding to market rumors

- 4.1 The Company shall have clearly laid down procedures for responding to any queries or requests for verification of market rumors by regulatory authorities.

4.2 The official designated for corporate disclosure shall be responsible for deciding whether a public announcement is necessary for verifying or denying rumours and then making the disclosure.

5. Timely reporting of shareholdings / ownership and changes in ownership

5.1 Disclosure of shareholdings / ownership by major shareholders and disclosure of changes in ownership as provided under any Regulations made under the Act and the Listing Agreement shall be made in a timely and adequate manner.

6. Disclosure / dissemination of Price Sensitive Information with special reference to Analysts, Institutional Investors

6.1 The Company shall follow the guidelines given hereunder while dealing with analysts and institutional investors:

(i) Only public information to be provided

The Company shall provide only public information to the analyst / research persons / large investors like institutions. Alternatively, the information given to the analyst should be simultaneously made public at the earliest.

(ii) Recording of discussion

In order to avoid misquoting or misrepresentation, it is desirable that at least two company representatives be present at meetings with Analysts, brokers or Institutional Investors and discussion should preferably be recorded.

(iii) Handling of unanticipated questions

The Company should be careful when dealing with analysts' questions that raise issues outside the intended scope of discussion. 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.

(iv) Simultaneous release of information

When the Company organizes meetings with analysts, it shall make a press release or post relevant information on its website after every such meet. The company may also consider live web casting of analyst meets.

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)

1 Name, PAN No., CIN/DIN & address with contact nos.	2 Category of Person (Promoters/ KMP / Directors/immediate relatives/others etc)	3 Securities held as on the date of regulation coming into force		4 % of Shareholding	5 Open Interest of the Future contracts held as on the date of regulation coming into force		6 Open Interest of the Option Contracts held as on the date of regulation coming into force		7
		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				5					6

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).

1 Name, PAN No., CIN/DIN & Address with contact nos.	2 Category of Person (Promoters/ KMP / Directors/immediate relatives/others etc.)	3 Date of appointment of Director /KMP OR Date of becoming Promoter	4 Securities held at the time of becoming Promoter/appointment of Director/KMP		5 % of Shareholding	6 Open Interest of the Future contracts held at the time of becoming Promoter/appointme nt of Director/KMP		7 Open Interest of the Option Contracts held at the time of becoming Promoter/appointme nt 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		
		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 of units (contracts * lot size)	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

1 Name, PAN No., CIN/DIN & address Of connected persons, as identified by the company With Contact nos.	2 Connecti on with company)	3 Securities held prior to acquisition/disposal		4 Securities acquired/Disposed		5 % of shareholding		6 Date of allotment advice/ acquisition of shares/ sale of shares specify		7 Date of intimatio n to company	8 Mode of acquisition (market purchase/pub lic/ rights/ preferential offer / off market/ Inter-se transfer etc.)	9 Trading in derivatives (Specify type of contract, Futures or Options etc)				10 Exchange on which the trade was executed
		Type of security (For eg. -- Shares, Warrants, Convertible Debenture s etc.)	No.	Type of security (For eg. -- Shares, Warrants, Convertible Debenture s etc.)	No.	Pre transa ction	Post transa ction	Buy	Sell			Value	Number of units (contracts * lot size)	Value	Number of units (contracts * lot size)	
1		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:
