

**CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF  
UNPUBLISHED PRICE SENSITIVE INFORMATION AND HANDLING OF  
PRICE SENSITIVE INFORMATION FOR LEGITIMATE PURPOSES**

**[Pursuant to Regulation 8 and 9 of the Securities and Exchange Board of India (Prohibition of  
Insider Trading) Regulations, 2015]**



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## 1. Preamble

The **Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015**, as amended from time to time ("**SEBI (PIT) Regulations**"), mandate all listed entities to establish internal systems and adopt a Code of Conduct to regulate, monitor, and report trading by designated persons and their immediate relatives. These regulations also require listed companies to put in place a Code for Fair Disclosure of Unpublished Price Sensitive Information ("**UPSI**")

In compliance with Regulations 8 and 9 of the SEBI (PIT) Regulations, Laser Power & Infra Limited ("the Company") has formulated this Code of Conduct and Code of Fair Disclosure ("**Code**") to ensure fair and transparent dealings in the securities of the Company and to prevent misuse of UPSI.

This Code applies to all Insiders, including designated persons and their immediate relatives, as defined herein. It is designed to prevent insider trading and ensure that the Company's securities are traded only in accordance with applicable laws and ethical standards.

The Board of Directors may review and amend this Code from time to time, as may be required to align with evolving regulatory requirements or best practices.

The PIT Regulations for the time being in force inter alia prohibits (i) communication of Unpublished Price Sensitive Information, (ii) procurement of price sensitive information and (iii) trading in securities when in possession of Unpublished Price Sensitive Information. The PIT Regulations under regulation 9 requires every listed Company to enact and adopt a Code which lays down the internal procedures for regulating, monitoring and reporting of trading by Designated person(s) and their Immediate Relatives. Accordingly, the Code adopted by the Board of Directors is enclosed herewith. This Code shall come into effect immediately and shall replace any other code made in this regard.

## 2. Objective:

The objective of this document is to communicate the Code of Conduct, related to trading in securities of the Company. It is intended to serve as a guideline to all the Employees, Directors, Designated Persons, Immediate Relatives of Designated Persons and Connected Persons while trading in securities of the Company.

### 3. Definition:

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

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

**“Code” or “Code of Conduct”** shall mean this Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information and Handling of Price Sensitive Information for Legitimate Purposes formulated in terms of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time.

**“Company”** means **Laser Power & Infra Limited**.

**“Compliance Officer”** means any senior officer, designated so and reporting to the board of directors or head of the organization in case board is not there, 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.

**[Explanation** – For the purpose of this regulation, “financially literate” shall mean a person who has the ability to read and understand basic financial statements i.e., Balance Sheet, Profit and Loss Account, and Statement of Cash Flows];

**“Connected Person”** means

- i. any person who is or has been, during the 6 months prior to the concerned act, 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, with the Company, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonable expected to allow such access.

- ii. The persons falling within the following categories shall be deemed to be connected person unless the contrary is established-
- a) A relative of Connected Persons specified in clause (i); or
  - b) A holding Company or Associate Company or Subsidiary Company; or
  - c) An Intermediary as specified in section 12 of the Act or an Employee or Director thereof; or
  - d) An Investment Company, Trustee Company, Asset Management Company or an Employee or Director thereof; or
  - e) An official of a stock exchange or of Clearing House or Corporation; or
  - f) A Member of Board of Trustees of a Mutual Fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
  - g) A Member of the board 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 Relative or Banker of the Company, has more than 10% of the holding or interest; or
  - k) A Firm or its Partner or its employee in which a connected person specified in sub-clause (i) of clause (d) is also a partner; or
  - l) a Person sharing Household or Residence with a connected person specified in sub-clause (i) of clause (d).

NOTE: It is intended that a connected person is one who has a connection with the company that is expected to put him in possession of unpublished price sensitive information. Relatives and other categories of persons specified above are also presumed to be connected persons but such a presumption is a deeming legal fiction and is rebuttable. This definition is also intended to bring into its ambit persons who may seemingly not occupy any position in a company but are in regular touch with the company and its officers and are involved in the know of the company's operations. It is intended to bring within its ambit those who would have access to or could access unpublished price sensitive information about any company or class of companies by virtue of any connection that would put them in possession of unpublished price sensitive information.

**“Designated Person(s)”** means:

- i. Promoter(s) and members of Promoter Group of the Company; and
- ii. Directors and Key Managerial Personnel of the Company and its Material Subsidiary(ies);
- iii. All employees of the Company in the Corporate Secretarial Team, Finance, Business Finance, Revenue, Human Resources, Legal, Public Relations, Corporate Development of Manager (or equivalent) designation and above;
- iv. Chief Executive Officer and employees up to two levels below Chief Executive Officer of the Company and its material subsidiaries irrespective of their functional role in the Company or ability to have access to UPSI;
- v. Any Support staff of the Company such as IT staff and secretaries / assistants who have access to UPSI;
- vi. Employees of the Company and its material subsidiaries designated as such on the basis of their functional role or access to UPSI in the Company by the Board of Director;
- vii. Any other person(s) as the Board of Directors shall in consultation with the compliance officer to be covered by the Code on the basis of their role and function in the Company and the access that such role and function would provide to UPSI in addition to seniority and professional designation;

**“Generally Available Information”** means information that is accessible to the public on a non-discriminatory basis and shall not include unverified event or information reported in print or electronic media. For avoidance of doubt, it is clarified that information is considered to be generally available if it is published on the website of National Stock Exchange of India Limited / BSE Limited and / or the Company’s website.

**“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.

**“Insider”** means any person who is,

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

**“Key Managerial Person (KMP)”** means person as defined in Section 2(51) of the Companies Act, 2013, or any modification thereof.

**“Legitimate Purposes”** shall include sharing of Unpublished Price Sensitive Information in the ordinary course of business by an insider with partners, Trustees, Registrars and Share Transfer Agents, Custodians, Valuation Agencies, Fund Accountants, Association of Mutual funds of India, Credit Rating Agencies, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors or other advisors or consultants, insolvency professionals provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.

**“Material Financial Relationship”** means 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 (12 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.

**“Proposed to be listed”** shall include securities of an unlisted company:

- i. if such unlisted company has filed offer documents or other documents, as the case may be, with the Board, stock exchange(s) or registrar of companies in connection with the listing; or
- ii. if such unlisted company is getting listed pursuant to any merger or amalgamation and has filed a copy of such scheme of merger or amalgamation under the Companies Act, 2013;

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

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

**“Relative”** shall mean the following:

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

**"Senior Management Personnel"** shall mean senior management as defined under Regulation 16(1)(d) of the Listing Regulations.

**"Securities"** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund;

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

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

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

**"Unpublished Price Sensitive Information ('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 relating to the following:

- a) financial Results;
- b) dividends;
- c) change in capital structure;
- d) mergers, de-mergers, acquisitions, de-listings, disposals and expansion of business and such other transactions; award or termination of order/contracts not in the normal course of business and such other transactions
- e) changes in key managerial personnel, other than due to superannuation or end of term, and resignation of a Statutory Auditor or Secretarial Auditor
- f) change in rating(s), other than ESG rating(s);
- g) fund raising proposed to be undertaken;
- h) agreements, by whatever name called, which may impact the management or control of the company;
- i) fraud or defaults by the company, its promoter, director, key managerial personnel, or subsidiary or arrest of key managerial personnel, promoter or director of the company, whether occurred within India or abroad;



- j) resolution plan/ restructuring or one-time settlement in relation to loans/borrowings from banks/financial institutions;
- k) admission of winding-up petition filed by any party /creditors and admission of application by the Tribunal filed by the corporate applicant or financial creditors for initiation of corporate insolvency resolution process against the company as a corporate debtor, approval of resolution plan or rejection thereof under the Insolvency and Bankruptcy Code, 2016;
- l) initiation of forensic audit, by whatever name called, by the company or any other entity for detecting mis-statement in financials, misappropriation/ siphoning or diversion of funds and receipt of final forensic audit report;
- m) action(s) initiated or orders passed within India or abroad, by any regulatory, statutory, enforcement authority or judicial body against the company or its directors, key managerial personnel, promoter or subsidiary, in relation to the company;
- n) outcome of any litigation(s) or dispute(s) which may have an impact on the Company;
- o) giving of guarantees or indemnity or becoming a surety, by whatever named called, for any third party, by the company not in the normal course of business;
- p) granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.

**Explanation 1-** For the purpose of sub-clause (ix):

- i. 'Fraud' shall have the same meaning as referred to in Regulation 2(1)(c) of Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003.
- ii. 'Default' shall have the same meaning as referred to in Clause 6 of paragraph A of Part A of Schedule III of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

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

It is intended that information relating the Company or securities, that is not generally available would be unpublished price sensitive information if it is likely to materially affect the price upon coming into the public domain. The types of matters that would

ordinarily give rise to unpublished price sensitive information have been listed above to give illustrative guidance of unpublished price sensitive information.

**“Regulations”** shall mean the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.

**“SEBI (LODR) Regulations”** shall mean the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Reference to statutory/ regulatory provisions shall be construed as meaning and including references also to any amendment or re-enactment thereof for the time being in force. This Policy is intended to be in conformity with the SEBI (LODR) Regulations as on the date of its adoption. However, if due to subsequent modifications in the SEBI (LODR) Regulations or any other applicable law, a provision of this Policy or any part thereof becomes inconsistent with the SEBI (LODR) Regulations, the provisions of the SEBI (LODR) Regulations as modified shall prevail.

#### **4. Restrictions on Communication and Trading by Insiders**

##### **4.1 Communication or procurement of UPSI**

- i. No insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- ii. Designated persons shall maintain confidentiality of all UPSI. They shall not pass on information to any person, directly or indirectly.
- iii. No person shall procure from or cause the communication by any insider of UPSI relating to the Company or securities of the Company, listed or proposed to be listed except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- iv. Any UPSI may be communicated, provided, allowed access to or procured in connection with a transaction that meets either of the stipulations laid down in Regulation 3(3) of the regulations, as amended from time to time.
- v. Any person in receipt of UPSI pursuant to a “legitimate purpose” shall be considered an “insider” for the purpose of this Code of Conduct and due notice shall

be given to such person to maintain confidentiality of UPSI in compliance with the Regulations.

- vi. Further, if any UPSI is shared with any third party in furtherance of a legitimate purpose, the Compliance Officer shall ensure that such third party is bound by non-disclosure or confidentiality agreements which shall also mention the duties and responsibilities of such Person with respect to such UPSI and the liabilities involved if such person misuses or uses such UPSI in breach of these Regulations.

vii. **Legitimate Purpose**

The board of directors of a listed company shall make a policy for determination of “legitimate purposes” as a part of “Codes of Fair Disclosure and Conduct” formulated under regulation 8 of the SEBI PIT Regulations. Legitimate Purpose shall include sharing of UPSI in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the SEBI regulations.

Any person in receipt of UPSI pursuant to a “legitimate purpose” shall be considered as an “Insider” for purposes of this Policy and the SEBI Regulations and due notice shall be given to such persons to maintain confidentiality of such UPSI in compliance with this Policy.

viii. **Structured Digital Database**

The Board of Directors shall ensure that a **structured digital database** is maintained containing the nature of unpublished price sensitive information and the names of such persons who have shared the information and also the names of such persons with whom information is shared under the Regulation along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such database shall not be outsourced and shall be maintained internally with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.”

- ix. In case the listed company is sharing UPSI with intermediary or Fiduciary, who is a designated person then Listed Company shall in its Structured Digital Database maintained internally contain following information:
  - a. Details of UPSI
  - b. Details of Persons with whom such UPSI is shared (along with their unique identifier number) and details of persons who have shared UPSI.
- x. The Board of Directors shall ensure that the structured digital database is preserved for a period of not less than eight years after completion of the relevant transactions and in the event of receipt of any information from the SEBI regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.

#### **4.2 Trading when in possession of UPSI**

- i. No insider shall trade in securities that are listed or proposed to be listed on a stock exchange when in possession of unpublished price sensitive information:

**[Explanation]** –When a person who has traded in securities has been in possession of unpublished price sensitive information, his trades would be presumed to have been motivated by the knowledge and awareness of such information in his possession.]

Provided that the insider may prove his innocence by demonstrating the circumstances including the following: –

- a. the transaction is an off-market inter-se transfer between insiders who were in possession of the same unpublished price sensitive information without being in breach of regulation 3 and both parties had made a conscious and informed trade decision.

Provided that such unpublished price sensitive information was not obtained under sub-regulation (3) of regulation 3 of these regulations.

Provided further that such off-market trades shall be reported by the insiders to the company within two working days. Every company shall notify the

particulars of such trades to the stock exchange on which the securities are listed within two trading days from receipt of the disclosure or from becoming aware of such information.;

- b. the transaction was carried out through the block deal window mechanism between persons who were in possession of the unpublished price sensitive information without being in breach of regulation 3 and both parties had made a conscious and informed trade decision;
- c. Provided that such unpublished price sensitive information was not obtained by either person under sub-regulation (3) of regulation 3 of these regulations.
- d. the transaction in question was carried out pursuant to a statutory or regulatory obligation to carry out a bona fide transaction.
- e. the transaction in question was undertaken pursuant to the exercise of stock options in respect of which the exercise price was pre-determined in compliance with applicable regulations.
- f. in the case of non-individual insiders: –
  - the individuals who were in possession of such unpublished price sensitive information were different from the individuals taking trading decisions and such decision-making individuals were not in possession of such unpublished price sensitive information when they took the decision to trade; and
  - appropriate and adequate arrangements were in place to ensure that these regulations are not violated and no unpublished price sensitive information was communicated by the individuals possessing the information to the individuals taking trading decisions and there is no evidence of such arrangements having been breached;
- g. the trades were pursuant to a trading plan set up in accordance with regulation 5.

- ii. In the case of connected persons, the onus of establishing, that they were not in possession of unpublished price sensitive information, shall be on such connected persons and in other cases, the onus would be on the Board.
- iii. The Board may specify such standards and requirements, from time to time, as it may deem necessary for the purpose of these regulations.

#### **4.3 Trading Plans**

- i. An insider shall be entitled to formulate a trading plan and present it to the compliance officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such Plan.
- ii. Such trading plan shall: –
  - a. not entail commencement of trading on behalf of the insider earlier than one hundred and twenty calendar days from the public disclosure of the plan;
  - b. not entail overlap of any period for which another trading plan is already in existence;
  - c. set out following parameters for each trade to be executed:
    - (i) either the value of trade to be effected or the number of securities to be traded;
    - (ii) nature of the trade;
    - (iii) either specific date or time period not exceeding five consecutive trading days;
    - (iv) price limit, that is an upper price limit for a buy trade and a lower price limit for a sell trade, subject to the range as specified below:
      - **for a buy trade:** the upper price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent higher than such closing price;
      - **for a sell trade:** the lower price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent lower than such closing price.

#### **Explanation:**

- (a) While the parameters in sub-clauses (i), (ii) and (iii) shall be mandatorily mentioned for each trade, the parameter in sub-clause (iv) shall be optional.

- (b) The price limit in sub-clause (iv) shall be rounded off to the nearest numeral.
    - (c) Insider may make adjustments, with the approval of the Compliance Officer, in the number of securities and price limit in the event of Corporate Actions related to Bonus Issue and stock split occurring after the approval of trading plan and the same shall be notified on the stock exchanges on which securities are listed.
  - d. not entail trading in securities for market abuse.
- iii. The compliance officer shall review the trading plan to assess whether the plan would have any potential for violation of these regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.
- Provided that pre-clearance of trades shall not be required for a trade executed as per an approved trading plan.
- Provided further that trading window norms shall not be applicable for trades carried out in accordance with an approved trading plan.
- iv. The trading plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to either execute any trade in the securities outside the scope of the trading plan or to deviate from it except due to permanent incapacity or bankruptcy or operation of law.

Provided that the implementation of the trading plan shall not be commenced if any unpublished price sensitive information in possession of the insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation.

Provided further that if the insider has set a price limit for a trade under sub-clause (iv) of clause (v) of sub-regulation 2 of Regulation 5 of PIT Regulations, the insider shall execute the trade only if the execution price of the security is within such limit. If price of the security is outside the price limit set by the insider, the trade shall not be executed.

Explanation: In case of non-implementation (full/partial) of trading plan due to either reasons enumerated in sub-regulation 4 or failure of execution of trade due to inadequate liquidity in the scrip, the following procedure shall be adopted:

- (i) The insider shall intimate non-implementation (full/partial) of trading plan to the compliance officer within two trading days of end of tenure of the trading plan with reasons thereof and supporting documents, if any.
  - (ii) Upon receipt of information from the insider, the compliance officer, shall place such information along with his recommendation to accept or reject the submissions of the insider, before the Audit Committee in the immediate next meeting. The Audit Committee shall decide whether such non-implementation (full/partial) was bona fide or not.
  - (iii) The decision of the Audit Committee shall be notified by the compliance officer on the same day to the stock exchanges on which the securities are listed.
  - (iv) In case the Audit Committee does not accept the submissions made by the insider, then the compliance officer shall take action as per the Code of Conduct.
- v. The compliance officer shall approve or reject the trading plan within two trading days of receipt of the trading plan and notify the approved plan to the stock exchanges on which the securities are listed, on the day of approval.

## 5. Trading Window

- a) Designated persons may execute trades subject to compliance with these regulations. Towards this end, a notional trading window shall be used as an instrument of monitoring trading by the designated persons.
- b) The trading window shall be closed 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. Accordingly, the Trading Window shall be, inter alia, closed at the time of:
  - i. financial results;
  - ii. dividends;
  - iii. change in capital structure;
  - iv. mergers, de-mergers, acquisitions, de-listings, disposals and expansion of business and such other transactions;
  - v. changes in key managerial personnel



- c) Such closure shall be imposed in relation to such securities to which such unpublished price sensitive information relates.
- d) Designated persons and their immediate relatives shall not trade in securities when the trading window is closed.
- e) For unpublished price sensitive information not emanating from within the Listed Company, trading window may not be closed.
- f) Trading restriction period shall be made applicable from the end of every quarter till 48 hours after the declaration of financial results. The gap between clearance of accounts by audit committee and board meeting should be as narrow as possible and preferably on the same day to avoid leakage of material information.
- g) The trading window restrictions mentioned in sub-clause (b) shall not apply in respect of–
  - i. transactions specified in sub-clause (i) to (iv) and (vi) of the proviso to Clause 2(1) and in respect of a pledge of shares for a bonafide purpose such as raising of funds, subject to pre-clearance by the compliance officer and compliance with the respective regulations made by the Board;
  - ii. transactions which are undertaken in accordance with respective regulations made by the Board 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 the Board from time to time.
- h) The timing for re-opening of the trading window shall be determined by the Compliance Officer taking into account of various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, which in any event shall not be earlier than forty-eight hours after the information becomes generally available.

**Leak of UPSI:**

Leak of UPSI shall refer to such communication of information by any Insider, employee & Designated Person of the Company, by virtue of which UPSI is made available or becomes available, by any means or mode to any person before its official publication or announcement or formal circulation in public domain.

### **Report of actual or suspected leak of UPSI to the SEBI**

On becoming aware of actual or suspected leak of UPSI of the Company, whether suo moto or by way of receipt of information from any person, the Compliance Officer shall ensure that: (a) the matter is placed for consideration before the Inquiry Committee; and (b) a report on such actual or suspect leak of UPSI and results thereof shall be promptly informed to the SEBI upon conclusion of the inquiry.

### **Constitution of Inquiry Committee**

In case of actual or suspected leak of UPSI, a Committee shall be constituted by the Board or by the Committee of the Board or of such person(s) as may be of the authorized by the Board or Committee in this behalf, to be called as "Inquiry Committee" to perform such duties as may be prescribed by this Code or by any other applicable law for the time being in force.

The Inquiry Committee shall consist of minimum 3 (three) members which shall include Chief Financial Officer and Compliance Officer and / or any other officer(s) of the Company as the Board or the Committee of the Board, may deem fit.

The Board or Committee of the Board may change / alter / re-constitute the Inquiry Committee as may be required from time to time.

### **Duties of Inquiry Committee**

The Inquiry Committee shall be responsible;

- a. To conduct a preliminary inquiry to ascertain the truth contained in the information or complaint pertaining to actual or suspected leak of UPSI, if any;
- b. To authorize any person, if required, to collect necessary support material;
- c. To consider the facts and circumstances and decide / direct on the matter;
- d. To decide disciplinary action thereon.

### **Procedure for inquiry in case of leak of UPSI**

The Inquiry Committee shall upon receipt of written complaint or becoming aware or otherwise, of actual or suspected leak of UPSI of the Company shall follow the below-mentioned procedure in order to inquire and/or otherwise investigate the matter:

**a. To take cognizance of the matter:**

The Inquiry Committee shall meet within a period of 2 (two) working days after receipt of the information or becoming aware of actual or suspected leak of UPSI, take cognizance of the matter and decide as follows:

- i. If it is found that the allegation is frivolous, not maintainable or outside the scope, the same may be dismissed.
- ii. If it is found that the issue requires further investigation, Preliminary Inquiry may be initiated.

**b. Preliminary Inquiry:**

Preliminary Inquiry is a fact-finding exercise which shall be conducted by the Compliance Officer. The object of preliminary inquiry is to ascertain the truth or otherwise of the allegations contained in the information or complaint, if any, and to collect necessary available material in support of the allegations, and thereafter to decide whether there is justification to embark any disciplinary action.

The Inquiry Committee, if required and in addition to Compliance Officer may also appoint and/or authorize any person(s), as it may deem fit, to initiate/conduct an inquiry to collect the relevant fact, material substances on actual or suspected leak of UPSI, including, seeking oral and written representations from any person(s) alleged to have caused the leak of UPSI.

**c. Report of Preliminary Inquiry to the Inquiry Committee:**

The Compliance Officer or Person(s) appointed/authorized to inquire the matter of actual or suspected leak of UPSI shall submit his/her report to the Inquiry Committee within 7 days from the date of his appointment on this behalf.

**d. Proceedings before the Inquiry Committee:**

On receipt of recommendation of Compliance Officer and after due review of evidence(s)/ record(s) and representation(s) made by the person(s) alleged to have cause leak of UPSI, if the Inquiry committee forms an opinion that such person(s) is/are guilty of leak of UPSI or suspected leak of UPSI, then it will order for necessary Disciplinary Action, which will be in addition to the penal provisions stated under SEBI Insider Trading Regulations and any other statutory enactments, as applicable.

### **Disciplinary Action:**

The Disciplinary Action(s) shall include wage freeze, suspension, recovery, claw back, termination etc., as may be decided by the Members of the inquiry Committee, in addition to the action to be initiated by the SEBI, if any.

## **6. Pre-Clearance of Trades**

- a) When the trading window is open, trading by designated persons shall be subject to preclearance by the compliance officer, if the value of the proposed trades is above such thresholds as the board of directors may stipulate.
- b) Prior to approving any trades, the compliance officer shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any unpublished price sensitive information. He shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.
- c) A designated person who is permitted to trade shall not execute a contra trade for a period of six months. The Compliance Officer may be empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate these regulations. 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 Board for credit to the Investor Protection and Education Fund administered by the Board under the Act. Provided that this shall not be applicable for trades pursuant to exercise of stock options and trades carried out in accordance with an approved trading plan.
- d) Pre-clearance of trade is not required for a trade executed as per the Trading Plan approved by the compliance officer.
- e) **Procedure for Pre-Clearance:**
  - (i) An application in the form annexed hereto as **Annexure 1** shall be made to the Compliance Officer by the Designated Person indicating the estimated number of Securities that such Designated Person intends to trade in, details of depository and such other information as may be prescribed by the Company to the effect that he/she is not in possession of UPSI.
  - (ii) Before a Trade is executed, the Designated Person shall execute a declaration in the form annexed hereto as **Annexure 2** in favour of the Company.

- (iii) The pre-clearance approval by the Compliance Officer, if any shall be in the form annexed hereto as **Annexure 3**. The Designated Person shall not affect such Trade until such time that the pre- clearance is received by the Designated Person from the Compliance Officer.
  - (iv) All Designated Persons and their immediate relatives shall execute their Trades in respect of Securities of the Company within seven (7) Trading Days after the approval of pre-clearance is given, failing which fresh pre-clearance would be needed for the trades to be executed.
  - (v) The Designated Person shall file within two (2) Trading Days of the execution of the Trade, the details of such Trade with the Compliance Officer in the form annexed hereto as **Annexure 4**.
  - (vi) The Compliance Officer can call for further information, if deemed necessary and it shall be obligatory for the Designated Person to immediately furnish the information sought for by the Compliance Officer.
- f) The Compliance Officer or the Board of Directors may grant relaxation from strict application of such restriction in this Code for reasons to be recorded in writing provided that such relaxation does not violate the Regulations.

## 7. Disclosures of Trading by Insiders

### Initial Disclosure.

Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter or member of Promoter Group shall disclose his/her holding of Securities of the Company as on the date of appointment or becoming a Promoter/Promoter Group, to the Compliance Officer within 7 (seven) days of such appointment or becoming a Promoter in the form set out in **Annexure 5**.

The Chief Executive Officer, Managing Director or such other analogous person of a listed company, intermediary or fiduciary shall put in place adequate and effective system of internal controls to ensure compliance with the requirements given in PIT Regulations to prevent insider trading.

The internal controls shall include the following:

- a. all employees who have access to unpublished price sensitive information are identified as designated person;

- b. all the unpublished price sensitive information shall be identified and its confidentiality shall be maintained as per the requirements of these regulations
- c. adequate restrictions shall be placed on communication or procurement of unpublished price sensitive information as required by these regulations;
- d. lists of all employees and other persons with whom unpublished price sensitive information is shared shall be maintained and confidentiality agreements shall be signed or notice shall be served to all such employees and persons;
- e. all other relevant requirements specified under these regulations shall be complied with;
- f. periodic process review to evaluate effectiveness of such internal controls.

### **Continual Disclosure.**

- (a) Every promoter, member of the promoter group, designated person and director shall disclose to the company the number of such 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 transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 10,00,000/- Rupees Ten Lakh Only). The disclosure shall be made within 2 (two) trading days of in the form specified in **Annexure 6.**
- (b) Every company shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.

### **Disclosures by other connected persons.**

Any company whose securities are listed on a stock exchange may, at its discretion require any other connected person or class of connected persons 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 these regulations. **Annexure 7.**

### **Other Disclosures**

- a) Every Designated Person shall disclose names and Permanent Account Number ("PAN") 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:
  - immediate relatives;
  - persons with whom such Designated Person(s) shares a Material Financial Relationship; and

- phone, mobile and cell numbers which are used by them.
- b) In addition, the names of educational institutions from which Designated Persons have graduated and names of their past employers shall also be disclosed on a one-time basis.

### **Principles of Fair Disclosure**

As per Regulation 9 of PIT Regulations, the board of directors, shall formulate and publish on its official website, a code of practices and procedures for fair disclosure of unpublished price sensitive information that it would follow in order to adhere to each of the principles set out in Schedule A to these regulations, without diluting the provisions of these regulations in any manner.

The board of directors shall in consultation with the compliance officer specify the designated persons to be covered by the code of conduct on the basis of their role and function in the organisation and the access that such role and function would provide to unpublished price sensitive information in addition to seniority and professional designation and shall include:-

- i. Employees of such listed company, intermediary or fiduciary designated on the basis of their functional role or access to unpublished price sensitive information in the organization by their board of directors or analogous body;
- ii. Employees of material subsidiaries of such listed companies designated on the basis of their functional role or access to unpublished price sensitive information in the organization by their board of directors;
- iii. All promoters of listed companies and promoters who are individuals or investment companies for intermediaries or fiduciaries;
- iv. Chief Executive Officer and employees upto two levels below Chief Executive Officer of such listed company, intermediary, fiduciary and its material subsidiaries irrespective of their functional role in the company or ability to have access to unpublished price sensitive information; and
- v. Any support staff of listed company, intermediary or fiduciary such as IT staff or secretarial staff who have access to unpublished price sensitive information.

The Company shall adhere to the below Code of practices and procedures for fair disclosure of Unpublished Price Sensitive Information:

- a) 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) Uniform and universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure.
- c) Designation of the compliance officer to deal with dissemination of information and disclosure of Unpublished Price Sensitive Information.
- d) Prompt dissemination of Unpublished Price Sensitive Information that gets disclosed.
- e) Selectively, inadvertently or otherwise to make such information generally available.
- f) Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- g) Ensuring that information shared with analysts and research personnel is not Unpublished Price Sensitive Information.
- h) Developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
- i) Handling of all Unpublished Price Sensitive Information on a “need-to- know” basis.

## **8. Contravention of Code and Regulations**

- a) Designated Person(s) shall bring to the attention of the Compliance Officer and the Board any violation of the Regulations or this Code whether committed by such Designated Person or any other person.
- b) Any Designated Person or Insider who trades in Securities or communicates any information for trading in Securities, in contravention of the Code of Conduct may be penalised and appropriate action may be taken by the Company.
- c) Designated Person of the Company who violates the Code of conduct shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, recovery, etc. ineligibility for future participation in employee stock option plans, etc. Any amount collected under this clause shall be remitted to the SEBI for credit to the Investor Protection and Education Fund administered by the SEBI under the Act.
- d) The action by the Company shall not preclude SEBI from taking any action in case of violation of the Regulations.
- e) In case it is observed by the Compliance Officer that there has been a violation of Regulations or the Code by Designated person(s) and/or their Immediate Relative(s), then on behalf of the Company, the Compliance Officer in consultation with Managing



Director & CEO and/or Chief Financial Officer and/or Audit Committee, shall inform the stock exchange(s), in such form and such manner as may be specified by the SEBI, from time to time.

#### **9. Amendment to the Code**

The Board of Directors may amend this Code, as and when deemed fit. Any or all provisions of this Code would be subject to revision / amendment in accordance with the Rules, Regulations, Notifications etc. on the subject as may be issued by relevant statutory authorities, from time to time.

The code of practices and procedures for fair disclosure of unpublished price sensitive information and every amendment thereto shall be promptly intimated to the stock exchanges where the securities are listed.

In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail notwithstanding the provisions hereunder from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

#### **10. Disclosure of the Code**

The Code will be uploaded on the website of the Company.

**ANNEXURE 1**

**APPLICATION FOR PRE-CLEARANCE OF TRADE**

To,  
The Compliance Officer,  
**Laser Power & Infra Limited**  
Adventz Infinity5  
19<sup>th</sup> Floor, BN Block,  
Sector-V, Bidhan Nagar, Kolkata-700091

Dear Sir,

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended, and the Company's **Code of Conduct for Regulating, Monitoring and Reporting of Trades** under the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("Code"), I seek pre-clearance to Trade in securities of the Company as per details given below:

<b>Details of Designated Person</b>	
Name	
Designation	
PAN	
Location	
Email Id.	
Contact No.	
<b>Preclearance sought for</b>	Self/ Immediate Relative
<i>If pre-clearance sought for Immediate Relative, then</i>	
Name of the Immediate Relative for whom pre-clearance sought	
Nature of Relationship	
PAN of Immediate Relative	
<b>Details of Security held by self/ Immediate Relative for whom the pre-clearance is sought</b>	
No. of Securities held as on date in physical form	
In dematerialized form	

<b>Details of Proposed Transaction</b>	
Nature of Proposed Transaction	Sale/ Purchase
No. of Securities proposed to be transacted	
Value of Security – Market value on date of application	
<b>Details of identified account</b>	
Name & contact details of Broker with Account No.	
Name of Depository Participant	
DP ID	
<b>Details of previous pre-clearance, if any</b>	
No. of Shares for which pre-clearance was taken	
Date of approval of pre-clearance	
Whether transaction was executed	
If yes, No. of shares transacted & Value	
Reasons if not traded	

All capitalized terms used herein but not defined shall have the same meaning as has been assigned to the terms in the Code.

**Date:**

**Place:**

**Signature:**

**Name & Designation:**

**ANNEXURE 2**  
**FORMAT OF DECLARATION**

To,  
The Compliance Officer,  
**Laser Power & Infra Limited**  
Adventz Infinity5  
19<sup>th</sup> Floor, BN Block,  
Sector-V, Bidhan Nagar, Kolkata-700091

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Internal Code of Conduct for Regulating, Monitoring and Reporting of Trades under the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("Code"), I, \_\_\_\_\_ (**designation**) of the Company residing at \_\_\_\_\_ am desirous of Trading in securities of the Company as mentioned in my application dated \_\_\_\_\_ for pre-clearance of the transaction.

I am issuing this declaration pursuant to **Clause 6(e) (ii)** of the Code. I hereby confirm and undertake:

- a) that I do not possess any Unpublished Price Sensitive Information (UPSI);
- b) not to pass on UPSI of the Company to any person directly or indirectly;
- c) that I shall not enter into any contra-trade within six (6) months of such Trade.
- d) to submit the necessary forms/ documents within the prescribed timelines.
- e) to report to the Compliance Officer, any UPSI that may be received by me;
- f) that in case I have access to or receive UPSI after the signing of this undertaking but before the execution of the Trade, I shall inform the Compliance Officer of the same and I shall completely refrain from Trading in the securities of the Company till such time the UPSI becomes public;
- g) that I have not contravened the Code as notified by the Company from time to time;
- h) all disclosures made by me in this letter are true and complete; and
- i) That I shall execute my Trade in respect of securities of **Laser Power & Infra Limited** within seven (7) Trading Days after the pre-clearance is given. If the Trade is not executed within seven (7) Trading Days after the approval is given, I shall obtain fresh pre-clearance for the Trade.

***All capitalized terms used herein but not defined shall have the same meaning as has been assigned to the terms in the Code.***

**Date:**  
**Place:**

**Signature:**  
**Name & Designation:**

**ANNEXURE 3**  
**FORMAT FOR PRE- CLEARANCE ORDER**

**Date:**

**Name:**

**Designation:**

**Place:**

**Sub:** Pre-clearance of transaction in the Company's Securities.

**Ref:** Your application dated \_\_\_\_\_, 20\_\_\_\_ for pre-clearance of Trade for \_\_\_\_\_ securities of the Company in your name / in the names of \_\_\_\_\_

This is pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Internal Code of Conduct for Regulating, Monitoring and Reporting of Trades under the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("**Code**").

With reference to your above application seeking pre-clearance of your Trading in securities of the Company, we hereby accord our approval to the proposed transaction.

You may kindly note that pursuant to provisions of the Code, the aforesaid Trade shall be executed **within seven (7) Trading Days** from the date of receipt of this letter, failing which, a fresh application seeking pre-clearance to the proposed Trade together with a declaration in the prescribed format, shall be made in order to execute the Trade.

Further, you are required to file the details of the executed transactions in the attached form (**Annexure 4**) within two (2) days from the date of execution of the Trade. In case the Trade is not undertaken, a 'Nil' report shall be necessary.

You shall not enter into any contra trade within six (6) months of such Trade.

All capitalized terms used herein but not defined shall have the same meaning as has been assigned to the terms in the Code.

Yours faithfully,

**For, Laser Power & Infra Limited.**

**(Compliance Officer)**

#### ANNEXURE 4

#### FORMAT FOR DISCLOSURE OF TRANSACTIONS

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

To,  
The Compliance Officer,  
**Laser Power & Infra Limited**  
Adventz Infinity5  
19<sup>th</sup> Floor, BN Block,  
Sector-V, Bidhan Nagar, Kolkata-700091

Sub: SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Internal Code of Conduct for Regulating, Monitoring and Reporting of Trades under the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("Code").

I hereby inform that I have not traded \_\_\_\_\_ in any of the securities of the company securities for the reasons given below.

(OR)

I hereby inform that I have Traded \_\_\_\_\_ securities as mentioned below on \_\_\_\_\_ (date)

Name of Designated Person	
Designation	
PAN	
Email Id	
Contact No.	
<b><i>If the trade was effected in the name of Immediate Relative</i></b>	
Name of Immediate Relative	
Nature of Relationship	
PAN	
<b><i>Details of Pre-clearance approved: -</i></b>	
Type of Transaction for which pre-clearance was applied	Purchase/ Sale
No. of Shares for which pre-clearance was applied	
Pre-clearance approved for (No. of security & date of Approval)	
<b><i>Details of Transaction executed</i></b>	
No. of Securities bought/sold	
DP ID/Client ID/Folio Number	

<b>No. of Securities held prior to the date of transaction</b>	
Price at which the transaction executed	
Total number of Securities held after acquisition / sale	
<b>Reasons, if transaction not executed</b>	
<b>Reasons, if transaction executed for lower quantity</b>	

In connection with the aforesaid Trade(s), I hereby undertake to preserve, for a period of **three (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 demat 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 (6) months**. In case there is any urgent need to sell these securities within the said period, I shall approach the Compliance Officer for the necessary approval.

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

All capitalized terms used herein but not defined shall have the same meaning as has been assigned to the terms in the Code.

Regards.

**Date:**

**Place:**

**Signature:**

**Name & Designation:**

**ANNEXURE - "5"**

**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (1) (b) read with Regulation 6(2) – Disclosure on becoming a Key Managerial Personnel/Director/Promoter/Member of the promoter group]**

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 or member of Promoter Group of a listed Company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).

Name, PAN No., CIN/DIN & Address with contact nos.	Category of Person (KMP/ Director or Promoter/ member of Promoter Group/ immediate relative to/ others etc.)	Date of appointment of KMP/ Director OR Date of becoming Promoter / member of Promoter Group	Securities held at the time of appointment of KMP/Director or upon becoming Promoter or member of Promoter Group		% of Shareholding
			Type of security (For e.g. – Shares, Warrants, Convertible Debentures, Rights entitlements, 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 on the securities of the company held on appointment of 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 Option Contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group**

Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
7	8	9	10	11	12

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

**Date:**

**Place:**

**Signature:**

**Name & Designation:**

# **ANNEXURE - "6"**

## **SEBI (Prohibition of Insider Trading) Regulations, 2015** **[Regulation 7 (2) read with Regulation 6(2) – Continual Disclosure]**

Name of the company:

ISIN of the company:

**Details of change in holding of Securities of Promoter, Member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).**

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoter/me mber of the promoter group/desig nated  person/ Director s/immediate relative to/others etc.)	Securities held prior to acquisition/ disposal		Securities acquired/Disposed				Securities held Post acquisition/ disposal		Date of allotment advice/acquisition of shares / disposal of shares,specify		Date of intimation to 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 securiti es (For eg.  - Shares, Warrants, Convert ible Debentu res, Rights entitlem ents etc.)	No. and % of share holding	Type of securities (For eg.  - Shares, Warrants, Convertib le  Debentur es, Rights entitlemen t, etc.)	No.	Value	Transac tion  Type (Purcha se/sale Pledge / Revocat ion / Invocati on/  Others- please specify)	Type of securities (For eg.  - Shares, Warrants, Converti ble  Debentur es, Rights entitleme nt, etc.)	No. and % of shareh olding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

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

**(ii)** Value of transaction excludes taxes/brokerage/any other charges

Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc.)						Exchange on which the trade was executed	
Type contract	of	Contract specifications	Buy		Sell		
			Notional Value	Number of units (contracts * lot size)	Notional Value		Number of units* (contracts lot size)
16		17	18	19	20	21	22

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

Date:  
Place:

Signature:  
Name & Designation:



**ANNEXURE - "7"**

**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, CIN/DIN, & address with contact nos. of other connected persons as identified by the company	Connection with company	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/ acquisition of shares/ disposal of shares specify		Date of intimati on to 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 securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of shareholding	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No.	Value	Transaction Type (Purchase/Sale/ Pledge/ Revocation / Invocation / Others- please specify)	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of share holding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

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

**(ii)** Value of transaction excludes taxes/brokerage/any other charges