

MISHRA DHATU NIGAM LIMITED

THE CODE OF INTERNAL PROCEDURES AND CONDUCT FOR PROHIBITION OF INSIDER  
TRADING

CHAPTER I  
PRELIMINARY

**1. Introduction:**

- a. This code shall be called "The Code of Internal Procedures and Conduct for prohibition of insider trading in dealing with the securities of the Mishra Dhatu Nigam Limited ("**MIDHANI**")
- b. The purpose of this Code is to set up an appropriate mechanism to regulate, monitor, report and prohibit insider trading and ensuring fair disclosure of Unpublished Price Sensitive Information (UPSI). This Code is issued in pursuance of the minimum standards prescribed in Schedule A and B of SEBI (Prohibition of Insider Trading) Regulations, 2015, amended from time to time, without diluting the provisions of its regulations in any manner.
- c. It shall come into force with effect from 01.04.2019

**2. Definitions:**

- 2.1. "**Act**" means the Securities and Exchange Board of India Act, 1992 (15 of 1992);
- 2.2. "**Board**" means the Securities and Exchange Board of India;
- 2.3. "**Regulations**" means the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.
- 2.4. "**Compliance Officer**" means Company Secretary of MIDHANI unless any senior officer so designated and reporting to the Board of Directors, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under the 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in the Regulations under the overall supervision of the Board of directors of MIDHANI.

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."

- 2.5. "**Connected Person**" means,

- (i) any person who is or has during the six months prior to the concerned act been associated with MIDHANI, 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 MIDHANI or holds any position including a professional or business relationship between himself and MIDHANI whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.

- (ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established,
  - (a) an immediate relative of connected persons specified in clause (i); or
  - (b) a holding company or associate company or subsidiary company; or
  - (c) an intermediary as specified in section 12 of the 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 MIDHANI; or
  - (j) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of MIDHANI or his immediate relative or banker of MIDHANI, has more than ten percent of the holding or interest;

2.6. **“Designated Persons”** shall include

- (a) All members of the Board of Directors, all executives of MIDHANI of the level of Chief General Managers and General Managers.
- (b) All Key Executives, not covered in (a) above, as identified by the Chairman & Managing Director of the Company from time to time.
- (c) All employees working in the offices of Chairman & Managing Director and all the functional Directors of MIDHANI.
- (d) All officers of Central Accounts and other Officers of AGM and above in

Finance Department, Officers of Public Relations, Corporate Communications, Business Development and Marketing and the Office of Company Secretary.

- (e) Any other employee of MIDHANI to be notified by the Compliance Officer, from time to time, with the approval of the Board.
  - (f) Spouse and other dependent family members of (a) to (e) above.
  - (g) Insiders having possession of unpublished price sensitive information.
- 2.7. **“Generally available information”** means information that is accessible to the public on a non-discriminatory basis;
- 2.8. **“Immediate relative”** shall have the same meaning as defined in regulation of 2 (1) (f) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (refer-Appendix-I).
- 2.9. **“Insider”** shall have the same meaning as defined in regulation 2 (1) (g) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (refer-Appendix-I).
- 2.10. **“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.
- 2.11. **“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; ”*
- 2.12. **“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.
- 2.13. **“Takeover regulations”** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;
- 2.14. **“Trading”** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in securities of MIDHANI, and "trade" shall be construed accordingly;
- 2.15. **“Trading day”** means a day on which the recognized stock exchange are open for trading;

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

- (a) Periodical audited or unaudited financial results;
- (b) Declaration of dividends (both interim and final);
- (c) Change in capital structure;
- (d) Mergers, de-mergers, acquisitions, takeover or delisting;
- (e) Any major expansion plans or execution of new projects;
- (f) Disposal of the whole or a substantial part of the undertaking;
- (g) Changes in key managerial personnel;
- (h) Any significant changes in policies, plans or operations of the Company.

**CHAPTER II**  
**APPLICABILITY**

3. This “Code of Internal Procedures and Conduct for prohibition of insider trading in dealing with the securities of MIDHANI” shall apply to all “insiders” defined at 2.9, as above including Connected Person and Designated Persons.

**CHAPTER III**  
**RESTRICTIONS ON COMMUNICATION AND TRADING BY INSIDERS**

4. Communication or procurement of Unpublished Price Sensitive information
5. No insider shall communicate, provide, or allow access to any Unpublished Price Sensitive Information, relating to MIDHANI or securities of MIDHANI or securities proposed to be listed by MIDHANI, to any person including other insiders, except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- (i) No person shall procure from or cause the communication by any insider of Unpublished Price Sensitive Information, relating to MIDHANI or securities of MIDHANI or securities proposed to be listed by MIDHANI, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

The policy for determination of “legitimate purposes” as a part of “Codes of Fair Disclosure and Conduct” formulated under regulation 8 is enclosed as **Annexure - A**.

Explanation: For the purpose of illustration, the term “legitimate purpose” shall include sharing of unpublished price sensitive information 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 these regulations.”

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

- (ii) Notwithstanding anything contained in this Code, Unpublished Price Sensitive Information may be communicated, provided, allowed access to or procured, in terms of the provisions of Regulation 3(3), 3(4) and 3(5) of the “**Regulations**”.
6. 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.
7. Trading by insiders including [promoters], non-individual insiders when in possession of Unpublished Price Sensitive Information shall be governed by Regulation 4 of the “**Regulations**”.

8. **'Need to know' Basis:** All the Designated Persons, who are privy to UPSI shall handle the same strictly on a 'need to know' basis. Any insider who got the possession of UPSI on 'need to know' basis for legitimate purposes, performance of duties or discharge of legal obligations shall maintain confidentiality of the said UPSI and will be deemed to be considered as designated person and shall abide with the Code & the Regulation. All non-public information directly or indirectly received by any Designated Person shall be immediately be reported to the head of the department or the Compliance Officer
9. **Limitations on access to UPSI:** All the Designated Persons who are privy to the UPSI shall, in preserving the confidentiality of the same, and to prevent its wrongful dissemination, adopt among others, but not limited to, the following safeguards:
- (a) To keep files containing UPSI or Confidential Information, secured;
  - (b) To keep computer files with adequate security of login through a password;
  - (c) To follow the guidelines for maintenance of electronic records and systems as applicable in MIDHANI from time to time.
10. **Chinese Walls:**
- (a) Chinese Walls refers to the arrangements wherein Insiders/Designated Persons working within an Area are prohibited from communicating any Confidential Information or UPSI to Insiders in Public Areas.
  - (b) All departments of MIDHANI dealing in confidential information shall adopt and put in place suitable measures (which may include providing restricted access controls, passwords, firewalls, biometric access etc) to ensure that the confidential information in their possession does not get disseminated either directly, indirectly, covertly or overtly. The same is to prevent the inadvertent spread and misuse of UPSI.
  - (c) Concerned head of the department shall be responsible to ensure that adequate security measures are implemented at all places which handle / deal in such confidential / Unpublished Price Sensitive Information either frequently or otherwise.
  - (d) Insiders/Designated Persons within a Chinese wall have a responsibility to ensure the Chinese wall is not breached deliberately or inadvertently. Known or suspected breaches of the Chinese wall must be referred to the Chairman and Managing Director or Director (Finance) or Compliance Officer immediately.
  - (e) In exceptional circumstances, Insiders/Designated Persons from the public areas may be brought "over the wall" and given confidential information on the basis of "need to know" criteria, under intimation to the concerned Head of Department or Compliance Officer.
  - (f) All Insiders/Designated Persons must maintain the confidentiality of all UPSI coming into their possession or control. To comply with this confidentiality obligation under Chinese Wall, the Insiders/Designated Persons shall not:

- i) pass on any UPSI to any person directly or indirectly by way of making a recommendation for the purchase or sale of the securities of MIDHANI; or
- ii) disclose UPSI to their family members, friends, business associates or any other individual, or
- iii) discuss UPSI in public places, or
- iv) disclose UPSI to any Employee who does not need to know the information for discharging his or her duties, or
- v) recommend to anyone that they may undertake trading in the securities of MIDHANI while being in possession, control or knowledge of UPSI, or be seen or perceived to be trading in the securities of the Company on the basis of UPSI.

## **11. Digital Database**

11.1. The Board of Directors of MIDHANI shall ensure that a structured digital database is maintained containing the names of such persons or entities as the case may be with which information is shared under this Code and Insider Trading Regulation.

11.2. MIDHANI shall maintain a structured digital database and the Compliance Officer shall be responsible to such database of such persons or entities as the case may be with whom Information is shared, which shall contain the following information;

- (i) Name and PAN of such recipient (Person/entities) with whom UPSI is shared/disclosed
- (ii) Name and PAN of the immediate relatives of aforesaid recipient.
- (iii) Postal Address and E-mail ID of such recipient.
- (iv) Any other identifier authorized by law, if PAN is not available.
- (v) And Such other information as asked or decided by Compliance Officer

11.3. The Company Secretary shall also be responsible to ensure that such databases shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of such database.

## **12. Trading Plans:**

12.1. 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.

12.2. Such 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 MIDHANI 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.

12.3. The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of this Code and 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 and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

12.4. 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. 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 and in such event the Compliance Officer shall confirm that the commencement ought to be deferred until such Unpublished Price Sensitive Information becomes generally available information so as to avoid a violation of this Code or Regulations.

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



## CHAPTER IV

### DISCLOSURES OF TRADING BY INSIDERS

#### 13. General Provisions

Every public disclosure under this Chapter shall be made within two trading days. The disclosures to be made by any person under this Chapter shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions. The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account for purposes of this Chapter. Provided that trading in derivatives of securities is permitted by any law for the time being in force.

13.1. The disclosures made under this Chapter shall be maintained by MIDHANI for a minimum period of five years, in such form as may be specified.

#### 14. Disclosures by certain persons.

##### 14.1. Initial Disclosures.

- a. Every promoter, key managerial personnel and director of MIDHANI shall disclose his holding of securities in MIDHANI within thirty days of this policy taking effect, unless the disclosure in this regard has already been made to the Company;
- b. Every person on appointment as a key managerial personnel or a director of MIDHANI or upon becoming a Promoter shall disclose his holding of securities of MIDHANI as on the date of appointment or becoming a Promoter, to the company within seven days of such appointment or becoming a Promoter.

##### 14.2. Continual Disclosures:

- a. Every promoter, Designated Person and Director of MIDHANI 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 10 (ten) lakhs or other such values as may be specified by the Regulations;
- b. Compliance Officer of MIDHANI 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.

**Explanation** - It is clarified for the avoidance of doubts that the disclosure of the incremental transactions after any disclosure under this sub-regulation, shall be made when the transactions effected after the prior disclosure cross the threshold specified in clause (a) of sub-regulation (2) of the Regulations.

14.3. **Disclosures by other connected persons:** MIDHANI may, at its discretion require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of MIDHANI in such form and at such frequency as may be determined by the company in order to monitor compliance with the Regulations.

## CHAPTER V

### 15. Mechanisms for Prevention of Insider Trading

15.1. MIDHANI shall put in place adequate and effective system of internal controls to ensure compliance with the requirements of this Code and Insider Trading Regulations to prevent insider trading. Such internal controls shall include the following:

- (a) all employees who have access to unpublished price sensitive information are identified as designated employee/ designated person.
- (b) maintain confidentiality with respect to all information identified and considered as UPSI.
- (c) restrictions on communication or procurement of unpublished price sensitive information;
- (d) all other relevant requirements specified under this code or Insider Trading Regulations shall be complied with;

15.2. The Board of Directors shall ensure that the Chairman and Managing Director ensures compliance with this code and regulation 9 and sub-regulations (1) and (2) of Insider Trading regulation.

15.3. The Audit Committee shall review compliance with the provisions of this code and insider trading regulations at least once in a financial year and shall verify that the systems for internal control are adequate and are operating effectively.

15.4. In case of leak of UPSI or suspected leak of UPSI, the inquiry and relevant mechanisms will be followed as per MIDHANI's Policy and Procedure for inquiry in case of leak of UPSI or suspected leak of UPSI, placed as Annexure-B. In case of such incidents, the SEBI shall be promptly informed about such leaks, inquiries and results of such inquiries.

15.5. For the report of instances of leak of UPSI by whistle blower will be dealt as per the Policy and Procedure for inquiry in case of leak of UPSI or suspected leak of UPSI placed as Annexure B, shall be followed.

### 16. Principles of Fair Disclosure on Unpublished Price Sensitive Information

16.1. MIDHANI shall

- (a) Make prompt public disclosure of Unpublished Price Sensitive Information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.

- (b) Ensure uniform and universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure.
- (c) Compliance Officer / Chief Investor Relations Officer / any other officer designated in this regard shall deal with dissemination of information and disclosure of Unpublished Price Sensitive Information.
- (d) Ensure prompt dissemination of Unpublished Price Sensitive Information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- (e) Endeavour appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
- (f) Ensure that the information shared with analysts and research personnel is not Unpublished Price Sensitive Information.
- (g) Develop 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.
- (h) Ensure that all Unpublished Price Sensitive Information are handled on a need – to-know basis.

16.2. Compliance Officer shall ensure that the principles of fair disclosures of Unpublished Price Sensitive Information are adopted and adhered to before issuance of any Press Release or during interactions with media, analysts and other investor relations conferences etc.

## CHAPTER VI

### 17. Trading window

17.1. Designated Persons of MIDHANI shall not deal in any transaction involving the purchase or sale of securities of MIDHANI either in their own name or in the name of their dependents during the periods mentioned below, when “Trading Window” shall remain closed:

S. No.	Events/ Particulars	
(a)	Declaration of financial results of first quarter.	To be notified by the Compliance Officer depending upon the date of the Board meeting.
(b)	Declaration of Half - yearly financial Results.	To be notified by the Compliance Officer depending upon the date of the Board meeting.
(c)	Declaration of first Interim Dividend.	To be decided by Compliance Officer depending upon the record date.
(d)	Declaration of financial results of third quarter.	To be notified by the Compliance Officer depending upon the date of the Board meeting.
(e)	Declaration of second Interim Dividend.	To be decided by Compliance Officer depending upon the record date.
(f)	Declaration of Annual audited financial results and final dividend.	To be notified by the Compliance Officer depending upon the date of the Board meeting.
(g)	Any other major events. To be notified by Compliance Officer as and when the relevant proposal is put up to the Board / Committee / Competent Authority with the approval of CMD.	

17.2. Explanation:

- (i) The trading window shall be opened 48 hours after the “Unpublished price Sensitive Information”, for which the trading window is closed, becomes generally available.
- (ii) The notice of closure and opening of trading window shall be intimated to the Stock Exchanges and uploaded on the intranet and website of MIDHANI.

17.3. The remaining days of a year other than the days mentioned under 17.1 above shall be called “Valid Trading Window”. All Designated Persons of MIDHANI shall conduct their dealings in the securities of the Colony in “Valid Trading Window” as mentioned above.

- 17.4. Trading restriction period may also be made applicable from the end of every quarter till 48 hours after the declaration of financial results if deemed necessary by the management in the best interest of the company.
- 17.5. 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.
- 17.6. The restrictions mentioned in clause 17.1 above shall not be applicable in respect of exercise of an option under Employees Stock Option Scheme (ESOS) or ESOPs. However, shares allotted on exercise of ESOS/ESOPs, shall not be sold during the period mentioned under clause 17.1, when "Trading Window" shall remain closed.

## **18. Pre-clearance of Trades**

- 18.1. All Designated Persons who intend to deal in the securities of MIDHANI either in their own name or in the name of their dependents (above the minimum threshold limit mentioned under clause 18.4) shall obtain preclearance of the transaction as per the pre-dealing procedure as described hereunder. Application for pre-clearance shall be made only during valid trading period. Application submitted during closure of trading window shall be invalid.
- 18.2. Designated Persons shall make pre-clearance application to the Compliance Officer in the format given in Appendix-II. The application shall indicate the estimated number of securities that the Designated Persons intends to deal in, the details as to the depository with which he has a security account, the details as to securities in such depository mode and such other details, as may be required by the Compliance Officer from time to time in this behalf.
- 18.3. An undertaking shall be executed in favour of MIDHANI by such Designated Persons a combined proforma application cum undertaking is annexed to this code as Appendix-II.
- 18.4. The pre-clearance shall not be necessary if the number of shares to be traded is less than 1000 shares in a single transaction or less than 3000 shares in a week.
- 18.5. Immediately on receipt of the pre-clearance application, the date and time of the receipt of the same shall be recorded thereon. The Compliance Officer shall process the pre-clearance applications and if the pre-clearance application is in accordance and in compliance with the provisions of this Code, the Compliance Officer shall endeavor to communicate the pre-clearance immediately but not later than 2 working days from the time of receiving the application. In the absence of the Compliance Officer, the officer authorized by the Compliance Officer shall give the pre-clearance.
- 18.6. All Designated Persons and their dependents shall execute their order in respect of securities of MIDHANI within seven trading days after the approval of pre-clearance is given. If the order is not executed within seven trading days after

the approval, the Designated Persons and their dependents shall obtain fresh pre clearance.

- 18.7. All Designated Persons who buy or sell any number of shares of MIDHANI shall not enter into an opposite transaction i.e. sell or buy shares (including shares allotted in IPO) during the next six months following the prior transaction. All Designated Persons shall also not take positions in derivative transactions in the shares of the company at any time. The holding period would commence when the securities are actually allotted.
- 18.8. In case the sale of securities is necessitated by personal emergency, the holding period may be waived by the Compliance Officer after recording in writing the reasons in this regard provided that such relaxation does not violate the Regulations.
- 18.9. 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.
- 18.10. Provided that this shall not be applicable for trades pursuant to exercise of stock options.

## **19. Reporting Requirements for transactions in securities**

- 19.1. All Designated Persons of MIDHANI shall be required to forward following details of their transactions in securities of MIDHANI including the transaction in the name(s) of dependent family members to the Compliance Officer:

**(i) Initial disclosure at the time of Joining:**

All holdings in securities / Position taken in derivatives of MIDHANI by Designated Persons (including that of his dependent family members) within 2 working days of joining MIDHANI or on becoming Designated Persons, as the case may be (*proforma* disclosure form) is given at Appendix-III;

**(ii) Continual disclosure for any Change in shareholding**

Any change in the shareholding (including that of his dependent family members) exceeding 1000 shares, including shares acquired after preclearance under clause 11 above, within 2 working days of such change shall be disclosed to the company. Further such changes are to be reported to Stock Exchanges where MIDHANI shares are listed and the change exceeds Rs.10,00,000 (Rupees Ten Lakhs) in value or 25,000 (Twenty Five Thousand) shares or 1% of total shareholding or voting rights, whichever is lower. (*proforma* disclosure form is given at Appendix-IV);

**(iii) Annual Disclosure of Securities**

- (a) Every Designated Person shall disclose his/her holdings of Securities of the Company within 30 (thirty) days from the relevant financial year in **APPENDIX-V**.
  - (b) Every Designated Person shall also provide in Annual Disclosure and as and when the information changes, the names and PAN or any other identifier authorized by law of the following persons to the Company in the format specified by Compliance Officer, within 30 days from the end of the year/ change of information:
    - i) immediate relatives
    - ii) persons with whom such designated person(s) shares a material financial relationship
    - iii) phone / cell numbers which are used by them
  - (c) Explanation: "Material financial relationship" mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding twelve months, equivalent to at least 25% of such payer's annual income but shall exclude relationships in which the payment is based on arm's length transactions.
  - (d) Every Designated Person also shall disclose 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.
- 19.2. The Compliance Officer shall within two working days of receipt of periodical disclosure of change in shareholding under sub-clause (ii) of 19.1 above, shall disclose to all stock exchanges on which securities of MIDHANI are listed, the information received as above.
- 19.3. Confidentiality of information and procedures to be adopted. All department of MIDHANI dealing in confidential information shall adopt and put in place suitable measures (which may include providing restricted access controls, passwords, firewalls, bio- metric access etc) to ensure that the confidential information in their possession does not get disseminated either directly, indirectly, covertly or overtly. Concerned head of the department shall be responsible to ensure that adequate security measures are implemented at all places which handle /deal in such confidential /Unpublished Price Sensitive Information either frequently or otherwise. All information shall be handled within the organization on a need-to-know basis and no Unpublished Price Sensitive Information shall be communicated to any person except in



furtherance of the insider's legitimate purposes, performance of duties or discharge of his legal obligations. Due regard to the role and function of the concerned employee shall be had before giving him access to Unpublished Price Sensitive Information, in addition to seniority and professional designation.

- 19.4. Reporting to Audit Committee and Board of Directors. The Compliance Officer shall provide a report to the Board of Directors through the Audit Committee with regard to implementation and operation of this Code periodically and at least once in every financial year.

## **20. Maintenance of Records & Registers:**

The Compliance Officer shall maintain:

- 20.1. Register of the periods of "Closure of Trading Window", wherein he shall record the date of closure and opening of the trading window and purpose for which trading window is closed. A proforma of the register of periods of closure of Trading Window is given at Appendix-VI.
- 20.2. Register of Pre-clearance of trading of Securities and record therein the name and designation of the Designated Persons submitting the application, date of the application, date & time of receipt of the application, nature of the transaction, number of securities, consideration value, name of the dependent family member if the transaction is in the name of the dependent family member and date & details of the actual transaction. A proforma of the Register of Pre-clearance of Trading is given at Appendix-VII.
- 20.3. Register of Waiver of restriction on holding investment in the securities of MIDHANI and shall record thereon the name of the Designated Persons/details of securities for which waiver is granted, date of waiver and the ground of the waiver. A proforma of the Register of Waiver is given at Appendix-VIII.
- 20.4. Register of Designated Person as per proforma given at Appendix-IX.
- 20.5. Records of all the declarations in the appropriate form given by the Designated Persons and their dependents for a minimum period of three years.
- 20.6. Three separate Registers for recording the Initial disclosure, continual disclosure and Annual disclosure received under sub-clause 12.1 above. Proforma of the Registers to be maintained are given in Appendix-X.

## **21. Penalty for contravention of Code:**

- 21.1. Any director/ officer designated employee who trades in Securities of MIDHANI or communicates any information for Trading in Securities of MIDHANI in contravention of this Code may be penalized and appropriate action may be taken by the competent authority as defined under Conduct, Discipline and Appeal Rules (CDA) of MIDHANI. Directors, Officers and employees of MIDHANI

who violate the Code shall also be subject to disciplinary action by the competent authority.

- 21.2. If MIDHANI/Compliance Officer observes any violation of SEBI (Prohibition of Insider Trading) Regulations, 2015, the Compliance Officer/ MIDHANI shall inform the SEBI of such violation after obtaining the approval of the Audit Committee / Board.

## **22. Power of SEBI:**

- 22.1. The action taken by MIDHANI shall not preclude SEBI and other authorities from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.
- 22.2. In case, the SEBI Regulations or any Statutory Provisions are more stringent than those contained in the Code, the SEBI Regulations/ statutory provisions will prevail.

## **23. Clarifications:**

For all queries concerning this Code, employees of the Company may please contact the Compliance Officer.

This Code and any amendments thereto shall be available on the website of MIDHANI at [www.midhani-india.in](http://www.midhani-india.in).

## Annexure – A

### **POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES**

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#### **1. Purpose of Policy**

This policy is for the purpose of preservation, communication and procurement of UPSI for legitimate purpose.

#### **2. Communication of UPSI**

- 2.1. An insider shall not communicate, provide, or allow access to any UPSI, relating to MIDHANI or its securities listed with stock exchanges, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- 2.2. Insiders shall share the UPSI with the external agencies only in the interest of the MIDHANI and/or in compliance with the requirements of the law.
- 2.3. It is an obligation on all insiders who are essentially persons in possession of UPSI to handle such information with care and to deal with the information with them when transacting their business strictly on a need-to-know basis.
- 2.4. Sharing of information may be construed as insider trading even while it is in pursuit of compliances required or business interests of MIDHANI in appropriate circumstances. The person who has the UPSI should ideally recuse himself from assigned task of the sharing the UPSI with third parties in such doubtful cases to avoid any adverse inferences in this regard.

#### **3. Procurement of UPSI**

- 3.1. No person shall procure from or cause the communication by any insider of UPSI, relating to MIDHANI or its securities, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- 3.2. It is intended to impose a prohibition on unlawfully procuring, possession of UPSI from Insider or MIDHANI.
- 3.3. Inducement and procurement of UPSI not in furtherance of one's legitimate duties and discharge of obligations would be considered as illegal under this code and Insider Trading regulations.

#### **4. Sharing of UPSI pursuant to Legitimate Purpose**

- 4.1. Any person in receipt of UPSI pursuant to a “legitimate purpose” shall also be considered an “insider” for purposes of this Code and Insider Trading Regulations.
- 4.2. Accordingly, the Compliance Officer or the sender of UPSI shall give a due notice to the recipient of UPSI, as
  - a. To make aware such person that the information shared is or would be UPSI.
  - b. To make aware to such person the duties and responsibilities attached to the receipt of such UPSI and the liability attached to misuse or unwarranted.
  - c. To instruct such person to maintain confidentiality of such UPSI in compliance with this Code and Regulations.
- 4.3. The Designated Person who is sharing the UPSI with anyone shall ensure that the same is shared for legitimate purpose.
- 4.4. The Designated Person shall maintain the details of the person i.e. Name of the person, Entity, Medium of sharing, Purpose of sharing, etc. with whom such UPSI is shared.

#### **5. Determination of UPSI for legitimate purpose**

- 5.1. The purpose for which UPSI is shared will be dependent upon functional responsibilities, roles and capacities in which insiders are associated with MIDHANI.
- 5.2. The UPSI shall be shared by any Designated Persons or person(s) authorized by the Board of Directors or Company Secretary of MIDHANI in this behalf, only in furtherance of legitimate purpose(s) which shall include the following;
  - a) Sharing of UPSI in the ordinary course of business by any Insider, Designated Person, or by any authorized person with existing or proposed partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants.
  - b) Sharing of UPSI where such communication is in furtherance of performance of duty (ies);
  - c) Sharing of UPSI for discharge of legal obligation(s).
  - d) Sharing of UPSI for any other genuine or reasonable purpose as may be determined by the Company Secretary of MIDHANI.

- e) Sharing of UPSI for any other purpose as may be prescribed under the Securities Regulations or Company Law or any other law for the time being in force, in this behalf, as may be amended from time to time.

Provided that such sharing of information for the aforesaid purposes shall not be carried out with a motive to evade or circumvent the prohibitions of Insider Trading Regulations.

However, other provisions / restrictions as prescribed under the SEBI (Prohibition of Insider Trading) Regulations, 2015 or any other law for the time being in force in this behalf, as may be amended from time to time, shall be observed.

## **6. Communication of UPSI for other purpose**

- 6.1. Notwithstanding anything contained in this policy, an UPSI may be communicated, provided, allowed access to or procured, in connection with a transaction that would:
  - (a) entail an obligation to make an open offer under the takeover regulations where the Board of Directors of MIDHANI is of informed opinion that sharing of such information is in the best interests of MIDHANI;
  - (b) not attract the obligation to make an open offer under the takeover regulations but where the Board of Directors of MIDHANI is of informed opinion that sharing of such information is in the best interests of MIDHANI and the information that constitute UPSI 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 to be adequate and fair to cover all relevant and material facts.
  - (c) For this purpose, MIDHANI 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, except for the purpose of sub regulation (3) of Regulation 3 of Insider Trading Regulations, and shall not otherwise trade in securities of MIDHANI when in possession of UPSI.

## Annexure – B

### **POLICY AND PROCEDURE FOR INQUIRY IN CASE OF LEAK OF UPSI OR SUSPECTED LEAK OF UPSI**

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#### **1. Applicability**

This policy shall apply to all Insiders and Designated Persons and persons in possession of or having access to UPSI.

#### For the purpose of this Policy

‘Leak of UPSI’ shall refer to such act / circumstance(s) by virtue of which an UPSI is made available or becomes available, by any means or mode to any person, association, body, firm, agency, society, entity or to a group thereof, whether registered or otherwise before its official publication or announcement or formal circulation in public domain and which shall also include any purported attempt thereof.

#### **2. Procedure of inquiry in case of leak of UPSI or suspected leak of UPSI**

- 2.1. Any instance of leak of Unpublished Price Sensitive Information should be on the basis of a direct and first-hand experience of the Whistle Blower. It should not be based on any secondary, unreliable source such as grapevine or any other form of informal communication.
- 2.2. Inquiry under this policy shall commence based on a written complaint received from any Insider, Designated Person, Department of MIDHANI, Registrar and Share Transfer Agent, Depository, Stock Exchange, Regional Director or any official thereof, Registrar of Companies or any official thereof, regulatory / statutory authority or any other department of Central or State Government.
- 2.3. The Whistle Blower may complaint or report the leak of UPSI by addressing the hard copies or by an email to the Chairman and Management Director of the Company, mentioning the subject as “LEAK OF UPSI”.
- 2.4. The Whistle Blower shall interalia state particulars of the complianee and details of the complaint or report. The Whistle Blower has the option of annexing such documentary evidence, as deemed reasonable for the purpose of substantiating the complaint/ report lodged.
- 2.5. Within 5 (five) working days of receipt of the complaint or report, the Chairman and Management Director, in consultation with Company Secretary, if required, shall write to the complainee intimating the details of the complaint/report

received and requesting him to give a written representation within 7 (seven) working days of receipt of letter.

- 2.6. The instance of leak of UPSI made by the Whistle Blower must be genuine with adequate supporting data/proof. If it is established that the allegation was made with mala-fide intentions or was frivolous in nature or was not genuine, the Whistle Blower shall be subject to Disciplinary Action.
- 2.7. Within 7 (seven) working days of receipt of representation, the Chairman and Management Director shall proceed to investigate in the matter and for such purpose may consult such persons, whether internal or otherwise or obtain such external assistance or opinion, as he may deem expedient in this regard. During the course of such investigation, the Chairman and Management Director of the Company may call for such additional documents, representations, etc. as he may deem fit.
- 2.8. If no representation is received within the aforesaid stipulated time, the Chairman and Managing Director shall issue notice to the complainee asking him to show cause as to why the MIDHANI should not initiate disciplinary proceedings, as applicable, against him.
- 2.9. On completion of the above mentioned preliminary investigation, receipt of reply to the show cause notice issued under clause 2.8 or on non-receipt thereof, the Chairman and Management Director shall refer the matter to the Chairman of the Audit Committee, along with his opinion, for his consideration.
- 2.10. The Chairman of the Audit Committee on receipt of such opinion shall proceed to convene a meeting of the Audit Committee and shall convene the concerned meeting of the Audit Committee within a period of 30 days of receipt of opinion of the Chairman and Management Director of MIDHANI.
- 2.11. The Audit Committee shall consider the matter and put forward its recommendation to the Board. The Board, on receipt of such recommendation and after due review, if forms an opinion that the complainee is guilty of leak of UPSI or suspected leak of UPSI, then it will order for necessary disciplinary proceedings of the company, and such incident and its results shall be promptly inform to the SEBI. The aforesaid disciplinary action which will be in addition to the penal provisions stated under SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 and any other statutory enactments, as applicable.

- 2.12. MIDHANI suo moto reserves the right of initiating an inquiry under this policy against any Insiders or Designated Persons, if it has reasons to believe that such person has leaked UPSI or suspected to leak UPSI.
- 2.13. This policy shall not in any way preclude any referrals, complaints, measures, actions etc. which can be instituted or which are available under the existing Whistle Blower/ Vigil Mechanism Policy of MIDHANI.



## APPENDIX I

### **“IMMEDIATE RELATIVE”**

In term of regulation of 2 (1) (f) of the SEBI (Prohibition of Insider Trading) Regulations, 2015

"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”**

In terms of Regulation 2 (1) (g) of SEBI (Prohibition of Insider Trading) Regulations, 2015 the term “Insider” means any person who is:

- (a) A connected person; or
- (b) In possession of or having access to Unpublished Price Sensitive Information;

**APPENDIX II  
APPLICATION FOR PRE-CLEARANCE OF TRADING IN  
SECURITIES**

(In terms of clause 11.2 of the Code of Internal Procedures and Conduct for Prohibition of Insider Trading in Dealing with the Securities of Mishra Dhatu Nigam Limited)

To,

The Compliance Officer  
Mishra Dhatu Nigam Limited  
P.O. Kanchanbagh, Hyderabad,  
Telangana 500058, India

Dear Sir,

I, Shri/Smt. \_\_\_\_\_ a Designated Person of Mishra Dhatu Nigam Limited intend to carry out transaction(s) in the shares of Mishra Dhatu Nigam Limited as per the details given below:-

Name & Designation of the  
Designated Persons:

Department of Designated Persons:

Date of Joining / becoming Designated Person:

S.No	No. of shares held (including by dependent members) as on the date of application	Folio No. / DP ID & Client ID	Nature of new transaction for which approval is sought	Estimated number of securities to be dealt	Estimated consideration value	Whether proposed transaction is in the name of self or in the name of dependent family member	Name of the dependent/ relationship, if the transaction is in the name(s) of the dependent(s)
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)

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

## **UNDERTAKING**

In this connection I solemnly confirm and declare:

- a) THAT I do not have access and/or have not received any Unpublished Price Sensitive Information up to the time of signing the undertaking;
- b) THAT in case I have access to or receive "Unpublished Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction, I shall inform the Compliance Officer of any change in my position and that I shall completely refrain from dealing in the securities of the MIDHANI till the time such information becomes public; That I have not contravened the Code of Conduct for prohibition of insider trading as notified by the MIDHANI from time to time.
- c) THAT I hereby confirm that I abide by the provisions of Cl.11.7 of the Code with regard to time norms for holding/buying/selling securities I hereby solemnly declare that I have made a full and true disclosure in this regard to the best of my knowledge and belief. Pre-clearance may kindly be accorded in terms of Clause-11 of the Code of Conduct for prohibition of insider trading in dealing with the securities of Mishra Dhatu Nigam Limited

Signature:

Date:

Name:

Place:

Designation:

### **OFFICE USE**

Serial number of the application received:

Date & time of receipt of the Application:

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

Reasons for not giving pre-clearance:

Signature of the Compliance Officer/Authorized Officer

**APPENDIX III**  
**PROFORMA FOR INITIAL DISCLOSURE OF DETAILS OF SHARES HELD BY**  
**DESIGNATED PERSONS**

(In terms of clause 12.1 (a) of the Code of Internal Procedures and Conduct for Prohibition of Insider Trading in Dealing with the Securities of Mishra Dhatu Nigam Limited.)

To,

The Compliance Officer  
Mishra Dhatu Nigam Limited  
P.O. Kanchanbagh, Hyderabad,  
Telangana 500058, India

Dear Sir,

I, Shri/Smt. \_\_\_\_\_ a Designated Person of Mishra Dhatu Nigam Limited furnish below the details of shareholding in Mishra Dhatu Nigam Limited as on in my name and/or in the name(s) of my dependent family members in terms of regulation 2(1)(f) of SEBI (Prohibition of Insider Trading) Regulation, 2015 and clause 12.1(a) of the Code of Internal Procedures and Conduct for Prohibition of Insider Trading in Dealing with the Securities of Mishra Dhatu Nigam Limited.

Name & Designation of the Designated Person:

Department of Designated Person:

Date of Joining/ becoming Designated Person:

**Form B**

Details of shares held or positions taken in derivatives by Director or Officer of a listed company and his dependents

Name, PAN No. & Address Of Director / Officer	Date of assuming office of Director/ Officer	No. & % of shares/ voting rights held at the time of becoming Director/ Officer	Date of intimation to company	Mode of acquisition (market purchase/ public/ rights/ preferential Offer etc.)	Trading member through whom the trade was Executed with SEBI Registration No. of the TM	Exchange on which the Trade was executed	Buy Quantity	Buy value
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Note: The above table shall be applicable with suitable modifications to disclosure for position taken in derivatives also.

Signature

Name:

Date:

Place:

Designation:

## APPENDIX IV

### PROFORMA FOR DISCLOSURE OF CHANGE IN SHARE HOLDING HELD BY DESIGNATED PERSON

(In terms of clause 12.1 (b) of the Code of Internal Procedures and Conduct for Prohibition of Insider Trading in Dealing with the Securities of Mishra Dhatu Nigam Limited.)

To,  
The Compliance Officer  
Mishra Dhatu Nigam Limited  
P.O. Kancharanbagh, Hyderabad,  
Telangana 500058, India

Dear Sir,

I, Shri/Smt. \_\_\_\_\_ Director/Officer/Designated Person of Mishra Dhatu Nigam Limited furnish below the details of transactions of my own/ dependent family members in the shares of Mishra Dhatu Nigam Limited exceeding 1000 shares during the period from \_\_\_to\_\_\_in terms of regulation 2(1)(f) of SEBI(Prohibition of Insider Trading) Regulation, 2015 and clause 12.1(b) of the Code of Internal Procedures and Conduct for Prohibition of Insider Trading in Dealing with the Securities of Mishra Dhatu Nigam Limited.

Name & Designation of the Designated Person:

Department of Designated Person:

Date of Joining/ becoming Designated Person:

I hereby confirm that I abide by the provisions of Cl.11.7of the Code with regard to time norms for holding /buying /selling securities.

#### **Form D**

##### Details of Change in Shareholding by Director or Officer of a Listed Company and his dependents

Name , PAN No.& Address of Director / Office R	No. & % of shares of voting rights Held by the Director/Officer	Date of receipt of allotment advice / acquisition / sale of shares / voting rights	Date of Intimation to company	Mode of acquisition (market purchase/ public/ rights/ Preferential offer etc.)	No. & % of shares/ Post acquisition/ voting rights Sale	Trading member through whom the trade was executed with SEBI Registration No. Of the TM	Exchange on which the trade was executed	Buy Quantity	Buy value	Sell Quantity	Sell value
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**Note:** The above table shall be applicable with suitable modifications to disclosure for position taken in derivatives also.

Signature:

Date:

Place:

**APPENDIX-V**

**PROFORMA FOR ANNUAL DISCLOSURE OF SHAREHOLDING OF DESIGNATED PERSON**

To,  
The Compliance Officer  
Mishra Dhatu Nigam Limited  
P.O. Kanchanbagh, Hyderabad,  
Telangana 500058, India

Dear Sir,

I Shri/ Smt ..... Designated person of Mishra Dhatu Nigam Limited furnish below the details of transaction(s) in the shares of Mishra Dhatu Nigam Limited during the financial year ..... as well as shareholding as on 31<sup>st</sup> March .....

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(i)	Name and Designation of the Designated Person	:	
(ii)	Department of Designated Person	:	
(iii)	Date of Joining/ becoming Designated Person	:	
(iv)	List of Immediate relatives with phone, mobile and cell numbers used by them	:	(Enclose as Annexure)
(v)	List of persons with whom you share a material financial relationship with phone, mobile and cell number used by them	:	(Enclose as Annexure)

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**One time disclosure:**

(i) Names of educational institutions from which designated persons have graduated:

1. ....
2. ....
3. ....

(ii) Names of their past employers:

1. ....
  2. ....
  3. ....
-

I. Details of transaction/shareholding in own name

No. of shares held as on (date of previous disclosure)	Date of transaction	Details of shares purchased during the year		Details of shares sold during the year		No. of shares Held as on --- (date of present disclosure)	Folio/ DPID/Client ID No.
		No	Consideration (Rs)	No.	Consideration (Rs)		

II. Details of transaction/shareholdings of dependent family members.

Name of the dependent family members	Relationship	No. of shares held as on 1.4.20...	Details of shares purchased during the year		Details of shares Sold during the year		No. of shares held as on 31.3.20.....	Folio/ DPID/Client ID No.
			No.	Value(Rs)	No.	Value(Rs)		

Note: The above table shall be applicable with suitable modifications to disclosure for position taken in derivatives also.

I hereby confirm that I abide by the provisions of the Code with regard to time norms for holding /buying/selling securities.

Signature :

Date :

Place :

**APPENDIXVI**  
**REGISTER OF PERIODS OF CLOSURE OF TRADING WINDOW**

Sl. No	PURPOSE	DATE OF NOTIFYING CLOSURE OF TRADING WINDOW	START DATE OF CLOSURE OF TRADING WINDOW	DATE OF NOTIFYING OPENING OF TRADING WINDOW	DATE OF OPENING OF TRADING WINDOW	REMARKS
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**APPENDIXVII  
REGISTER OF PRE-CLEARANCE FOR TRADING IN SECURITIES**

Sl. No	Name	Designation	Department	Date & time of Receipt of Preclearance Application	Nature of Transaction (purchase or Sale)	Estimated Number of Securities Indicated in the Application
1	2	3	4	5	6	7

Estimated Consideration value Indicated In The Application	Name of the Dependent if The Transaction Is in the Name of the Dependent/ Relationship	Date of Communication of the Clearance By the Compliance officer	Reasons For non Clearance , if not Cleared	Date of placing before the Committee	Number of Securities Actually Traded, if Intimated	Remarks

Note: The above table shall be applicable with suitable modifications to clearances given for trading in derivatives also.

**APPENDIXVIII**  
**REGISTER OF WAIVER OF RESTRICTION FOR DISPOSAL OF**  
**SECURITIES**  
**[Regulation 13.3]**

Sl. No	Name	Designation	Department	Name of the Dependent, if the Shares held in the name Of Dependent	Number of Shares	Consideration value	Reasons for Waiver	Date of Waiver	Remarks
1	2	3	4	5	6	7	8		9

Note: The above table shall be applicable with suitable modifications to disclosure for position taken in derivatives also

**APPENDIXIX**

**REGISTER OF DESIGNATED PERSONS**

Sl No	Name	Designation	Department	Employee Code	Date of Joining MIDHANI	Date of Becoming Designated Person	Date of Cessation As Designated Person	Remarks
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**APPENDIXX**

**REGISTER OF DISCLOSURE OF SHAREHOLDING BY DESIGNATED PERSONS**

Name & Designation of the Designated Person:

Department of Designated Employee:

Date of Joining/ becoming Designated Person:

Sl. No	INITIAL DISCLOSURE				
	DATE OF RECEIPT OF INFORMATION	NUMBER OF SECURITIES (MIDHANI)	DATE OF ACQUISITION	CONSIDERATION VALUE (Rs.)	NAME OF THE DEPENDENT/ RELATIONSHIP IF SECURITIES HELD IN THE NAME OF DEPENDENT
1	2	3	4	5	6

CHANGE IN HOLDING					
DATE OF RECEIPT OF INFORMATION	NUMBER OF SECURITIES	DATE OF TRANSACTION	NATUE OF TRANSACTION (PURCHASE/ SALE)	CONSIDERATION VALUE (Rs)	NAME OF THE DEPENDENT/ RELATIONSHIP IF SECURITIES HELD IN THE NAME OF DEPENDENT
7	8	9	10	11	12

**YEAR END DISCLOSURE**

DATE OF RECEIPT OF INFORMATION	NUMBER OF SECURITES	AGGREGATE VALUE (Rs)	NAME OF THE DEPENDENT/RELATIONSHIP IF SECURITIES HELD IN THE NAME OF DEPENDENT	REMARKS
13	14	15	16	17