RELIGARE
Values that bind

April 01, 2019

The National Stock Exchange of India Ltd
Corporate Communications Department
"Exchange Plaza", 5th Floor,
Bandra-Kurla Complex, Bandra (East),
Mumbai - 400051

BSE Limited
Department of Corporate Services
Phiroze Jeejeebhoy Towers
Dalal Street, Mumbai – 400 001

Scrip Symbol: RELIGARE

Scrip Code: 532915

Subject: Intimation under SEBI (Prohibition of Insider Trading) Regulations, 2015 – Religare Enterprises Limited ("the Company")

Dear Sir(s),

In pursuance to the requirements of SEBI (Prohibition of Insider Trading) Amendment Regulations 2018, we would like to inform you that the Company has adopted a revised 'Code of Practices and Procedures for Fair Disclosure of Price Sensitive Information' and 'Code of Conduct for Prevention of Insider Trading" to regulate, monitor and report trading in securities w.e.f. April 01, 2019.

Further, the revised Codes shall be made available on the Company's websites at www.religare.com. A copy of the above Codes is enclosed herewith for your kind reference.

You are requested to take the above intimation on record.

Thanking You,

Yours faithfully,
For Religare Enterprises Limited

RELIGARE ENTERPRISES LIMITED NEW DELHI

Reena Jayara
Company Secretary

Religare Enterprises Limited
CIN: L74899DL1984PLC146935
Regd. Office : 2nd Floor, Rajlok Building, 24, Nehru Place, New Delhi-110019 Ph.: +91-11-46272400, Fax No.: +91-11-46272447
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Religare Enterprises Limited

Code of Practices and Procedures for

Fair Disclosure of Price Sensitive Information

(Effective from May 15, 2015)

(Amended on February 14, 2018, April 01, 2019)

Index

Chapter 1 : Introduction

1.1. Title

This code shall be known as the "Code of Practices and Procedures for Fair Disclosure of Price-Sensitive Information of Religare Enterprises Limited" (the "Code") and has been made pursuant to Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (the "Regulations") as amended.

1.2. Applicability

This Code shall be applicable to Religare Enterprises Limited.

1.3. Definitions

In this Code:

(a) "Chief IRO" shall mean the person nominated to function as the Chief Investor Relations Officer under the Regulations;

(b) "Company" shall mean Religare Enterprises Limited, and where the context so requires, shall include its subsidiaries;

(c) "Compliance Officer" shall mean the Company Secretary of the Company, and in his absence, any other senior officer designated so and reporting to the Board of Directors as mentioned in the Regulations;

(d) "MD" means Managing Director of the Company;

(e) "CEO" shall mean the Chief Executive Officer of the Company or such other person, by whatever name called, in whom substantial powers of management of the Company vest;

(f) "PIT Code" shall mean the Code of Conduct for Prevention of Insider Trading adopted by the Board of Directors of the Company; and

(g) "Unpublished Price Sensitive Information / UPSI" shall have the meaning assigned thereto in the Regulations

Words and terms defined used in this Code and not defined herein, but defined in the Regulations, the PIT Code, the Securities Contracts (Regulation) Act, 1956, the Securities and Exchange Board of India Act, 1992, the Depositories Act, 1996 or the Companies Act, 2013, shall have the meanings respectively assigned to them in such legislation.

1.4. Publication of the Code

This Code, upon its adoption by the Board of Directors of the Company, shall be uploaded on the Company's website and any updates hereto shall be promptly reflected on the Company's website.

Chapter 2 : Handling and Dissemination of Price-Sensitive Information

2.1. Identification of Unpublished Price Sensitive Information

The MD/ CEO shall identify the information that shall be treated as Unpublished Price Sensitive Information. In addition to the information falling within the definition of "unpublished price sensitive information" under the Regulations, the MD/ CEO may classify any other information as Unpublished Price Sensitive Information, if he is satisfied that the disclosure of such information is likely to have a material impact on the market prices of the securities of the Company. The MD/ CEO shall be assisted by the Chief IRO and the Compliance Officer in making such assessment and may be guided by the Board of Directors in the classification of any information as Unpublished Price Sensitive Information.

2.2. Access to Unpublished Price Sensitive Information

2.2.1. The MD/ CEO shall determine which person(s) may be provided access to Unpublished Price Sensitive Information relating to any particular transaction. In determining such access, the MD/ CEO shall be guided by the principle that Unpublished Price Sensitive Information shall be made available to any person only if such information is required for the furtherance of the legitimate purposes, performance of duties or discharge of legal obligations of such person or as permitted in the Regulations. No person so obtaining access to Unpublished Price Sensitive Information, whether an employee of the Company, an external consultant or advisor, shall disclose such information to any person except those specifically authorised in this behalf by the MD/ CEO .

2.2.2 An insider can share the UPSI for Legitimate Purpose to any person subject to following conditions:

a. The person with whom UPSI is to be shared pursuant to a "legitimate purpose" shall also be considered an "insider" for purposes of this code, PIT Code and Regulations;

b. A non-disclosure agreement will be executed with such person before sharing UPSI to maintain confidentiality of such UPSI in compliance with Regulations.

c. Designated Persons informs in advance to the Compliance Officer/MD/CEO/CFO about sharing of UPSI and share the following details with Compliance Officer/MD/CEO/CFO.

   i. Name, address, Telephone or mobile number, e-mail address and PAN number of the person with whom UPSI is to be shared;

ii. Name and address of Corporate for which that person works for alongwith designation, if applicable;
iii. Nature, purpose and details of UPSI to be shared; and
iv. Copy of executed and signed NDA

2.2.3. A digital database shall be maintained by the Compliance Officer of the details mentioned in clause 2.2.2(c) which shall be placed before the Audit Committee on periodic basis.

Explanation : For the purpose of this clause, **"Legitimate Purpose**" means 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 Regulations.

2.3. Public Disclosure of Unpublished Price Sensitive Information

2.3.1 Timing of Disclosure

All Price Sensitive Information shall be made public upon the information itself becoming reasonably certain or upon the occurrence of the contemplated transaction to which the information relates becoming reasonably certain, except as allowed otherwise under the Regulations. Upon such reasonable certainty being established, the information shall be made public at the earliest practicable time and in compliance with all prevalent regulations. Where any such contemplated transaction requires authorisation by the Board of Directors, the occurrence of the event shall not be deemed to be reasonably certain unless such authorisation has been granted.

2.3.2 Manner of Disclosure

To ensure fair, uniform and universal disclosure, information that is intended to be made generally available shall be reported to the stock exchanges on which the securities of the Company are listed for wide dissemination to investors and members of the exchanges through the websites and/or trading terminals of the stock exchanges before such information is disclosed on any other forum. Upon the information being sent to the stock exchanges, the information shall be deemed to be generally available and shall no longer be treated as Unpublished Price Sensitive Information.

2.3.3 Further Dissemination of Generally Available Information

Once any information is made generally available, the information may be uploaded on the Company's website in a suitable form and may be shared with any person or disseminated using any means without any restriction. It is clarified that the mere changing of the form of the information without affecting its essence shall not result in the information being treated as new information.

2.3.4 Public Disclosure of Information Disclosed Selectively

In the event that any Unpublished Price Sensitive Information is disclosed selectively, inadvertently or otherwise, to any person, and the Company does not have the power to require such person not to trade in the securities of the Company on the basis of such information and not to communicate such information to any other person, such Unpublished Price Sensitive Information shall be promptly made generally available in accordance with this Code. The MD/ CEO shall decide based on the facts of the case, whether the Company has the power to require the receiver of such selective information, not to trade in the securities of the Company on the basis of such information and not to communicate such information to any other person.

2.4. Responding to requests for information

2.4.1 Requests for information from investors, research analysts, etc.

Any request for information received by the Company from any investor, research analyst, journalist or other member of the public shall be responded to, based on information that is in essence generally available. It is clarified that the sharing with a specific person or persons, of information which about the Company or the industry(ies) that the Company operates in which is general in nature, or any information that is derived from or is a mere elaboration of generally available information and is not inconsistent with such generally available information, or any information that is not likely to impact the price-discovery process of the Company's securities shall not be treated as selective disclosure by the mere fact of the information not being publicly disseminated earlier in the same form.

2.4.2 Requests for verification of information from regulatory authorities

Any queries on material published in the media or requests for verification of market rumours received from regulatory authorities or stock exchanges shall be responded to promptly and in a manner that is not misleading.

2.5. Access to Conference Calls and Presentation Materials

The Chief IRO shall provide all investors access to the Company's conference calls and presentation materials by placing on the Company's website, the dial-in information and instructions for any conference calls organised by or on behalf of the Company to discuss the financial performance of or any strategic transaction by the Company at the earliest practicable once the arrangements for the conference call have been finalised, and any presentation materials used by the Company at any investor conference or analyst meet.

2.6. Nomination of Chief Investor Relations Officer

The MD/ CEO shall nominate an employee of the Company as the Chief IRO for the purposes of the Regulations. Such Chief IRO must be financially literate and conversant with the workings of the stock market, and shall be the primary contact person for research analysts and investors seeking to interact with the Company. The Chief IRO may have other responsibilities within the Company and may be given a suitable title to reflect his or her functions and level within the organization.

Code of Conduct

for

Prevention of Insider Trading

of

Religare Enterprises Limited

(Last updated on May 27, 2016, April 01, 2019)

DI S

c ko m		Dr omj p odj i	
c ko m		Kmn mq odj i j a Kmd N i ndodq Dr aj nh odj i	
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c ko m		G f Npnk o g f j a Pi kp gdhc Kmd N i ndodq Dr aj nh odj i	
c ko m		K i gpt aj m j i omq i odj i j a j	
c ko m		j nh n	

CHAPTER – 1

Introduction

Oc ch j nc gg f i j r i n **"Code of Conduct for Prevention of Insider Trading of Religare Enterprises Limited"** **Code** h kpnmp i o oj kpnmp i o oj N D Knjcd odj i j aD nd mOm d b M bpg odj i n **"PIT Regulations")**

1.1 Applicability

Oc ch j nc gg kkgt oj ndbi o K mnj i n j a M gb m i o nkmdh n Gch cb **the Company** i dnnp nd d nd n n ad d cc j i cc dn k i i on

1.2 Definitions

"Act" h i n cc N pmdbd n i s c i b j m j aD d o

"Board" h i n N pmdbd n i s c i b j m j aD d

"Body Corporate" h i n j t jnkjmo n ad d n odj i j a cc j h k i d n o

"Compliance Officer" h i n j h k i t N mo mt j a cc j h k i t i d cch n i i t j cc mn i dj mj aad m ndbi o nj i m kj mod b oj cc j m j a dn oj mm n h i odj i d cc M bpg odj i n knjqd cc o j h kgd i j aad m nc gg ad i d ggt gb mo d c nc c n cc dgdbt oj m i pi mmo i nd ad i d g mo o h i on d g i nc o knjadb i gj nn j pi o i mo o h i o j a nc agj r n

"Connected Person(s)" h i n k mnj i n n ad d KDO M bpg odj i n

a ***"Dealing in Securities or Trading "*** h i n i d gp n np n nd d b pt d b n ggd b gd b j m bm d b oj np n nd pt n gg gd i t N pmdbd n i om nc gg j i nonp j m d bgt b ***"Dependent(s)"*** d gp n nkjpn ja k mmji i d gp n k mio nd gd b i cdg janp c k mmji jmjaoc nkjpn it jarcjh dh dc m k i io ad i dggt ji np c k mmji jm jinpgon np c k mmji d o f d b dhdjinmg od b oj om d b d n pmobd n

c ***"Designated Persons(s)"*** nc ggd gp ajggir d b k mmjind gp d b h kgjt n ja oc jh k it i dn np nd d md n d gp d b oc h kgjt n r cj m n ji omi na mm kpo oj joc mbmjpk jm aadgd o jh k i d n amjh oc jh k it

dn ojmm jaoc jh k it

s podq dn ojmm ja oc np nd d md n ja oc jh k it s gp d b

D k i io dn ojmm

F t H i b md gK mmjii gjaoc jh k it i dn np nd d md n

Kmjh jo m i Kmjh jo m mjpk jaoc jh k it

h kgjt n

d r cj m C ja k moh ion ja oc jh k it i dn np nd d md n

dd pkoj or j g q gn gjr H i bd b dn ojm cd a s podq aad m jaoc jh k it i dn np nd d md n

ddd ja ajggir d b k moh ion jaoc jh k it

d i

N mo nd g

Nomo bt H mb m l pdhdbdji n D q nojmM g odji n

G b g

D ajmh odji O ci jgj bt

a O s

b mi i H mfi od b

c D o mi g p db

dq r cj m s podq mndho ion oj oc k mmjinh iodji d oj jq

d ***"Director(s)"*** h i n dn ojm kkjd o ji oc j m jaoc jh k it

e ***"Insider(s)"*** h i n it k mmji r cj dh

- ndbi o K nmji
- jii o K nmji jm
- d kjnn nndji ja jmc qd b nn oj Pi kp gdhc Knd N i ndbdq Daj nh odji

f *Key Managerial Personnel"* h inf t h i b ndgk nmjii g n ad d oc j h k i d n o i d gp n

cd a s podq aad m

H i bd b dn oj m

H i b m

j h k i t N mo nt

R c j g Och dn oj m

a cd a d i d g aad m

g *"Material Financial Relationship"* h i n mg odj i ncdk d r cdc ji k nmji dh m dkdi oja i t f d jak t h i onp c n t r t ja gj i jmbdo pndbcc dh h d o gt km d b or gq h j i ocn l pdq g i o oj o g no ja np c k t mn i i p gd j h ponc gg s gp mg odj i ncdknd r cdc cc k t h i odh n ji nh ng i bcc omi n odj i n

h *"Promoter and Promoter Group"* h i n k nmj i n n ncj r i d n kmjh j o m i kmjh j o mbnjpk d cc g o no nc mcjg d b k co mi adg t cc j h k i t r dc cc Noj f s c i b n pi m N DGchod b gb odj i n i dh gi npm M l pdnh i on M bpg odj i n

i *Regulations"* h i n N D Kmjcd dodj i ja D nd mOm d b M bpg odj i n

j *"Securities"* h i n N pmdbd n ja cc j h k i t i nc ggc q cc h i d b nndbi oj db pi mcc N pmdbd n j i om on M bpg odj i o j m i t h j dd odj i cc m j a s kopi dn j a h pop gapi

k *"Unpublished Price Sensitive Information/ UPSI"* h i n d aj nh odj i n ad d KDO M bpg odj i n

1.3 R j mn i jod b cc nd bpg mnc ggd gp cc kgpmg i qd q mn i r j mn i jod b h n pgd b i mnc gg d gp ma mi oj a h d d jmi po m b i m

1.4 R j mn i skmnndj i n pn i i j o ad d ccdh j po ad d cc N D Kmjcd dodj i ja D nd m Om d b M bpg odj i n N pmdbd n i s c i b j m ja D d o cc N pmdbd n j i om on M bpg odj i o cc kj ndbj md n o j mcc j h k i d n o i npg n i mbpg odj i n h oc mpi mnc ggc q oc h i d bn mnk odq gt nndbi oj oc h d oc j n g bdhg odj i

1.5 Pi g nn oc j i o somlpdnn j oc mr dh h kgj t nc ggh i h kgj t j a oc j h k i t

1.6 Compliance Officer

1.6.1 Oc j h kgdi aad mnc gg mnkj i nd g aj mn ood b aj moc kj gddn i kmj pmn i h j i dbj md b c mi oj oc nppg n aj moc kmn mq odj i j a pi kp ghc kmd n i ndodq d aj mh odj i h d o d d b o n j i o d d b odgn j a ndbi o K mmj i n i odgn j a np c k mmj i n iodbdn r dbc r c j h PKND dh nc m km g md b j a gg ndbi o K mmj i n i oc dn k i i on om n ocmjpbc mnk odq k moh i o c n da i t h j i dbj md b j a om n i dh kg h i o odj i j a ocdh j pi moc j q m gg npk mqdhdj i j a oc j m j a oc j h k i t

1.6.2 Oc j h kgdi aad mnc ggh d o d m j m j a oc ndbi o K mmj i n i i t c i b n h d oc ghoj a ndbi o K mmj i n i Di nd mn n k m ml pdnh i on j a KDD M bpg odj i n

1.6.3 Oc j h kgdi aad m nc gg nndho gg h kgj t n ndbi o K mmj i n Di nd mn j a oc j h k i t d mnnd b i t g mdad odj i mb m d b KDD M bpg odj i n i oc j h k i t n j

1.6.4 Oc j h kgdi aad mnc ggmkj mo oj oc j m j a dn oj mn i nc gg kmjqd mkj mon oj oc p db j h h dbo j a oc j h k i t j i k mdj d g ndhr c i q mml pdn

CHAPTER – 2

PRESERVATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION

2.1 I j ncbi o K mmji Dnd mnc gg j h h pi d o kmjiqd j m ggj r mn oj i t PKND m g od b oj oc j h k i t jmN pmbd ngho j mkmjikj n oj gho oj i t k mmji d gp d b joc mDnd mm s kor c m np c j h h pi d odji chd apmoc mi j a oc ncbi o K mmji Dnd mn g bdbch o kpmkjn n k majmh i j a podnjm ch c mb j ag b gj gb odji n j m n k mh dbo d oc KDD M bpg odji n i ch d j m i r dbc j j a Km od n i Kmj pmn aj m dn ch gj npm j a Kmd N i ndbdq D ajmh odji j a oc j h k i t

2.2 Chinese Wall

m n j a oc j h k i t r c d c mj pod gt c q mn oj j i ad i od g d ajmh odji nc gg j i nd m d nd m n i n k mo amj h oc j n m n r c d c g r dbc n g h mfi od b d q mbh i o qd j m joc m k moh ion kmjiqd d b npkkjmo n mqd n j i nd m kp gd m n t cd n R gg

Oc h kgj t n d oc d nd m nc gg i j o j h h pi d o i t j i ad i od g d ajmh odji PKND oj i t j i d kp gd m

D s kodji g dnph no i n h kgj t n amj h oc kp gd m n h t mj pbco j q moc r gg i bdq i j i ad i od g d ajmh odji PKND j i i oj f i j r ndh mb nd d apmoc mi j a oc dng bdbch o kpmkjn n k majmh i j a podnjm ch c mb j ag b gj gb odji n

CHAPTER 3

PREVENTION OF MISUSE OF 'PRICE SENSITIVE INFORMATION

3.1 gg ncbi o K mmjin Dnd mm ja cc j h k i t nc gg np e o oj om d b m nomd odj i n n i ph mo gj r

3.2 **Trading Window**

3.2.1 Oc j h k i t nc gg nk dat om d b k mdj oj gg om d b r d jr aj mom d b d cc j h k i t n N pmdbd n Oc om d b r d jr nc gg gj n pmd b cc och cc d aj mh odj i m a mm oj d k m ch pi kp ghc j m i t och n j h h pi d o t cc j h kg d i aad m

3.2.2 R c i cc om d b r d jr ch gj n cc ncbi o K mmjin Dnd mm i cc dn k i i onnc ggi j oom d cc j h k i t n N pmdbd n d np c k mdj s kor c m om d b kg i c n i kkmjq t cc j h kg d i aad m

3.2.3 Oc om d b r d jr nc gg *inter alia* gj n occ och j a

g modj i j aad i d gm npgon

g modj i j a dqd i n

c i b d kdb gnomp opm t r t j akp gd ndbcon kma mi od gdnp

h nb mm h nb mm l pdhdodj i n ghod bn dhkj n gn i sk i ndj i j a

pnd nn i np c j cc momi n odj i n

c i b nd F t H i b nd gK mmji i g i

3.2.4 Oc och aj m j h h i h i o j a gjnd b j aom d b r d jr i m j k i d b j aom d b r d jr nc gg d t cc j h k i t Cj r q md i t n

pi g mn j h h pi d o jcc mr ch om d b r d jr r dgg gjn o g no c j pmm aj m cc d aj mh odj i m a mm oj d k m j h nkp gd

oc m jk idbjaom dbrd jr nc ggijo ngdmoci cjpmm
aomoc dajmh odji maomm ojdkm jh nkp gd

Kmjiqd oc od n ja gmodji jalp mo mgt iip gad i dgmnpgonja
oc jhkit om dbrd jr nc gg gjn amjh i ja q mt lp mo modgg
cjpmm ao m gmodji jaad i dgmnpgon

3.2.5 gg ndbi o Kmmjin Dnd mm ja oc jhkit nc gg ji po gg oc dn
gdbnd oc N pmdbdnjaoc jhkit jigt d q gd om dbrd jr jm
nk mkkmjq om dbkgi i nc ggijo gd itomin odji dqjggdb
oc kpmc n jmng jaoc jhkitnN pmdbdn pmdboc k mdj nrci
om dbrd jr dh gjn jmrc m oc m dhij km kkmjq om dbkgi
jm pmdb it joc mk mdj nh t nk dad t oc jhkit amjh odh
oj odh

3.2.6 D n ja N Kn s mdh jajkodji h t ggjr d oc k mdj rci oc
om dbrd jr dh gjn Cjr q mng ja nc mn ggjoo ji s mdh ja
N Kn nc ggijo ggjr rci om dbrd jr dh gjn

3.3 Trading Plan

3.3.1 Om dbkgi dh kgi pi mrcdc ndbi o K mmji i om d
N pmdbdn q i rci om dbrd jr dh gjn Db bdq n i jkodji oj
Dnd mmrcjh t k mk op ggt d kjmn mndji jaPKND i i gd b oc h
oj om d N pmdbdnd jhkgdioh ii mOc dh kmjq dhdji rjpg i g
oc ajmh pg odji ja om dbkgi t ndbi o K mmji oj i g cdh oj
kgi ajmom noj s po d apopm t jdbnj oc kjmn mndji jaPKND
rci om pi m om dbkgi dh op ggt s po rjpg ijokmjcd db
oc s podji janp c om noc oc c km d q i ajm oc PKND
h doj db

3.3.2 q mt ndbi o K mmji nc gg iodg oj ajmh pgo om dbkgi i
kmnio db oj oc jhkgdi aad majm kkmjq g i kp gd dh gjnpm

kpnmp i o oj r c d c om n h t mmd j po j i cdh c gad j m i
r dc np c kg i

3.3.3 R cdg kmn i od b oc om d b kg i ajggj r d b kj d on nc gg f kod h d

Oc m h pno b k j a h j i ocn or i oc kp gd dh gj npm j akg i i
j h h i h i o j aom d b

D i t n d nc j pg m h h m oc o oc dh dh j i gt no opoj mt j j g j aa
k mdj i r j pg i j o bmi o dh h pi dt amj h odj i daoc ndbi o K mmj i
r noj d kj mn mndj i j aoc n h PKND j oc o oc odh j aaj mh pg odj i j a
oc kg i i dh kg h i o odj i j aoc n h

D i t n om d b r dggi j o k mh do or i oc or i od oc om d b
t kmdj moj oc g no t j a i t ad i d g k mdj aj m r c d c m npgn m
ml pdn oj i i j pi t oc j h k i t i oc n j i om d b t
ao moc dh gj npm j anp c ad i d gm npgn

Om d b kg i nc gg i o dg om d b aj m k mdj j a i j o g mn oc i or gj
h j i ocn

Om d b kg i nc gg i j o i o dg j q ng k j a i t k mdj aj m r c d c i j oc m
om d b kg i dh gm t d sdno i

Om d b kg i nc gg n o j po dc moc q gp j a om n oj aa o j moc
i ph mj a N pmdbd n oj om gj i b r dc oc i opm j a oc om i
oc d o mq gn o j m o nj i r c d c np c om n nc gg aa o

a Om d b j i oc ndh j a np c om d b kg i r j pg i j o bmi o nj gpo
dh h pi dt amj h md bd b kmj d bn aj mh mf o pn

3.3.4 R cdg bmi od b oc kkmj q g oc j h kgd i aad mnc gg i odg oj n f
np c skm mnpi mo f d bn nc h t ocd f i mn mt oj mn mn i kkmj q
oc kg i

3.3.5 Oc om d b kgi ji kkmjq nc gg dmmqj g i oc ndbi o K mmji nc gg h i ojmdgt c q oj dh kg h i o oc kgi r dcjpo d b i odbg oj dc m qd o amjh db jmoj s po i t om d oc N pmdbd n jpond oc n jk jaoc om d b kgi

Kmjqd oc o oc dh kg h i o odji j a oc om d b kgi nc gg i jo j h h i da i t PKNDd kjmn mdji jaoc ndbi o K mmji o oc odh jaajmh pg odji jaoc kgi c ni jo jh b i mggt q dg g o oc odh ja oc j h h i h i ojadh kg h i o odji

3.3.6 i oc om d b kgi dh kkmjq oc j h kgdi aad mnc gg i j odat oc kgi oj oc moj f s c i b nji r cdc oc N pmdbd n m gdho

3.4 Pre-clearance of Trades

3.4.1 gg ndbi o K mmji n i oc dn k i i on r cj d o i oj gd oc N pmdbd n ja oc j h k i t nc gg km g m oc d o i omi n odji n d gp d b ocj n ja k i i o d oc N pmdbd n j a oc j h k i t n k moc km gd b kmj pm n md c mpi m

Kmjqd oc o km g mi j a om n nc gg i j o ml pdn ajm om s po nk m i kkmjq om d b kgi

3.4.2 Np c km g mi j a om r j pg kkgd g r c mq m i t ndbi o K mmji cdh k i i o d o i n oj gd oc N pmdbd n j a oc j h k i t d s mn j a oc h d dh ph oc m nc j g gdh db j a h mfi o q gp s d b Mn jm N pmdbd n r c d c q mdh g mn d j i j mh j m omi c d i t j i l p mo m **However, Directors of the Company have to pre-clear their all intended transactions irrespective of value or number of Securities involved.** Om n j a oc j h kgdi aad mr c d c ml pdn km g mi d o mh n j a oc jq nc gg kkmjq t oc H i bd b dn oj m j m c d a s podq aad mj md oc dn n i t i t R c j g Odh dn oj mj a oc j h k i t

3.4.3 i kkgd odji d **"Form I",** n kmn nd d oc j nc gg h oj jh kgdi aad m ao mj o d d b oc kkmjq g j a k moh i o g c da i t d d od b oc noch o i ph mj a N pnobd n oc o ncbi o K nmji d o i noj gd i o dgn j a kj nobj nt r doc r c d c c c n kj nobj nt jpi o i np c joc m o dgn n h t ml pdn t i t npg h t oc jh k i t d occh c ga

3.4.4 i pi mo f d b d **Form I** nc gg s po d a qj pmj aoc jh k i t t np c ncbi o K nmji

CHAPTER 4

OTHER RESTRICTIONS

4.1 R c m i t omin odji c n i kkmjiq oc ndbi o K mmji i oc dn k i i on **shall execute the order within one week** j aoc g mi j aoc omin odji i r c m i t omin odji c n i kkmjiq r doc i t dodji g mnomdodjin oc n h nc gg s po r docd oc jq odh d jm i r doc oc dodji gmnomdodjinnk dad Daoc jm mdhijo s po r docd ji r f ao moc kkmjiq gdh bodq i oc ndbi o K mmji hpnokm g m oc omin odji b d

4.2 Oc jhkgdi aad mnc ggc q ndbcooj mqjf i t g mi bmio oj i t omin odji jm apmoc m dodji gmnomdodjinoj i t g mi ajm oc mgq ioomin odji c n i s po

4.3 D n i t omin odji c n i mapn oc ndbi o K mmji i oc dn k i i onnc gg am oj m kkgt ajmkm g mi j a oc omin odji r c d c r nmapn oj oc i socdoc m pocjmodt d oj H i bd b dn ojm c d a s podq aad mR c j g Odh dn ojmda jhkgdi aad mc nmapn oc omin odji

4.4 gg ndbi o K mmjinr c j pt jmn gg i t iph mja N pmobdn j a oc jhk i t nc ggijo io mdoj jiom om jmjkkjndo omin odji d n ggjm pt i t iph mja N pmobdn pmd b oc i sonds hjiocnajggjr d b oc kmodjm omin odji

Cjr q m ptd b janc mnkpmmp iooj s mdhd b janoj f jkodjin i oc i n ggd b jaocjn nc mnr docd k modj jands hjiocnnc ggijo h oj jiom om kmjiqd np c om j n ijo qdjgo oc j i oc M bpg odjin

Kmjiqd apmoc moc oom d b r d jr ijmhn i mnomdodjinji jiom om nc ggijo kkgd g ajmoom n mmd jpod jm i r doc i kkmjiq om d bkgi

4.5 I j ncbi o K mmji nc gg o f kjncbcbji n d mcbq ocbq omi n ocbji n d cc N pmcbcbd n j acc j h k i t o i t ocbh

4.6 D n cc n g j a N pmcbcbd n cbh i mncbo t k mmji g h mbi t cc cjg d b k mcbj h t r cbq t cc j h kgd i aad m H i bd b cbn ojm cd a s pocbq aad mR cjg Ocbh cbn ojmji m j h h i ocbji jac ja k mcbh i o cba i t ao mm jmd b d r mcbcbd b ccbh c mm nji n d cccbh mb m kmjqd np c mgs ocbji j nijoqcbjgo cc M bpg ocbji n

Cjr q mcba jiom om cbh s po d q mo i ogt jmjcc mr cbh d qcbjg ocbji janp c mnomdocbji cc kmjacbnamjih np c om nc gg gd g oj cbhbjmb ajmmh cbo i oj cc j m ajmm cboj cc D q nojmKmjo ocbji i p ocbji pi h d cbo m t cc j m

CHAPTER 5

REPORTING REQUIREMENTS

5.1 gg ndbi o K mmjin jii o K mmjin m mlpdn oj ajmr m oc ajggjr d b o dgnoj oc jh kgdi aad m

5.1.1 Initial Disclosure

gg ndbi o K mmjin nc gg mlpdn oj ajmr m oc dn o dgn d gp d b o dgn j a oc dn k i ion i k mmjin r dc r c j h np c ndbi o K mmji nc mn H o mdg d i d gM g odj inc dk i o dgn ggcjg d bnd N pmdbd n j mq j od b mdbcon c g i kjndbdj i n o f i d mdq odq n t np c k mmji oj oc j h kgdi aad m n k m **Form II"** kmn md d oc j gj i br dc I ji dh gjnpm bm h i o r dc d t n j aejd d b kkjd oh i o j m j h d b oc ndbi o K mmji r c d c q mdh kkgd g

5.1.2 Continual Disclosure

gg ndbi o K mmjin nc gg mlpdn oj ajmr m ajggjr d b o dgn d C gaT mgt No o h i od **"Form III"** n kmn md d j j a ggcjg d bnd N pmdbd n j a oc j h k i t r dc d t n amjh oc i j a oc c gat m

ddl i i p gno o h i od **"Form IV"** n kmn md d j j a ggcjg d bnd N pmdbd n r dc d t n amjh oc i j a oc ad i d gt m

dddl o dgn j a k i ion i k mmjin r dc r c j h oc t c q H o mdg d i d gM g odj inc dk d **" Part II of Form II"** n kmn md d j r dc d t n amjh oc i j a oc ad i d g t m i r dc d t n ajm i t c i b n oc md

5.1.3 Event Based Disclosure

Disclosures by Designated Persons

q mt ndbi o h kgjt nc gg dh gjn oj oc j h k i t oc i ph mjanp c N pmdbd n l pdn j m dhkjn j a **within two trading days** j a np c omi n odj i daoc q gp j a oc N pmdbd nom r c oc md j i omi n odj i j m n mdnjaomin odjin **over any calendar quarter** bbmb o noj om q gp d s mnja **ten lakh** mpk njmmp c joc mq gp nh t nk dad t j m d np c ajmh o nnk dad pi mKDD M bpg odjin

Kmjqd oc oda ndbi o K mmji j n it jaah mfi oom d N pmddnja oc jhk it c nc gg dh gjn oc o dgnjanp c om r dcd or j r jmfid b tnoj oc jhk itd np c ajmh o nnk dad pi mKDD M bpg odjin

<u>Disclosures by Connected persons</u>

gg jii o k mmjinr cj ajmoc odh d b m d kjmn mndji ja PKNDnc gg dh gjn oj oc jhk it oc iph mjanp c N pmddn lpdn jm dhkjn ja r dcd adq om d b tnjanp c omin odji daoc q gp jaoc N pmddn om r c oc md ji omin odji jm n mdnjaomin odjinjq mji hjioc bbmb o noj om q gp d s mnjaadq gfc mpk n

Explanation 1*:* Oc dh gjnpmnja om d b d N pmddn nc gg gnj d gp om d b d mdq odq nja N pmddn i oc om q gp ja oc mdq odq n nc gg o f i d oj jpio

Explanation 2*:* Dodh g mdad ajmoc qjd i ja jp onoc ooc dh gjnpmja oc d mh io gomin odjin ao m it dh gjnpm pi mocdh mpg nc gg h r c i oc omin odjin aa o ao moc kmdjm dh gjnpm mjnn oc ocmncjg nk dad

5.2 Oc jhkgdi aad mnc ggh d o d m jm ja ggoc g modjinbdq i t gg ndbi o K mmjin i jii o K mmjinajm h d dh ph k mdj ja adq t mm

5.3 Oc jhkgdi aad mnc ggkg ajm oc p db jhh doo jm jhh doo ijodad t oc j m **on a quarterly basis** ggoc o dgnja oc gd b d oc N pmddnja oc jhk it t oc ndbi o K mmjin i jii o k mmjin m dq t cdh i oc jhk itd b j ph ion oc o np c k mmjin c s po pi mc km gd b kmj pm n iqch b d cch j r c mq m kkgd g

CHAPTER 6

Leak/Suspected leak of Unpublished Price Sensitive Information

i t h kgjt jacc j h k i t jmdnnp nd d mdn i mkjmodno i n jag f jmnpnk o g f ja PKND PKNDG f pi mR cdhog gjr mKjgdt jacc j h k i t R Kjgdt

Cjr q mi jordcnoi d b itccd b jio d d R Kjgdt d cchmb m i t j h kg d o m dq m g od b oj PKNDG f nc gg kg ajm cc p db j h h dbo t cc c dhk mmji ja cc p db j h h dbo r c j ch gnj jh p nk mmji pi mR Kjgdt p db j h h dbo r dggd q ncdb o cc PKND G f i ggjcc m jii o h ccmmd cc h ii mdbh t h adbd gp d b i b bd b d o mi gk j kg jpond j i npgp i onoj nndhod cc d q ncdb odji

2. p db j h h dbo h t nf i t d ajmh odji amjh m g q i o Dnd mm d o mh d mdn i ad p d mdnjacc j h k i t d mg odji oj np c PKNDG f

i l pdhtt t cc p db j h h dbo nc gg j h kg o d och j pi h ii m po i jo g o m cc i ccm h j i ccn amjh o ja j h kg d o m dq t jh p nk mmji Da i l pdhtt b on g t t j i ccm h j i ccn cc i m nji n ajm n h nc gg m jm t cc p db j h h dbo d r mdbd b gj i b r dbc cc mqch och gd n

p db j h h dbo h t gg d k mmji i t h kgjt ndbi o K mmji n jm Dnd mjacc j h k i t d mg odji oj cc i l pdhtt i cc o k mmji nc ggapggt j j k mo d cc i l pdhtt d gp d b po i jo gh db oj nc md b cch jaadd g g kojk k mmji g o dgn ajmcc kpnkjn ja i l pdhtt a dgd b r c d c db nc gg h oj h ch ji p o i i ji j j k modji ji cc k mojacc o k mmji i nc gg j m d bgt gp r dbc d j m i r dbc ccch j i j h k i t n jcc m j n i Kjgdd n

dhdji ja p db j h h dbo d mg odji oj i l pdhtt nc gg ad g i i t qdj g odji nc gg gp d j m i r dbc cc j d dhdji oj odji nocc o h t o f i pi mR Kjgdt i jcc m j n i Kjgdd n jacc j h k i t

j h kgd i aad mnc gg d ajmh cc N D jpo PKNDG f i dhdji ja p db j h h dbo r dbc d ji r jmfd b t amjh cc o ji r c d c PKNDG f h ccmr n ch pmn t cc p db j h h dbo i d cc o i i l pdhtt d dbdo d cc h ccmOc m ao mji cc d l pdhtt ch ji gp t cc p db

j h h dbo o dgn j anp c ji gpndj i i dhdj i j a p db j h h dbo nc gg
gnj d odh o oj N Dr dbc d ji r j nfid b t amj h o j anp c dhdj i

CHAPTER 7

Penalty for Contravention of the Code

6.1 i t ndbi o k mmji r c j om n d N pmdbd n j m j h h pi d o n i t
d aj nh odj i aj mom d b d N pmdbd n d ji omq i odj i j a ocdh j h t
k i gdh i kkmj kmdl o odj i h t o f i t oc j h k i t

6.2 ndbi o K mmj i n j aoc j h k i t r c j qdj g o ocdh j nc gg gnj np e o
oj dh dkgdl mt odj i t oc j h k i t r c d c h t d gp r b am u
npnk i ndj i m j q mt g r f mi md gbd g aj mapopm k mod dk odj i d
h kgj t noj f j kodj i kg i n o

6.3 Oc odj i t oc j h k i t nc ggi j okm gp j m amj h o f d b i t odj i d
n j aqdj g odj i j aM bpg odj i n

6.4 D n oc j h k i t j n mq n oc o oc m c n i qdj g odj i j a oc n
M bpg odj i n oc j h k i t nc ggd aj nh j m

CHAPTER 8

FORMS

Form I

Oj o

Oc j h kgd i aad m
M gdb m i o nkmdh n Gdh do

mjh I h
ndbi odj i
k mdh i o

Ocmjpbc C j a k mdh i oda i t

R dbc ma mi oj oc j ja ji p oajmKmq iodji jaDnd mOm d b jaoc j h k i t D oc pi mmdbi n f tjpm kkmjiq goj pt n gg n kmd dk g b i od lpdbt Nc mn jaoc j h k i t bbmb od b d q gp Mn kkmjis

STATEMENT OF HOLDINGS AT THE TIME OF PRE-CLEARENCE

I. DETAILS OF SHAREHOLDING OF DESIGNATED PERSONS HELD IN THEIR OWN NAME

I h	ndbi odj i	k mdh i o	I j ja Nc mnC g r dbc jgdj I j K D gd i o D	I opm ja Omi n odj i ajmr cdc kkmjiq gdh nj pbco Kpmc n N gg oc mm Kgn Nk dat	I j ja Nc mnoj gp	bbmb o q gp jaoc Omi n odj i Mn kkmjis

II. DETAILS OF SHARES HELD BY DEPENDANTS

I h	M g odj incdk	I j jaNc mn C g r dbc jgdj K D gd i oD	I opm ja Omi n odj i ajmr cdc kkmjiq gdh nj pbco Kpmc n N gg oc mm Kgn Nk dat	I j jaNc mn oj gp	bbmb o q gp jaoc Omi n odj i bbmb o q gp jaoc Omi n odj i M n kkmjis

Please tick the appropriate case:

DR c m t g m oc oDc q i jokpmc n i t nc m d g no h j i ocn Da kkmjiq gchnjpbcoajmn ggd b janc mn	
DR c m t g m oc oDc q i jonjg i t nc m d g no h j i ocn Da kkmjiq gchnjpbcoajmkpmc n janc mn	
Oc Nc mnoj gpd m ggjco pi m N KNc h ja oc j h k i t i m i jonp e oojgj f d k mdj ja h j i oc	

Signature

Name of Designated Person

Name of Department Head
Signature

Di n oc n g j a n pmdbd n ch i mnob o t k mmji g h nb i t ncbi o K mmji nc ggnk dat oc m nj i n

M nj i n

Enclosure: Undertaking

FOR OFFICE USE ONLY

PRE CLEARANCE ORDER

Occh ch oj d ajmh tjp oc o tjpm mlp no ajm gd b d i j n
Nc mn i opmn oc mN pmdbd n j a oc j h k i t ch kkmjiq Kg n i j o oc o oc n d omi n odj i h pno j h kg o r dbcd tnamjh oc o j aocchjm m

j i dbdj i n ch i t
jmM gb m i o mkmdh nGch cb
o

j h kgd i aad mH i bd b dn ojm

UNDERTAKING

D I h ndbi odji i koo mnd d b o ndhjpn ja gd b d i jn ja l pdbt Nc mn Kma Nc mn i opmn oc m N pmdbd n Kg n nk dat n h i odji d h t kkgd odji o ajmkm g mi ja oc omi n odji

nml pdn t oc j Dc m t no o oc o

Dc q i j nn oj i jm j Dc q i t d ajmh odji oc o j pg ji nomp n Kmd N i ndbdq D ajmh odji n ad d oc j pkoj oc odh ja ndbi d b ocdh pi no f d b

D h s pod b oc omi n odji nk m pgt kknjiq om d b kg i Kg n g o ocdh g pn dai jo kkgd g

D oc q i ooc o Dc q nnoj jmm dq i t d ajmh odji oc o j pg ji nomp n Pi kp gdhc kmd n i ndbdq d ajmh odji n ad d oc j ao moc ndbi d b jaocdh pi no f d b po ajm s pod b oc omi n odji ajmr c d c kknjiq gdh nj pbc o Dnc ggd ajmh oc jh kgd i aad mj aoc N h i nc gg jh kg o gt maamd anjih gd b d oc N pmdbd n j aoc jh k i t pi odgnp c d ajmh odji jh nkp gd

Dc q i jo ji omq i oc knjiqdhdji n j aoc j n i j odad t oc jh k i t anjih odh oj odh

Dc q h apgg i omp dh gi npm d oc h oo m

Kg Ndbi opm
o I h

Form II

Part I

Details of Individual

h k j	K I I j	aad d g h dg d	K mmji g h dgd	Hj dg I ph m	o ja jhdb ndbi o K mmji	I h i mmn ja p odji g Dmodbpodji amjh rcdc Cdbc no Kmja nndji g jpnm dh jhkgo	I h n ja K no ocm h kgjt mm	h o jpio odgn	I ji dh gi npm bm h io ndbi T n I j

Part II

Details of Dependent

I h ja k i io	mnn	M godji	K I I j jmd n ja I j K I oc i c m i j K mnkjmo I j mdqd b Gd in I j	K mmji g h dgd	Hj dg I ph m	h o jpio odgn

Details of Persons with whom there if Material Financial Relationship*

I h ja k i io	mnn	M godji	K I I j jmd n ja I j K I oc i c m i j K mnkjmo I j mdqd b Gd in I j	K mmji g h dgd	Hj dg I ph m	h o jpio odgn

"Material Financial Relationship" h in mgodjincdkd rcdc ji kmmji dh m dkdioja itfd jak th ionp c n t r tja gi i jmbdo pmd boc dh h do gt km d bor gq hjiocn lpdq giooj og no janp ck t mn iip gd jh ponc gg s gp mgodjincdknd rcdcoc k th iodh n ji mh ngiboc omin odjin

Part III

SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (b) read with Regulation 6(2) – Disclosure on becoming a director/KMP/Promoter]

I h jacc j h k i t

DND jacc j h k i t

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

I h K I I j D D mnn rdbc jio o ijn	objmtja K mnji Kmjhjomm FHK dnojmmdh h do mgodqnjcc mm o	oja kkjdoh ioja dnojm FHK M oja jhdb Kmjhjom	N pmdbdn c g o cc odh ja jhdb Kmjhjom kkjdoh io ja dnojmFHK		ja Nc mcj g d b	k i Do mnnojacc popm jiom oncg occ odh ja jhdb Kmjhjom kkjdoh ioja dnojm FHK			k i Do mnnojacc kodji jiom oncg occ odh ja jhdb Kmjhjom kkjdoh ioja dnojmFHK		
			Otk jan pmdbt jmb Nc mn R mmion jiq modg iopmn o	I j		jiom o nk dad odjin	I ph m japidon jiom on gio ndu	I jodj i g q gp d Mpk o mhn	jiom o nk d ad od jin	I ph m ja pidon jiom on gio ndu	I jodji g q gp d Mpk o mhn

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

(ii) In case of Options, notional value shall be calculated based on premium plus strike price of options

I h Ndbi opm

ndbi odji

o

Kg

Form III

Oj o
Oc j h kgd i aad m
M gb m i o nkmh n Gh ob

D **HALF YEARLY STATEMENT OF SHAREHOLDING OF DESIGNATED PERSONS**

I h	ndbi od ji	k mh i o	I j ja N pmdd nC g ji	I j ja N pmdd n jpbco pmd b oc C ga T m	I j ja N pmdd nNj g pmd b oc C ga T m	I j ja N pmdd nc g ji	jgj K D gd i o D

II. DETAILS OF SHARES HELD BY DEPENDANTS

I h	M g odj i nc dk	I j ja N pmdd n C g ji	I j ja N pmdd n jpbco pmd b oc C gat m	I j ja N pmdd n Nj g pmd b oc C gat m	I j ja N pmdd n c g ji	jgj K D gd i o D

DR c m t g m oc o DR c q j h kgd r dc oc j i KDD M bpg odj i n r dc mnk oj aoc N pmdd nkpmc n nj g

DR apmoc m g m oc ooc j q dh gj npm dhomp i j mm o i dh d j m i r dc oc kmqdj pn dh gj npm bdq i oj oc j h k i t

Ndbi opm

I h

Form IV

Oj o
Oc j h kgd i aad m
M gb m i o nkmh n Gch ob

ANNUAL DISCLOSURE

D **STATEMENT OF SHAREHOLDING OF DESIGNATED PERSONS**

I h	ncbi od ji	k mh i o	I j ja N pmbd nC g ji m kmg	I j ja N pmbd n j pbco pmd b T m	I j ja N pmbd nNj g pmd b T m	I j ja N pmbd nc g ji m H mc	jgj K D gd i o D

II. DETAILS OF SHARES HELD BY DEPENDANTS

I h	M g odj i nc dk	I j ja N pmbd n C g ji m kmg	I j ja N pmbd n j pbco pmd b oc t m	I j ja N pmbd n Nj g pmd b oc t m	I j ja N pmbd n c g ji m H mc	jgj K D gd i o D

DR c m t g m oc o DR c q j h kgd r dc oc j i KDO M bpg odj i n r dc mnk oj acc N pmbd nkpmc n nj g

DR apmoc m g m oc ooc j q dh gj npm dh omp i j mm o i dh d j m i r dc oc kmqdj pn dh gj npm bdq i oj oc j h k i t

Ndbi opm
I h