PODDAR PIGMENTS

Ref: PPL/JPR/SECT/23-24

Date : 29th May, 2023

BSE Ltd.,
Phiroze Jeejeebhoy Towers,
25th Floor, Dalal Street, Fort,
Mumbai -400001

Company Code : 524570

National Stock Exchange of India Ltd.,
Exchange Plaza, Plot No. C/1, G Block,
Bandra-Kurla Complex, Bandra (E),
Mumbai - 400051

Company Symbol : PODDARMENT

Sub: Intimation under Regulation 8(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015

Dear Sir/Madam,

Pursuant to the provisions of Regulation 8(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended, we hereby inform you that the Board of Directors of the Company at its meeting held today i.e. 29th May, 2023, has amended the "Code of Practices and Procedures for Fair Disclosure" as attached herewith.

The same is also being made available on the website of the Company.

This is for your information and records.

Thanking you,

Yours faithfully,
For Poddar Pigments Limited

ANIL KUMAR SHARMA

Anil Kumar Sharma
Compliance Officer

Encl: As above

Poddar Pigments Limited
Regd. Office & Works :
E-10-11 & F-14 to 16
RIICO Industrial Area, Sitapura
Jaipur - 302 022 Rajasthan, India.
Tel.: +91-141-2770202/03/287/291
Fax : +91-141-2771922
Email : jaipur@poddarpigmentsltd.com
CIN : L24117RJ1991PLC006307
GSTIN : 08AAACP1125E1ZZ

P

P

1.

a.

b.

c.

P

d.

P

2.

3.

P

4.

5.

6.

7.

P

Need-to-Know

Explanation:- *Need to Know*

P

P

P

P

P

P

P

P

P

Annexure 1

Annexure 2

P

P

Annexure 3

P

Annexure 4

P

P

P

(i)

Annexure 5

(ii)

Annexure 6

P

(iii)

Annexure 7)

(iv)

(Annexure 8)

P

P

P

P

ANNEXURE-1
APPLICATION FOR PRE-CLEARANCE APPROVAL

Date:

To,
The Compliance Officer,
Poddar Pigments Limited
E-10-11 & F-14 to 16, RIICO Industrial Area,
Sitapura, Jaipur – 302022

Dear Sir/Madam,

Application for Pre-clearance approval in securities of the Company

Pursuant to the SEBI (prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct to Regulate, Monitor and Report Trading by Insiders, I seek approval to purchase / sale / subscription of ______________________ equity shares of the Company as per details given below:

1.	Name of the applicant		
2.	Designation		
3.	Number of securities held as on date		
4.	Folio No. / DP ID / Client ID No.)		
5.	The proposal is for		(a) Purchase of securities (b) Subscription to securities (c) Sale of securities
6.	Proposed date of dealing in securities		
7.	Estimated number of securities proposed to be acquired/subscribed/sold		
8.	Price at which the transaction is proposed		
9.	Current market price (as on date of application)		
10.	Whether the proposed transaction will be through stock exchange or off-market deal		
11.	Folio No. /DPID / Client ID No. where the securities will be credited / debited		

I enclose herewith the form of Undertaking (ANNEXURE-2) signed by me.

Yours faithfully,

(Signature of Employee)

ANNEXURE-2

FORMAT OF UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-CLEARANCE UNDERTAKING

To,
The Compliance Officer,
Poddar Pigments Limited
E-10-11 & F-14 to 16, RIICO Industrial Area,
Sitapura, Jaipur – 302022

I, ________________, _________________of the Company residing at, am desirous of dealing in ___________* shares of the Company as mentioned in my application dated _________________________ for pre-clearance of the transaction.

I further declare that I am not in possession of or otherwise privy to any unpublished Price Sensitive Information (as defined in the Company's Code of Conduct for prevention of Insider Trading (the Code) up to the time of signing this Undertaking.

In the event that I have access to or received any information that could be construed as "Unpublished Price Sensitive Information (UPSI)" as defined in the Code, after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public. I declare that I have not contravened the provisions of the Code as notified by the Company from time to time.

I undertake to submit the necessary report within four days of execution of the transaction / a 'Nil' report if the transaction is not undertaken.

If approval is granted, I shall execute the deal within 7 days of the receipt of approval failing which I shall seek pre-clearance.

I declare that I have made full and true disclosure in the matter.

Date :

Signature :

* Indicate number of share

ANNEXURE-3
FORMAT FOR PRE- CLEARANCE ORDER

To,
Name:
Designation :
Place :

This is to inform you that your request for dealing in_____________ (nos) shares of the Company as mentioned in your application dated______________is approved.

Please note that the said transaction must be completed on or before__________ (date) that is within 7 Trading Days from today.

In case you do not execute the approved transaction /deal on or before the aforesaid date you would have to seek fresh pre-clearance before executing any transaction/deal in the securities of the Company. Further, you are required to file the details of the executed transactions in the attached format (ANNEXURE-4) within 2 Trading Days from the date of transaction/deal. In case the transaction is not undertaken a 'Nil' report shall be necessary.

Yours faithfully,
For Poddar Pigments Limited

Compliance Officer

Date :

Encl: Format (Annexure-4) for submission of details of transaction

ANNEXURE-4

FORMAT FOR DISCLOSURE OF TRANSACTIONS

(To be submitted within 2 Trading Days of transaction / dealing in securities of the Company)

To,
The Compliance Officer,
Poddar Pigments Limited
E-10-11 & F-14 to 16, RIICO Industrial Area,
Sitapura, Jaipur – 302022

I hereby inform that I
have not bought / sold/ subscribed any securities of the Company
have bought/sold/subscribed to securities as mentioned below on (date)

Name of holder	No. of securities dealt with	Bought/sold/subscribed	DP ID/Client ID / Folio No	Price (Rs.)

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 5 years and produce to the Compliance officer / SEBI any of the following documents:
Broker's contract note.
Proof of payment to/from brokers.
Extract of bank passbook/statement (to be submitted in case of demat transactions).
Copy of Delivery instruction slip (applicable in case of sale transaction).

I agree to hold the above securities for a minimum period of six months. In case there is any urgent need to sell these securities within the said period, I shall approach the Compliance Officer for necessary approval. (Applicable in case of purchase / subscription).

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

Date :

Signature :
Name :
Designation:

ANNEXURE-5
FORMAT FOR INITIAL DISCLOSURE OF SECURITIES
Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (b) read with Regulation 6 (2)]

Name of the company:

ISIN of the company:

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

Name, PAN, CIN / DIN & address with contact nos.	Category of Person (KMP /Director or Promoter or member of the promoter group/ Immediate relative to/others, etc.)	Date of appointment of KMP/ Director/ OR Date of becoming Promoter/ member of the promoter group	Securities held at the time of appointment of KMP/Director or upon becoming Promoter or member of the promoter group		% of Shareholding
			Type of security (For e.g. Shares, Warrants, Convertible Debentures, Rights entitlements etc.)	No.	
1	2	3	4	5	6

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

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

Open Interest of the Future contracts held at the time of appointment of Director/KMP or upon becoming Promoter/ member of the promoter group			Open Interest of the Option Contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group		
Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms

7	8	9	10	11	12

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

Name:

Signature:

Designation:

Date:

Place:

ANNEXURE-6

Name of the company:

ISIN of the company:

Details of change in holding of Securities of Promoter, Member of the Promoter Group, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2)

Name, PAN, CIN / DIN & address with contact nos.	Category of Person (Promoters / Promoter Group / KMP / Director / immediate relative to / others, etc.)	Securities held prior to acquisition / disposal		Securities acquired / disposed				Securities held post acquisition /disposal		Date of allotment / advice acquisition of shares/ sales of shares specify		Date of intimation to Company	Mode of acquisition/ disposal on market / public/ rights / preferential offer / off market / inter-se transfer, ESOPs, etc.	Exchange on which the trade was executed
		Type of security (For e.g. Shares, Warrants, Convertible Debentures, Rights entitlements etc.)	No. and % of shareholding	Type of security (for e.g. Shares Warrants, Convertible Debentures, Rights entitlements etc.)	No.	Value	Transaction Type (Buy/Sale/ Pledge / Revoke / Invoke	Type of security (for e.g. Shares, Warrants, Convertible Debentures, etc.)	No. and % of shareholding	From	To			

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

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

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

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

Signature:

Designation:

Date:

Place:

ANNEXURE-7

Name of the Company:

ISIN of the Company:

Transactions by other connected persons as identified by the Company

Name, PAN, CIN / DIN & address with contact nos.	Connection with company	Securities held prior to acquisition / disposal		Securities acquired / disposed	Securities held post acquisition /disposal	Date of allotment / advice acquisition of shares/ sales of shares specify	Date of intimation to Company	Mode of acquisition/ disposal on market / public/ rights / preferential offer / off market / inter-se transfer, ESOPs, etc.	Exchange on which the trade was executed
		Type of security (For e.g. Shares, Warrants, Convertible Debentures, Rights entitlements etc.)	No. and % of shareholding	Type of security (for6					

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

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

Signature:

Designation:

Date:

Place:

ANNEXURE-8

E-10-11 & F-14 to 16,
RIICO Industrial Area, Sitapura,

Particulars	Details
Name of educational institutions from which I graduated	1. 0 2. 3. 4.
Name(s) of the past employer(s), if any	1. 2. 3. 4.

____

____

____

____