

**ARCHEAN CHEMICAL INDUSTRIES LIMITED**

**CODE OF CONDUCT FOR PREVENTION OF  
INSIDER TRADING**

<b>Effective Date</b>	<b>29<sup>th</sup> January 2022</b>
<b>Last Revised on</b>	<b>7<sup>th</sup> February 2025</b>

## **CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING**

### **1. Introduction**

Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended (hereinafter referred to as “**PIT Regulations**”) requires *inter alia* every listed company and board of directors or heads of every intermediary shall ensure that the CEO or MD to formulate a code of conduct with their approval to regulate, monitor and report trading by its designated persons and immediate relatives of designated persons towards achieving compliance with these regulations and enforce a code of internal procedures and conduct based on the Model Code in accordance with the Regulations. Further, Regulation 7 of the PIT Regulations requires every promoter, member of the promoter group, key managerial personnel, directors and connected person of listed companies to disclose their shareholdings and changes to such shareholding to the respective companies.

In compliance with the above requirements, Archean Chemical Industries Limited (hereinafter referred to as “**the Company**”) has introduced a code for Prohibition of Insider Trading (hereinafter referred to as the “**Code**”).

### **2. Objective**

The Company endeavors to preserve the confidentiality of unpublished price sensitive information and to prevent misuse of such information. The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations.

Every Designated Person of the Company has a duty to safeguard the confidentiality of all such information obtained in the course of his or her work at the Company. No Designated Person may use his or her position or knowledge of the Company to gain personal benefit or to provide benefit to any third party. Such persons are prohibited from communicating/ counseling others with respect to the securities of the Company. Such persons should also refrain from profiteering by misusing the unpublished price sensitive information and thereby enabling the Company to retain investor confidence.

To achieve these objectives, the Company hereby notifies that this Code is to be followed by all Designated Persons.

### **3. Definition of terms**

- 3.1 ‘**Act**’ means the Securities and Exchange Board of India Act, 1992 as amended from time to time.
- 3.2 ‘**Code**’ means this Code of Conduct to regulate, monitor and report trading by Insiders in securities of the Company as amended from time to time.
- 3.3 ‘**Compliance Officer**’ means the Company Secretary of the Company. If there is no Company Secretary, any other senior level employee who shall report directly to the Managing Director and appointed by the Company as compliance officer.
- 3.4 ‘**Connected Person**’ means
  - i. any person who is or has been, during the six months prior to the concerned act, associated with a company, in any capacity, directly or indirectly, 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

***Code of Conduct for Prevention of Insider Trading; effective from 10<sup>th</sup> February 2023***

or an employee of the company or holds any position including a professional or business relationship, whether temporary or permanent, with the company, that allows such a 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, -
  - i. a relative of connected persons specified in clause (i); or
  - ii. a holding company or associate company or subsidiary company; or
  - iii. an intermediary as specified in section 12 of the Act or an employee or director thereof; or
  - iv. an investment company, trustee company, asset management company or an employee or director thereof; or
  - v. an official of a stock exchange or of clearing house or corporation; or
  - vi. 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
  - vii. 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
  - viii. an official or an employee of a self-regulatory organization recognised or authorized by the Board; or
  - ix. a banker of the company; or
  - x. a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his relative or banker of the company, has more than ten per cent of the holding or interest; or
  - xi. a firm or its partner or its employee in which a connected person specified in sub-clause (i) of clause (d) is also a partner; or
  - xii. a person sharing household or residence with a connected person specified in sub-clause (i) of clause (d);

3.5 **‘Designated Persons’** shall include person identified by the Board of Directors in consultation with the Compliance Officer based on his/her role and function in the organisation and the access to UPSI and shall also include:

- (i) The Promoters of the Company;
- (ii) Members of the Board of Directors of the Company;
- (iii) Key Managerial Personnel of the Company;
- (iv) Auditors of the Company;
- (v) All employees, support staff of the Accounts, Finance, Legal, Internal audit, Information technology and Secretarial Department of the Company at the Registered and Corporate Office;
- (vi) Key Managerial Personnel of the material subsidiary of the Company;
- (vii) Secretaries/Executive Assistants reporting to the Directors and the Key Managerial Personnel;
- (viii) All Departmental Heads of the Company;
- (ix) Employees of other Departments/Divisions on a case-to-case basis, who could be reasonably expected to have access to UPSI(s) relating to the Company, to be decided by the Chairman/Managing Director/Compliance Officer/Chief Financial Officer, on a case-to-case basis;
- (x) Employees of material subsidiaries of the Company designated on the basis of their functional role or access to UPSI in the organisation by their Board of Directors;

- (xi) Employees upto two levels below the Board of Directors of the Company irrespective of their functional role in the company or ability to have access to UPSI;
- (xii) Any support staff of the Company, such as IT staff or secretarial staff Legal Staff, Finance Staff, Strategy Staff who have access to UPSI; and
- (xiii) Such other persons as may be identified by the Compliance Officer or Board

For the purpose of this Code, the aforesaid persons are individually or collectively referred to as “**Designated Persons**”.

- 3.6 ‘**Generally Available Information**’ means information that is accessible to the public on a non-discriminatory basis and shall not include unverified event or information reported in print or electronic media.
- 3.7 ‘**Immediate Relative**’ means the 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. A spouse is presumed to be an “immediate relative” unless rebutted so.

For the purpose of this Code, the declaration given by a Designated Person of an Immediate Relative who is either dependent financially on the person or who consults such person in taking decisions relating to trading in securities will be considered.

- 3.8 ‘**Insider**’ means any person who is
- (i) a Connected Person;
  - (ii) In possession of or having access to unpublished price sensitive information.
- 3.9 ‘**Pre-Clearance of Trade**’ means prior approval for trading/ dealing in the securities of the Company.
- 3.10 ‘**Promoter**’ shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof;
- 3.11 “relative” shall mean the following:
- (i) spouse of the person;
  - (ii) parent of the person and parent of its spouse;
  - (iii) sibling of the person and sibling of its spouse;
  - (iv) child of the person and child of its spouse;
  - (v) spouse of the person listed at sub-clause (iii); and
  - (vi) spouse of the person listed at sub-clause (iv)
- 3.12 ‘**Securities**’ shall have the meaning assigned to it under the Securities Contracts Regulation Act, 1956 or any modification thereof except units of a mutual fund.
- 3.13 ‘**Trading**’ means and includes subscribing, redeeming, switching, buying, selling, dealing or agreeing to subscribe, buy, sell, deal in securities and ‘trade’ shall be construed accordingly.
- 3.14 ‘**Trading Day**’ means a day on which recognized stock exchanges are open for trading.

- 3.15 **‘Unpublished Price Sensitive Information/ UPSI’** means any information, relating to the Company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the Securities of the Company and shall, ordinarily including but not restricted to, information relating to the following:
- (i) Periodical financial results of the Company;
  - (ii) Dividends (both interim and final);
  - (iii) Change in capital structure;
  - (iv) Mergers, demergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
  - (v) Changes in Key Managerial Personnel; and
- 3.16 **‘Trading Window’** refers to the period during which the Company’s securities can be traded by the Designated Person as provided in this Code.
- 3.17 **‘PIT Regulations’** means Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time.

Words and expressions used and not defined in this Code but defined in SEBI Act, 1992, the SCRA Act, 1956, the Depositories Act, 1996 or Companies Act, 2013 and Rules and Regulations thereunder shall have the meanings respectively assigned to them in those legislations.

#### **4 Compliance Officer**

- 4.1. The Board of Directors of the Company has appointed the Company Secretary of the Company as the Compliance Officer for the purposes of this Code.
- 4.2. The Compliance Officer shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of ‘Unpublished Price Sensitive Information’, pre-clearing of Designated Persons, monitoring of trades and the implementation of the Code of Conduct under the overall supervision of the Board of Directors.
- 4.3. The Compliance Officer shall maintain a record of persons and shall make changes to such record as and when the intimation of changes from the HR Department is received.
- 4.4. The Compliance Officer shall assist all the employees in addressing any clarifications regarding the PIT Regulations and the Company’s Code of Conduct.
- 4.5. The Compliance Officer shall maintain records of all the declaration(s) given by the Designated Persons for a minimum period of three years.
- 4.6. Reviewing the trading plan and assessing the potential of the plan for violation of the PIT Regulations, if any;
- 4.7. The compliance officer shall approve or reject the trading plan within two trading days of receipt of the trading plan and notify the approved plan to the stock exchanges on which the securities are listed, on the day of approval.

## **5 Prohibition on Dealing, Communicating or Counseling on Matters relating to Insider Trading.**

No insider shall:-

- (i) either on his own behalf, or on behalf of any other person, deal in securities of the Company when in the possession of any unpublished price sensitive information;
- (ii) communicate, provide, or allow access to any unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

## **6 Preservation of ‘Unpublished Price Sensitive Information’**

Designated Persons shall maintain the confidentiality of all Unpublished Price Sensitive Information. Designated Persons shall not pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sale of Securities. To this end, no Designated Person shall:

- a. pass on Unpublished Price Sensitive Information to any person; or
- b. disclose Unpublished Price Sensitive Information to their Immediate Relatives and any other person; or
- c. discuss Unpublished Price Sensitive Information in public places where others might overhear; or
- d. disclose Unpublished Price Sensitive Information to any other Designated Person or any other person who does not need to know the information to do his or her job; or
- e. give others the perception that he/she is trading on the basis of Unpublished Price Sensitive Information.

Following practices should be followed in this regard.

### **6.1 Need to know**

Unpublished Price Sensitive Information is to be handled on a ‘need to know’ basis i.e., Unpublished Price Sensitive Information should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of information. No Unpublished Price Sensitive Information shall be communicated to any person except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations, or in any other manner which is contrary to Regulation 3 of the Regulations. It is clarified that the term ‘legitimate purpose’, shall have the same meaning as provided under the Company’s policy on ‘**Code of Fair Practices & Disclosure**’ which is attached as Annexure-A to this code.

While communicating or allowing access to the Unpublished Price Sensitive Information, the Designated Person(s) is required to give due notice to such person(s) with whom the Unpublished Price Sensitive Information is shared, to maintain confidentiality of such Unpublished Price Sensitive Information in compliance with the Regulations and the Code.

### **6.2 Limited access to Unpublished Price Sensitive Information**

Files containing Unpublished Price Sensitive Information shall be kept secure. Computer files must have adequate security of login and password. Without prejudice to the above, Designated Persons shall follow such guidelines for maintenance of electronic records and

systems as may be prescribed by the Compliance Officer from time to time after consultations with the person in charge of the IT teams.

### **6.3 Restrictions on Designated Persons and their Immediate Relatives**

#### **No Designated Person, their Immediate Relatives shall –**

- i. Communicate, provide, or allow access to any Unpublished Price Sensitive Information;
- ii. Procure from or cause the communication by any other person of Unpublished Price Sensitive Information;
- iii. either on his own behalf, or on behalf of any other person, Trade when in possession of any Unpublished Price Sensitive Information unless made in accordance with the Trading Plan. Such prohibition shall include Trades undertaken through portfolio management schemes, whether discretionary or non-discretionary;
- iv. advise any person to Trade in the Securities while being in possession, control or knowledge of Unpublished Price Sensitive Information. For avoidance of any doubt it is clarified that “advice” shall mean to include recommendations, communications or counselling.

*Explanation 1: It is clarified that when any of the abovementioned persons trades in securities of the Company while in possession of unpublished price sensitive information, his/her trades would be presumed to have been motivated by the knowledge and awareness of such information in his / her possession.*

*Explanation 2: It is further clarified that such communication, procurement or allowing access can be made in furtherance of legitimate purposes, performance of duties or discharge of legal obligations, as referred under Clause 5.2 of this Code.*

Provided that for the purposes of the Code, Trading and advising any person to Trade by an Immediate Relative of a Designated Person shall be deemed to have been done by the concerned Designated Person and such Designated Person shall be liable to comply with all the provisions of the Code as may be applicable to such trading and advice. The Designated Person shall ensure that the Immediate Relative complies with all the provisions of this Code. Nothing contained herein shall preclude the Immediate Relative to Trade in the Securities of the Company in the ordinary course of business without being in possession of Unpublished Price Sensitive Information.

Each Designated Person and their Immediate Relatives shall ensure that their respective wealth managers, portfolio managers or similar persons do not Trade in the Securities of the Company on behalf of any Designated Person, unless such Designated Person is permitted to Trade in the Securities of the Company in accordance with this Code.

### **6.4 Declaration required from all Designated Persons**

All Designated Persons of the Company shall by the [●] declare to the Compliance Officer, his/her shareholding in the Company and the shareholding of his/her Immediate Relatives in the Company as on [●] in the format prescribed in FORM A.

Any other person, upon being designated by the Compliance Officer as a Designated Person or joining the company as a Designated Person shall within 7 (seven) calendar days declare to the Compliance Officer, his/her shareholding in the Company and the shareholding of his/her Immediate Relatives in the Company in the format prescribed in FORM B.

## **6.5 Restrictions on opposite transactions and short selling**

### **Contra Trade**

- a. All Designated Persons who buy or sell any number of Securities of the Company shall not enter into an opposite transaction i.e. sell or buy any number of Securities during the next 6 (six) months following the prior transaction ("Contra Trade"). All Designated Persons shall also not take positions in derivative transactions in the Securities of the Company at any time.
- b. If a Designated Person intends to enter into a Contra Trade, such Contra Trade may be made only with prior approval of the Compliance Officer. The Compliance Officer while approving such exception to Clause a above, shall record in writing the reasons for which such exception was granted and why such exception would not be in violation of the Code or the Regulations.
- c. In the event that a Contra Trade has been executed without prior approval of the Compliance Officer the profits from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

It is clarified that the above restrictions on undertaking Contra Trade shall not be applicable for trades executed pursuant to exercise of employee stock options and on participation in buy-back offers, open offers, rights issue, further public offers, bonus issues and exit offers.

### **Short Selling**

No Designated Person shall directly or indirectly sell any Security if such person (i) does not own the Security sold; or (ii) owns the Security but does not deliver such Security against such sale within the acceptable settlement cycle ("short sale").

## **7 Trading Plan**

7.1. An insider shall be entitled to formulate a trading plan in accordance with Clause 7.2 ("Trading Plan"). The Trading Plan so formulated shall be presented to the Compliance Officer and for public disclosure and such Designated Person(s) or their Immediate Relative(s) may Trade only in accordance with their Trading Plan.

### **7.2. The Trading Plan shall;**

7.2.1. not entail commencement of trading on behalf of the Designated Person or their Immediate Relatives earlier than 120 calendar days from the public disclosure of the Trading Plan;

7.2.2. ;

7.2.3. not entail overlap of any period for which another trading plan is already in existence;

7.2.4. set out following parameters for each trade to be executed

- (i) either the value of trade to be effected or the number of securities to be traded;
- (ii) nature of the trade;



(iii) either specific date or time period not exceeding five consecutive trading days;  
price limit, that is an upper price limit for a buy trade and a lower price limit for a sell trade, subject to the range as specified below:

- (iii)
- a. for a buy trade: the upper price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent higher than such closing price;
  - b. for a sell trade: the lower price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent lower than such closing price.

Explanation:

- (i) While the parameters in sub-clauses (i), (ii) and (iii) shall be mandatorily mentioned for each trade, the parameter in sub-clause (iv) shall be optional.
- (ii) The price limit in sub-clause (iv) shall be rounded off to the nearest numeral.
- (iii) Insider may make adjustments, with the approval of the compliance officer, in the number of securities and price limit in the event of corporate actions related to bonus issue and stock split occurring after the approval of trading plan and the same shall be notified on the stock exchanges on which securities are listed; and

7.2.5. not entail trading in securities for market abuse.

7.3. The Compliance Officer shall review the Trading Plan to assess whether such plan would have any potential for violation of the Regulations and shall be entitled to seek such express undertaking as may be necessary to enable such assessment and to approve and monitor the implementation of the plan

7.4. The Trading Plan once approved shall be irrevocable and the Designated Person or his Immediate Relative who has formulated the said Trading Plan, shall mandatorily have to implement the Trading Plan and shall not be entitled to execute any trade outside the scope of the Trading Plan or to deviate from it except due to permanent incapacity or bankruptcy or operation of law.

Provided that the implementation of the Trading Plan shall not be commenced if any Unpublished Price Sensitive Information in possession of the Designated Person or his Immediate Relative at the time of formulation of the plan has not become Generally Available Information at the time of the commencement of implementation.

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

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

(i) The insider shall intimate non-implementation (full/partial) of trading plan to the compliance officer within two trading days of end of tenure of the trading plan with reasons thereof and supporting documents, if any.

(ii) Upon receipt of information from the insider, the Compliance Officer, shall place such information along with his recommendation to accept or reject the submissions of the insider, before the Audit Committee in the immediate next meeting. The Audit Committee shall decide whether such non-implementation (full/partial) was bona fide or not.

(iii) The decision of the Audit Committee shall be notified by the compliance officer on the same day to the stock exchanges on which the securities are listed.

(iv) In case the Audit Committee does not accept the submissions made by the insider, then the compliance officer shall take action as per the Code of Conduct.

## **8 Trading Window**

1.1. The Company shall specify a trading period for trading in the Securities (“Trading Window”).

1.2. All Designated Persons or their Immediate Relatives shall conduct all their trading in the Securities only when the Trading Window is open and no Designated Person or their Immediate Relatives shall trade in the Securities during the period when the Trading Window is closed or during any other period as may be specified by the Compliance Officer from time to time.

1.3. Unless otherwise specified by the Compliance Officer, the Trading Window shall be closed for all Designated Persons and their Immediate Relatives during the following periods:

1.3.1. *\*closed from the end of every quarter till 48 hours after the declaration of financial results of the Company.* and

1.3.2. inter alia be closed 2 (two) calendar days prior to and 2 (two) calendar days after:

- a. any intended announcements regarding amalgamation, mergers, takeovers and buy-back, disposal of whole or substantially whole of the undertaking, issue of Securities by way of public/ rights/bonus etc., any major expansion plans or execution of new projects,
- b. any changes in policies, plans or operations of the Company that could have a material impact on its financial performance.

*\* Amended and approved at the Board Meeting held on 10<sup>th</sup> February 2023*

1.4. The Trading Window shall be closed when the Compliance Officer or the Board determines that a Designated Person or class of Designated Persons can reasonably be expected to have possession of Unpublished Price Sensitive Information and shall remain closed during the time the Unpublished Price Sensitive Information remains unpublished. The Trading Window shall be opened 48 (forty-eight) hours after the Unpublished Price Sensitive Information is made public.

1.5. In addition to the above, the Compliance Officer may after consultation with any two Directors, declare the Trading Window closed, on an “as-needed” basis for any reason and for such other persons, as the Compliance Officer may deem fit.

1.6. Despite the Trading Window being open, Designated Persons or their Immediate Relatives would only be allowed to Trade subject to the conditions specified in Clause 9 below and provided that they are not in possession of any Unpublished Price Sensitive Information at the time they carry out the transaction.

1.7. **The restriction on trading window shall not be applicable in the following circumstances:**

- a. the transaction is an off-market inter-se transfer between insiders who were in possession of the same unpublished price sensitive information without being in breach of the Regulations and both parties had made a conscious and informed trade decision
- b. the transaction was carried out through the block deal window mechanism between persons who were in possession of the unpublished price sensitive information without being in breach of the Regulations 3 of the Regulations and both parties had made a conscious and informed trade decision;  
Provided the transaction mentioned in sub-clauses (a) and (b) above, should not pertain to such unpublished price sensitive information which was obtained in a manner provided under Regulation 3(3) of the Regulations.
- c. the transaction in question was carried out pursuant to a statutory or regulatory obligation to carry out a bona fide transaction.
- d. the transaction in question was undertaken pursuant to the exercise of stock options in respect of which the exercise price was pre-determined in compliance with applicable regulations.
- e. the trades were pursuant to a trading plan set up in accordance with Clause 7 above
- f. Pledge of shares for a bonafide purpose such as raising of funds, subject to pre-clearance by the Compliance Officer under clause 8 and compliance with the respective regulations.
- g. Transactions undertaken in accordance to respective regulations made by SEBI, such as acquisition by conversion of warrants or debentures, subscribing to rights issue, further public issue, preferential allotment or tendering of shares in a buy-back offer, open offer, delisting offer.

## **9 Pre-clearance of transactions in Securities**

### **9.1. Applicability**

9.1.1. All Designated Persons who (or whose Immediate Relatives) intends to Trade in the Securities in a calendar quarter (either in one transaction or in a series of transactions) of a consideration price exceeding Rs. 10,00,000 (Rupees Ten Lakhs) for the Securities should obtain a prior approval for the transactions as per the procedure described hereunder. This is a mandatory requirement even when the trading window is open.

9.1.2. Any Designated Person or his/her Immediate Relatives who carries on any transaction or series of transaction to circumvent this clause shall be in violation of this Code.

Explanation: It is clarified that pre-clearance is not required for (1) trades executed in accordance with a Trading Plan which is approved under Clause 7 of this Code; (2) exercise of employee stock options

### **9.2. Procedure for the purpose of obtaining a prior approval to a transaction**

The Designated Person should make an application (for his/her trading or the trading of his/her immediate relative), in the prescribed form to the Compliance Officer. Such application should be complete and correct in all respects and should be accompanied by such

undertakings, declarations, indemnity bonds and other documents/papers as may be prescribed by the Compliance Officer from time to time, in the prescribed form.

### **9.3. Approval**

9.3.1. The Compliance Officer shall consider the application made as above and shall approve it unless he/she is of the opinion that the grant of such approval would result in a breach of the provisions of the Code, or the Regulations or the Act or any other law in force at that time.

9.3.2. The Compliance Officer shall be entitled to seek declarations to the effect that the Designated Person or his Immediate Relative applying for pre-clearance is not in possession of any Unpublished Price Sensitive Information. The Compliance Officer shall also have the discretion to assess and decide as to whether such declarations are factually accurate.

9.3.3. Every approval letter shall be in such format as may be prescribed by the Company from time to time.

9.3.4. The Compliance Officer shall convey his decision to the Designated Person or his Immediate Relative, as the case may be, within 2 (two) Trading Days of receipt of the application. If the Compliance Officer does not respond within 2 (two) Trading Days, it shall be deemed to be a rejection of the application.

9.3.5. Every approval shall be dated and shall be valid for a period of 7 (seven) calendar days or such lesser period as prescribed in the approval.

9.3.6. All transactions involving the Compliance Officer shall be approved by the CEO.

9.3.7. In case any such person procures or comes in possession of Unpublished Price Sensitive Information before execution of the Trade during the subsistence of the pre-clearance sought in accordance with this clause 9.3, such person shall refrain from executing the Trade.

### **9.4. Completion of approved transaction**

9.4.1. All Designated Persons and his Immediate Relative shall ensure that they complete execution of every approved transaction in the Securities as provided in Clause 9.1 within the expiry of the approval period and send within 2 (two) Trading Days of execution of the transaction, the details of such transaction, to the Compliance Officer in such format as may be prescribed by the Company from time to time.

9.4.2. If a transaction is not executed within the approval period, the Designated Person or his Immediate Relative must apply to the Compliance Officer for pre-clearance of the transaction, if they intend to transact again.

### **9.4.3. Disclosure to the Company and stock exchanges**

Transactions by Designated Persons and their Immediate Relatives in accordance with Clause 8.1.1, are required to be disclosed by such persons to the Company within 2 (two) Trading Days of the transaction. The obligation to disclose trading by the Immediate Relatives of Designated Persons or by any other person for whom such Designated Person takes trading decisions, is upon the said Designated Person.

Off-market trades as mentioned in Clause 8.7(a) shall be reported to the Company within 2 (two) working days

Additionally, transactions by Designated Persons or their Immediate Relatives in accordance with Clause 9.1.1 in which the consideration price for Securities exceeds Rs. 10,00,000/- (Rupees Ten Lakhs) are required to be disclosed by the Company to the stock exchanges within 2 (two) Trading Days of receipt of disclosure from Designated Persons or their Immediate Relatives.

#### **9.5. Advice regarding Pre-Clearance**

In case of doubt, Designated Persons and their Immediate Relatives shall be responsible to check with the Compliance Officer or one of the contact persons designated by the Compliance Officer, if any, from time to time, whether the provisions of this Clause 9 are applicable to any particular proposed transaction in the Securities.

#### **9.6. Reporting and Disclosure**

9.6.1. The Compliance Officer shall place before the Board and the chairman of the Audit Committee, on a quarterly basis, all the details of the trading in the Securities of the Company done by the Designated Persons or their Immediate Relatives under Clause 9.4 together with the accompanying documents that such persons had executed under the pre- approval procedure as outlined above.

9.6.2. The Company shall be entitled to disclose to all the stock exchanges where its Securities are listed, the information provided by Designated Persons or their Immediate Relatives to the Compliance Officer in accordance with the Code.

### **10 Penalty for Contravention**

10.1. Every Designated Person is individually responsible for complying with the applicable provisions of the Code (including to the extent the provisions hereof are applicable to the Immediate Relatives of the Designated Persons).

10.2. Any person who violates this Code shall be deemed to be in violation of the Company's Code of Conduct, Integrity Policy, the penalty for which shall be decided as per the discretion of the Compliance Officer after discussion with the Audit Committee, where necessary and whether the violation was intentional or unintentional.

10.3. For a transaction involving the Chairman of the Company, the Chairman of the Audit Committee shall decide the penalty and whether the violation was intentional or unintentional.

10.4. Besides the above stated penalties, sanctions such as, wage freeze, suspension, recovery, and clawback may also be imposed on the Designated Person who has violated any of the provisions of this Code or the Regulations.

10.5. Where necessary, the Company shall inform SEBI and any other applicable regulatory authority for any instances of violation of this Code or the Regulations which comes to the Company's knowledge. In addition to the action taken by the Company, the Designated Person or his/her Immediate Relatives who has violated the provisions of this Code shall provide any information required by and comply with any order passed by SEBI or other regulatory authorities under any other applicable laws/rules/regulations.

## **11 Interpretation or clarification**

In case any difficulty or doubt arises in the interpretation of the Code, the matter shall be referred to any two Directors and their decision shall be final and binding. If the issue involves any act or matter involving the Chairman, the Chairman of the Audit Committee shall decide upon such issue.

## **12 Enquiries**

For any questions regarding whether they possess or have access to Unpublished Price Sensitive Information, Designated Persons or their Immediate Relatives may contact the Compliance Officer.

## **13 Disclaimer**

The Code is the internal policy of the Company to regulate Designated Persons and their Immediate Relatives who may be considered by the Company to be in possession of Unpublished Price Sensitive Information for the purposes of the Regulations, from Communicating and Trading. It is however the responsibility of each Designated Person to ensure compliance with the provisions of the Regulations and other related laws and also on behalf of its Immediate Relatives. The Company shall not be responsible or liable for any violation or contravention by any Designated Person or their Immediate Relatives, of the Regulations or other related laws.

## **14 Provision of Unpublished Price Sensitive Information**

Nothing herein contained shall be considered as obligating the Company in any way to furnish to any Designated Persons or their Immediate Relatives with any Unpublished Price Sensitive Information.

## **15 Disclosure by Designated Persons**

### **15.1. Initial disclosure**

Designated Persons are required to disclose the following information on a one-time basis:

The names of the educational institution from which such Designated Person has graduated;  
Name of the past employers of such Designated Person.

### **15.2. Continual disclosure**

- (i) All Designated Persons shall disclose the name, Permanent Account Number and mobile number used by the following persons:
  - a. their Immediate relatives;
  - b. Persons with whom such Designated Person(s) share a material financial relationship, where 'material financial relationship' refers to a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift from a designated person during the immediately preceding twelve months, equivalent to at least 25% of the annual income of such designated person but shall exclude relationships in which the payment is based on arm's length transactions.

Explanation: It is clarified that the abovementioned information must be shared on an annual basis and also as and when the said information changes.

- (ii) All Designated Persons and their Immediate Relatives shall disclose the number of securities acquired or disposed of within 2 (two) Trading Days of such transaction if the value of the Securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 10,00,000/- (Rupees Ten Lakhs).

#### **16 Intimation to SEBI**

In case the Compliance Officer and/ or the Company observe that there has been a violation of the Regulations, the Company shall inform SEBI of such violations for appropriate action. SEBI can initiate necessary proceedings for violation of any of these Regulations.

#### **17 Clarifications / Enquiries**

The Compliance Officer may be contacted for any assistance as to the interpretation and application of this Code.

#### **18 Communication**

The Code for fair disclosure of Unpublished Price Sensitive Information will be uploaded on the website of the Company. The Code will be disseminated to all Designated Persons who shall abide by the same. The responsibility for complying with the provisions of the PIT Regulations shall vest with each Designated Person including any violation by their immediate relatives.

#### **19 Amendment of the Code**

This Code and any subsequent amendment(s) thereto, shall be promptly intimated to the Stock Exchange(s) where the securities of the Company are listed.

## **Annexure A**

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

#### **1. Introduction**

Regulation 8 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time (hereinafter referred to as “**PIT Regulations**”) requires *inter alia* every listed company to formulate and publish on its official website, a code of practices and procedures for fair disclosure of unpublished price sensitive information that it would follow in order to adhere to each of the principles set out in Schedule A to the PIT Regulations.

Accordingly, the Board of Directors of Archean Chemical Industries Limited (hereinafter referred to as “**the Company**”) at their meeting held on **29<sup>th</sup> January 2022** has formulated code of practices and procedures for fair disclosure of unpublished price sensitive information that it would follow in order to adhere to each of the principles set out in Schedule A to the regulations.

#### **2. Objective of the Code of Fair Disclosures**

The Code of Practices and Procedures for Fair Disclosures is required for the Company to ensure timely and adequate disclosure of unpublished price sensitive information which would impact the price of the Company’s securities and to maintain the uniformity, transparency and fairness in dealing with all stakeholders and in ensuring adherence to applicable laws and regulations. Further, the Company endeavors to preserve the confidentiality of unpublished price sensitive information and to prevent misuse of such information.

#### **3. Prompt disclosure of Unpublished Price Sensitive Information**

The Company shall promptly make 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.

#### **4. Uniform and Universal dissemination of Unpublished Price Sensitive Information**

The Company shall make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.

#### **5. Chief Investor Relations Officer**

The Company hereby designates the Compliance Officer & Company Secretary as a Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.

#### **6. Dissemination of Unpublished Price Sensitive Information disclosed selectively**

The Company shall promptly disseminate the unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

#### **7. Overseeing and coordinating disclosure:**

The Chief Investor Relations Officer, for the purpose of these regulations, shall oversee corporate disclosures and deal with dissemination of information and disclosure of unpublished price sensitive information.



The Chief Investor Relations Officer shall be responsible for ensuring that the Company complies with continuous disclosure requirements and; overseeing and coordinating disclosure of unpublished price sensitive information to stock exchanges, on the website of the Company and media.

If the information is accidentally disclosed without prior approval of Chief Investor Relations Officer, the person responsible may inform the Chief Investor Relations Officer immediately, even if the information is not considered as unpublished price sensitive information. In such event of inadvertent, selective disclosure of unpublished price sensitive information, the Chief Investor Relations Officer shall take prompt action to ensure such information is generally available.

#### **8. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities**

8.1 Any queries or requests for verification of market rumours by exchanges should be forwarded immediately to the Chief Investor Relations Officer who shall decide on the response / clarification.

8.2 The Chief Investor Relations Officer shall decide whether a public announcement is necessary for verifying or denying rumours and then making the disclosure.

8.3 The Company will, subject to non-disclosure obligations, aim to provide appropriate and fair response to the queries on news reports and requests for verification of market rumours by regulatory authorities.

8.4 As a general practice, if the rumour appears in a responsible media channel which has reasonably wide audience and the rumour can have material impact on pricing of securities, then the Company would immediately make a proper announcement to present the correct position.

#### **9. Timely Reporting of shareholdings/ ownership and changes in ownership:**

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

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

The guidelines given hereunder shall be followed while dealing with analysts and institutional investors:-

##### **(i) Only Public information to be provided**

Only public information should be provided to the analyst/ research persons alternatively, the information given to such persons should be made generally available at the earliest.

##### **(ii) Recording of discussion**

In order to avoid misquoting or misrepresentation, it is desirable that at least two representatives of the Company be present at meetings with analysts, brokers or Institutional Investors and the discussions should preferably be recorded.

**(iii) Handling of unanticipated questions**

Sufficient care should be exercised while dealing with analysts' questions that raise issues outside the intended scope of discussion. Unanticipated questions may be taken on notice and a considered response given later. If the answer includes price sensitive information, the same should be promptly made generally available.

**(iv) Prompt release of Information**

The Company will make transcripts or records of the proceedings of the meetings with Analysts, Investor Relation meetings available on the website of the Company promptly. The Company may also consider live webcasting of analyst meets.

**11. Medium of disclosure / dissemination**

- (a) Disclosure/ dissemination of information may be done through various media so as to achieve maximum reach and quick dissemination.
- (b) Chief Investor Relations Officer shall ensure that disclosure to stock exchanges is made promptly.
- (c) Company may also facilitate disclosure through the use of their dedicated Internet website.
- (d) Company websites may provide a means of giving investors direct access to analyst briefing material, significant background information and questions and answers.
- (e) The information filed by the Company with stock exchanges under continuous disclosure requirements may be made available on the Company website.

**12. Unpublished price sensitive information on a Need-to-Know basis**

Unpublished Price Sensitive Information shall be handled on a "need to know" basis i.e., unpublished price sensitive information shall be disclosed only to those where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

**13. Disclosure of Code on Public Domain**

This Code and any amendment thereof will be published on the Company's website i.e [www.archeanchemicals.com](http://www.archeanchemicals.com)

**14. Amendment of the Code**

This Code and any subsequent amendment(s) thereto, shall be promptly intimated to the Stock Exchange(s) where the securities of the Company are listed.

For **Archean Chemical Industries Limited**

[Name]  
[Designation]  
DIN: [●]  
Date: [●]  
Place: [●]

**FORM-B**

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (1) read with Regulation 6 (2) –Disclosure on becoming a Director/KMP/Promoter / PG]

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 other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN / DIN & address with contact nos.	Category of Person (Promoters / PG / KMP / Directors/ immediate relative to / others etc.)	Date of appointment of Director /KMP or Date of becoming Promoter / PG	Securities held at the time of becoming Promoter/ PG /appointment of Director/KMP		% of shareholding
			Type of security (For eg. – Shares, Warrants, Convertible Debentures 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 of the company 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 other such persons as mentioned in Regulation 6(2).

Open Interest of the Future contracts held at the time of becoming Promoter or member of the promoter group /appointment of Director/KMP			Open Interest of the Option Contracts held at the time of becoming Promoter or member of the promoter group /appointment of Director/KMP		
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 :

**FORM-C**  
**SEBI (Prohibition of Insider Trading) Regulations, 2015**  
**[Regulation 7(2) read with Regulation 6(2) - Continual disclosure]**

Name of the Company :  
 ISIN of the Company :

Details of change in holding of Securities of Promoter, member of the promoter group, Designated Person or Director of a listed Company and other such persons as mentioned in Regulation 6(2)

Name, PAN, CIN / DIN & address with contact nos.	Category of Person (Promoters /PG/KMP/ Directors/ 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/ sale 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.)
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Value (Rs.)	Transaction Type (Buy/Sale/ Pledge/Revoke/ Invoke)	Type of security (For eg.-Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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

Details of trading in derivatives of the company by Promoter, PG, Designated Person or Director of a listed Company and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts*lot size)	Notional Value	Number of units (contracts*lot size)	
15	16	17	18	19	20	21

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

Name:

Signature:

Designation:

Date:

Place :

**FORM-D (Indicative format)**

SEBI (Prohibition of Insider Trading) Regulations, 2015

Regulation 7(3) – Transactions by Other connected persons as identified by the Company

Name of the Company:

ISIN of the Company:

Details of trading in securities by other connected persons as identified by the Company

Name, PAN, CIN / DIN & address with contact nos. of other connected persons as identified by the company	Connect ion with company	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/acquisition of shares/ sale 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.)
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholdin g	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/Sale/ Pledge/Revoke/ Invoke)	Type of security (For eg.-Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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

Details of trading in derivatives by other connected persons as identified by the Company

Trading in derivatives (specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts* lot size)	Notional Value	Number of units (contracts*lot size)	
15	16	17	18	19	20	21

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

Name:

Signature:

Designation:

Date:

Place :

**FORM – E**

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015  
[Under Clause 7 of Schedule B of Company's Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons and their Immediate Relatives and Code of Practices and Procedures for Fair Disclosure (Code)]

To

The Compliance Officer

**APPLICATION FOR PRE-CLEARANCE**

As on date I /my immediate relative Shri. \_\_\_\_\_, am/is holding \_\_\_\_\_ shares in your Company, under Folio No. / DP ID - Client ID \_\_\_\_\_. I/my immediate relative am/is desirous of dealing (which includes buying / selling / dealing/pledging/revocation of pledge/subscribing) \_\_\_\_\_ Shares of the Company. I seek your approval for the same under Schedule - B of the Company's Code.

I hereby state that-

- a) I do not have any access or have not received up to the time of signing this undertaking any "Price Sensitive Information" which has remained unpublished and not in the public domain.
- b) In case I get access to or receive unpublished Price Sensitive Information after signing the undertaking but before the execution of this transaction, I shall inform the Compliance Officer of the change in my position and I /my immediate relative would completely refrain from dealing in the securities of the Company until such information becomes public.
- c) I /my immediate relative have not contravened the Code as framed by the Company from time to time.
- d) I have made a full and true disclosure while applying for clearance for this trade.
- e) I /my immediate relative undertake to execute the trade within ONE WEEK from the date of approval failing which I /my immediate relative agree to obtain fresh approval.
- f) I /my immediate relative agree that I /my immediate relative shall not enter into opposite transaction during the next six months following this transaction and shall not take positions in the derivative segment during that period of six months except as permitted by the Code.

Name :

Employee No. :

Signature :

Date :

**FORM F**

**FORMAT FOR DISCLOSURE OF TRANSACTIONS UNDER PRE-CLEARANCE**

[To be submitted within two (2) working days of trading in the Securities of the Company]

To

The Compliance Officer

Dear Sir,

**DETAILS OF TRADING**

Ref: Your Approval dated \_\_\_\_\_

I hereby inform you that I/ my \_\_\_\_\_ (Name of the immediate relative)

have not traded any shares of the Company under the pre-clearance approval referred above, for the following reason(s):

OR

have traded shares of the Company under the pre-clearance approval referred above, as per the details given below:

<b>Date</b>	<b>Nature of Trade</b>	<b>No. of Shares</b>	<b>DP ID / Client ID</b>

Thanking you,

Yours sincerely,

Signature :

Name :

Employee No. :

Date :

**FORM G**

[Under Schedule B of Company's Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons and their Immediate Relatives and Code of Practices and Procedures for Fair Disclosure (Code)]

**ANNUAL DISCLOSURE OF SHAREHOLDINGS OF ALL DESIGNATED PERSONS / CONNECTED PERSONS**

For the Year ended March 31, 20_						
1	Employee No.					
2	Name of the Designated Person					
3	Location					
4	Date of declaration					
5	Educational institutions from which you have graduated					
6	Names of their past employers					
7	Details of shares held in the company as on				March 31, 20_	
	No. of Shares					
	Folio No. / DP ID – Client ID					
8	Details of shares held by the immediate relative as on				March 31, 20_	
	Name of the immediate relative	Nature of Relationship	No. of Shares held	Phone & Mobile Number	PAN / other ID number	Folio No. / DP ID Client ID

*"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; A spouse is presumed to be an "immediate relative" unless rebutted so.*

Signature :

Date :



**FORM – H**

[Under Schedule B of Company's Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons and their Immediate Relatives and Code of Practices and Procedures for Fair Disclosure (Code)]

The Compliance Officer

**ANNUAL DISCLOSURE OF TRANSACTIONS BY DESIGNATED PERSON / CONNECTED PERSONS**

For the year ended 31 <sup>st</sup> March 20_					
Name of the Designated Person / Connected Person					
Employee Code					
Date of purchase	No. of shares	Price per share	Date of Sale	No. of shares	Price per share
TOTAL			TOTAL		
Total no. of shares held at the beginning of the Year					
Total no. of shares held at the end of the Year					
Name of the Immediate Relative					
Relationship					
Date of purchase	No. of shares	Price per share	Date of Sale	No. of shares	Price per share
TOTAL			TOTAL		
Total no. of shares held at the beginning of the Year					
Total no. of shares held at the end of the Year					
Name of the Immediate Relative					
Relationship					
Date of purchase	No. of shares	Price per share	Date of Sale	No. of shares	Price per share
TOTAL			TOTAL		
Total no. of shares held at the beginning of the Year					
Total no. of shares held at the end of the Year					

Signature :  
Name :  
Employee No. :  
Date :

**FORM – I**

[Under Schedule B of Company's Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons and their Immediate Relatives and Code of Practices and Procedures for Fair Disclosure (Code)]

<b>From</b>		<b>To</b> <b>The Compliance Officer</b>
<b>Employee Code</b>		
<b>Department</b>		
<b>Grade</b>		
<b>Address</b>		

Dear Sir,

**Sub: Annual Disclosure under Schedule B of Company's Code read with SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018**

I, \_\_\_\_\_ S/o. \_\_\_\_\_ aged about \_\_\_\_ years, hereby provide the required information.

My Permanent Account No :  
Phone No :  
Mobile Number(s) :

**1. Educational Institution details:**

Sl. No.	Qualification	Name of the Educational Institution	Year of Passing
1			
2			
3			
4			

**2. Past Employer details:**

Sl. No.	Name of the Company	Address	Period of employment	
			From	To
1				
2				
3				
4				

**3. Details of Persons with whom I share material financial relationship:**

Sl. No.	Name of the Person	PAN	Phone No	Mobile Number(s)
1				
2				

*Note: Material Financial Relationship means a person who is a recipient of loan/gift amounting to not less than 25% of your annual income during the preceding 12 months, excluding arms' length transactions.*

I hereby state that the information provided herein above are true to the best of my knowledge. I also undertake to provide this disclosure, whenever there is a change in the information provided herein above.

Yours faithfully,

Signature

Date:

**FORM – I**

NAME  
DESIGNATION  
EMP. CODE

ADDRESS -1  
ADDRESS-2  
ADDRESS-3

Date:

To

The Compliance Officer,

Dear Sir,

**Sub: One Time Disclosure under Clause 14 of Schedule B of SEBI (Prohibition of Insider trading Regulations, 2015**

I, \_\_\_\_\_ S/o. \_\_\_\_\_ aged about \_\_\_\_\_ years, hereby declare that the following are the details of Educational institutions from where I have graduated and details of my past employers:

1. Educational Institution details:

No.	Qualification	Name of the Educational Institution	Year of Passing

2. Past Employer details:

No.	Name of the Company	Address	Period of employment	
			From	To

I hereby state that the information provided herein above are true to the best of my knowledge.

Yours faithfully,

(Name of the Employee)