

ANAND PROJECTS LIMITED

(Formerly Known as The Anand Electric Supply Company Limited)

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***CODE OF CONDUCT FOR REGULATING, MONITORING AND
REPORTING OF TRADING BY INSIDERS
UNDER
SEBI (PREVENTION OF INSIDER TRADING)
REGULATIONS, 2015, AS AMENDED***

MARCH 29, 2019

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1. PREAMBLE

On January 15, 2015, the Securities and Exchange Board of India (“SEBI”) has notified the SEBI (Prohibition of Insider Trading) Regulation, 2015 effective from May 15, 2015, i.e. 120th day from the notification of the regulations, replacing the SEBI (Prohibition of Insider Trading) Regulations, 1992 which was further amended by the SEBI (Prohibition of Insider Trading) (Amendment) Regulation, 2018. Further, on January 21st, 2019 has introduced another amendment by notifying the SEBI (Prohibition of Insider Trading) (Amendment) Regulation, 2019.

This document embodies the Code of Conduct for regulating and reporting of trading by Insiders to be adopted by the Company. In terms of this Code of Conduct, every Insider of the Company has a duty to safeguard the confidentiality of all of ‘Unpublished Price Sensitive Information’ obtained in the course of his/her duty. No Insider may use his/her position or knowledge of Company to gain personal benefit or to provide benefit to any third party.

2. THE POLICY AND OBLIGATIONS

This code of conduct or prevention of Insider trading is framed pursuant to Regulation 9 (1) of Chapter-IV of the Securities and Exchange of Board of India (Prohibition of Insider Trading) Regulations, 2015 (as amended), to secure the confidentiality of un-published price sensitive information, ensure transparency and fairness in dealing with all stakeholders in observance to all laws and regulations. Every member of the Board of Directors, connected person, designated employee 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 member of the Board of Directors, connected person, designated employee may use his or her position or knowledge of the Company to gain personal benefit or to provide benefit to any third party.

3. OBJECTIVE OF THE CODE

The objective of the Code is to regulate, monitor and report trading by Designated Employees and other Connected Persons towards achieving compliance with regulations. The Code shall also provide for practices and procedures for fair disclosure of unpublished price sensitive information.

4. APPLICABILITY

This Code shall apply to all Designated Employees and other Connected Persons as mentioned in this Code.

5. DEFINITIONS

For the purpose of the Code the following terms shall have the meanings assigned to them hereunder:

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

“**Board**” means the Securities and Exchange Board of India;

“**Code**” shall mean Anand Projects Limited - Code of Conduct to Regulate, Monitor and Report Trading by Insiders, as amended from time to time;

“**Code of Fair Disclosure and Conduct**” means the code of practices and procedures for fair disclosure of Unpublished Price Sensitive Information, as amended from time to time;

“**Compliance Officer**” means any senior officer, designated so and reporting to the board of directors or head of the organization in case board is not there, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board of directors of the listed company or the head of an organization, as the case may be.

Explanation – For the purpose of this regulation, “financially literate” shall mean a person who has the ability to read and understand basic financial statements i.e. balance sheet, profit and loss account, and statement of cash flows.

“**Connected Person**” means:

- a) any person who is or has during the 6 months prior to the concerned act been associated with the Company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the Company or holds any position including a professional or business relationship between himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to Unpublished Price Sensitive Information of the Company or is reasonably expected to allow such access.
- b) 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:

- an Immediate Relative of connected persons specified in Clause (a); or
- a holding company or associate company or subsidiary company of the Company; or
- an intermediary as specified in Section 12 of the Act or an employee or director thereof; or
- an investment company, trustee company, asset management company or an employee or director thereof; or
- an official of a stock exchange or of clearing house or corporation; or
- 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
- 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
- an official or an employee of a self-regulatory organization recognized or authorized by the Board; or
- a banker of the Company; or
- a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of the Company or his immediate relative or banker of the Company, has more than ten per cent of the holding or interest.

“Generally Available Information” means information that is accessible to the public on a non-discriminatory basis;

“Designated Person(s)” shall include the following:

- (a) Directors;
- (b) Key Managerial Personnel;
- (c) Chief Commercial Officer;
- (d) General Counsel; and
- (e) Any other person as identified and notified by the Compliance Officer from time to time, with the approval of the Board.

“Immediate Relative” means a spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in Securities;

“Insider” means any person who is (a) a Connected Person; or (b) in possession of or having access to Unpublished Price Sensitive Information;

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

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

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

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

“Key Managerial Personnel” means person as defined in Section 2(51) of the Companies Act, 2013;

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

“Takeover Regulations” means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended from time to time;

“Trading” means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;

“Trading Day” means a day on which the recognized stock exchanges on which Securities of the Company are listed are open for trading and the word “Trade” shall be construed accordingly;

“Specified” means specified by the Board in writing;

“Unpublished Price Sensitive Information” or “UPSI” means any information, relating to the Company or its Securities, listed or to be listed, that is not generally available which upon becoming generally available, is likely to materially affect the price of the Securities and shall, ordinarily include without limitation, information relating to the following:

- a) financial results;
- b) dividends;
- c) change in capital structure;
- d) mergers, de-mergers, acquisitions, delisting, disposals, amalgamation, restructuring, arrangement, spin off and expansion of business and similar other transactions;
- e) changes in Key Managerial Personnel;

“Legitimate Purpose” shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations;

“Need-To-Know Basis” means that 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.

Words and expressions used and not defined in this Code, but defined in the Act, the Insider Trading Regulations, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made thereunder shall have the meanings respectively assigned to them in such legislations.

6. PROHIBITION ON COMMUNICATION OR PROCUREMENT OF UPSI

- (1) All information shall be handled by the Company on a “need-to-know basis” and no Insider shall:
 - (i) communicate, provide, or allow access to any Unpublished Price Sensitive Information, relating to the Company or its securities listed or proposed to be listed, to any person including other Insiders, except in furtherance of legitimate purposes, performance of duties or discharge of his legal obligations;
 - (ii) procure from or cause the communication by an Insider of UPSI, relating to the Company or its securities listed or proposed to be listed except in furtherance of legitimate purposes, performance of duties or discharge of his legal obligations.
- (2) Provided that Unpublished Price Sensitive Information may be communicated, provided, allowed access to or procured, in connection with a transaction that would:
 - (i) entail an obligation to make an open offer under the Takeover Regulations where the Board is of informed opinion that the proposed transaction is in the best interests of the Company; or
 - (ii) not attract the obligation to make an open offer under the Takeover Regulations but where the Board is of informed opinion that the proposed transaction is in the best interests of the Company and the information that constitute Unpublished Price Sensitive Information is disseminated to be made generally available at least 2 Trading Days prior to the proposed transaction being effected in such form as the Board may determine.

- (3) For purposes of this Clause, the Board shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the purpose of this Clause, and shall not otherwise Trade in Securities of the Company when in possession of Unpublished Price Sensitive Information.

7. PROHIBITION ON INSIDER TRADING

No Insider shall directly or indirectly Trade in Securities that are listed or proposed to be listed when in possession of UPSI.

8. TRADING PLANS

- (1) No Insider shall Trade in the Securities of the Company when in possession of any Unpublished Price Sensitive Information except in cases where the Trades are pursuant to a Trading Plan (defined below) set up in accordance this Code.
- (2) An Insider shall be entitled to formulate a trading plan (“Trading Plan”) and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.
- (3) Such Trading Plan shall:
 - (i) not entail commencement of trading on behalf of the Insider earlier than 6 months from the public disclosure of the Trading Plan;
 - (ii) not entail Trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced and the second Trading Day after the disclosure of such financial results;
 - (iii) entail Trading for a period of not less than twelve months;
 - (iv) not entail overlap of any period for which another Trading Plan is already in existence;
 - (v) set out either the value of Trades to be effected or the number of securities to be traded along with the nature of the Trade and the intervals at, or dates on which such Trades shall be effected; and
 - (vi) not entail Trading in Securities for market abuse.
- (4) The Compliance Officer shall review the Trading Plan to assess whether the Trading Plan would have any potential for violation of the Insider Trading Regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the Trading Plan.

Provided that pre-clearance of trades shall not be required for a trade executed as per an approved trading plan.

Provided further that trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

- (5) The Trading Plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the Trading Plan, without being entitled to either deviate from it or to execute any Trade in the Securities outside the scope of the Trading Plan.

Provided that the implementation of the Trading Plan shall not be commenced if any UPSI in possession of the insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation and in such event the Compliance Officer shall confirm that the commencement ought to be deferred until such UPSI becomes Generally Available Information so as to avoid a violation of sub-regulation (1) of regulation 4.

- (6) Upon approval of the Trading Plan, the Compliance Officer shall notify the Trading Plan to the Stock Exchanges on which the Securities are listed.

9. TRADING RESTRICTIONS

- (1) All Designated Persons and/or their Immediate Relatives shall execute trades in the Securities of the Company only in a valid Trading Window prescribed hereunder and shall not execute any trade deal in any transaction involving the purchase or sale of the Company's Securities including position in derivatives during the period when the Trading Window is closed.
- (2) The Trading Window shall be closed when the Compliance Officer determines that Designated Persons or class of Designated Persons and/or their Immediate Relatives can reasonably be expected to have possession of Unpublished Price Sensitive Information. Such closure shall be imposed in relation to such Securities to which such Unpublished Price Sensitive Information relates.
- (2) The trading window shall be closed from the end of every quarter and shall remain closed upto 48 hours after the declaration of financial results.
- (3) In addition to the above, the Trading Window shall also be closed for the following purposes:
 - (i) Declaration of dividends (interim and final);
 - (ii) Change in capital structure;
 - (iii) Amalgamation, mergers, de-mergers, takeovers, acquisitions, delisting and buy-back.

- (4) Designated Persons and/or their Immediate Relatives shall not Trade in Securities when the Trading Window is closed.
- (5) The Compliance Officer (in consultation with the Management or Whole Time Director) may close the Trading Window for a longer period or for any events other than those suggested in Clause (3) above, as it may deem fit after taking into account the nature and sensitivity of Unpublished Price Sensitive Information.
- (5) The Compliance Officer shall intimate the closure of trading window to all the Designated Persons when he determines that a Designated Person or class of Designated Persons can reasonably be expected to have possession of UPSI. Such closure shall be imposed in relation to such securities to which such UPSI relates.

10. OTHER RESTRICTIONS

- (1) The disclosures to be made by any person under this Code shall include those relating to Trading by such person's Immediate Relatives, and by any other person for whom such person takes trading decisions.
- (2) The disclosures of Trading in Securities shall also include Trading in derivatives of Securities and the traded value of the derivatives shall be taken into account for purposes of this Code, provided that Trading in derivatives of Securities is permitted by any law for the time being in force.

11. ROLE OF COMPLIANCE OFFICER

The Compliance Officer shall

- (1) be responsible for:-
 - (i) following the policies and procedures laid down by the Board or a committee thereof, monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information under the overall guidance and direction of the Board;
 - (ii) pre-clearing of Trades done by Designated Person and their Immediate Relatives monitoring Trades and the implementation of this Code under the overall supervision of the Board.
- (2) assist all Designated Person(s) in addressing any clarifications regarding the Insider Trading Regulations and the Code;
- (3) report on insider trading to the Board and in particular, shall provide reports to the Chairman of the Board at such frequency as may be stipulated by the Board;
- (4) seek such express undertakings from Designated Person(s) as may be necessary before approving Trading Plans and to monitor the implementation of Trading Plans;

- (5) be entitled to seek declarations to the effect that the applicant for preclearance is not in possession of any UPSI;
- (6) confidentially maintain a list of such Securities as a “restricted list” which shall be used as the basis for approving or rejecting applications for preclearance of trades. The Compliance Officer shall update the restricted list from time to time;
- (7) maintain a record of the disclosures made for a minimum period of 5 years.

12. PRE-CLEARANCE OF TRADES

- (1) All Designated persons of the Company who intend to deal, on their behalf and / or on behalf of their dependent family members, in the securities of the Company and where the number of shares intended to be dealt exceeds 1000 shares in single trade and 3000 shares in a week, should pre-clear the transactions as per the pre-dealing procedure as described hereunder.
- (2) An application may be made in the prescribed format (*refer Annexure-1*), to the Compliance Officer indicating the estimated number of securities that the Designated person intend to deal in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be specified in this behalf.
- (3) Along with the request for pre-clearance of transaction, an undertaking (*refer Annexure-2*) shall be executed in favour of the Company by such Designated person, that he/she is not in possession of unpublished price sensitive information.
- (4) No contra trade shall be executed by the designated person within the period six months from date of execution of the pre-cleared trade.
- (5) Any pre cleared trade not executed by the designated person within 7 days of its pre clearance would require fresh clearance for the trades to be executed.
- (6) The Compliance Officer may be empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate these regulations.
- (7) In case of execution of a contra trade, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the SEBI for credit to the Investor Protection and Education Fund administered by the Board under the Act.

13. DISCLOSURE OF TRADING

A. INITIAL DISCLOSURE

1. Every Promoter, Key Managerial Personnel and Director shall provide the disclosure of his holding of securities of the company within 30 days of the implementation of the Regulations to the Compliance officer as per prescribed format (*refer Annexure-3*).
2. Every person appointed as Key managerial personnel or a director of the company or upon becoming the promoter shall within 7 days shall provide disclosure of his securities to the Compliance Officer as per prescribed format (*refer Annexure-4*).

B. OTHER DISCLOSURE

1. Every promoter, employee and director of every company shall disclose, within 2 trading days, to the Compliance officer the number of securities acquired or disposed of, whether one transaction or in series of transactions over any calendar quarter and the value of such transactions is in excess of Rs 10 lakhs as per prescribed format (*refer Annexure-5*).
2. The Compliance Officer shall notify the stock exchanges within 2 trading days of either receipt of disclosure or becoming aware of such information.
3. The Company may at its discretion require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the Company in such form and at such frequency as may be determined by the Compliance Officer in order to monitor compliance with the Regulations.

C. DISCLOSURE BY THE COMPANY TO THE STOCK EXCHANGE(S)

1. Within 2 days of the receipt of intimation under Clause (B), the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received.
2. The Compliance officer shall maintain records of all the declarations in the appropriate form given by the directors / officers / designated employees for a minimum period of five years.

14. DISSEMINATION OF PRICE SENSITIVE INFORMATION

1. No information shall be passed by Designated Persons by way of making a recommendation for the purchase or sale of securities of the Company.

2. Disclosure/dissemination of Price Sensitive Information with special reference to analysts, media persons and institutional investors:

The following guidelines shall be followed while dealing with analysts and institutional investors,

- Only public information to be provided.
- At least two Company representatives be present at meetings with analysts, media persons and institutional investors.
- Unanticipated questions may be taken on notice and a considered response given later. If the answer includes price sensitive information, a public announcement should be made before responding.
- Simultaneous release of information after every such meet.

15. PENALTY & RESTRICTION

- (1) Any Designated person who trades in securities or communicates any information for trading in securities in contravention of the Code of Conduct may be penalized by the Board of Directors as they may deem fit and appropriate action would be taken.
- (2) Designated persons of the Company who violate the Code of Conduct shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension etc.
- (3) The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulation, 2015.
- (4) In case it is observed by the Company/Compliance Officer that there has been a violation of SEBI (Prohibition of Insider Trading) Regulations, 2015 (as amended), the Compliance Officer shall inform SEBI promptly.

16. AMENDMENT TO THE CODE

1. This Code and any subsequent amendment(s) thereto, shall be carried out with the approval of the Board.
2. Any or all provisions of this Code would be subject to revision / amendment in accordance with the Rules, Regulations, Notifications, etc. on the subject as may be issued by relevant statutory authorities, from time to time.
3. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Code, then such amendment(s), clarification(s), circular(s), etc. shall prevail upon the provisions hereunder and this Code shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s), etc.

APPLICATION FOR PRE-CLEARANCE OF TRADES

To,
The Compliance Officer,
Anand Projects Limited
House No. 304, Ajadpura,
Lalitpur-284403

Date: _____

Dear Sir/Madam,

Subject: Application for Pre-dealing approval in securities of the Company

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 (as amended) and the Company's Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons, 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.	No. of securities held as on date	:	
4.	Folio No. / DP ID /Client ID	:	
5.	PAN	:	
6.	The proposal is for (please tick)	:	(i) Purchase of securities (ii) Sale of securities (iii) Subscription to the securities
7.	Proposed date of dealing in securities	:	
8.	Estimated no. of securities proposed to be acquired / sold / subscribed	:	
9.	Price at which the transaction is proposed	:	
10.	Current market price (as on date of application)	:	
11.	Whether the proposed transaction will be through the stock exchange or off-market deal	:	
12.	Folio No. / DP ID /Client ID No. where the securities will be credited /debited	:	

I enclose herewith the form of Undertaking duly signed by me.

Yours faithfully,

(Signature of designated person)

ANNEXURE-2

UNDERTAKING TO BE EXECUTED AT THE TIME OF APPLYING FOR PRE-CLEARANCE

To,
The Compliance Officer,
Anand Projects Limited
House No. 304, Ajadpura,
Lalitpur-284403

Date: _____

Dear Sir/Madam,

I, _____, resident of _____ hereby declare that I am Designated Person of Anand Projects Limited.

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 to Regulate, Monitor and Report Trading by Designated Persons up to and at the time of signing this Undertaking/Declaration.

In case I have access to or I receive any Unpublished Price Sensitive Information after signing this Undertaking/Declaration but before execution of the transaction, I shall inform the Compliance Officer of the change in my position and I would, and ensure that my Immediate Relatives would completely refrain from Trading in the Securities (including derivatives) of the Company till the time such Unpublished Price Sensitive Information becomes generally available.

I declare that I have not contravened the Code as notified by the Company from time to time.

I undertake to submit the necessary report within two Trading Days of execution of the transaction/a "Nil" report if the transaction is not undertaken.

I am aware that, I shall be liable to face penal consequences as set forth in the Code including disciplinary action under the Code of the Company, in case the above declarations are found to be misleading or incorrect at any time.

I agree to comply with the provisions of the Code and provide any information relating to the trade as may be required by the Compliance Officer and permit the Company to disclose such detail to SEBI, if so required by SEBI.

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

(Signature of Applicant)

FORM A
SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (a) read with Regulation 6(2)]

INITIAL DISCLOSURE TO THE COMPANY

To,
The Compliance Officer,
Anand Projects Limited
House No. 304, Ajadpura,
Lalitpur-284403

Date: _____

Details of Securities held by Promoter, Key managerial personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

Name, PAN, CIN/DIN & Address with contact nos.	Category of Person (Promoters/ KMP/ Directors/ Immediate relative to/ others etc.)	Securities held as on the date of regulation coming into force		% of Shareholding
		Type of security (For e.g.- Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5

Note: "Securities" shall have the same 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 by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

Open Interest of the future contracts held as on the date of regulation coming into force			Open interest of the Option contracts held as on the date of regulation coming into force		
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 B
SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (b) read with Regulation 6(2)]

DISCLOSURE ON BECOMING A DIRECTOR/ KMP/ PROMOTER

Name of the Company : _____

ISIN of the Company : _____

Details of Securities held by Promoter, Key managerial personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

Name, PAN, CIN/DIN & Address with contact nos.	Category of Person (Promoters/ KMP/ Directors/ Immediate relative to/ others etc.)	Securities held as on the date of regulation coming into force		% of Shareholding
		Type of security (For e.g.- Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5

Note: "Securities" shall have the same 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 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/appointment of Director/KMP			Open interest of the Option contracts held at the time of becoming Promoter/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 change in holding of securities of promoters, employee or director of a listed and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN, & address with contact nos.	Category of person (Promoters /KMP /Director /Immediate relative to/others etc.)	Securities held prior to acquisition/ disposal		Securities acquired/ Disposed			
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No. and % of share-holding	Type of Security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction type (Buy/ Sell/ Pledge/ Revoke/ Invoke)
1	2	3	4	5	6	7	8

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 share-holding	From	To		
9	10	11	12	13	14

Note: "Securities" shall have the same 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, Employee 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	Type of contract	Contract Specifications	

		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 :

FORMAT FOR APPROVAL OF PRE-CLEARANCE ORDER

Name: [Insert Name]

Designation: [Insert Designation]

Place: [Insert Place]

This is to inform you that your request for dealing in *[Insert number of shares]* shares of the Company as mentioned in your application dated *[Insert Date]* is approved. Please note that the said transaction must be completed on or before *[Insert Date]* that is within 7 days from today. In case you do not execute the approved transaction /deal on or before the aforesaid date this approval shall stand withdrawn and 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 within 2 days from the date of transaction/deal. In case the transaction is not undertaken a 'Nil' report shall be necessary.

Based on your undertaking it is understood that you have not executed any opposite transaction in past six months and not contravened the provisions of the Code as notified by the Company from time to time.

Please note this approval can be withdrawn, if subsequently the information provided by you in the application form or the undertaking is found incorrect.

Yours faithfully,
For Anand Projects Limited

(Compliance Officer)