



Barbeque-Nation Hospitality Limited

***(Registered Office: Sy. No. 62, Site No. 13, 6th Cross, NS Palya,
BTM Layout, Bengaluru-560076, Karnataka, India)***

CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING (“CODE OF CONDUCT”)

This Policy shall come into effect from the date of listing of the Securities of the Company on the stock exchange(s).

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING IN SECURITIES OF THE COMPANY

[Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015]

1. INTRODUCTION

The Code is framed pursuant to the provisions of Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

2. PURPOSE AND APPLICABILITY:

The Company endeavors to preserve the confidentiality and prevent the misuse of un-published price sensitive information (UPSI). The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all the applicable laws and regulations. The code is applicable to every Designated Person and their immediate relatives

3. DEFINITIONS:

In this Code unless the context otherwise requires, the following words, expression and derivations there from shall have the meanings assigned to them as under:

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

3.2 “**Board**” means the Board of Directors of the Company.

3.3 “**Code**” or “**Code of Conduct**” shall mean this Code for Regulating, Monitoring and Reporting of trades for prohibition of insider trading under Securities and Exchange Board India (Prohibition of Insider Trading) Regulations, 2015 (SEBI PIT Regulations) as amended from time to time.

3.4 “**Company**” means Barbeque-Nation Hospitality Limited (Barbeque)

3.5 “**Compliance Officer**” means Company Secretary of the Company or in absence of Company Secretary, any senior officer, designated so or in absence of both, the Executive Director or such other senior officer, who is financially literate and is capable of appreciating requirements of legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring and adherence to the rules for preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in this Code of Conduct and Compliance officer shall function and carry out his/her responsibilities under the overall supervision of the Board of Directors of the Company.

Explanation – for the purpose of this Regulation “financially literate” shall mean a person,

who has ability to read and understand basic financial statement like Balance Sheet, Statement of Profit and Loss, Cash Flow Statement etc.

3.6 **“Connected Person”** means:

- (1) any person who is or has during the six months prior to the concerned act been associated with a 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 or is reasonably expected to allow such access.
- (2) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established,
 - (a) an immediate relative of connected persons specified in sub clause (1); or
 - (b) a holding company or associate company or subsidiary company; or
 - (c) an intermediary as specified in Section 12 of the Act or an employee or director thereof; or
 - (d) an investment company, trustee company, asset management company or an employee or director thereof; or
 - (e) an official of a Stock Exchange or of clearing house or corporation; or
 - (f) a member of board of trustees of a mutual fund or a member of the Board of Directors of the Asset Management Company of a mutual fund or is an employee thereof; or
 - (g) a member of the Board of Directors or an employee, of a public financial institution as defined in Section 2 (72) of the Companies Act, 2013; or
 - (h) an official or an employee of a self-regulatory organization recognized or authorized by the Board; or
 - (i) a banker of the Company; or
 - (j) a concern, firm, trust, Hindu undivided family, company or association of persons where in a director of the Company or his immediate relative or banker of the Company, has more than ten percent, of the holding or interest.

NOTE: It is intended that a connected person is one who has a connection with the Company that is expected to put him in possession of unpublished price sensitive information. Immediate relatives and other categories of persons specified above are also presumed to be connected persons but such a presumption is a deeming legal fiction and is rebuttable. This definition is also intended to bring into its ambit persons who may not seemingly occupy any position in a company but are in regular touch with the Company and its Officers and are involved in the know of the company's operations. It is intended to bring within its ambit those who would have access to or could access unpublished price sensitive information about any company or class of companies by virtue of any connection that would put them in possession of unpublished price sensitive information.

3.7 **Designated Person(s)** shall mean and include:

- (1) All Directors of the Company and their secretaries;
- (2) Officers in the Senior Management of the company i.e., Leadership Team; Key Managerial Personnel,
- (3) Company Secretary Department, Central Finance Department, Tax Department- Information Technology Department, Sourcing Department, Marketing Department, and as such other employees or Departments as may be notified from time to time.
- (4) All promoters of the Company.
- (5) Employees of the Company designated based on their functional role or access to unpublished price sensitive information.
- (6) Employees of the Material Subsidiary, if any, designated based on their role or access to unpublished price sensitive information.
- (7) Employees up to two levels below Managing Director.
- (8) Employees up to two levels below the Managing Director of the Material Subsidiary, if any.
- (9) Any other person as may be determined and informed by the Compliance Officer from time to time.

3.8 **"Director"** means a member of the Board of Directors of the Company.

3.9 **"Derivatives"** includes (a) a right to call or delivery or a right to make a delivery at a specified price and within a specified time of a specified number of shares / debentures or other securities of the Company (b) any contract which derives its value from the prices or index of prices of underlying securities of the Company.

3.10 **"Employee"** means every employee of the Company including the Directors in the employment of the Company.

3.11 **"Generally available Information"** means information that is accessible to the public on a non-discriminatory basis.

3.12 **"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

3.13 **"Informant"** means an individual, who voluntarily submits to the SEBI a Voluntary Information Disclosure Form relating to an alleged violation of insider trading laws that has occurred, is occurring or has a reasonable belief that it is about to occur, in a manner provided under the SEBI PIT Regulations, regardless of whether such individual(s) satisfies the requirements, procedures and conditions to qualify for a Reward.

3.14 **"Insider"** means any person who, a connected person; or is in possession of or having access to unpublished price sensitive information.

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

It is clarified that any person in receipt of unpublished price sensitive information pursuant to a “legitimate purpose” shall be considered an “insider” for the purpose of this code.

NOTE: Since “generally available information” is defined, it is intended that anyone in possession of or having access to unpublished price sensitive information should be considered as an “insider” regardless of how one came in possession of or had access to such information. Various circumstances are provided for such a person to demonstrate that he has not indulged in insider trading. Therefore, this definition is intended to bring within its reach any person who is in receipt of or has access to unpublished price sensitive information. The onus of showing that a certain person was in possession of or had access to unpublished price sensitive information at the time of trading would, therefore, be on the person leveling the charge after which the person who has traded when in possession of or having access to unpublished price sensitive information may demonstrate that he was not in such possession or that he has not traded or he could not access or that his trading when in possession of such information was squarely covered by the exonerating circumstances.

- 3.15 **“Key Managerial Person (KMP)”** means the person as defined in Section 2(51) of the Companies Act, 2013 including any amendment or modification thereto.
- 3.16 **“Legitimate purpose”** shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partner(s), collaborator(s), lender(s), customer(s), supplier(s), Merchant Banker(s), legal adviser(s), auditors, insolvency professional(s) or other adviser(s) or consultant(s), provided that such sharing has not been carried out to evade or circumvent the prohibitions of these Regulations.
- 3.17 **“Listing Regulations”** Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 (SEBI (LODR) Regulations, 2015) as amended from time to time.
- 3.18 **“Need to know”** means the Price Sensitive Information shall 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 the information.
- 3.19 **“PIT Compliance Committee”** Internal committee is formed to ensure compliance of this policy, maintenance of records, monitoring and adherence to the rules for preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in this Code of Conduct and Compliance officer shall function and carry out his/her responsibilities under the supervision of this committee. The members of the committee are
- CEO & Whole Time Director

- Chief Financial Officer
 - Company Secretary & Compliance Officer
- 3.20 "**Promoter**" and "**Promoter Group**" shall have same meaning assigned to it under Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any amendment thereof.
- 3.21 "**Reward**" means any gratuitous monetary amount for which an Informant is declared eligible as per the provisions of SEBI PIT Regulations.
- 3.22 "**Securities**" includes Equity Shares and derivatives but does not include units of mutual funds. It shall also have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof.
- 3.23 "**SEBI**" means Securities and Exchange Board of India constituted under Securities and Exchange Board of India Act, 1992.
- 3.24 "**SEBI PIT Regulations**" means Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time including any statutory modification hereof.
- 3.25 "**Stock Exchange**" shall mean any recognized stock exchange on which Company's securities are listed.
- 3.26 "**Specified**" means specified by the Board in writing.
- 3.27 "**Takeover Regulations**" means Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;
- 3.28 "**Trading**" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities of the Company whether directly or through any Portfolio Management Scheme or otherwise.
- 3.29 "**Trading Day**" means a day on which the recognized stock exchanges are open for trading;
- 3.30 "**Unpublished Price Sensitive Information**" 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 and shall, ordinarily including but not restricted to, information relating to the following:
- (i) Financial results;
 - (ii) dividends;
 - (iii) change in capital structure;
 - (iv) mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions; and

- (v) changes in key managerial personnel(KMP)
- (vi) material events as specified in the Policy on Determining Materiality and Archival of Disclosures adopted pursuant to Regulation 30 of SEBI (LODR) Regulations, 2015 as amended from time to time.

3.31 **“Voluntary Information Disclosure Form”** means the form provided in the schedule of the Code.

3.32 **“Voluntarily Providing Information”** means providing the SEBI with information before receiving a request, inquiry, or demand from the SEBI, any other Central or State authorities or other statutory authority about a matter, to which the information is relevant.

Words and expressions used and not defined in this Code but defined in SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, SEBI Act, 1992 (15 of 1992), Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made there under (including any statutory modifications or re-enactment thereof) shall have the meanings respectively assigned to them in those legislation.

In this Code unless there is anything repugnant in the subject or context words importing the masculine gender shall be taken to include females and vice versa. In addition, words in the singular shall include the plural and vice versa.

4. TRADING WINDOW:

4.1 All Designated Persons including their immediate relatives shall deal in the securities of the Company only when the trading window is open. No Designated Persons including their immediate relatives shall deal in the securities when the trading window is closed. It is the duty of the Designated Persons to inform the immediate relatives of the closure of trading window and ensure that they do not deal in the securities of the Company.

4.2 The trading window will remain closed during the following periods:

- (i) From the close of the quarter/ half year/ year and upto 48 hours after the date on which the results for the respective quarter/ half year/ year as the case may be is announced to stock exchanges;
- (ii) From the date of issue of notice/agenda of the Board Meeting or intimation to the stock exchange(s), whichever is earlier, at which proposal on any matter which has a bearing on the price of security is considered, up to 48 hours after the information has been made available by the company: example: recommendation of dividend / interim dividend / bonus shares / right shares / further issue of shares / amalgamation / merger / takeover, etc.;
- (iii) In addition to the above, the Compliance Officer may in consultation with PIT Compliance Committee, declare the closure of Trading Window, on an “as-needed” basis for any reason.
- (iv) Trading Window shall be also closed for the designated person or class of designated persons when the Compliance Officer determines that the designated

persons or class of designated persons can reasonably be expected to have possession of unpublished price sensitive information either due to being part of any special project or otherwise. The Trading Window shall be opened not earlier than 48 hours after the information becomes generally available or when it is finally decided to abandon the project.

- 4.3 The Compliance Officer or any other employee from the Company Secretarial department of the Company will notify the designated persons about closure and opening of trading window.
- 4.4 The trading window shall also be applicable to any person having contractual or fiduciary relation with the Company such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the Company.

5. PRE-CLEARANCE OF TRADES:

- 5.1 All designated persons, who intend to deal in the securities of the Company directly or indirectly or through their immediate relatives when the trading window is opened should take pre-clearances of the transaction from the PIT Compliance committee. Designated Persons of the Company shall not take part in derivative transactions in the securities of the Company at any time, except as provided under the SEBI PIT Regulations.
- 5.2 No Designated Person including for dealings through their immediate relatives or Portfolio Managers shall be entitled to apply for pre-clearance of any proposed trade if such designated person is in possession of Unpublished Price Sensitive Information even if the trading window is not closed. The pre-dealing procedure shall be as given below:
- (i) An application complete in all respects should be made in accordance with the Form prescribed in **Annexure 1**.
 - (ii) An undertaking as per **Annexure 2** shall be executed in favor of the Company by the Designated Person.
 - (iii) PIT Compliance Committee after satisfying himself that the application and undertaking are in order and the proposed trade will not breach the SEBI PIT Regulations or this Code of Conduct shall pre-clear the trades within three (3) working days from receipt of application and undertaking complete in all respects. (Refer **Annexure 3** for Pre-clearance order).
 - (iv) The Designated Persons shall execute their trade in respect of securities of the Company within Five (5) Trading days after the approval of pre-clearance is given.
 - (v) If the trade is not executed within the aforesaid Five (5) days, the designated person must obtain fresh pre-clearance by following the aforesaid procedure above.
 - (vi) The designated persons must report to the PIT Compliance Committee the details of the trade executed within one Trading day of the execution of the trade. In case the transaction is not undertaken a Nil Report must be submitted to the Compliance Officer within one Trading day from the expiry of the aforesaid Five (5) trading days. (Refer **Annexure 4** for Disclosure of details of transactions undertaken by DP)

- (vii) The Designated Person shall not execute / deal in a contra trade for any number of securities for a period of six (6) months from the execution of the trade.

Contra trade means: In case the designated person pre-clears for buying shares of the company, he cannot enter into a sale of securities of the company for a period of Six (6) months from the date of execution of buy order and *vice-versa*.

- (viii) The PIT Compliance committee may waive at its discretion the sale of securities necessitated due to personal emergency before the six months period mentioned above. The Compliance Officer may take necessary undertakings and declarations and seek appropriate information as he deems necessary from the designated person before granting the relaxation.
- (ix) The waiver from the strict application under clause (viii) will have to be in writing giving reasons thereof.

6. REPORTING BY THE COMPLIANCE OFFICER:

- 6.1 The Compliance Officer shall furnish to the Board of Directors and in particular, shall provide to the Chairman of Audit Committee, if any, or to the Chairman of the Board of Directors at such frequency as may be stipulated by the Board of Directors, the following details:
 - (i) Pre-clearance sanctioned or rejected;
 - (ii) Details of transactions done pursuant to pre-clearance including those cases where no transaction has been executed after securing pre-clearance along with the reasons;
 - (iii) Details of relaxation, if any from the strict requirements under this Code;
 - (iv) Disciplinary actions, if any taken by Managing Director/Whole-time Director pursuant to this Code;
 - (v) Disclosures under the SEBI PIT Regulations, if any;
 - (vi) Trading plans, if any presented for approval;
 - (vii) Other relevant information for each calendar quarter
- 6.2 The Compliance Officer shall place the aforesaid details at the first Meeting of the Board of Directors held after the close of the calendar quarter.

7. DISCLOSURES UNDER SEBI PIT REGULATIONS AND THIS CODE:

The disclosure to be made by any person under this code shall include those relating to trading by immediate relative(s) of such person and by any other person for whom such person takes trading decisions. This disclosure of trading in securities shall also include trading in derivatives and traded value of the derivatives shall be taken into account for the purpose of this code.

Initial Disclosure

- 7.1 Every Promoter including member of Promoter Group, Key Managerial Personnel of the company, Director and the Designated Persons shall disclose his holding of securities of the Company as on the date of these regulations taking effect to the Company within Thirty (30) days of the regulations taking effect.
- 7.2 Every person on appointment as a KMP or a Director of the Company or upon becoming a Promoter or a member of a Promoter Group shall disclose his holding of securities of the Company as on the date of appointment or becoming a promoter to the Company within Seven (7) days of such appointment or becoming a Promoter.

Continual Disclosures

- 7.3 All Designated Persons shall furnish in the prescribed form (**Annexure 5 & 6**) to the PIT Compliance Committee/Compliance Officer details of their holding of securities and transactions in the securities of the Company on annual basis.
- 7.4 If the value of the securities traded, whether in one transaction or series of transaction over any calendar quarter, aggregates to a traded value in excess of rupees Ten (10) Lakhs, designated persons shall disclose to the Company the number of such securities acquired or disposed of within Two (2) trading days of such transaction in the form prescribed by SEBI. It is clarified that any incremental transactions after any disclosure under this clause shall be made when the transactions effected after the prior disclosure cross the threshold specified herein. The Company shall notify the particulars of such trading to the stock exchanges within Two (2) days of receipt of the disclosure or from becoming aware of such information.

By Connected persons

- 7.5 The Compliance Officer may after considering the facts, circumstances and appropriateness, require the connected person or class of connected persons to whom the Company has to provide unpublished price sensitive information in the course of its business, to furnish the details of holdings and trading in securities of the Company as per **Annexure 5 & 6**.
- 7.6 Each Designated Person and connected person 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 or connected person, unless such Designated Person or connected person is permitted to trade in the securities of the Company in accordance with this Code.

8. CONFIDENTIAL INFORMATION AND UNPUBLISHED PRICE SENSITIVE INFORMATION:

- 8.1 Directors and employees shall maintain strict confidentiality of business information and all Unpublished Price Sensitive Information of the Company.
- 8.2 The business information and all Unpublished Price Sensitive information should not be

communicated to any person except in the course of performance of duties or discharge of legal obligations.

- 8.3 The Unpublished Price Sensitive Information shall be handled on a “need to know” basis i.e. price sensitive information shall 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 the information.
- 8.4 Files containing confidential information shall be kept secure. Computer files shall have adequate security of login and password as per the Company’s IT Policy.
- 8.5 All employees must consult the Compliance Officer and /or Investor Relations Officer before communicating with the media or public. The Company’s communication policy with the public will have to be adhered to at all times.

9. TRADING PLANS:

- 9.1 A Designated Person or an insider shall be entitled to formulate a Trading Plan and present it to the PIT Compliance Committee for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such Plan.
- 9.2 Such Trading Plan shall:
- (i) Not entail commencement of trading earlier than Six (6) months from the public disclosure of the plan;
 - (ii) Not entail trading for the period between the Twentieth (20) trading day prior to the last day of any financial period for which results are required to be announced by the issuer of the securities and the second trading day after the disclosure of such financial results;
 - (iii) entail trading for a period of not less than Twelve (12) 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.
- 9.3 PIT Compliance committee upon receipt of Trading Plan will review the trading plan to assess whether the plan would have any potential for violation of these Regulations provided that pre-clearance of trades shall not be required for a trade executed as per an approved trading plan, provided further that the trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

The PIT Compliance committee is entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.

- 9.4 The Trading Plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.

- 9.5 The implementation of the Trading Plan shall not be commenced, if any Unpublished Price Sensitive Information in possession of the designated person/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 PIT Compliance committee shall confirm that the commencement ought to be deferred until such unpublished price sensitive information becomes generally available information so as to avoid a violation of the SEBI PIT Regulations.
- 9.6 Upon approval of the Trading Plan, the Compliance Officer will notify the plan to the Stock Exchange(s) on which the securities are listed.

10. DISCLOSURE OF TRADING BY DESIGNATED PERSONS OR INSIDERS:

- 10.1 All Designated Persons or Insiders including such person's immediate relatives and by any other person for whom such person takes trading decisions must disclose to the PIT Compliance committee.
- 10.2 The Disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of derivatives shall be taken into account, provided that trading in derivatives of securities is permitted by any law for the time being in force.
- 10.3 The disclosures shall be maintained by the Company for a minimum period of Five (5) years.
- 10.4 Report to the Audit Committee for appropriate action.
The Compliance Officer shall report to the Chairman of the Audit Committee and upon receipt of report by the Chairman, he/she will convene Meeting of the Audit Committee, depending on severity of the matter. The Audit Committee based on such report decide the suitable action including but not limited to withholding of salary /termination of employment / monetary penalty.
- 10.5 Designated Persons shall disclose names and PAN or other identifier authorized by law, of the following persons on an annual basis and as and when the information changes;
- Designated person himself/herself
 - Immediate relatives of Designated Person
 - Persons with whom such Designated Person(s) has a material financial relationship
 - Phone/cell numbers which are used by them

Explanation: The term "material financial relationship" shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding Twelve (12) months, equivalent to at least 25% of such payer's annual income but shall exclude relationships in which the payment is based on arm's length transactions.

- 10.6 The Board shall ensure that the structured digital database is preserved for a period of not less than eight years after completion of the relevant transactions and in the event of receipt of any information from the Board regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.

11. MECHANISM FOR PREVENTION OF INSIDER TRADING

The Company has adopted system of internal controls which mainly consist of the following, to prevent dealing in securities by insiders with misuse of UPSI:

- a. All employees who have access to UPSI are identified as designated employee
- b. All UPSI shall be identified and its confidentiality shall be maintained by designated employee and others who have knowledge of unpublished price sensitive information.
- c. Adequate restriction shall be placed on procurement, communication and sharing of UPSI by designated employee and others who have knowledge of UPSI.
- d. List of employees and other persons with whom UPSI is shared shall be maintained and confidentiality agreement shall be executed or notice shall be served to all such employees and persons
- e. Audit committee shall review once in a financial year, the process to evaluate effectiveness of the above said internal controls and shall verify that the system for internal control are adequate and are operating effectively.
- f. Audit committee shall review at least once in a financial year, compliance with this Code of Conduct read with the Insider Trading Regulations.

12. PENALTY

- 12.1 Every Designated Person shall be individually responsible for complying with the provisions of this Code of Conduct (including to the extent the provisions hereof are applicable to his /her immediate relatives).
- 12.2 The Designated Person who contravenes the Code of Conduct shall be penalised and shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, etc.
- 12.3 The Company shall promptly inform the SEBI regarding any violation of the Code of Conduct.
- 12.4 The action by the Company shall not preclude the SEBI from taking any action in case of violation of the Insider Trading Regulations

13. ROLE OF COMPLIANCE OFFICER IN PREVENTION OF INSIDER TRADING:

The PIT Compliance committee shall be responsible for setting forth policies, procedures and monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information, pre clearing and monitoring of trades and the implementation of this Code under the overall supervision of the Board of Directors of the Company.

The PIT Compliance committee shall report to the Board of Directors/ / Audit Committee as applicable, the changes in Designated Persons, the details of trading plans received, pre-clearance given and / or any violation of the PIT Regulations reported.

The PIT Compliance committee/Compliance Officer shall maintain a record of the Designated Persons and any changes made in the list of Designated Persons.

The Compliance Officer shall assist all the persons in addressing any clarification regarding this Code and the PIT Regulations.

The Compliance Officer shall report to the Audit Committee/Board of Directors any amendment to SEBI (PIT) Regulations, 2015 and accordingly this Code will be amended by Audit Committee/Board of Directors depending upon the effect of proposed amendment.

14. POLICY FOR DETERMINATION FOR LEGITIMATE PURPOSES FOR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

[Under Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015]

The Company believes in timely and adequate disclosure of price sensitive information for legitimate purposes. The following norms shall be followed for disclosure of Price Sensitive Information.

- a. The Company Secretary is designated as the Compliance Officer to administer the code of conduct and other requirements under these regulations.
- b. The Compliance Officer shall after clearance from the PIT Compliance committee furnish Price Sensitive Information to the Stock Exchanges.
- c. The quarterly financial information of the Company shall be hosted in the web site of the Company after the information is furnished to the Stock Exchanges.
- d. Disclosure/dissemination of information may be approved in advance by the PIT Compliance committee or the Compliance Officer as the case may be.
- e. If information is accidentally disclosed without prior approval, the person making such disclosure shall immediately inform the PIT Compliance committee, even if the information is not considered price sensitive.
- f. The Compliance Officer in consultation with the PIT Compliance committee shall respond to queries or requests from Stock Exchanges concerning market rumours.
- g. The PIT Compliance committee shall be responsible for deciding whether a public announcement is necessary for verifying or denying rumours and then making the disclosure.

15. DISCLOSURE TO SEBI UNDER CHAPTER IIIA OF THE SEBI PIT REGULATIONS AND PROTECTION OF THE INFORMANT

- a) Disclosure by an Informant shall be governed by SEBI PIT Regulations and shall be made to SEBI in the format specified in Annexure 7. Informants who are considered tentatively eligible for an award, shall submit the informant reward claim form in the

format specified in Annexure 8D to the SEBI, within the period specified in the intimation sent by the SEBI.

- b) Any Employee who files a Voluntary Information Disclosure Form or does any other act incidental to same, shall not be subject to any discharge, discrimination, termination, suspension, threats, harassment, directly or indirectly. The Company shall provide adequate protection to such Employee against any discharge, termination, demotion, suspension, threats, harassment, discrimination, irrespective of whether the information is considered or rejected by the SEBI or he or she is eligible for a Reward under SEBI PIT Regulations, by reason of:
- i) filing a Voluntary Information Disclosure Form under SEBI PIT Regulations;
 - ii) testifying in, participating in, or otherwise assisting or aiding the SEBI in any investigation, inquiry, audit, examination or proceeding instituted or about to be instituted for an alleged violation of insider trading laws or in any manner aiding the enforcement action taken by the SEBI; or
 - iii) breaching any confidentiality agreement or provisions of any terms and conditions of employment or engagement, solely to prevent any employee from cooperating with the SEBI in any manner.

Nothing in this Clause 15 shall require such Employee to establish that:

- i) the SEBI has taken up any enforcement action in furtherance of information provided by such person; or
 - ii) the information provided fulfils the criteria of being considered as an Original Information under SEBI PIT Regulations.
- c) Any Employee may approach the Compliance Officer in case of any discharge, termination, demotion, suspension, threats, harassment, directly or indirectly or discrimination against him / her on account of filing the Voluntary Information Disclosure Form. The Compliance Officer shall take all the reasonable steps that are necessary to maintain the confidentiality of such Employee.
- d) The Compliance Officer shall report the complaint to the Audit Committee for further inquiry and action. The person against whom a complaint is made and the person making the complaint shall not be a member of the committee looking into the matter

16. AMENDMENTS:

The Board may, at any time, modify, alter and amend the provisions of this Code by giving notice of such modification, alteration and amendment to the Designated Persons.

Cautionary Statement: The Code is the internal policy of the Company to prevent Designated Persons and Connected Persons who are considered by the Company to be insiders of the Company for the purposes of the Regulations, for prevention of insider trading. It is however the responsibility of each Designated Person and Connected Person to ensure compliance with the provisions of the Regulations and other related laws. The Company shall not be responsible or liable for any violation or contravention by any Designated Person or Connected Person, of the Regulations or other related laws.

ANNEXURE 1

SPECIMEN OF APPLICATION FOR PRE-DEALING APPROVAL

Date: _____

To
PIT Compliance Committee
Barbeque-Nation Hospitality Limited

Dear Sir/Madam,

Application for Pre-dealing approval in securities of the Company

Pursuant to the SEBI (prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct for Prevention of Insider Trading, I seek approval to purchase / sale / subscription of Equity shares/ stock derivatives of the Company as per details given below:

1	Name of the applicant	
2	Designation	
3	Number of Securities held as on date	
4	Folio No. / DPID/ Client Id	
5	The Proposal is a) Purchase of Securities b) Subscription to Securities c) Sale of Securities	
6	Proposed date of dealing in securities	
7	Estimated number of securities proposed to be acquired/subscribed/sold	
8	Price at which the transaction is proposed (if off market)	
9	Current Market Price (as on date of application)	
10	Whether the proposed transaction will be through Stock Exchange or off –market	
11	Folio No/ DPID/CLID where the securities will be credited /debited – (applicable for off market)	
12	Stock Derivative- lot size as notified given by exchanges a) Stock Future – No. of units, Price & Expiry Date b) Stock Option- No. of units, Put/ Call, Strike price & Expiry Date	
13	PAN and Mobile No.	

I enclose herewith the form of undertaking signed by me.

Yours faithfully

(Signature of Employee)
Emp. Code:

Date:
Place:

ANNEXURE 2

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

To
The PIT Compliance Committee
Barbeque-Nation Hospitality Limited

I, _____, of the Company residing at _____, am desirous of dealing in _____* shares of the Company/ stock derivatives as mentioned in my application dated for pre-clearance of the transaction.

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

In the event that I have access to or received any information that could be construed as "Price Sensitive Information" as defined in the Code, after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public.

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

I undertake to submit the necessary report within one day of execution of the transaction / a 'Nil' report if the transaction is not undertaken within 5 days.

If approval is granted, I shall execute the deal within five (5) days of the receipt of approval failing which I shall seek pre-clearance.

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

Signature: _____

Date:

Place:

* Indicate number of shares/units (contracts lot size)

ANNEXURE 3

FORMAT FOR PRE- CLEARANCE ORDER

To

Name: _____

Designation: _____

Place: _____

This is to inform you that your request for dealing in _____(nos.) shares of the Company/ stock derivative as mentioned in your application dated _____is approved. Please note that the said transaction must be completed on or before _____(date) that is within _____days from today.

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

Yours faithfully

For Barbeque-Nation Hospitality Limited

Compliance Officer

Date: _____

Place: _____

Encl.: Format for submission of details of transaction

ANNEXURE 4

FORMAT FOR DISCLOSURE OF TRANSACTIONS

(To be submitted within 1 day of transaction / dealing in securities of the Company)

To
The Compliance Officer
Barbeque-Nation Hospitality Limited

I hereby inform that I

- have not bought /sold/ subscribed any securities of the Company
- have bought/sold/ subscribed to _____ securities as mentioned below on (date)

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

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of years and produce to the Compliance officer / SEBI any of the following documents:

1. Broker's contract note.
2. Proof of payment to/from brokers.
3. Extract of bank passbook/statement (to be submitted in case of demat transactions).
4. Copy of Delivery instruction slip (applicable in case of sale transaction)

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

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

Signature: _____

Name:

Designation:

Date:

Place:

ANNEXURE 5
FORMAT FOR INITIAL DISCLOSURE OF SECURITIES

To
The Compliance Officer
Barbeque-Nation Hospitality Limited

I, _____, in my capacity as _____ of the Company hereby submit the following details of securities held in the Company as on ___ (date of designated person).

I. Details of securities held by me:

Type of Securities	No. of securities held	Folio No	Beneficiary A/c Client ID

II. Details of dependent(s):

Pursuant to the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Procedures and Conduct for Prevention of Insider Trading, I hereby declare that I have the following dependents and immediate relatives:

Sl. No.	Name of the dependent/ and immediate relatives	Relation with Director / Officer / Designated Employee	PAN, Phone No./Mobile No.

III. Details of securities held by dependent(s)/ immediate relatives:

Name of Relative	Relationship	Type of securities	No. of Securities held	Folio No.	Beneficiary A/c Client ID

Signature: _____

Name:

Designation:

Date:

Place:

ANNEXURE 6
DISCLOSURE OF CHANGE IN SHAREHOLDING

To
The Compliance Officer
Barbeque-Nation Hospitality Limited

I, _____, in my capacity as _____ of the Company hereby submit the following details of change in holding of securities of the Company:

Name, PAN No. & address of shareholder	No. of Securities held before Transaction	Receipt of Allotment advice/ acquisition of /sale of securities	Nature of transaction & quantity			Trading Member to whom the trade was executed with SEBI Registration Number	Exchange on which the trade was executed
			Purchase	Sale	Others		

Details of change in securities held by dependent/family members:

Name, PAN No. & address of shareholder and relationship	No. of securities held before the transaction	Receipt of allotment advice/ac quisition of /sale of securities	Nature of transaction & quantity			Trading Member to whom the trade was executed with SEBI Registration Number	Exchange on which the trade was executed
			Purchase	Sale	Others		

I/We declare that I/We have complied with the requirement of the minimum holding period of six months with respect to the securities purchased/sold.

I hereby declare that the above details are true, correct and complete in all respects.

Signature: _____

Name:

Designation:

Date:

Place:

ANNEXURE 7

[See Regulation 7B of the SEBI PIT Regulation]

Form for Informant's Voluntary Information Disclosure to be submitted to the SEBI

Note: For submission of information through a legal representative, the redacted copy of the Form expunging information that may identify the Informant shall be submitted by the Legal Representative without expunging any information relating to the Legal Representative and the details relating to the violation of Insider trading Laws.

*Indicates that the required field is non-mandatory, remaining fields are mandatory

I. PERSONAL INFORMATION OF THE INFORMANT		
A. INDIVIDUAL 1: Title:	First Name:	Last Name:
Address:	City/State:	PIN:
Telephone (with State Code):	Mobile:	E-Mail address:
Employment Details*:	Permanent Account Number, if available:	
II. LEGAL REPRESENTATIVE (where applicable)		
Title:	First Name:	Last Name:
Firm Name (if not self-employed):		
Contact address:	City/State:	PIN:
Residence address:	City/State:	PIN:
Telephone (with State Code):	Mobile:	E-Mail address:
Bar Council Enrolment Number:		
III SUBMISSION OF ORIGINAL INFORMATION		
1. Is it a violation of securities laws? Yes/No		
2. If yes to question (1), please describe the type of violation:		
3. Has the violation: Occurred/ Occurring/ Potential to occur in the future		
4. If the violation has occurred, date of occurrence: dd/mm/yy (in case exact date is not known, an approximate period may be entered)		
5. Have the individual(s) or their representatives had any prior communication(s) or representations with the SEBI concerning this matter? Yes (Details thereof) / No		
6. Does this violation relate to an entity of which the individual is or was an officer, director, counsel, employee, consultant or contractor? Yes (Details thereof) / No		
7. If yes to question (6), was the original information submitted first to your Head or internal		

legal and compliance office? Yes/No
8. If yes to question (7), then please provide, Date of submission of original information: dd/mm/yy
9. Please describe in detail why you think the information submitted is a violation?
10. What facts or supporting material is your allegation based on? Please attach any additional documents to this form, if necessary.
11. Identify any documents or other information in your submission that you believe could reasonably be expected to reveal your identity and explain the basis for your belief that your identity would be revealed if the documents were disclosed to a third party.
12. Provide details of connection amongst the Informant, the company whose securities are involved and the person against whom information is being provided:
IV. DECLARATION
I/ we hereby declare that: <ul style="list-style-type: none"> A. I/ we have read and understood the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015; B. I/ we accept that mere furnishing of information by me/us does not by itself confer on me/us does not by itself confer of me/us right to get reward and that I/we may not get any Reward at all. I/we would be bound by the decisions that the authority competent to grant reward may take; C. I/we accept that the Securities and Exchange Board of India is under no obligation to enter into any correspondence regarding action or inaction taken as a result of my/our information. D. I/we accept that the reward would be an ex-gratia payment which, subject to the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, shall be granted at the absolute discretion of the competent authority. The decision of the authority shall be acceptable to me/us and I/we shall not challenge it in any litigation, appeal, adjudication, etc. E. In the event of my/our death before the reward is paid to me/us, it may be paid to (Details of nominee): F. I/ we declare that the information contained herein is true, correct and complete to the best of my/our knowledge and belief and not obtained from the categories of persons indicated in sub-regulation (2) and sub-regulation (6) of regulation 7G of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and agree to indemnify the SEBI in case it is not so found. I/we fully understand that I/we may be subject to action under securities laws as well as Section 182 of the Indian Penal Code, 1860 (45 of 1860) and ineligible for Reward if, in my/our submission of information or in any other dealings with the SEBI, I/we knowingly and wilfully make any false, fictitious, or fraudulent statements or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious, or fraudulent statement. <p>Signature: _____ Date: dd/mm/yy Place: _____</p>
V. CERTIFICATE BE LEGAL REPRESENTATIVE (where the information is submitted through Legal Representative)
I hereby certify as follows:

- (a) I have reviewed the completed and signed Voluntary Information Disclosure Form for completeness and accuracy and the information contained therein is true, correct and complete to the best of my knowledge;
- (b) I have irrevocable consent from the Declarant, to provide to the Securities and Exchange Board of India, the original Voluntary Information Disclosure Form in the event of a request for it from the Securities and Exchange Board of India due to concerns that the Informant has not complied with these regulations or where the Securities and Exchange Board of India requires the said information for the purpose of verification for declaring any gratuitous reward to the Informant or where the Securities and Exchange Board of India determines that it is necessary to seek such information to accomplish the purpose of Securities and Exchange Board of India Act including for the protection of investors, sharing with foreign securities regulators and foreign and Indian law enforcement agencies, etc.;
- (c) I am and shall continue to be legally obligated to provide the original Voluntary Information Disclosure Form without demur within seven (7) calendar days of receiving such request from the Securities and Exchange Board of India.

Signature:
Place:

Date: dd/mm/yy

ANNEXURE 8

[See regulations 7D and 7E of the SEBI PIT Regulations]

Form for Informant's Reward Claim to be submitted to the SEBI within the time specified in the intimation of prima facie eligibility to receive an Informant Reward.

All fields are mandatory

I. PERSONAL INFORMATION		
A. Informant: Title:	First Name:	Last Name:
Address:	City/State:	PIN:
Telephone (with State Code):	Mobile:	E-Mail address:
Employment Details*:		Permanent Account Number, if available:
II. ORIGINAL INFORMATION SUBMITTED		
Online Acknowledgment Receipt Number: (Annex Original Form for Voluntary Information Disclosure, if not yet submitted to Securities and Exchange Board of India)		
Subject matter of submission:		Date of submission: dd/mm/yy
Case Name:	SEBI Order No.:	Date: dd/mm/yy
III CONSIDERATION FOR REWARD		
Provide any material information that may be relevant in light of the criteria for determining the amount of Reward or denial thereof. Include any supporting documents if necessary.		
IV DECLARATION BY INFORMANT		
I/we hereby declare that:		
A. I/we have read and understood the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;		
B. I/we accept that mere furnishing of information by me/us does not by itself confer on me/us right to get reward and that I/we may not get any Reward at all. I/we would be bound by the decisions that the authority competent to grant reward may take;		
C. I/we accept that the Securities and Exchange Board of India is under no obligation to pay any reward or enter into any correspondence regarding action or inaction taken as a result of this communication.		
D. I/we accept that the reward would be an ex-gratia payment which, subject to the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, shall be granted at the absolute discretion of the competent authority. The decision of the authority shall be acceptable to me/us and I/we shall not challenge it in any litigation, appeal, adjudication, etc.		
E. In the event of my/our death before the reward is paid to me/us, it may be paid to (Details of Nominee):		
F. I/we declare that the information contained herein is true, correct and complete to the best of my/our knowledge and belief and not obtained from the categories of persons indicated in sub-regulation (2) and sub-regulation (6) of regulation 7G of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and agree to indemnify the SEBI in case it is not so found. I/we fully understand that I/we may be subject		

to action under securities laws as well as Section 182 of the Indian Penal Code, 1860 (45 of 1860) and ineligible for an Informant Reward if, in my/our submission of information or in any other dealings with the SEBI, I/we knowingly and wilfully make any false, fictitious, or fraudulent statement or representations, or use any false writing or document knowing that the writing or document contains any false, fictitious or fraudulent statement.

Signature:

Date: dd/mm/yy

Place:

V CERTIFICATE BY LEGAL REPRESENTATIVE (where applicable)

I hereby certify as follows:

- a) I have reviewed the completed and signed claim form for completeness and accuracy and the information contained therein is true, correct and complete to the best of my knowledge; and
- b) The declarant is the person who signed the original Voluntary Information Disclosure Form.

Signature:

Date: dd/mm/yy

Place:

FORMATS PRESCRIBED BY SEBI UNDER SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015:

FORM A

**SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (a) read with Regulation 6 (2) – Initial disclosure to the company]**

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 eg. – Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5

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 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
6	7	8	9	10	11

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 Key Managerial Personnel/Director/Promoter/Member of the promoter group]

Name of the company: _____

ISIN of the company: _____

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

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

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

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

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

Note: (i) "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015. (ii) Value of transaction excludes taxes/brokerage/any other charges

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

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)	
16	17	18	19	20	21	22

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**

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	Connection with company	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/acquisition of shares/disposal of shares specify		Date intimation to company	Mode of acquisition/disposal (on market/public/rights/ Preferential offer / off market/ Inter-se transfer, ESOPs etc.)	Exchange on which the trade was executed
		Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of shareholding	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No.	Value	Transaction Type (Purchase/Sale/ Pledge/ Revocation / Invocation/ Others please specify)	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of share holding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

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

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

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

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)	
16	17	18	19	20	21	22

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

Name:

Signature:

Date:

Place: