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**Code of Internal Procedures and Conduct for Regulating,
Monitoring and Reporting of Trading by Insiders**
[Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015]

**Procedure Revised and Approved by Audit Committee and Board of Directors
Meeting held on 14th February 2019 (w.e.f from April 01, 2019)**

PROLOGUE

The Code is in accordance with the relevant provisions of **The SEBI [Prohibition of Insider Trading] Regulations, 2015**, This Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading by Insiders will be known as **“NEELAMALAI AGRO INDUSTRIES LIMITED [“NEELAMALAI”] Code of Conduct for Prohibition of Insider Trading”**, hereinafter referred as 'Code'

OBJECTIVE OF THE CODE

- ✓ To prevent insider trading by prohibiting dealing through, communicating or counselling on matters relating to insider trading.
- ✓ To preserve the confidentiality of unpublished price sensitive information in order to prevent misuse of such information.
- ✓ To remain committed to transparency & fairness in dealing with all stakeholders & in ensuring adherence to all the applicable laws & regulations.

CO-ORDINATING DISCLOSURE

The Board has designated Company Secretary as Compliance Officer who would be responsible to ensure timely, adequate, uniform and universal dissemination of information and disclosure of Unpublished Price Sensitive Information [UPSI] pursuant to this Code as required under the Regulations so as to avoid selective disclosure.

ROLE OF COMPLIANCE OFFICER

- a) The Compliance Officer shall report to the MD and Board of Directors as the case may be.
- b) The Compliance Officer shall be responsible to review the trading plan, to assess whether the plan would have any potential for violation of these 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 plan.
- c) The Compliance Officer shall maintain a record and declarations of Directors & Designated Employees and any changes made thereto.
- d) All disclosure/dissemination of any unpublished price sensitive information [UPSI save and except disclosure required to be made under any law or under this Code] on behalf of the Company shall be first marked to the Compliance Officer, for approval. Any such information shall be made public or published on behalf of the Company only if the same is approved by MD of the Company. In case of doubt, the Compliance Officer, shall consult and seek approval of the MD and Board of Directors before dissemination of such information.
- e) Audit committee shall review policy and compliance once in a year



TRADING PLAN

All the Directors, KMPs, Designated Employees and Connected persons of "NEELAMALAI" shall be subject to trading restrictions as enumerated below:

- Not entail commencement of trading earlier than six months from the public disclosure of the plan;
- 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 by the issuer of the securities and the second trading day after the disclosure of such financial results;
- Entail trading for a period of not less than twelve months;
- Not entail overlap of any period for which another trading plan is already in existence;
- 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
- Not entails trading in securities for market abuse.
- Pre-clearance of trades shall not be required for a trade executed as per approved trading plan.

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.

Upon approval of the Trading Plan, the Chief Investor Relations Officer shall notify the plan to the stock exchanges on which the securities are listed.

DISCLOSURES OF TRADING

- Every disclosure shall be made in such form as specified.
- The disclosures shall be made by such person's immediate relatives, and by any other person for whom such person take trading decisions.
- The disclosures made shall be maintained by the company, for a minimum period of five year, in such form as may be specified.
- Initial Disclosures – Every Promoters, KMP's and Directors shall disclose holding of securities of the "NEELAMALAI" as on the date of these regulations.
- Continual Disclosures - Every Promoters, KMP's and Directors shall disclose to "NEELAMALAI" the number of such securities acquired or disposed of within two trading days of such transactions if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Ten lakhs Rupees. Such trading will be promptly be intimated to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.
- Code of practices and procedures for Fair Disclosure of unpublished price sensitive information and there amendment thereto, shall be published on official website.

PENALTY FOR CONTRAVENTION OF THE CODE OF CONDUCT

- In case of any violation of Code, a corporate action will be taken by the Board in accordance with the act and punishment be awarded, which may include wage freeze, suspension, ineligibility for future participation in employee stock option plans, etc.

UPLOADING OF CODE NEELAMALAI WEBSITE

- This code and any amendments thereto shall be available on the website of the company. www.neelamalaiagro.com



Policy for Determination of “Legitimate Purposes”

[Pursuant to Reg.3 (2A) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

**Approved by Audit Committee and Board of Directors Meeting held on
14th February 2019 (w.e.f from April 01, 2019)**

CONNOTATION

“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 professional or other advisors or consultants, which sharing carried out to evade or circumvent the prohibitions of these regulations.

“Unpublished price sensitive information” – UPSI

Means any information, relating to a 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 include but not restricted to, information relating the following:

- Financial results;
- Dividends;
- Change in capital structure;
- Mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
- Changes in key managerial personnel.

“Insider”

Means any person who is:

- a connected person; of
- in possession of or having access to unpublished price sensitive information

COMMUNICATION OR PROCUREMENT OF UPSI

- ✓ Notice shall be given to all such persons to maintain confidentiality of such UPSI;
- ✓ UPSI may be communicated, where the board of directors is of opinion that sharing of such information is in the best interest of the company, in connection with a transaction that would entail an obligation to make an open officer under the takeover regulation;
- ✓ The board of directors and parties execute agreement to contract confidentiality shall not trade in securities of the company when in possession of UPSI;
- ✓ Board of directors shall ensure structured digital data base is maintained with time stamping along with Permanent Account number or any other identification of authorized by law where PAN is not available;



CODE OF FAIR DISCLOSURE AND CONDUCT

- ✓ Shall formulate and publish on its official website, a code of practices and procedures for fair disclosure of UPSI;
- ✓ Every amendment shall be promptly be intimated to Stock Exchange;
- ✓ Shall ensure uniform and universal dissemination of UPSI;
- ✓ Company Secretary and compliance officer of the company duly authorised to deal with dissemination of information and disclosure of UPSI;
- ✓ Appropriate and fair response to queries;
- ✓ Information shared with analysts and research personnel shall not be UPSI;
- ✓ Summaries of proceedings of meetings with analysts and other investor conferences be disseminated of official website.
- ✓ Handling of all unpublished price sensitive information on a need-to know basis.



**Policy and procedures for inquiry in case of leak of
Unpublished price sensitive information**

[Pursuant to Reg.9A (5) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

**Approved by Audit Committee and Board of Directors Meeting held on
14th February 2019 (w.e.f from April 01, 2019)**

"Unpublished price sensitive information" – UPSI	
	Means any information, relating to a 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 include but not restricted to, information relating the following: <ul style="list-style-type: none"> - Financial results; - Dividends; - Change in capital structure; - Mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions; - Changes in key managerial personnel.
"Insider"	
	Means any person who is: <ul style="list-style-type: none"> - a connected person; of - in possession of or having access to unpublished price sensitive information
"Internal controls" includes;	
	<ul style="list-style-type: none"> - all employees who have access to UPSI are identified as designated employee - all the UPSI shall be identified and its confidentiality shall be maintained - adequate restrictions shall be place on communication - Confidentiality agreements shall be signed or notice be served to all such employees and persons - Periodic review to evaluate effectiveness by Audit Committee
"Disciplinary Action"	
	means any action that can be taken on the completion of / during the investigation proceedings including but not limiting to a warning, imposition of fine, suspension from official duties or any such action as is deemed to be fit considering the gravity of the matter.
"Disclosure of UPSI"	
	means a concern raised by a written communication made in good faith that discloses of UPSI information it entail an obligation to make an open offer under the takeover regulations where the board of directors of the company is on opinion that sharing of such information is in the best interests of the Company.
SCOPE OF THE POLICY	
	<ul style="list-style-type: none"> - The policy intends to cover serious concerns that could have grave impact on the operations and performance of the business of the Company; - This policy is an extension of the "NEELAMALAI" - Code of Internal Procedures and Conduct for Regulating Monitoring and Reporting of Trading



	<p>by Insiders;</p> <ul style="list-style-type: none"> - Insiders should not act on their own in conducting any investigation activities; - Any untrue allegations will not be taken up and investigated and appropriate action will be taken for the same; - Appropriate and fair enquires and verification on market rumours;
INVESTIGATION AND PROCEDURE OF INQUIRY	
	<ul style="list-style-type: none"> - Board of Directors authorise immediate superior of the department and Company secretary & compliance Officer of the Company to initiate appropriate inquiries on becoming aware of leak of UPSI or suspected leak of UPSI and inform the Board promptly of such leaks, inquiries and results of such inquiries. - How to Report; You must report all suspected violations to <ol style="list-style-type: none"> i. Your Immediate Superior ii. CS and Compliance Officer ; at narasimhan.l@avtplantations.co.in <p>If you have reason to believe that your immediate supervisor or the Compliance Officer is involved in the suspected violation, your report may be made to the Audit Committee of "NEELAMALAI" at:</p> <p>Chairman Audit Committee Neelamalai Agro Industries Limited Katary Estate, Katary Post, Coonoor, The Nilgiris, Tamilnadu 643 213.</p> <ul style="list-style-type: none"> - The investigation shall be completed normally within 45 days of the receipt of the complaint - If it is not completed within 45 days, Compliance office shall provide proper explanations to the Chairman of the Audit Committee for the delay. - Failure to report any reasonable belief that a violation has occurred or is occurring is itself a violation of this Policy and such failure will be addressed with appropriate disciplinary action, including possible termination of employment. - All reports under this Policy will be promptly and appropriately investigated and all information disclosed during the course of the investigation will remain confidential, except as necessary to conduct the investigation and take any remedial action, in accordance with applicable law. - Everyone working for or with the Company, should cooperate in the investigation of reports of violations - Failure to cooperate in an investigation or deliberately providing false information during an investigation can be the basis for disciplinary action, including termination of employment. - If, at the conclusion of investigation, the Company determines that a violation has occurred, the Company will take effective remedial action commensurate with the nature of the offense. This action may include disciplinary action against the accused party, up to and including termination. Reasonable and necessary steps will also be taken to prevent any further violations of Company policy. - All documents related to reporting, investigation and enforcement pursuant to this Policy shall be kept in accordance with the Company's record retention policy and applicable law



REVISION

The Audit Committee or the Board of Directors of "NEELAMALAI" can modify this Policy unilaterally at any time without notice. Modification may be necessary, among other reasons, to maintain compliance with central, state or local regulations and/or accommodate organizational changes within the Company.



**Amended code of Insider trading appointed by Audit Committee meeting
held on 08th November, 2019**

On September 17, 2019 SEBI notified the SEBI (Prohibition of Insider Trading) (Third Amendment) Regulations, 2019 (mainly on information), this notification is effective from 26th December, 2019.

“**Employee** who reports any alleged violations of Insider Trading laws to Securities and Exchange Board of India in accordance with the SEBI (Prohibition of Insider Trading) Regulations, 2015, will be protected against any discharge, termination, demotion, suspension, threats, harassment, directly or indirectly or discrimination.”

Formats of Schedules D and E dealing with Informant’s Voluntary Information Disclosure to the Board and Informant’s Reward Claim to received an Informant Reward, respectively were also notified.



ANNEXURE-1

APPLICATION FOR PRE-DEALING APPROVAL

Date:

To,

The Compliance Officer,

Neelamalai Agro Industries Limited

Chennai

Dear Sir,

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 subscription of _____ equity shares of the Company as per details given below:

A	Name of the Applicant	
B	Designation, if any	
C	Number of Securities held as on date	
D	Folio No./DP ID/Client ID No.	
E	The Proposal is for	
F	Proposed date of dealing in Securities	
G	Estimated number of Securities proposed to be acquired	
H	Price at which the transaction is proposed	
I	Current Market Price (as on date of application)	
J	Whether the proposed transaction will be through stock exchange or off-market deal	
K	Folio No. /DP ID/Client ID No. where the securities will be credited /debited	

I enclose herewith the undertaking signed by me.

Yours faithfully,

For Authorised Signatory

ANNEXURE -2

UNDERTAKING

To,

The Compliance Officer,
Neelamalai Agro Industries Limited,

We, _____ having its registered office at Katary Estate, Katary Post, Coonoor, The Nilgiris, Pin code : 643 213, represented by _____, of the Company is desirous of dealing in _____ shares of your Company.

We further declare that we are 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 we 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, we 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.

We declare that we have not contravened the provisions of the Code and SEBI (Prohibition of Insider Trading Regulation), 2015 from time to time.

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

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

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

For Neelamalai Agro Industries Limited

Authorised Signatory

ANNEXURE -3

FORMAT FOR PRE- CLEARANCE ORDER

To,

Name : _____

Designation : _____

Place : _____

This is to inform you that your request for dealing in _____ (nos) shares of the Company as mentioned in your application dated _____ is approved. Please note that the said transaction must be completed on or before _____ (date) that is within 7 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 2 days from the date of transaction/deal. In case the transaction is not undertaken a 'Nil' report shall be necessary.

Yours faithfully,

For Neelamalai Agro Industries Limited

COMPLIANCE OFFICER

Date : _____

Encl: Format for submission of details of transaction

ANNEXURE-4

DISCLOSURE OF TRANSACTIONS

To,

The Compliance Officer.
Neelamalai Agro Industries Limited

We hereby inform that we

- Have bought to _____ securities as mentioned below on _____
-

Name of the Holder	No .of Securities dealt with	Bought	DP ID/Client ID/ Folio No.	Price (Rs.)

In connection with the aforesaid transaction(s), we hereby undertake to preserve, for a period of 3 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 slips (applicable in case of sale transaction.)

We 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, we shall approach the Compliance Officer for necessary approval.

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

For

Authorised Signatory

Date:

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

Name of the Company : **NEELAMALAI AGRO INDUSTRIES LIMITED**
 ISIN of the Company : **INE605D01012**

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) Regulation, 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 Specification	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 of becoming a director/KMP/Promoter]

Name of the Company : **NEELAMALAI AGRO INDUSTRIES LIMITED**
 ISIN of the Company : **INE605D01012**

Details of Securities 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).

Name, PAN, CIN/DIN & address with Contact nos.	Category of Person (Promoters/KMP/Directors/immediate relative to/others etc)	Date of Appointment Of Director/KMP or Date of becoming Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP		% of shareholding
			Type of security (For eg. Shares, Warrants, Convertible Debentures etc.)	NO.	
1	2	3	4	5	6

Note: "Securities" shall have the meaning as defined under regulation 2(1) (i) of SEBI (Prohibition of Insider Trading) Regulation, 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 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 Specification	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) Regulation 6(2) – Continual Disclosure]

Name of the Company : **NEELAMALAI AGRO INDUSTRIES LIMITED**

ISIN of the Company : **INE605D01012**

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

Name, PAN, CIN/DIN & address with Contact nos.	Category of Person (Promoters/ KMP/Directors/ Immediate relative to/others etc)	Securities held to prior to acquisition/disposal		Securities acquired/ Disposed				Securities held post acquisition / disposal		Date of allotment advice/acquisition of shares/sale of shares specify		Date of intimation to company	Mode of acquisition / disposal (on market/Public/rights/preferential offer/off market/Inter-se transfer, ESOPs etc..)
		Type of security (For eg. Shares, Warrants, Convertible Debentures etc.)	No. and % of share holding	Type of security (For eg. Shares, Warrants, Convertible Debentures etc.)	No	Value	Transaction Type (Buy/Sale /Pledge/ Revoke/Invoke)	Type of security (For eg. Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

Note: "Securities" shall have the meaning as defined under regulation 2(1) (i) of SEBI (Prohibition of Insider Trading) Regulation, 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		
		Notional Value	Number of units (contracts*lot)	Notional Value	Number of units (contracts* lot size)	
15	16	17	18	19	20	21

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

Name & Signature:

Designation:

Date:

Place

FORM-D
SEBI (Prohibition of Insider Trading) Regulations, 2015
Regulation 7(3) Transactions by Other connected person as identified by the company

Name of the Company: **NEELAMALAI AGRO INDUSTRIES LIMITED**
 ISIN of the Company : **INE605D01012**

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

Name, PAN, CIN/DIN & address with Contact nos.	Category of Person (Promoters/ KMP/Directors/Immediate relative to/others etc)	Securities held to prior to acquisition/disposal		Securities acquired/ Disposed				Securities held post acquisition / disposal		Date of allotment advice/acquisition of shares/sale of shares specify		Date of intimation to company	Mode of acquisition / disposal (on market/Public rights/preferential offer/off market/Inter-se transfer, ESOPs etc.)
		Type of security (For eg. Shares, Warrants, Convertible Debentures etc.)	No. and % of share holding	Type of security (For eg. Shares, Warrants, Convertible Debentures etc.)	No	Value	Transaction Type (Buy/Sale /Pledge/ Revoke/Invoke)	Type of security (For eg. Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

Note: "Securities" shall have the meaning as defined under regulation 2(1) (i) of SEBI (Prohibition of Insider Trading) Regulation, 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		
		Notional Value	Number of units (contracts*lot)	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:

SCHEDULE D

[See regulation 7B]

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

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 securities laws.

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

I. PERSONAL INFORMATION OF THE INFORMANT		
A. INDIVIDUAL 1:		
Last Name:.....	First Name:.....	Title:.....
Address:	City / State:	PIN:
Telephone (with State Code):	Mobile:	E-Mail address:
Employment Details*:		Permanent Account Number, if available:
II. LEGAL REPRESENTATIVE (where applicable)		
Last Name:.....	First Name:.....	Title:.....
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 future		
4. If the violation has occurred, date of occurrence: dd/mm/yy <i>(in case exact date is not known, an approximate period may be entered)</i>		
5. Have the individual(s) or their representatives had any prior communication(s) or representations with the Board 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 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,-

- 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 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 us 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 Board 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 Board, I/we knowingly and willfully 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.

Signature:.....

Date:

dd/mm/yy Place:

V. CERTIFICATE BY 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 the 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:.....

Date:

dd/mm/yy Place:

(I) after Schedule D, the following Schedule shall be inserted, namely, –

“SCHEDULE E

[See regulations 7D and 7E]

Form for Informant’s Reward Claim to be submitted to the Board 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:		
Last name:-----	First Name:-----	Title:-----
Address:	City / State:	PIN:
Telephone (with State code):	Mobile:	E-Mail Address:
Employment Details:	Permanent Account Number:	
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/20

Case Name:

SEBI Order No.:

Date: dd/mm/20

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 Board 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 Board, I/we knowingly and willfully 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.

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: