



**JUBILANT INDUSTRIES LIMITED**

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

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**JUBILANT INDUSTRIES LIMITED**  
**CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING**

**I. PREAMBLE**

This Code of Conduct for Prevention of Insider Trading (the “**Code**”) aims to regulate, monitor and report trading in the Securities of Jubilant Industries Limited (the “**Company**”) by the employees and other connected persons for achieving compliance with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (the “**Regulations**”).

The Code is effective from February 08, 2017 and supersedes the earlier Insider Trading Code.

**II. DEFINITIONS**

1. “**Board**” means the board of directors of the Company.
2. “**Compliance Officer**” means the Company Secretary of the Company who shall report to the Board of the Company.
3. “**Designated Persons**” mean:
  - (i) Directors and key managerial personnel of the Company ;
  - (ii) All employees of the Company of the rank of senior vice president and above, business heads, functional heads, plant heads and plant finance heads of the Company;
  - (iii) All employees of the Company in finance & accounts, secretarial, legal, taxation, management assurance, corporate communications, investor relations, financial planning & analysis and strategy & business development of the rank of manager and above located at the corporate office of the Company;

- (iv) Statutory Auditors of the Company;
  - (v) Directors, Chief Executive Officer(s)/ President(s), Business Heads, Chief Financial Officer(s)/ Finance Heads of the subsidiary companies; and
  - (vi) Any other person as identified and notified by the Compliance Officer from time to time, with approval of the Chairman.
4. **"Generally Available Information"** means information that is accessible to the public on a non-discriminatory basis. Information available on the websites of the Stock Exchanges would ordinarily be considered as generally available.
5. **"Immediate Relative"** in respect of a person means spouse of a person, and includes parents, siblings and children of such person or of the spouse, any of whom is either financially dependent on such person, or consults such person in taking decisions relating to Trading in the Securities of the Company. Provided however, that spouse shall be presumed to be an 'Immediate Relative', unless the presumption is rebutted.
6. **"Securities"** shall have the meaning ascribed to the term under the Securities Contract (Regulation) Act, 1956 and shall include derivatives, if any, of the shares and securities of the Company, provided that Trading in such derivatives is permitted by any law for the time being in force.
7. **"Threshold Limit"** for Trading in the Securities of the Company in any calendar quarter shall be the Traded value of Rs. 10,00,000 (Rupees Ten Lacs). Cumulative value of all the transactions in the Securities of the Company (whether acquired or disposed off) during the calendar quarter shall be considered while calculating the Threshold Limit.

8. **“Trading Day”** means a day on which the concerned stock exchanges where the Securities of the Company are listed are open for trading.
9. **“Trading in Securities”** means and includes subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell or deal in any securities of the Company by any person and the word **“Trade”** shall be construed accordingly.
10. **“Trading Plan”** means a plan to Trade in the Securities of the Company, which has been approved by the Compliance Officer and disclosed to the Stock Exchanges.
11. **“Trading Window”** means the period during which Trading in the Securities of the Company can be undertaken by the Designated Persons and their Immediate Relatives subject to compliance with this Code.
12. **“Unpublished Price Sensitive Information”** means any information, relating to the Company or its Securities, directly or indirectly, that is not generally available and which upon becoming generally available, is likely to materially affect the price of the Securities of the Company and shall, ordinarily include but not be restricted to, information relating to the following:
  - (i) financial results;
  - (ii) dividends;
  - (iii) change in capital structure;
  - (iv) merger, de-merger, acquisition, delisting, disposal and expansion of business and such other transactions;
  - (v) changes in key managerial personnel; and
  - (vi) material events defined in defined in SEBI (Listing Obligations and Disclosures Requirements) Regulations, 2015) read with the Company’s Policy for Determination of Materiality of Events and Information, as amended from time to time.

Word and expressions used and not defined in this Code but defined in the Regulations shall have the meanings respectively assigned to them in the Regulations.

### **III. RESPONSIBILITY OF DESIGNATED PERSONS**

1. Designated Persons shall maintain confidentiality of the Unpublished Price Sensitive Information. All information shall be handled within the Company on a need-to-know basis. Designated Persons shall not communicate, provide or allow access to such Unpublished Price Sensitive Information to any person except where such communication is in furtherance of legitimate purposes of the Company, performance of duties of the Designated Person or discharge of legal obligations of the Company. In case any Unpublished Price Sensitive Information is required to be shared by a Designated Person, such information shall be shared only with the prior written approval of the Chairman or Executive Director-Finance. While granting such approval, they may impose such conditions as deemed necessary.
2. Designated Persons or their Immediate Relatives shall not Trade in the Securities of the Company while in possession of Unpublished Price Sensitive Information.
3. Designated Persons or their Immediate Relatives shall not Trade in the Securities of the Company during the period when the Trading Window is closed.
4. Designated Persons or their Immediate Relatives shall not Trade in the Securities of the Company in excess of the Threshold Limits, whether singly or cumulatively, without obtaining pre-clearance from the Compliance Officer. This restriction shall not apply when Trades are executed pursuant to the Trading Plan.

5. Files containing confidential information shall be kept secure. Computer files shall have adequate security of login and password, etc.

#### **IV. COMPLIANCE OFFICER**

1. The Compliance Officer shall be responsible for compliance of the policies, procedures, maintenance of records, monitoring adherence to the rules for preservation of Unpublished Price Sensitive Information, pre-clearing and monitoring of Trades and implementation of this Code, under the overall supervision of the Board of the Company.
2. The Compliance Officer shall maintain records of the Designated Persons and any changes therein in **Form 1**.
3. The Compliance Officer shall provide guidance and clarifications sought by the Designated Persons for effective compliance with this Code and the Regulations.
4. The Compliance Officer shall be responsible for:
  - (i) pre-clearing and monitoring of Trades;
  - (ii) approving the Trading Plan and notifying the same to the stock exchanges on which the Securities of the Company are listed;
  - (iii) re-opening and closure of the Trading Window;
  - (iv) providing relaxation from the restriction of contra transaction(s) as stipulated in this Code; and
  - (v) reporting violation of this Code or of the Regulations to the Board of the Company and Securities and Exchange Board of India ("**SEBI**").
5. The Compliance Officer shall maintain relevant records under this Code for a minimum period of five years.

## V. TRADING WINDOW

### 1. **Trading Window**

The Trading Window shall be deemed to be open, unless specifically closed.

### 2. **Closing of Trading Window**

The Compliance Officer shall, from time to time, notify the period during which the Trading Window shall remain closed.

### 3. **Closure timing**

The Trading Window shall remain closed for such period as may be determined by the Compliance Officer, in the event the Compliance Officer determines that a Designated Person or class of Designated Persons can reasonably be expected to have possession of Unpublished Price Sensitive Information.

Notwithstanding the above, the Trading Window shall, as far as practicable, be closed:

- (i) In respect of declaration of financial results - 7 days prior to the end of the respective calendar quarter, half year or financial year, as the case may be; or
- (ii) In any other case - from the issuance of notice of the Board Meeting in which an Unpublished Price Sensitive Information is scheduled to be considered.

In addition to the above, the Board of the Company or the Audit Committee or Chairman or the Compliance Officer may close the Trading Window during such time and for such period as deemed fit and proper.



4. **Reopening of Trading Window**

The Trading Window shall re-open at a time determined by the Compliance Officer after considering various factors, including but not limited to the Unpublished Price Sensitive Information on account of which the Trading Window was closed becoming generally available or through other permissible means and becoming capable of assimilation by the market, provided however that under no circumstance shall the Trading Window be re-opened prior to the expiry of 48 hours from the time at which the aforementioned Unpublished Price Sensitive Information becomes generally available.

5. Restrictions pertaining to the Trading Window shall also be applicable to any connected person, as may be decided by the Compliance Officer from time to time, having contractual or fiduciary relation with the Company assisting or advising the Company.

**VI. PRE-CLEARANCE OF TRADES**

1. Designated Persons and their Immediate Relatives who intend to Trade in the Securities of the Company in excess of the Threshold Limits (taking into account the cumulative value of all Trades undertaken by such Designated Person and its Immediate Relatives during the calendar quarter), shall obtain pre-clearance of their intended Trades by applying to the Compliance Officer in **Form 2**. Alternatively, they can carry out Trades in the Securities of the Company by complying with the requirements of the Trading Plan as mentioned in this Code.
2. Designated Persons and their Immediate Relatives shall not apply for pre-clearance of a proposed Trade, while in possession of any Unpublished Price Sensitive Information. Further, while applying for pre-clearance of a proposed Trade, the Designated Persons and their

Immediate Relatives shall furnish a declaration that they are not in possession of any Unpublished Price Sensitive Information in **Form 2**.

3. The pre-clearance granted by the Compliance Officer shall be with reference to this Code only. Such pre-clearance shall not in any way be deemed to be confirmation of compliance with the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 (the "**Takeover Code**") if applicable. The person seeking pre-clearance shall be solely responsible for compliance with the provisions of the Takeover Code, if applicable.
4. Designated Persons and their Immediate Relatives shall execute their Trades in respect of the Securities of the Company within seven Trading Days from the date of pre-clearance by the Compliance Officer. If the Trade is not executed within this time period, such persons shall get the Trade pre-cleared from the Compliance Officer again. On execution of the Trade, such person shall intimate details thereof within two Trading Days of execution to the Compliance Officer in **Form C**.

Where a Trade is not executed after obtaining pre-clearance from the Compliance Officer for the same, such person shall intimate the same and the reasons thereof to the Compliance Officer within two Trading Days after expiry of the said period of seven trading days or prior to seeking fresh pre-clearance for the trade, whichever is earlier in **Form 2**.

5. In case the Compliance Officer or his Immediate Relatives intend to Trade in the Securities of the Company requiring pre-clearance, he shall obtain pre-clearance for the same from the Chairman, as per the pre-clearance procedure prescribed in this Code.
6. Designated Persons and their Immediate Relatives, who Trade in the Securities of the Company pursuant to a pre-clearance or under an

approved Trading Plan, shall not enter into a contra transaction, either themselves or through their Immediate Relatives i.e. Trade in the Securities of the Company during six months from the date of Trade in Securities of the Company by such person. The Compliance Officer may provide relaxation from the above provision, on an application made in this behalf by the Designated Persons or their Immediate Relatives and for reasons to be recorded in writing. Any such relaxation shall be granted by the Compliance Officer after obtaining prior approval of the Chairman of the Company, provided such relaxation does not violate the Regulations. If any Designated Person or an Immediate Relative of a Designated Person contravenes with this provision, inadvertently or otherwise, the profits from any Trade in such contravention shall be required to be disgorged for remittance to the SEBI for credit to the Investor Protection and Education Fund administered by the SEBI under the Securities and Exchange Board of India Act, 1992.

Provided however, the exercise of options granted under the employee stock option schemes (“ESOP Schemes”) shall not be considered as “trading” for the purpose of this Code. Therefore, acquisition of shares of the Company by exercise of options under ESOP Schemes and disposal of such shares acquired through ESOP Schemes shall not tantamount to contra transaction. However, necessary disclosure and reporting requirements prescribed in this Code shall be complied with by the Designated Persons.

## **VII. TRADING PLAN**

The Designated Persons who may be perpetually in possession of Unpublished Price Sensitive Information and their Immediate Relatives have an option to formulate a Trading Plan for carrying out Trades in the Securities of the Company in a compliant manner as stated below:

- 1) The Designated Persons or their Immediate Relatives shall be entitled to formulate and present a Trading Plan to the Compliance Officer in **Form 3** for approval and public disclosure pursuant to which Trades in the Securities of the Company may be carried out on their behalf.
- 2) Such Trading Plan shall:
  - i) not entail commencement of Trading in the Securities of the Company on behalf of the Designated Persons or their Immediate Relatives earlier than six months from the public disclosure of the Trading Plan;
  - ii) not entail Trading in the Securities of the Company 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 Company and the second Trading Day after disclosure of such financial results;
  - iii) entail Trading in the Securities for a period of not less than twelve months;
  - iv) not entail overlap of any period for which another Trading Plan is already in existence;
  - v) set out either the value of the Trades to be effected in the Securities of the Company or the number of the Securities of the Company 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 the Securities of the Company for market abuse.
- 3) The Compliance Officer shall review the Trading Plan to assess whether the Trading Plan would have any potential for violation of the Code or the Regulations and shall seek such express undertakings as

may be necessary to enable such assessment and to approve and monitor implementation of the Trading Plan.

- 4) Upon approval of the Trading Plan, the Compliance Officer shall notify the Trading Plan to the stock exchanges on which the Securities of the Company are listed.
- 5) The Trading Plan once approved shall be irrevocable and the Designated Persons and/ or their Immediate Relatives shall have to mandatorily implement the Trading Plan, without being entitled to either deviate from the same or to execute any Trade in the Securities of the Company outside the scope thereof.

Provided that the implementation of the Trading Plan shall not be commenced if any Unpublished Price Sensitive Information in possession of the Designated Persons at the time of formulation of the Trading Plan has not become generally available at the time of the commencement of implementation of such Trading Plan. In such an event, the Compliance Officer shall ensure that the commencement of the Trading Plan is deferred until such Unpublished Price Sensitive Information becomes generally available.

- 6) Such person who has obtained approval of the Trading Plan shall intimate details of the Trades executed in accordance with such Trading Plan, within two Trading Days to the Compliance Officer in **Form C**.
- 7) A Designated Person who has availed the facility of Trading Plan shall not be eligible to Trade in the Securities of the Company through pre-clearance mechanism as mentioned in this Code.

## **VIII. DISCLOSURES AND REPORTING REQUIREMENTS**

The Designated Persons, their Immediate Relatives, promoters and the welfare trust formed for administering the employee stock option schemes ("ESOP Trust") shall comply with the following:

### **1. Initial Disclosures**

- (a) Every director, key managerial personnel, promoter of the Company and ESOP Trust shall disclose details of the Securities of the Company held by him and his Immediate Relatives as on May 15, 2015 to the Company on or before June 14, 2015 in **Form A**.
- (b) Every director and key managerial personnel shall disclose details of the Securities of the Company held by him and his Immediate Relatives as on the date of his appointment as the director or key managerial personnel of the Company, as the case may be. Similarly, every promoter of the Company shall disclose details of the Securities of the Company held by him and his Immediate Relatives as on the date of his becoming a promoter of the Company. Such disclosures shall be made to the Company within seven days of such appointment or becoming a promoter in **Form B**.
- (c) A person shall within 7 working days of becoming a Designated Person, shall furnish a statement of his Immediate Relatives to the Company in **Form 4**.

### **2. Continual Disclosures**

- (a) Every Designated Person, promoter of the Company and ESOP Trust shall disclose details of the Securities of the Company acquired or disposed of by him and his Immediate Relatives, as the case may be, in **Form C** within two Trading Days of such transaction if the value of

the Securities Traded, in one or more transactions in a calendar quarter, aggregates to Rs. 10,00,000 (Rupees Ten Lacs) or more.

- (b) The Company shall notify the particulars of such Trading in the Securities to the stock exchange on which the Securities of the Company are listed, within two Trading Days of receipt of the disclosure or from becoming aware of such information.

**Explanation:** Any incremental transactions that take place after a transaction is disclosed under the above provisions shall be required to be made when the value of such incremental transactions exceed the threshold limit of Rs. 10,00,000.

3. All Designated Persons shall within 15 days from the end of the relevant period mentioned below, forward the following details to the Compliance Officer:
- (i) Annual declaration of names of Immediate Relatives as at March 31 of each year in **Form 4**.
  - (ii) Annual statement of all holdings in the Securities of the Company held by the Designated Persons and their Immediate Relatives as at March 31 of each year in **Form 5**.
4. The Compliance Officer shall present quarterly reports to the Board of the Company and the Chairman of the Audit Committee of the Company in respect of pre-clearance sought by the Designated Persons, Trading Plans, Trades executed pursuant to such pre-clearances and the Trading Plans and such other matters as may be necessary in **Form 6**.

## **IX. AMENDMENTS**

This Code may be amended from time to time by the Board of the Company. However, amendments in the Regulations shall be binding even if not incorporated in this Code.

## **X. PENALTIES**

- (i) Any contravention of this Code shall lead to such actions against the Designated Persons as the Board may decide, including but not limited to the following:
  - Salary freeze;
  - Suspension from duties; and
  - Non eligibility for participation in the employees stock option plan of the Company.
- (ii) Violation of this Code or the Regulations shall also be reported by the Compliance Officer to SEBI.
- (iii) Any action taken by the Company for violation of this Code or the Regulations shall not preclude SEBI from taking any action against the concerned person.



**FORM 1**

[To be maintained by Compliance Officer]

[As per Paragraph IV (2) of the Code of Conduct for Prevention of Insider Trading]

As on .....

**LIST OF DESIGNATED PERSONS**

Name of the Designated Person	Employee Number, if any	Designation	Department	Date of joining in case of new appointees(*)	Date of ceasing to be a Designated Person

(\*) Includes employees promoted to the category of Designated Persons.

**FORM 2**

[As per Paragraphs VI (1) and (2) of the Code of Conduct for Prevention of Insider Trading]

*Date:* \_\_\_\_\_

*To,*  
The Compliance Officer,  
Jubilant Industries Limited,  
1A, Sector 16A, Institutional Area,  
Noida – 201 301

**PRE-CLEARANCE APPLICATION CUM DECLARATION**

I/My Immediate Relative(s) am/are desirous of undertaking the following transaction(s) in Securities of the Company, which I would request you to pre-clear and confirm to me:

OR

I/My Immediate Relative(s) have not undertaken trades as per the pre-clearance of trades obtained. Details of the trades not executed with reasons thereof are given below:

Name of the Designated Person	Folio No. / Client ID No.	DP ID No.	Name and relationship of the Immediate Relative with the Designated Person	Nature and No. of Securities held	Details of proposed transaction			Reasons for not executing the Trade pre-cleared/ variation between quantity pre-cleared and actual quantity traded
					No. of Securities	Approximate market value Rs.	Type of transaction / Nature of Trade	

I hereby declare and confirm that:

- Neither I nor any of my Immediate Relative(s) have had any access to nor have I or any of my Immediate Relative(s) received any Unpublished Price Sensitive Information until the time of signing of this declaration. In case I get access to Unpublished Price Sensitive Information hereinafter, but before execution of above-mentioned transaction, I shall inform the Compliance Officer and shall refrain from Trading in the Securities of the Company till such Unpublished Price Sensitive Information becomes public.
- I have not contravened the Code of Conduct for Prevention of Insider Trading of the Company or the Regulations.

- I have made full and true disclosure in the matter.
- I do not have any approved Trading Plan in place.

All capitalized terms used but not defined herein shall have the meaning ascribed to such terms in the Code of Conduct for Prevention of Insider Trading of the Company.

.....

Signature

Name : \_\_\_\_\_

Designation : \_\_\_\_\_

Office address : \_\_\_\_\_

Employee No., if any : \_\_\_\_\_

**Notes:**

1. To be submitted in case a Designated Person or any Immediate Relative of a Designated Person intends to Trade in Securities of the Company in excess of the Threshold Limits. The Threshold Limits for dealing in Securities of the Company in any calendar quarter (i.e. January to March, April to June, July to September and October to December) by the Designated Persons together with their Immediate Relative(s) shall be traded value of Rs. 10,00,000 (Rupees Ten Lacs).
2. In case trades have not been executed as per pre-clearance obtained, details of the same with reason thereof shall be submitted in this form in accordance with Paragraph VI(4).

**FORM 3**

[As per Paragraph VII (1) of the Code of Conduct for Prevention of Insider Trading]

For Office Use Only
Trading Plan Approval No.: ___ of ____ [Year]

**Date:** \_\_\_\_\_

**To,**  
**The Compliance Officer,**  
**Jubilant Industries Limited,**  
**1A, Sector 16A, Institutional Area,**  
**Noida – 201 301**

**TRADING PLAN**

I hereby submit the Trading Plan for carrying out Trades in the Securities of the Company by me and / or my Immediate Relatives as per the following particulars for your consideration and approval:

1. Name and designation of the Designated Person for whom Trading Plan is submitted

\_\_\_\_\_

2. Name and relationship with Immediate Relative for whom Trading Plan is submitted:

\_\_\_\_\_

3. Permanent Account Number of the Designated Person/ Immediate Relative:

\_\_\_\_\_

4. Address of Designated Person/ Immediate Relative:

\_\_\_\_\_

5. Date of commencement of Trading Plan (not earlier than 6 months and 15 days from date of application):

\_\_\_\_\_

6. Duration of Trading Plan (atleast 12 months): From \_\_\_\_\_ To \_\_\_\_\_

7. Details of previous Trading Plan, if any [Approval Number, Date and Duration]:

8. Details of proposed trades:

Sr. No.	Nature of Trades	Dates of Trades or time interval between Trades <sup>(Refer Note-1)</sup>	Nature of Securities to be Traded	Value of Trades(in Rs.) or number of Securities to be Traded	Remarks, if any

I hereby confirm that I am not in possession of any Unpublished Price Sensitive Information on the date of this application.

**OR**

I hereby undertake that the above Trading Plan shall be implemented only after Unpublished Price Sensitive Information in my possession as on the date of this application is generally available.

.....

Signature

Name: \_\_\_\_\_

Designation: \_\_\_\_\_

Office address: \_\_\_\_\_

Employee No., if any: \_\_\_\_\_

**Notes:**

1. No Trading is permitted between 20<sup>th</sup> Trading Day prior to the last day of the financial period for which results are to be announced by the Company and the 2<sup>nd</sup> Trading Day after disclosure of such financial results.
2. "Immediate Relatives" means spouse of a person, and include parents, sibling and children of such person or of the spouse, any of whom is either financially dependent on such person or consults such person in taking decisions relating to Trading in the Securities of the Company.
3. All capitalized terms used but not defined herein shall have the meaning ascribed to such terms in the Code of Conduct for Prevention of Insider Trading of the Company.

**FORM 4**

[As per Paragraphs VIII(1)(c) and VIII(3)(i) of the Code of Conduct for Prevention of  
Insider Trading]

Date: \_\_\_\_\_

To,

**The Compliance Officer,  
Jubilant Industries Limited,  
1A, Sector 16A, Institutional Area,  
Noida – 201 301**

**DECLARATION REGARDING IMMEDIATE RELATIVES AS ON \_\_\_\_\_**

I hereby declare that I have the following Immediate Relatives:

<b>Sr. No.</b>	<b>Relationship</b>	<b>Name</b>	<b>Age (in case of minor only)</b>	<b>Permanent Account Number (PAN)</b>	<b>Folio No./ DP ID/ Client ID</b>
1	Spouse				
2	Father				
3	Mother				
4	Daughter (including step daughter)				
5	Son (including step son)				
6	Brother				
7	Sister				



Note: The above referred relatives need to be disclosed if they are financially dependent on the Designated Person or consult him for investment decisions.

.....

Signature

Name : \_\_\_\_\_

Designation : \_\_\_\_\_

Office address : \_\_\_\_\_

Employee No., if any : \_\_\_\_\_

Note: To be submitted within 7 working days of becoming Designated Person and also annually by April 15 by Designated Persons of the Company.

**FORM 5**

[As per Paragraph VIII (3)(ii) of the Code of Conduct for Prevention of Insider Trading]

Date: \_\_\_\_\_

To,  
**The Compliance Officer,  
Jubilant Industries Limited,  
1A, Sector 16A, Institutional Area,  
Noida – 201 301**

**ANNUAL STATEMENT OF SECURITIES HELD**

I give herein below details of Securities of the Company held by me/my Immediate Relatives as at March 31 \_\_\_\_\_ :

**1. BY SELF**

Folio No. / Client ID No.	DP ID	Nature of Securities	No. of Securities held

**2. BY IMMEDIATE RELATIVES**

Folio No. / Client ID No.	DP ID	Name and relationship	Nature of Securities	No. of Securities held

Note: “Immediate Relative” in respect of a person means spouse of a person, and includes parents, sibling and children of such person or of the spouse, any of whom is either financially dependent on such person, or consults such person in taking decisions relating to Trading in the Securities of the Company.

.....

Signature

Name : \_\_\_\_\_

Designation : \_\_\_\_\_

Office address : \_\_\_\_\_

Employee No., if any : \_\_\_\_\_

Note: Annual statement of holdings in Securities of the Company held by the Designated Persons or their Immediate Relatives to be informed annually by April 15.

**FORM 6**

[As per Paragraph VIII (4) of the Code of Conduct for Prevention of Insider Trading]

Date \_\_\_\_\_

To

**The Chairman of Audit Committee /  
Board of Directors,  
Jubilant Industries Limited**

**QUARTERLY REPORT BY COMPLIANCE OFFICER FOR THE QUARTER  
ENDED \_\_\_\_\_**

Sr. No.	Date of Trade	Name of Designated Person, Designation & Department / Division	Whether transaction by Designated Persons and / or their Immediate Relatives	Name of the Immediate Relative and relationship with the Designated Person	Nature, no. and value of Securities Traded	Details of Pre-clearance/ Trading Plans/ Trades executed/ Other matters

## 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 option

Name & Signature:

Designation:

Date:

Place:

**FORM B**

**SEBI (Prohibition of Insider Trading) Regulations, 2015**

**[Regulation 7(1)(b) read with Regulation 6(2) – Disclosure on becoming a director/KMP/Promoter]**

Name of the company: \_\_\_\_\_

ISIN of the company: \_\_\_\_\_

**Details of Securities held 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) Regulations, 2015.

**Details of Open Interest (OI) in derivatives of the company held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation 6(2).**

Open Interest of the Future contracts held at the time of becoming Promoter/appointment of Director/KMP			Open Interest of the Option Contracts held at the time of becoming Promoter/appointment of Director/KMP		
Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
7	8	9	10	11	12

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

Name & Signature:

Designation:

Date:

Place:

**Form C**

**SEBI (Prohibition of Insider Trading Regulations), 2015  
[Regulation 7(2) read with Regulation 6(2) – Continual Disclosure]**

Name of the Company: \_\_\_\_\_

ISIN of the Company: \_\_\_\_\_

**Details of change in 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 prior to acquisition/ disposal	Securities acquired/ Disposed	Securities held post acquisition/disposal	Date of allotment advice/ acquisition of shares/ sale of shares specify	Date of intimation to company	Mode of acquisition / disposal (on market/public/ rights/ preferential offer / off market/ Inter-se transfer, ESOPs etc.)



		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/Sale/Pledge/Revoke/Invoke)	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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

**Details of trading in derivatives of the company by Promoter, 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 size)	Notional Value	Number of units (contracts * lot size)	
15	16	17	18	1	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: