

# **CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS**

*[Pursuant to Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015]*

*(Applicable w.e.f. 15<sup>th</sup> May, 2015)*

The logo for KEI Industries Limited, featuring the letters 'KEI' in a bold, stylized, italicized font. The letters are black with a white, textured, metallic-like effect, giving them a three-dimensional appearance.

*Wires and cable*

## **KEI INDUSTRIES LIMITED**

Regd. Office: D-90, Okhla Industrial Area, Phase – 1 New Delhi – 110020

CIN: L74899DL1992PLC051527, Tel.: +91-11-26818840, 26818642,

Fax: +91-11-26811959, 26817225 Website: [www.kei-ind.com](http://www.kei-ind.com)

## **1. Preamble**

Pursuant to SEBI (Insider Trading) Regulations, 1992, the Board of Directors of the Company had approved the "Code of Conduct for Prevention of Insider Trading"

In line with the provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015 issued on 15th January, 2015, the following Code of Conduct to regulate, monitor and report trading by insiders ("hereinafter referred to as "Code" or "the Code" or "this code") has been formulated and adopted by the Board of Directors of M/s. KEI INDUSTRIES LIMITED (hereinafter referred to as "KEI" or "the Company") which will be applicable w.e.f. 15<sup>th</sup> May, 2015.

## **2. Objective**

The objective of this Code is to regulate, monitor and report trading by Designated Employees and other Connected Persons towards achieving compliance with SEBI (Prohibition of Insider Trading) Regulations, 2015 and cast a duty upon every Designated Employee of the Company and other Connected Persons to safeguard the confidentiality of all the information obtained in the course of his/ her work at the company. No Designated Employee and other Connected Persons may use his/ her position or knowledge about the Company to gain personal benefit or to provide benefit to any third party.

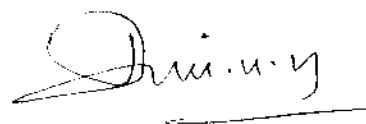
## **3. Applicability**

This Code shall be applicable to Designated Employees and all other connected persons dealing with KEI in any other capacity.

## **Explanation**

For the purposes of this Code '**Designated Employee**' shall mean and include: -

- a) all Promoters, Directors, Key Managerial Personnel (KMPs);
- b) Employees in the cadre of Vice President and above of the Company Management;
- c) Head of Finance of the Company/ Units/ Division;
- d) Employees working in Accounts & finance department and involved in finalization of financial statements of the Company;
- e) Other employees as may be designated by the Compliance Officer in consultation with the Chairman and Managing Director of the Company from time to time.



#### **4. Definitions**

**"Act"** means the Securities and Exchange Board of India Act, 1992.

**"Regulation or Regulations"** means the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time.

**"Compliance officer":**

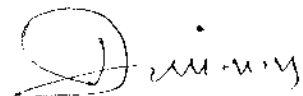
- The Executive Director (Finance) & CFO of the Company shall be the Compliance Officer & Chief Investor Relations Officer, who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board of Directors of the company and shall report to the Chairman of Audit Committee and Board of Directors of the Company annually.
- The compliance officer shall confidentially maintain a list of such securities as a "restricted list" which shall be used as the basis for approving or rejecting applications for preclearance of trades and may in consultation with the Chairman-cum-Managing Director and as directed by the Board specifies prohibited period from time to time and immediately make an announcement thereof.

**"Insider" means:**

- i) A Connected Person;
- ii) Any Person who is in possession of or is having access to Unpublished Price Sensitive Information (UPSI).

**"Connected person" means:**

- (i) 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 UPSI or is reasonably expected to allow such access.
- (ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established, -



- a) an immediate relative of connected persons specified in clause (i) above; 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 recognised 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 wherein a director of a company or his immediate relative or banker of the company, has more than ten per cent. of the holding or interest;

**"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;

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

**"Trading day"** means a day on which the recognized stock exchanges are open for trading;

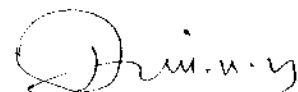
**"Trading Window"** means trading period for trading in the Company's Securities. All days shall be the trading periods except when trading window is closed;

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

(Information published on the website of a stock exchange, would ordinarily be considered generally available.)

**"Unpublished Price Sensitive Information" or "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 including but not restricted to, information relating to the following: –

- a) financial results;
- b) dividends;
- c) change in capital structure;



- d) mergers, de-mergers, acquisitions, delisting, disposals and expansion of business
- e) and such other transactions;
- f) changes in key managerial personnel; and
- g) material events in accordance with the listing agreement.

Compliance Officer may decide any other matter also as Price Sensitive Information;

All other words and phrases will have the same meaning as defined under the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time. Words and expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules & regulations made thereunder shall have the meanings respectively assigned to them in those legislation.

#### **5. Preservation of Unpublished Price Sensitive Information (UPSI)**

- a) Designated Employees and other Connected persons, in possession of UPSI shall maintain the confidentiality of all UPSI and shall not disclose or communicate or counsel or procure directly or indirectly the UPSI to any person (except in furtherance of legitimate purposes, performance of his duties or discharge of his legal obligations) until the same is made available to the general public.
- b) UPSI shall be handled within the Company on a "need to know"\* basis .
- c) UPSI shall not be disclosed / communicated to any person within KEI or outside except when the concerned person reasonably believes that such disclosure is required to enable proper and effective conduct of business and that they will have no information to believe that the information will be misused or improperly disclosed by the recipient.
- d) Notwithstanding anything contained in the Code, an UPSI may be communicated, provided, allowed access to or procured, in connection with a transaction that would:
  - (i) entail an obligation to make an open offer under the takeover regulations where the board of directors of the company is of informed opinion that the proposed transaction is in the best interests of the company;
  - (ii) not attract the obligation to make an open offer under the takeover regulations but where the board of directors of the company is of informed opinion that the proposed transaction is in the best interests of the company and the information that constitute UPSI is disseminated to be made generally available at-least two trading days prior to the proposed transaction being effected in such form as the board of directors may determine.

For the purpose of the above clause, the parties shall be required to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the purpose of sub-clause (d) above and shall not otherwise trade in securities of the company when in possession of UPSI.

\*Need to Know Basis means:

- i) the UPSI should be disclosed only to those within the company who need the information to discharge their duty and whose possession of such information will not give rise to conflict of interest or appearance of misuse of information.
- ii) All non-public information directly received by any employee should immediately be reported to the head of the department.

e) Limited access to confidential information and Chinese Wall:

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

## **6. Trading Restrictions**

- A) No insider shall either directly or through relatives, friends' etc. trade (buy / sell) in securities of the Company when in possession of UPSI.

Provided that as recognised under the Regulations, insider may prove his innocence by demonstrating the circumstances including the following:

- (i) the transaction is an off-market inter-se transfer between promoters who were in possession of the same UPSI without being in breach of regulation 5 and both parties had made a conscious and informed trade decision;
- (ii) in the case of non-individual insiders:
  - a) the individuals who were in possession of such UPSI were different from the individuals taking trading decisions and such decision-making individuals were not in possession of such UPSI when they took the decision to trade; and
  - b) appropriate and adequate arrangements were in place to ensure that these regulations are not violated and no unpublished price sensitive information was communicated by the individuals possessing the information to the individuals taking trading decisions and there is no evidence of such arrangements having been breached;

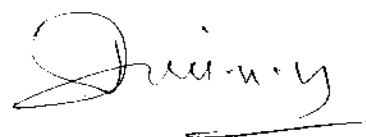
- iii) the trades were pursuant to a trading plan set up in accordance with regulation 7 hereunder.
- B) In the case of connected persons, the onus of establishing, that they were not in possession of UPSI shall be on such connected persons and in other cases the onus would be on the Board.
- C) The Board may specify such standards and requirements, from time to time, as it may deem necessary for the purpose of these regulations.

## **7. Governance of Designated Employees**

Employees and connected persons designated on the basis of their functional role (“**designated employees**”) in the company shall be governed by an internal code of conduct governing dealing in securities.

### **Trading Plans:**

- i) An insider shall be entitled to formulate a trading plan for dealing in securities of the Company and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.
- ii) Such Trading Plan shall:
  - a) not entail commencement of trading on behalf of the Insider earlier than six months from the public disclosure of the plan;
  - b) 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;
  - c) entail trading for a period of not less than twelve months;
  - d) not entail overlap of any period for which another trading plan is already in existence;
  - e) set out either the value of trades to be effected or the number of the Company’s 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
  - f) not entail trading in securities for market abuse.
  - g) The compliance officer shall 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.

- h) 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.

Provided that the implementation of the trading plan shall not be commenced, if at the time of formulation of the plan, the Insider is in possession of any UPSI and the said information has not become generally available at the time of the commencement of implementation of the plan and shall be deferred until such unpublished price sensitive information becomes generally available information. Further, the Insider shall also not be allowed to deal in securities of the Company, if the date of trading in securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer. The Compliance Officer shall be the final authority to decide on the deferment of the Trading Plan.

- i) Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

#### **8. Notional Trading Window - Trading Period and Trading Limit**

- i) The Company shall periodically specify the trading period to be called "Trading Window" for trading in the Company's Securities. The Trading Window will remain closed when the Compliance Officer determines that the Designated Persons can reasonably be expected to have possession of UPSI.
- ii) The Trading Window shall be closed Seven days prior to Board meeting related with any item that may give rise to UPSI.

However, if the circumstances so warrants the time for closing the window may be increased or decreased by the Compliance Officer with the approval of Chairman-cum-Managing Director of the Company.

- iii) The trading window shall be re-opened after the 48 (forty eight) hours of UPSI becomes generally available
- iv) All Designated Employees and their immediate relatives shall conduct all their trading in the securities of the company only in a valid trading window and shall not trade in company's securities during the periods when trading window is closed, as referred above or during any other period as may be specified by the Company from time to time.

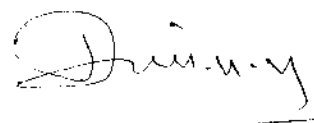


- v) The trading window restrictions shall also be applicable to any other person having contractual or fiduciary relation with the company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the company.

All communication regarding the closing and opening of the Trading Window will be sent by e-mail to the Designated Employees and will also be notified to the Stock Exchanges and uploaded on the Company's website. However, irrespective of whether such communication is received, the Insiders governed by this code should mandatorily verify whether the trading window is open before undertaking any transactions in respect of the Company's securities. Non receipt of communication regarding closure of trading window will not justify a transaction done during the period when the trading window was closed.

### **9. Pre-Clearance of Trade**

- i) The Insiders who intend to trade in the Company's securities should obtain pre-clearance from the Compliance Officer or such other official(s) authorized by the Compliance Officer if the transaction/s (either single or cumulative) aggregates to the total traded value in excess of Rs. 10 lakhs or such other value as may be specified by the Regulations over any calendar quarter.
- ii) However, no Designated Person shall be entitled to apply for pre-clearance of any proposed trade by himself or his Immediate Relative if such Designated Person / Immediate Relative is in possession of Unpublished Price Sensitive Information even if the Trading Window is not closed and hence he shall not be allowed to trade.
- iii) An Application may be made to the Compliance Officer or in case the applicant is Compliance Officer himself, to the Chairman of the Company in the prescribed format (refer **Annexure A**).
- iv) An Undertaking (refer **Annexure B**) shall be executed by these Person(s) stating that:
- he/ she does not have access to UPSI upto the time of signing the undertaking
  - that in case he/ she gets access to any information that could be construed as "Price Sensitive Information" after signing of this undertaking but before the execution of the transaction and in case of any change in his/ her position, he/ she shall inform the change in position and shall refrain from dealing in the securities of the Company till the time such information becomes public.
  - He / she has not contravened the Company's code of conduct for prevention of insider trading as notified by the Company from time to time.
  - In case the traded value exceeds Rs. 10 lakh or any such other value as may be specified, disclosures required under the Code of Conduct will be immediately furnished by him.

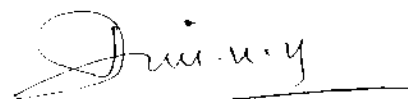


- he/ she has made a full and true disclosure in the matter, to the best of his/ her knowledge and belief.
- v) The Compliance Officer will scrutinize the application within 2 working days of submission and communicate the approval/ refusal (along with reasons therefore) to the applicant. The decision of the Compliance Officer in this regard will be final. In the absence of the Compliance Officer, the Managing Director will decide upon the pre-clearance application.
- vi) The pre-clearance approval shall be valid **only** for 7 days (one week) from the date of communication and shall lapse thereafter. If the transaction is not consummated within (7 days) one week from the approval date, the designated employee (who obtained pre-clearance approval letter) will be required to follow the process of pre clearance again.
- vii) The Designated Employee who buy or sell any number of shares of the company shall not execute a contra trade i.e. sell or buy any number of shares during the next six months following the prior transaction. The Compliance Officer may grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate the regulations.
- viii) The Designated Employee after obtaining pre-clearance approval letter from Compliance officer, shall file the details of transaction(s) in such format as prescribed under **Annexure – C (1)** with the Compliance Officer within 7 (Seven) days of the exercise of the trade. Even in cases where the transaction has not been undertaken, the same should be reported in the format prescribed under **Annexure – C (2)** with the Compliance Officer within 7 (Seven) days.
- ix) Should a contra-trade be executed inadvertently or otherwise, in violation of the aforesaid restriction, the profits from such trade shall be liable to be disgorged for remittance to SEBI for credit to the IEPF administered by it.

## 10. Disclosures

### A. Initial Disclosure

By Whom, to whom	What to be disclosed	When to be disclosed
Every Promoter, Director and KMP, to the Company (Compliance Officer)	holding of securities of the company as on the date of these regulations taking effect i.e. 15.05.2015	<b>Within 30 days</b> of taking effect of this code i.e. <b>till 15.06.2015</b> , in Form-A as provided under SEBI Regulations (refer <b>Annexure - D</b> )



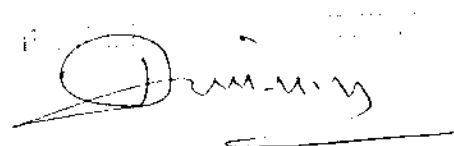
Every person on appointment as a Director or KMP of the Company or upon becoming a Promoter, to the Company (Compliance Officer)	holding of securities of the company as on the date of appointment or becoming a promoter	<b>Within 7 (seven) days</b> of such appointment or of becoming Promoter in Form-B as provided under SEBI Regulations (refer <b>Annexure – E</b> )
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**B. Continual Disclosures**

<b>By Whom, to whom</b>	<b>What to be disclosed</b>	<b>When to be disclosed</b>
Every Promoter, Employee and Director of the Company, to the Company (Compliance Officer)	Number of such securities acquired or disposed if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a <b>traded value in excess of Rs. 10 lakh</b> or such other value as may be specified.  * disclosure of the incremental transactions after any disclosure under this sub-regulation, shall be made when the transactions effected after the prior disclosure cross the threshold i.e. 10 lakh	<b>within two trading days</b> of such transaction in Form-C as provided under SEBI Regulations (refer <b>Annexure – F</b> )
Company to the Stock Exchanges where securities are listed	Details of above Disclosure	<b>Within two trading days</b> of receipt of above disclosure(s) or becoming aware of such disclosure

C. The disclosures to be made by any person under clause (a) and (b) above shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.

D. The Compliance Officer shall maintain records of all the disclosures/ declarations/ undertakings/ forms as mentioned in this Code, as received from time to time, for a period of five years.



## E. Annual Disclosure

By Whom, to whom	What to be disclosed	When to be disclosed
Every Promoter, Director and KMP and Designated Employee, to the Company (Compliance Officer)	holding of securities as on 31 <sup>st</sup> march	Within 30 days from the end of financial year i.e. till 30 <sup>th</sup> April in the format as prescribed under Annexure – G

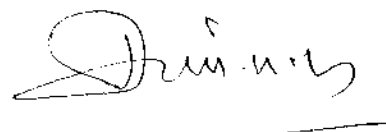
For the purpose of all the above prescribed disclosures, whether initial, continual, other or annual, the disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account accordingly.

### 11. Penalty for Contravention

- Every person, to whom the Code is applicable, shall be individually responsible for complying with the provisions of this Code (including to the extent the provisions hereof are applicable to his/ her immediate relatives).
- Violation of this Code will invite severe disciplinary action. Such disciplinary action will be irrespective of action that may be taken by SEBI under the Regulations.
- Any person who violates the Code, shall, in addition to any other penal action that may be taken against him under any law, also be subject to disciplinary action, including wage freeze, suspension etc.

### 12. General

All the Designated Employees are advised to peruse the Code and Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time, carefully and acquaint themselves with all the provisions contained therein. This Code and any amendments thereto shall be available on the website of the Company. The Compliance Officer will be available for clarification / assistance that may be necessary.



**Annexure-A**

**APPLICATION FOR PRE-CLEARANCE OF TRADE**

(For use by Designated Employees and their immediate relatives in case of trading in the securities of Company above minimum limit prescribed under the Code)

To  
The Compliance Officer  
KEI INDUSTRIES LIMITED  
New Delhi

Dear Sir,

I \_\_\_\_\_, S/o \_\_\_\_\_ R/o \_\_\_\_\_, desirous of trading in the below-mentioned securities of the Company to deal in my name or on behalf of my relatives (write name of relative and relationship):

Type of Security	No. of Securities	Market Price (if decided)*	Mode of acquisition Purchase/ Sale - physical/ Demat/ other	Date by which trade is proposed to be executed	Folio No./ DP ID /Client ID alongwith the name of depository	Present Holding (No. of Shares held in i) Physical and ii) Demat)

\* In case of proposed transaction is at the market price on stock exchange. Please mention "As per prevailing market price at stock exchange"

You are requested to pre-clear the above transaction.

Further, I hereby enclose the form of undertaking signed by me.

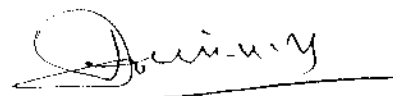
Thanking you,

**Signature:**

**Name:**

**Place:**

**Date:**



**UNDERTAKING**

To  
The Compliance Officer  
KEI INDUSTRIES LIMITED  
New Delhi

Dear Sir,

I, \_\_\_\_\_ S/o \_\_\_\_\_, R/o \_\_\_\_\_, presently holding \_\_\_\_\_ equity shares in the Company, hereby declare that I am a Promoter / Director / KMP / Designated Employee (state designation) of KEI Industries Limited.

I undertake that:

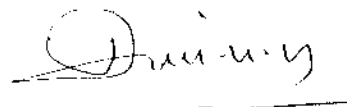
- a) I have no access to nor am I in possession of any unpublished price sensitive information at the time of signing this undertaking.
- b) In the event, I get access to any information that could be construed as "Price Sensitive Information" after signing of this undertaking but before the execution of the transaction and in case of any change in my position, I shall inform you the change in position and shall refrain from dealing in the securities of the Company till the time such information becomes public.
- c) I have not contravened the Company's code of conduct for prevention of insider trading as notified by the Company from time to time.
- d) In case the traded value exceeds Rs. 10 lakh or any such other value as may be specified, disclosures required under the Code of Conduct will be immediately furnished by me.
- e) I have made a full and true disclosure in the matter, to the best of my knowledge and belief.

Signature:

Name:

Place:

Date:



**DISCLOSURE OF PRE-CLEARED TRANSACTIONS**

To  
The Compliance Officer  
KEI INDUSTRIES LIMITED  
New Delhi

**Sub: Details of Pre-cleared Transaction(s) done by me**

Ref: Your Pre-Clearance Approval Letter No. \_\_\_\_\_ dated \_\_\_\_\_

Dear Sir,

This has reference to the captioned matter and Pre-Clearance Approval Letter granted by you. I wish to inform you that I have done the following transactions as per details given below:

As per Pre-Clearance Approval Letter			Details of transaction made			
Nature of Transaction (Buy/ Sell)	Nature of Securities	No. of Securities	Nature of Transaction (Buy/ Sell)	Nature of Securities	No. of Securities	Transaction Value (Rs.)

In this connection, I undertake to preserve the relevant documents relating to the aforesaid transaction, for a minimum period of five years and produce to the Compliance Officer/ SEBI (if required).

I declare that the above information is correct and no provision(s) of the Company's Code of Conduct for prevention of Insider Trading and/or applicable laws have been contravened in relation to conduct or completion of the above transaction(s).

Please contact me on \_\_\_\_\_ (Contact details) in case you need further information/clarifications.

Yours truly,

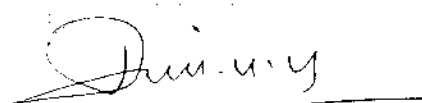
Signature:

Name:

Address:

Place:

Date:



Annexure-C (2)

**INTIMATION FOR NOT DECIDING TO EXECUTE/ NOT EXECUTE THE PRE-CLEARED TRANSACTION**

To  
The Compliance Officer  
KEI INDUSTRIES LIMITED  
New Delhi

**Sub: Details of not executed pre-cleared transaction**

Ref: Your Pre-Clearance Approval Letter No. \_\_\_\_\_ dated \_\_\_\_\_

Dear Sir,

This has with reference to the captioned subject and Pre-Clearance Approval Letter granted by you. I wish to inform that due to \_\_\_\_\_ (mention reason), I shall not/ did not carry the pre-cleared transaction in the securities of the Company.

Please contact me on \_\_\_\_\_ (Contact details) in case you need further information/clarifications.

Yours truly,

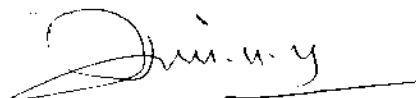
Signature:

Name:

Address:

Place:

Date:





FORM A

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (1) (a) read with Regulation 6 (2)]

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 No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relatives/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding	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	
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	6		7	

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

Signature:

Designation:

Date:

Place:

FORM B

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015  
[Regulation 7 (1) (b) read with Regulation 6 (2)]

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 No., CIN/DIN & Address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relatives/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	Open Interest of the Future contracts held at the time of becoming Promoter/appointme nt of Director/KMP		Open Interest of the Option Contracts held at the time of becoming Promoter/appointme nt of Director/KMP	
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	5	6		7	

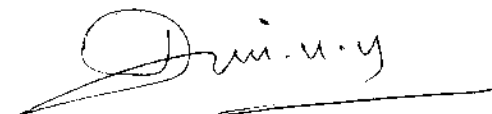
Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Signature:

Designation:

Date:

Place:



FORM C

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015  
[Regulation 7 (2) read with Regulation 6 (2)]

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 No., CIN/DIN, & address of Promoter/ Employee / Director with contact nos.	Category of Person (Promoters/ KMP / Directors/ immediate relatives/ others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed		% of shareholding		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition (market purchase/public rights/ preferential offer / off market/ Inter-se transfer etc.	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Pre transa ction	Post transa ction	From	To			Buy		Sell		
												Value	Number of units (contracts * lot size)	Value	Number of units (contracts * lot size)	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

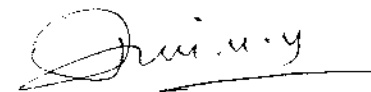
Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Signature:

Designation:

Date:

Place:



Annexure- G

To  
The Compliance Officer  
KEI INDUSTRIES LIMITED  
New Delhi

**Sub: Statement of Holdings of Securities**

Dear Sir,

I, \_\_\_\_\_ (Name), \_\_\_\_\_ (designation), R/o \_\_\_\_\_, confirm the following detail in respect of securities held by me:

**i) Statement of Holdings of Promoters, KMPs and Directors**

No. of shares held on 1 <sup>st</sup> April _____	No. of shares bought / sold during the financial year	Date of purchase / sale of shares during the financial year	No. of shares held as on 31 <sup>st</sup> March, _____	Folio No./ DP ID/ Client ID

**ii) Statement of Holdings of Immediate Relatives of Promoters, KMPs and Directors**

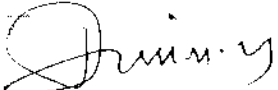
Name of immediate Relative	Relationship	No. of shares held on 1 <sup>st</sup> April _____	No. of shares bought / sold during the financial year	Date of purchase / (sale) during the financial year	No. of shares held as on 31 <sup>st</sup> March, _____	Folio No./ DP ID/ Client ID

Signature:

Name:

Place:

Date:

  
\_\_\_\_\_