RBZ JEWELLERS LIMITED

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

[Pursuant to Regulation 9(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

RBZ Jewellers Limited
CIN: L36910GJ2008PLC053586
Registered Office:
Block-D, Mondeal Retail Park,
Near Rajpath Club, S.G. Highway,
Beside Iscon Mall,
Ahmedabad, Gujarat-380054, India

RBZ JEWELLERS LIMITED

THE CODE OF CONDUCT TO REGULATE, MONITOR, AND REPORT TRADING BY INSIDERS OF RBZ JEWELLERS LIMITED

1. **PRELIMINARY**

1.1. As per Regulation 9(1) of the Securities and Exchange Board of India ("**SEBI**") (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time ("**Insider Trading Regulations**"), the Board of Directors of RBZ Jewellers Limited ("**Company**" or "**RBZ**"), is required to formulate a code of conduct to regulate, monitor and report trading by its Designated Persons *(defined below)* and Immediate Relatives *(defined below)* of Designated Persons towards achieving compliance with Insider Trading Regulations, adopting the minimum standards as set out in Schedule B to the Insider Trading Regulations without diluting any of the provisions of Insider Trading Regulations in any manner.

1.2. Pursuant to Regulation 9(1) of the Insider Trading Regulations, the Board of Directors of the Company has formulated the Code of conduct to Regulate, Monitor, and Report Trading by Insiders ("**Code**") in dealing with the securities of the Company.

2. **DEFINITIONS**

2.1. "**Act**" means the Securities and Exchange Board of India Act, 1992 as amended from time to time;

2.2. "**Board**" means the board of directors of the Company.;

2.3. "**Compliance Officer**" means Company Secretary of RBZ unless any senior officer, designated so and reporting to the board of directors, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under the Insider Trading Regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of UPSI, monitoring of trades and the implementation of the codes specified in the Insider Trading Regulations under the overall supervision of the Board or the head of an organization, as the case may be.

2.4. "**Connected Person**" means,

(i) any person who is or has during the six months prior to the concerned act been associated with RBZ, 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 RBZ or holds any position including a professional or business relationship between himself and RBZ 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) a Relative of connected persons specified in clause (i); 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; 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 RBZ; or

(j) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of RBZ or his Relative or banker of RBZ, has more than ten percent of the holding or interest.

(k) a firm or its partner or its employee in which a connected person specified in sub-clause (i) of clause (d) is also a partner; or

(l) person sharing household or residence with a connected person specified in sub-clause (i) of clause (d);]

2.5. "**Contra Trade**" means a trade or transaction which involves buying or selling any number of securities of the Company and within 6 months, trading or transacting in an opposite transaction involving sell or buy following the prior transaction.

2.6. "**Designated Employees**" means a person occupying any of the following position in the Company:

(a) All Directors and Chief Vigilance Officer;
(b) Key Managerial Personnel;
(c) All Executive Directors;
(d) All General Managers;
(e) All Heads of Finance of Units/Divisions/Regions;
(f) All Employees working in Corporate Finance;
(g) All employees working in Company Secretariat & Legal Department;
(h) All employees working in Secretariat of CMD/Functional Directors;
(i) Any support staff such as IT staff who have access to UPSI;
(j) Any other key person, who in the opinion of Compliance Officer be covered in the "Designated Employee".

2.7. **Designated Persons" means:**

(a) Promoters;
(b) Members of the Promoter Group;
(c) Directors;
(d) Chief Executive Officer and employees up to two levels below the Chief Executive Officer of the Company and its material subsidiary;
(e) Key Managerial Personnel;

(f) Such employee of the Company and its material subsidiary , who have access to unpublished price sensitive information such as all employees in the Finance and Accounts, Legal, Secretarial and Compliance, Investor Relations, Communications and Media Communications departments.

(g) Any support staff of the Company such as IT staff or secretarial staff who have access to unpublished price sensitive information; and

(h) Any other person who on the basis of their role and function in the Company, is reasonably expected to have access to unpublished price sensitive information(s) relating to the Company, as may be decided by the Chairman/Managing Director/Compliance Officer of the Company, from time to time.

2.8. “**Directors**” shall mean Directors on the Board of RBZ including Independent Directors.

2.9. “**Generally available information**” means information that is accessible to the public on a non-discriminatory basis[and shall not include unverified event or information reported in print or electronic media];

NOTE*: It is intended to define what constitutes generally available information so that it is easier to crystallize and appreciate what constitutes UPSI . Information published on the website of a stock exchange, would ordinarily be considered generally available.*

2.10. “**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;

2.11. “**Insider**” means any person who is:

(a) a Connected Person; or

(b) in possession of or having access to UPSI;

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

2.12. “**Key managerial personnel**”, in relation to the Company, means key managerial personnel as defined under Section 2(51) of the Companies Act, 2013.

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

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

2.15. **SEBI**” means the Securities and Exchange Board of India

2.16. **Securities**" shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund.

2.17. "**Trading**" means and includes subscribing, redeeming, switching,buying, selling, dealing, or agreeing to subscribe, redeem, switch, buy, sell, deal in securities of RBZ, and "trade" shall be construed accordingly;

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

2.19. "**"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: –

(i) financial results;

(ii) dividends;

(iii) change in capital structure

(iv) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business [, award or termination of order/contracts not in the normal course of business] and such other transactions;

(v) changes in key managerial personnel [,other than due to superannuation or end of term, and resignation of a Statutory Auditor or Secretarial Auditor;]

(vi) change in rating(s), other than ESG rating(s);

(vii)fund raising proposed to be undertaken;

(viii)agreements, by whatever name called, which may impact the management or control of the company;

(ix) fraud or defaults by the company, its promoter, director, key managerial personnel, or subsidiary or arrest of key managerial personnel, promoter or director of the company, whether occurred within India or abroad;

(x) resolution plan/ restructuring or one-time settlement in relation to loans/borrowings from banks/financial institutions;

xi) admission of winding-up petition filed by any party /creditors and admission of application by the Tribunal filed by the corporate applicant or financial creditors for initiation of corporate insolvency resolution process against the company as a corporate debtor, approval of resolution plan or rejection thereof under the Insolvency and Bankruptcy Code, 2016;

(xii) initiation of forensic audit, by whatever name called, by the company or any other entity for detecting mis-statement in financials, misappropriation/ siphoning or diversion of funds and receipt of final forensic audit report;

(xiii) action(s) initiated or orders passed within India or abroad, by any regulatory, statutory, enforcement authority or judicial body against the company or its directors, key managerial personnel, promoter or subsidiary, in relation to the company;

(xiv) outcome of any litigation(s) or dispute(s) which may have an impact on the company;

(xv) giving of guarantees or indemnity or becoming a surety, by whatever named called, for any third party, by the company not in the normal course of business;

(xvi) granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.

Explanation 1- For the purpose of sub-clause (ix):

a.' Fraud' shall have the same meaning as referred to in Regulation 2(1)(c) of Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003.

b. 'Default' shall have the same meaning as referred to in Clause 6 of paragraph A of Part A of Schedule III of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Explanation 2- For identification of events enumerated in this clause as unpublished price sensitive information, the guidelines for materiality referred at paragraph A of Part A of Schedule III of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as may be specified by the Board from time to time and materiality as referred at paragraph B of Part A of Schedule III of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 shall be applicable.]

NOTE: It is intended that information relating to a company or securities, that is not generally available would be unpublished price sensitive information if it is likely to materially affect the price upon coming into the public domain. The types of matters that would ordinarily give rise to unpublished price sensitive information have been listed above to give illustrative guidance of unpublished price sensitive information.

CHAPTER II
APPLICABILITY

3. This “Code of Conduct to Regulate, Monitor, and Report Trading by Insiders” shall apply to all “Insiders” defined at 2.11, as above including Connected Person, Designated Employees and Designated Persons and Immediate Relatives of the Designated Persons.

CHAPTER III

RESTRICTIONS ON COMMUNICATION AND TRADING BY INSIDERS

4. Communication or procurement of UPSI

(i) No insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations. (NOTE: This provision is intended to cast an obligation on all insiders who are essentially persons in possession of unpublished price sensitive information to handle such information with care and to deal with the information with them when transacting their business strictly on a need-to-know basis. It is also intended to lead to organizations developing practices based on need-to-know principles for treatment of information in their possession)

(ii) No person shall procure from or cause the communication by any Insider of UPSI, relating to RBZ or securities of RBZ or securities proposed to be listed by RBZ, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations. (NOTE: This provision is intended to impose a prohibition on unlawfully procuring possession of unpublished price sensitive information. Inducement and procurement of unpublished price sensitive information not in furtherance of one’s legitimate duties and discharge of obligations would be illegal under this provision.)

(iii) board of directors of a listed company shall make a policy for determination of “legitimate purposes” as a part of “Codes of Fair Disclosure and Conduct” formulated under regulation 8. (The term “legitimate purpose” shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.)

(iv) Any person in receipt of UPSI pursuant to a Legitimate Purpose shall be considered an Insider and due notice shall be given to such persons to maintain confidentiality of such UPSI in compliance with Insider Trading Regulations

(v) Notwithstanding anything contained in this Code, UPSI may be communicated, provided, allowed access to or procured, in terms of the provisions of Regulation 3(3) and 3(4) of the Insider Trading Regulations.

(vi) The Board shall ensure that a structured digital database is maintained containing the names of such persons or entities as the case may be with whom information is shared under the Insider Trading Regulations along with the permanent account number or any other identifier authorized by law where permanent account number is not available. Such databases shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.

(vii) The board of directors or head(s) of the organization of every person required to handle unpublished price sensitive information shall ensure that the structured digital database is preserved for a period of not less than eight years after completion of the relevant transactions and in the event of receipt of any information from the Board regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.

5. Trading by Insiders when in possession of UPSI:

(i) No Insider shall trade in securities of the Company when in possession of any UPSI.

Explanation: When a person who has traded in securities has been in possession of UPSI, his trades would be presumed to have been motivated by the knowledge and awareness of such information in his possession.

provided that the insider may prove his innocence by demonstrating the circumstances including the following: –

(i) the transaction is an off-market inter-se transfer between [insiders] who were in possession of the same unpublished price sensitive information without being in breach of regulation 3 and both parties had made a conscious and informed trade decision.

(ii)the transaction was carried out through the block deal window mechanism between persons who were in possession of the unpublished price sensitive information without being in breach of regulation 3 and both parties had made a conscious and informed trade decision;

(iii) the transaction in question was carried out pursuant to a statutory or regulatory obligation to carry out a bona fide transaction.

(iv) the transaction in question was undertaken pursuant to the exercise of stock options in respect of which the exercise price was pre-determined in compliance with applicable regulations.

(v) in the case of non-individual insiders: –

(a) the individuals who were in possession of such unpublished price sensitive information were different from the individuals taking trading decisions and such decision-making individuals were not in possession of such unpublished price sensitive information 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;

vi) the trades were pursuant to a trading plan set up in accordance with regulation 5.

(ii) For 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.

(iii) The Board may specify such standards and requirements, from time to time, as it may deem necessary for the purpose of these regulations.

6. **TRADING PLANS**

6.1. An Insider shall be entitled to formulate a trading plan and present it to the Compliance Officer for approval and public disclosure, pursuant to which trades may be carried out on his behalf in accordance with such plan.

NOTE: This provision intends to give an option to persons who may be perpetually in possession of unpublished price sensitive information and enabling them to trade in securities in a compliant manner. This provision would enable the formulation of a trading plan by an insider to enable him to plan for trades to be executed in future. By doing so, the possession of unpublished price sensitive information when a trade under a trading plan is actually executed would not prohibit the execution of such trades that he had pre-decided even before the unpublished price sensitive information came into being.

6.2. Such trading plan shall: –

(i) not entail commencement of trading on behalf of the insider earlier one hundred and twenty calendar days from the public disclosure of the plan;

(ii) not entail overlap of any period for which another trading plan is already in existence;

(iii) the trades were pursuant to a trading plan set up in accordance with regulation

(iv) set out following parameters for each trade to be executed: (i)either the value of trade to be effected or the number of securities to be traded; (ii)nature of the trade; (iii)either specific date or time period not exceeding five consecutive trading day. (iv)price limit, that is an upper price limit for a buy trade and a lower price limit for a sell trade, subject to the range as specified below: a. for a buy trade: the upper price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent higher than such closing price; b. for a sell trade: the lower price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent lower than such closing price.not entail trading in securities for market abuse.

(v) The Trading Plan shall be as per Insider Trading Regulations and Application for Trading Plan shall be given in **Form I**.

6.3. The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of the Code and Insider Trading Regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.

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

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

6.4. The trading plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to either to execute any trade in the securities outside the scope of the trading plan or to deviate from it except due to permanent incapacity or bankruptcy or operation of law

Provided that the implementation of the trading plan shall not be commenced if any UPSI in possession of the insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation

Provided further that if the insider has set a price limit for a trade under sub-clause (iv) of clause (v) of sub-regulation 2, the insider shall execute the trade only if the execution price of the security is within such limit. If price of the security is outside the price limit set by the insider, the trade shall not be executed.

6.5. The compliance officer shall approve or reject the trading plan within two trading days of receipt of the trading plan and notify the approved plan to the stock exchanges on which the securities are listed, on the day of approval. The provisions regarding pre-clearance of trades, trading window norms and restrictions on Contra Trade shall not be applicable for a trade executed as per an approved Trading Plan.

6.6. Letter of intimation of approval of trading plan is at **Form II**.

6.7. Such Insider is required to intimate the Compliance Officer regarding execution of trading plan within two trading days of each transaction intimated under the trading plan as per Performa provided in **Form III**.

6.8. The Compliance Officer shall maintain a register of trading plan of securities by the insiders and notification to Stock Exchange as given in **REG-I**.

CHAPTER IV
DISCLOSURES OF TRADING BY INSIDERS

7. **GENERAL PROVISIONS**

7.1. Every public disclosure under this Chapter shall be made within two trading days. The disclosures to be made by any person under this Chapter shall include those relating to trading by such person's Immediate Relative, and by any other person for whom such person takes trading decisions.

7.2. The disclosures to be made by any person under this Chapter shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.

7.3. The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account for purposes of this Chapter: Provided that trading in derivatives of securities is permitted by any law for the time being in force.

7.4. The disclosures made under this Chapter shall be maintained by RBZ for a minimum period of five years, in such form as may be specified.

8. **DISCLOSURES BY CERTAIN PERSONS.**

8.1. Initial Disclosures.

a. Every person on appointment as a Key Managerial Personnel or a Director of RBZ or upon becoming a Promoter or member of the Promoter Group shall disclose his holding of securities in RBZ as on the date of appointment or becoming a promoter, to the company within seven days of such appointment or becoming a promoter.

b. The Designated Persons shall disclose within thirty days of becoming a Designated Person the following details:

(i) Name and PAN (or any other identifier authorized by law) of the following persons:

(a) Immediate Relatives;

(b) Persons with whom the designated person shares a material financial relationship

(c) Phone, mobile and cell numbers which are used by the above persons

(ii) Names of educational institutions from which the designated person has graduated;

(iii) Names of past employers.

In **Form D** to the Company.

8.2. Continual Disclosures (on annual basis/change in information).

a. Every Promoter, member of the Promoter Group, Director and Designated Persons of RBZ shall disclose to the Company the number of such securities acquired or disposed of within two trading days of such transaction 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 10 (ten) lakhs or other such values as may be specified by the Insider Trading Regulations* in **Form – B** to the Compliance Officer of the Company;

*(*disclosure of incremental transactions shall be made when transactions*

effected after the prior disclosure cross the threshold specified above.)

b. Every company shall notify the particulars of such trading 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.(c) The above disclosures shall be made in such form and such manner as may be specified by the Board from time to time. The Designated Persons shall disclose:

(i) within thirty days of end of the financial year; and

(ii) whenever the information changes vis-a-vis their last disclosure, within from the change the following details in **Form-D** to the Company:

Name and PAN (or any other identifier authorized by law) of the following persons:

(a) Immediate Relatives;
(b) Persons with whom the Designated Person shares a material financial relationship;
(c) Phone, mobile and cell numbers which are used by the above persons.

8.3. For the purposes of Clause 8.1 and 8.2, the term *"material financial relationship"* shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift from a Designated Person during the immediately preceding twelve months, equivalent to at least 25% of the annual income of such Designated Person but shall exclude relationships in which the payment is based on arm's length transactions.

8.4. The disclosures to be made by any person under Clause 8.1 and 8.2 shall include those relating to trading by such person's Immediate Relative, and by any other person for whom such person takes trading decisions.

8.5. The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account for purpose of Clause 8.1 and 8.2.

8.6. **Disclosures by other connected persons:** RBZ may, at its discretion, require any other connected person or class of connected persons may require to make disclosures of holdings and trading in securities of the Company in **Form-C** and at such frequency as may be determined by the company in order to monitor compliance with these regulations.

CHAPTER V

9. **TRADING WINDOW**

9.1. Trading window shall mean a notional trading window which shall be used as an instrument of monitoring trading by Designated Persons.

9.2. The trading window shall be closed when the Compliance Officer determines that a Designated Person or class of Designated Persons can reasonably be expected to have possession of UPSI. Such closure shall be imposed in relation to such Securities to which such UPSI relates.

9.3. The trading window shall be closed during the time the information referred to in clause 9.4 becomes generally available.

9.4. Designated Persons shall not deal in any transaction involving the purchase or sale of securities of RBZ either in their own name or in the name of their Immediate Relative during the periods mentioned below, when "Trading Window" shall remain closed:

Sl No	**Events/Particulars**	**Restrictive Period**	
		From	**To**
1.	Declaration of quarterly and half-yearly financial results. .	To be notified by the Compliance Officer depending upon the date of the Board meeting.	
2.	Declaration of Interim Dividend and Final Dividend.	To be decided by Compliance Officer depending upon the record date.	
3.	Declaration of Annual audited financial results and Final Dividend.	To be notified by the Compliance Officer depending upon the date of the Board meeting. [Trading restriction period shall be made applicable from the end of every quarter till 48 hours after the declaration of financial results. The gap between clearance of accounts by audit committee and board meeting should be as narrow as possible and preferably on the same day to avoid leakage of material information.]	
4.	Any other major events.	To be notified by Compliance Officer as and when the relevant proposal is put up to the Board / Committee / Competent Authority with the approval of CMD.	

Explanation:

(i) The trading window shall be opened 48 hours after the "UPSI", for which the trading window is closed, becomes generally available.

(ii) The notice of closure and opening of trading window shall be intimated to the Stock Exchanges and uploaded on the intranet and website of RBZ.

9.5. The remaining days of a year other than the days mentioned under 9.4 above shall be called "**Valid Trading Window**".

9.6. The restrictions mentioned in clause 9.4 above shall not be applicable in respect of exercise of an option under Employees Stock Option Scheme (ESOS) or ESOPs. However, shares allotted on exercise of ESOS/ESOPs, shall not be sold when "Trading Window" is closed.

9.7. The trading window restrictions shall not apply in respect of –

a) transactions specified in clauses (i) to (iv) and (vi) of the proviso to sub- regulation (1) of Regulation 4 of the Insider Trading Regulations and in respect of a pledge of shares for a *bonafide* purpose such as raising of funds, subject to pre-clearance by the Compliance Officer and compliance with the respective regulations made by the Board;

b) transactions which are undertaken in accordance with respective regulations made by the Board such as acquisition by conversion of warrants or debentures, subscribing to rights issue, further public issue, preferential allotment or tendering of shares in a buy-back offer, open offer, delisting offer or transactions which are undertaken through such other mechanism as may be specified by the Board from time to time.

9.8. All Designated Persons shall conduct their dealings in the securities of the Company only in the "Valid Trading Window" period as mentioned above at clause 9.4 and shall not enter into Contra Trade i.e. opposite or reverse transactions i.e. buy or sell any number of shares (including shares allotted in IPO or any other public offer), in the securities of the Company during the next six months following the prior transaction. Compliance Officer is empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate these Insider Trading Regulations. Should a Contra Trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Board for credit to the Investor Protection and Education Fund administered by the Board under the Act.

9.9. The Compliance Officer shall maintain a register of the periods of "Closed Trading Window", wherein he shall record the date of closure and opening of the trading window and the purpose for which trading window is closed. A Performa of the register of periods of closure of Trading Window is given in **REG-II.**

10. PRE-CLEARANCE OF TRADES

10.1. All Designated Person who intends to deal in the securities of RBZ either in their own name or in the name of their Immediate Relative above the minimum threshold limit of INR 10,00,000/- (Rupees Ten Lakh only) shall obtain preclearance of the transaction as per the pre-dealing procedure as described hereunder.

10.2. Application for pre-clearance shall be made only during valid trading period in **Form IV**. Application submitted during closure of trading window shall be invalid.

10.3. No Designated Person shall apply for pre-clearance of any proposed trade, if such Designated Person is in possession of UPSI even if the trading window is not closed.

10.4. A Designated Persons shall make pre-clearance application to the Compliance Officer in the format given in in the prescribed format along with an undertaking stating that the insider has not contravened the provision of this Code.

10.5. Letter of intimation of pre-clearance is at **Form II**.

10.6. Immediately on receipt of the pre-clearance application, the date and time of the receipt of the same shall be recorded thereon. The Compliance Officer shall process the pre-clearance applications and if the pre-clearance application is in accordance and in compliance with the provisions of this Code, the Compliance Officer shall endeavor to communicate the pre-clearance immediately but not later than 2 working days from the time of receiving the application. In the absence of the Compliance Officer, the officer authorized by the Compliance Officer shall give the pre- clearance. If the compliance officer doesn't respond within 2 working days, it shall be deemed to be Rejection of the application.

10.7. The Compliance Officer shall maintain a register of pre-clearance of securities by the Designated Person as given in **REG-III**.

10.8. The Designated Persons shall, within seven trading days, execute the trade after the pre-clearance. If the trade is not executed within seven trading days after the pre-clearance is given the designated Person shall obtain fresh pre-clearance. Such Designated Person is required to intimate the Compliance Officer regarding execution/ non-execution of pre-approved transaction within two trading days as per Performa provided in **Form III**.

10.9. **CODE OF CONDUCT FOR INTERMEDIARIES:**

The Board of Directors or head(s) of the organization of every intermediary shall formulate a code of conduct to regulate, monitor and report trading by their designated persons, by adopting the minimum standards as specified in the Insider Trading Regulations with respect to trading in their own securities and with respect to trading in other securities.

10.10. **LEAK OR SUSPECTED LEAK OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

Any leak or suspected leak of unpublished price sensitive information shall be subject to inquiry as per the procedures prescribed under the "Whistle Blower Policy"

10.11. **PENALTY FOR CONTRAVENTION OF CODE OF CONDUCT**

(i) Every Designated Person shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her dependents). Any Designated Person who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalized and appropriate action may be taken by the Company.

(ii) The Compliance Officer shall report all the breaches of this Code to the Board. In the event of a breach of the Insider Trading Regulations, the Company shall promptly inform the stock exchanges where securities of the Company are traded, in such form and manner as may be specified by SEBI from time to time.

(iii) Designated Persons who violate the Code may also be subject to disciplinary action by the Company, which may include wage freeze, suspension, recovery, claw back, ineligibility for future participation in employee stock option plans, etc. Any amount collected under this shall be remitted to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

10.12. **CLARIFICATION**

For all queries concerning this Code, employees may please contact the Compliance Officer.

10.13. **DIGITIZATION OF DATA OF INSIDERS**

The Company has provided and implemented web-based software for digitization of the data and records required to be maintained for and by the insiders and the Company as provided in the Insider Trading Regulations including submission of the undertakings, continual/ annual disclosures, approval of the trading plan etc. With implementation of Web-based software, the Forms and Registers as attached in the Code are replaced with the forms and registers provided in the web-based software.

The Company reserves the right to amend or replace the existing web-based software with any other of the same kind or develop its own software for digitizing the records of the insider. Insider shall adhere to and comply with the requirement of taking approval and submitting disclosures etc. Through the web-based software, non- adherence to which shall be treated as contravention of the Code.

The Company shall maintain a structured digital database containing the names of persons or entities with whom unpublished price sensitive information is shared, along with the date and purpose of sharing, in compliance with Regulation 3(5) and 3(6) of SEBI (PIT) Regulations.

10.14. **UPLOADING CODE OF CONDUCT ON COMPANY'S WEBSITE:**

The Code and any amendments thereto shall be available on the website of the Company i.e. http://www.rbzjewellers.com/.

10.15. **AMENDMENT**

The Chairman and Managing Director of RBZ is authorised by the Board of Directors to amend or modify the Code from time to time and the same should be placed before the Board for their information. However, no such amendment or modification shall be inconsistent with the applicable provisions of law for time being in force.

DISCLAIMER

THIS POLICY IS ONLY INTERNAL CODE OF CONDUCT AND ONE OF THE MEASURES TO AVOID INSIDER TRADING. EVERY CONNECTED PERSON IS REQUIRED TO FAMILIARISE HIMSELF WITH THE INSIDER TRADING REGULATIONS AS IT WILL BE THE RESPONSIBILTY OF EACH CONNECTED PERSON (AND HIS RELATIVES) TO ENSURE COMPLIANCE OF THIS CODE, INSIDER TRADING REGULATIONS AND OTHER RELATED STATUTES FULLY.

Version No.	Approving Authority	Issue/Review Date
1.	Board of Directors	16th June 2023
2.	Board of Directors	14th May 2026

RBZ JEWELLERS LIMITED
FORM-I
APPLICATION FOR TRADING PLAN TO TRADE IN SECURITIES OF RBZ JEWELLERS LIMITED

To
The Compliance Officer
RBZ Jewellers Limited
Block-D, Mondeal Retail Park,
Near Rajpath Club,
S.G. Highway,
Beside Iscon Mall
Ahmedabad,
Gujarat-380054, India.
Dear Sir,
Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended, and the Company's Code of Internal Procedures and Conduct for Prohibition of Insider Trading in Dealing in Securities, I seek approval for trading plan in Securities of RBZ Jewellers Limited (give description) as per the details given below:

Name and Designation of Designated Persons:
Department of Designated Persons:
Date of Joining / becoming Designated Person:
PAN No.
Email ID:
KMP: Y/N

S. No.	No. of Securities held (including that of the Immediate Relative as on the date of application)	Folio No. / DP ID & Client ID	Nature of new transaction for which approval is sought	Estimated number of securities to be dealt	Estimated consideration value	Whether proposed transaction is in the name of self or in the name of Immediate Relative
(1)	(2)	(3)	(4)	(5)	(6)	(7)

Name of the Immediate Relative/ relationship, if the transaction is in the name(s) of the Immediate Relatives	Proposed Date of Trades/Date of allotment	Previous approval no. and date of purchase/ allotment
(8)	(9)	(10)

UNDERTAKING

In this connection I solemnly confirm and declare:

a) THAT I do not have access and/or have not received any Unpublished Price Sensitive Information up to the time of signing the undertaking;

b) THAT the trading plan once approved shall be irrevocable and I shall mandatorily 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.

c) THAT the implementation of the trading plan shall not be commenced if any Unpublished Price Sensitive information in my possession at the time of the formulation of the plan has not become generally available at the time of the commencement of implementation.

d) THAT I have not contravened the Code of Conduct for Prohibition of Insider Trading as notified by the RBZ from time to time.

e) THAT I shall adhere to Clause 9.5 of the Code.

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

g) THAT I hereby made a full and true disclosure in the matter.

Pre-clearance may kindly be accorded in terms of provisions of the Code of Conduct for Prohibition of Insider Trading in dealing with the securities of RBZ Jewellers Limited.

Signature:

Date:
Name:
Place:
Designation:

OFFICE USE

Serial number of the application received:

Date & time of receipt of the Application:

Date & time of communication of the pre-clearance or otherwise:
Reasons for not giving pre-clearance:
Signature of the Compliance Officer/Authorised Officer

FORM-II

Letter of Intimation of pre-clearance/Trading Plan

Name…………
Employee No ……….
Designation …………
Ref.: Application No.
Dear Sir,
With reference to your above application seeking approval for undertaking transactions in Securities detailed therein, please be informed that you are hereby authorized/ not authorised to undertake the transaction(s) as detailed in your said application for approval Trading Plan/ Pre-clearance.

This Approval is being issued to you based on the various declarations, representations and warranties made by you in your said application.

Kindly note that in terms of the Code of Conduct for Prohibition of Insider Trading in Dealing with Securities of RBZ Jewellers Limited, the above-mentioned transaction is to be completed within i.e. within seven trading days of the pre-clearance, in case of pre-clearance. In case of approval of Trading Plan, such plan shall be irrevocable and you have to mandatorily 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.

Further, you are required to file the details of the executed transactions in the attached format within two (2) trading days from the date of transaction/deal.

Kindly also note that in terms of the Code of Conduct for Prohibition of Insider Trading in Dealing with Securities of RBZ Jewellers Limited, the Securities shall be held for a minimum holding period as specified under Clause 9.5 of the Code.

In case of pre-clearance, the above sanction automatically stands withdrawn if subsequently the trading window is declared closed involving the period of sanction therein.

For and on behalf of
RBZ Jewellers Limited
Compliance Officer/Authorized Officer

RBZ JEWELLERS LIMITED
FORM-III
FORMAT FOR DISCLOSURE OF PRE-APPROVED/ TRADING PLAN TRANSACTIONS

(To be submitted within two trading days of transaction/Dealing in Securities of the Company)

Date: _______________

To
The Compliance Officer
RBZ Jewellers Limited
Block-D, Mondeal Retail Park,
Near Rajpath Club, S.G. Highway,
Beside Iscon Mall
Ahmedabad, Gujarat-380054, India

Dear Sir,

DETAILS OF PRE-APPROVED/TRADING PLAN TRANSACTION

Ref: Your Approval letter no. ____________________dated ____________

I hereby inform you that I

___Have not traded any Securities, (in case of pre-clearance only)

____ Have traded to the _____________Securities (give description) as mentioned below on ____________(insert date)

Name of holder	First or joint holder	No. of Securities dealt with	Bought / Sold/ Subscribed	DP ID/CLIENT ID (electronic form) or Folio no. for physical where the Sec. will be debited or credit	Price (Rs)

** “F” First holder “J” Joint holder

In connection with the aforesaid transaction (s), I hereby undertake to preserve, for a period of 3 (Three) years and produce to the Compliance Officer/SEBI any of the following documents:

1. Broker’s contract note;

2. Proof of payment to/from brokers;

3. Extract of bank passbook/statement (to be submitted in case of Demat transactions);

4. Copy of Delivery instruction slip (applicable in case of sale transaction).

I declare that the above information is correct and that no provisions of the Company's Internal Code of Conduct for prevention of Insider Trading in dealing with Securities and /or applicable laws/regulations have been contravened for effecting the above said transaction(s).

I agree to hold the above Securities for minimum holding period as specified under Clause 9.5 of the Code.

Yours truly,

Signature: ________________________

Name: ___________________________

Employee No: ________________________
Department/Division
_____Strike out whichever is not applicable.

RBZ JEWELLERS LIMITED
FORM-IV

APPLICATION FOR PRE-CLEARANCE TO TRADE IN SECURITIES OF RBZ JEWELLERS LIMITED

To
The Compliance Officer
RBZ Jewellers Limited
Block-D, Mondeal Retail Park,
Near Rajpath Club, S.G. Highway,
Beside Iscon Mall,
Ahmedabad, Gujarat-380054, India
Dear Sir,
Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended, and the Company's Code of Internal Procedures and Conduct for Prohibition of Insider Trading in Dealing in Securities, I seek approval for trading in Securities of RBZ Jewellers Limited (give description) as per the details given below:

Name and Designation of Designated Persons:
Department of Designated Persons:
Date of Joining / becoming Designated Person:
PAN No.
Email ID:
KMP: Y/N

S. No.	No. of Securities held (including that of the Immediate Relative as on the date of application)	Folio No. / DP ID & Client ID	Nature of new transaction for which approval is sought	Estimated number of securities to be dealt	Estimated consideration value	Whether proposed transaction is in the name of self or in the name of Immediate Relative
(1)	(2)	(3)	(4)	(5)	(6)	(7)

Name of the Immediate Relative/ relationship, if the transaction is in the name(s) of the Immediate Relatives	Proposed Date of Trades/Date of allotment	Previous approval no. and date of purchase/ allotment
(8)	(9)	(10)

UNDERTAKING

In this connection I solemnly confirm and declare:

a) THAT I do not have access and/or have not received any Unpublished Price Sensitive Information up to the time of signing the undertaking;

b) That in case I have access to or receive "Unpublished Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction, I shall inform the Compliance Officer of any change in my position and that I shall refrain from Dealing in Securities till the time such information becomes public;

c) THAT I have not contravened the Code of Conduct for Prohibition of Insider Trading as notified by the RBZ from time to time.

d) THAT I shall adhere to Clause 9.5 of the Code.

e) THAT I undertake to submit the necessary report within two days of execution of the transaction/ 'Nil' report if the transaction is not undertaken.

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

g) THAT I hereby undertake not to transact in Securities in the sanctioned period in case trading window is declared closed subsequently.

h) THAT I hereby made a full and true disclosure in the matter.

Pre-clearance may kindly be accorded in terms of provisions of the Code of Conduct for Prohibition of Insider Trading in dealing with the securities of RBZ Jewellers Limited.

Signature:

Date:
Name:
Place:
Designation:

OFFICE USE

Serial number of the application received:

Date & time of receipt of the Application:

Date & time of communication of the pre-clearance or otherwise:
Reasons for not giving pre-clearance:
Signature of the Compliance Officer/Authorised Officer

FORM A

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 (KMP / Director or Promoter or member of the promoter group/ Immediate Relative to/others, etc.)	Date of appointment of KMP/Director / OR Date of becoming Promoter/ member of the promoter group	Securities held at the time of appointment of KMP/Director or upon becoming Promoter or member of the promoter group		% of Shareholding
			Type of security (for e.g. – Shares, Warrants, Convertible Debentures, Rights entitlements, etc.)	No.	
(1)	(2)	(3)	(4)	(5)	(6)

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

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

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

Name:
Signature:
Designation:
Date:
Place:

FORM B

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 with contact nos.	Category of Person (Promoter/member of the promoter group/designated person/ 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/ disposal 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.)	Exchange on which the trade was executed
		Type of security (for e.g. – Shares, Warrants, Convertible Debentures, Rights entitlements etc.)	No. and % of shareholding.	Type of security (for e.g. – Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Purchase/sale Pledge / Revocation / Invocation/ Others please specify)	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.	No. and % of shareholding	From	To			
(1)	**(2)**	**(3)**	**(4)**	**(5)**	**(6)**	**(7)**	**(8)**	**(9)**	**(10)**	**(11)**	**(12)**	**(13)**	**(14)**	**(15)**

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

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

Trading in derivatives (Specify type of contract, Futures or Options etc.)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
(16)	(17)	(18)	(19)	(20)	(21)	(22)

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

Name:
Signature:
Designation:
Date:
Place:

FORM C

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7(3) –Transactions by Other connected persons as identified by the company]

Name, PAN No., CIN/DIN & address with contact nos. of other connected persons as identified by the company	Connection with Company	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/ disposal		Date of allotment advice/ acquisition of shares/ disposal of shares, specify		Date of intimation to company	Mode of acquisition /disposal (on market/ public/ rights/ preferential offer/ off market/ Inter-se transfer, ESOPs, etc.)	Exchange on which the trade was executed
		Type of security (for e.g. – Shares, Warrants, Convertible Debentures, Rights entitlements etc.)	No. and % of shareholding.	Type of security (for e.g. – Shares, Warrants, Convertible Debentures, Rights entitlement etc.)	No.	Value	Transaction Type (Purchase/sale Pledge / Revocation / Invocation/ Others please specify)	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.	No. and % of shareholding	From	To			
(1)	**(2)**	**(3)**	**(4)**	**(5)**	**(6)**	**(7)**	**(8)**	**(9)**	**(10)**	**(11)**	**(12)**	**(13)**	**(14)**	**(15)**

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

Details of trading in derivatives on the securities of the company by other connected persons as identified by the company.

Trading in derivatives (Specify type of contract, Futures or Options etc.)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
(16)	(17)	(18)	(19)	(20)	(21)	(22)

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

RBZ JEWELLERS LIMITED

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 9(A) read with Schedule B –Annual Disclosure]
FORM D

Name of the Company: ______________________________
ISIN of the Company: ________________________________

Annual Disclosure to maintain confidentiality of the Unpublished Price Sensitive Information possessed or to be possessed in future

1. Name of Director/Designated Employee:
2. PAN
3. Number of shares held in RBZ:
4. Name of Educational Institution:
   (a)
   (b)
   (c)

5. Name of Past Employers:
   (a)
   (b)
   (c)

Details of the Immediate Relatives and Person with whom a material financial relationship is shared:

Particulars	**Name**	**PAN/ any other ID proof No.**	**Phone No.**	**Mobile No.**
Spouse				
Father				
Mother				
Son				
Daughter				
Sister				
Brother				

UNDERTAKING

I, ____________________________hereby confirm that:

a) I shall preserve the confidentiality and prevent the unauthorized disclosure of unpublished price sensitive information;

b) I shall adhere to the compliance of these regulations; and

c) In case of any change in the above-mentioned information, I shall notify the change to the Compliance Officer.

Signature: __________________

Name: _____________________

RBZ JEWELLERS LIMITED

REG– I

REGISTER OF APPROVAL OF TRADING PLAN IN SECURITIES AND NOTIFICATION TO STOCK EXCHANGES

S. No.	NAME	DESIGNATION	DEPARTMENT	DATE & TIME OF RECEIPT OF TRADING PLAN APPLICATION	NATURE OF TRANSACTION	ESTIMATED NUMBER OF SECURITIES INDICATED IN THE APPLICATION
(1)	(2)	(3)	(4)	(5)	(6)	(7)

ESTIMATED CONSIDERATION VALUE INDICATED IN THE APPLICATION	NAME OF THE IMMEDIATE RELATIVE IF THE TRANSACTION IS IN THE NAME OF THE IMMEDIATE RELATIVE	DATE OF COMMUNICATION OF THE APPROVAL BY THE COMPLIANCE OFFICER	REASONS FOR NON-APPROVAL, IF NOT CLEARED	NUMBER OF SECURITIES ACTUALLY TRADED	DATE OF NOTIFICATION TO STOCK EXCHANGES	REMARKS
(8)	(9)	(10)	(11)	(12)	(13)	(14)

RBZ JEWELLERS LIMITED

REG– II

REGISTER OF PERIODS OF CLOSURE OF TRADING WINDOW

S. NO.	DATE OF NOTIFYING CLOSER OF TRADING WINDOW, IF ANY	START DATE OF CLOSER OF TRADING WINDOW	DATE OF OPENING OF TRADING WINDOW	PURPOSE FOR WHICH TRADING WINDOW CLOSED	REMARKS

RBZ JEWELLERS LIMITED REG–

III

REGISTER OF PRE-CLEARANCE FOR TRADE IN SECURITIES

SR. NO	NAME	DESIGNATION	DEPARTMENT	DATE & TIME OF RECEIPT OF TRADING PLAN APPLICATION	NATURE OF TRANSACTION (PURCHASE OR SALE)	ESTIMATED NUMBER OF SECURITIES INDICATED IN THE APPLICATION
(1)	(2)	(3)	(4)	(5)	(6)	(7)

ESTIMATED CONSIDERATION VALUE INDICATED IN THE APPLICATION	NAME OF THE IMMEDIATE RELATIVE IF THE TRANSACTION IS IN THE NAME OF THE IMMEDIATE RELATIVE	DATE OF COMMUNICATION OF THE CLEARANCE BY THE COMPLIANCE OFFICER	REASONS FOR NON-CLEARANCE, IF NOT CLEARED	DATE OF PLACEMENT BEFORE COMMITTEE	NUMBER OF SECURITIES ACTUALLY TRADED	REMARKS
(8)	(9)	(10)	(11)	(12)	(13)	(14)

****