



AHIMSA INDUSTRIES LIMITED

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CODE OF CONDUCT TO REGULATE, MONITER AND REPORT TRADING BY INSIDERS

**[Pursuant to Securities Exchange Board of India
(Prohibition of Insider Trading) Regulations, 2015]**

CODE FOR PROHIBITION OF INSIDER TRADING

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INTRODUCTION

Insider Trading is dealing (buying and/ or selling) in the securities of the Company by its Directors, Employees or other Insiders while in possession of any material unpublished price sensitive information, Such trading by Insiders erode the investors' confidence in the integrity of the management and is unhealthy for the capital markets.

The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as "the Regulations") replaced the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992 w.e.f. 15th May, 2015. The SEBI Regulations requires every listed company shall formulate a code of conduct to regulate, monitor and report trading by its employees and other connected persons towards achieving compliance with these regulations and enforce a code of internal conduct and procedures based on the Model code provided therein.

In Compliance with the said requirements, the Company has introduced a code for prohibition of Insider Trading (hereinafter referred to as the "Code"). This Code shall come into force on 10th October, 2015.

OBJECTIVE

Ahimsa Industries Limited (hereinafter referred to as "the Company") endeavors to preserve the confidentiality and prevent the misuse of un-published price sensitive information. The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all the applicable laws and regulations. Every Director, Officer, Designated Employee and connected person of the Company has a duty to safeguard the confidentiality of all such information which he/ she obtained in the course of performance of official duties. Directors, Officers, Designated Employees and Connected persons of the Company should not use their position to gain personal benefit. To achieve these objectives, the Company hereby notifies this **Code of conduct**.

1. DEFINITIONS

- A. "**Act**" means the Securities and Exchange Board of India Act, 1992 (15 of 1992).
- B. "**Board**" means the Securities and Exchange Board of India.
- C. "**Code**" means the Code of Conduct for prevention of Insider Trading, as notified hereunder, including any amendments/ modifications made from time to time.
- D. "**Company**" means Ahimsa Industries Limited.

E. **“Compliance Officer”** means the Company Secretary of the Company or any other senior level employee who shall be directed by the Board of Directors of the Company, who shall be responsible for compliance policies, procedures, maintenance of records of trade and implementation of the code under the overall supervision of the Board.

F. **“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 unpublished price sensitive information 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);
or
- b. a holding company or associate company or subsidiary company;
or
- c. an intermediary as specified in section 12 of the Act or an employee or director thereof; or
- d. an investment company, trustee company, asset management company or an employee or director thereof; or
- e. an official of a stock exchange or of clearing house or corporation;
or
- f. a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
- g. a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
- h. an official or an employee of a self-regulatory organization recognized or authorized by the Board; or

- i. a banker of the company; or
- j. a concern, firm, trust, Hindu undivided family, company or association of persons 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;

G. "Designated Persons"

- i. General Manager and above or its equivalent in all departments;
- ii. All employees in Secretarial, Finance and Accounts Department;
- iii. Such other employees as may be specified and determined from time to time by the Compliance Officer and/or Chief Financial Officer and/or Chairman and Managing Director.

H. "Director" means and includes every directors on the Board of Directors of the Company.

I. "Employees" means every employee of the company (whether working in India or abroad), including directors in the employment of the Company.

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

K. "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.

L. "Insider" means any person who is

- i. a connected person or
- ii. in possession of or having access to unpublished price sensitive information.

M. "Key Managerial Personnel" shall include following Personnel:

- i. Chief Executive Officer or Managing Director or Manager;
- ii. Company secretary;
- iii. Whole-Time Director;
- iv. Chief Financial Officer;
- v. such other officer as may be prescribed

N. "Promoter" shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof.

- O. "Regulations"** shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.
- P. Securities Exchange Board of India("SEBI")** means regulatory body established under Section 3 of the Act
- Q. "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.
- R. "Stock Exchange"** means National Stock Exchange of India Limited
- S. "Takeover regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.
- T. "Trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly.
- U. "Trading day"** means a day on which the recognized stock exchanges are open for trading.
- V. "Trading Plan"** shall mean a plan for trades to be executed in the future by persons who have perpetual access to the unpublished price sensitive information.
- W. "Trading Window"** shall mean the window available for trading in the Securities of the Company.
- X. "Unpublished price sensitive information(UPSI)"** means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following:
- i. Financial results;
 - ii. Dividends;
 - iii. Change in capital structure;
 - iv. Mergers, Demergers, Acquisitions, De-listings, Disposals and Expansion of business and such other transactions;
 - v. Changes in key managerial personnel; and

- vi. Material events in accordance with the SEBI (Listing Obligation and Disclosure Requirement) Regulations, 2015

2. COMPLIANCE OFFICER:

The Board of the Company shall appoint the Company Secretary or any other person as the Compliance Officer to ensure compliance and for effective implementation of the Regulations and also this Code across the Company.

2.1. The Compliance Officer shall report to the board of directors of the Company and in particular, shall provide reports to the Chairman of the Audit Committee, if any, or to the Chairman of the board of directors at such frequency as may be stipulated by the board of directors.

2.2. The Compliance Officer shall be responsible for setting forth the 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.

2.3. In the performance of his/her duties, the Compliance Officer shall have access to all information and documents relating to the Securities of the Company.

3. PRESERVATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION

3.1 All information shall be handled within the Company on a need-to-know basis and no unpublished price sensitive information shall be communicated to any person except in furtherance of the insider's legitimate purposes, performance of duties or discharge of his legal obligations.

3.2 Unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction which entails:

- i. 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; or
- ii. not attracting 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 unpublished price sensitive information 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.

3.3 The Board of Directors shall require the parties 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

limited purpose and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information.

4. NEED TO KNOW BASIS

Price Sensitive Information of the Company is to be handled on a "need to know" basis i.e. 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 a conflict of interest or apprehension of misuse of the information. All non-public information directly received by any employee should immediately be reported to the head of the department.

5. LIMITED ACCESS TO CONFIDENTIAL INFORMATION

All manual/ Physical files containing confidential information shall be kept secure. All Computer files must have adequate security.

6. PREVENTION OF MISUSE OF "UNPUBLISHED PRICE SENSITIVE INFORMATION"

6.1. Chinese Wall:

To prevent the misuse of unpublished price sensitive Information, the Company has adopted following norms for 'Chinese Wall' procedures which separates those departments which routinely have access to unpublished Price Sensitive Information, considered as inside area from those departments which deals with sale? Marketing or other departments providing support services, considered as public areas:

- i. The employees in the insider areas are not allowed to communicate any unpublished Price Sensitive Information to anyone in public area.
- ii. The employees in the insider areas may be physically separated from the employees in public area.
- iii. The demarcation of various departments as insider area shall be determined by the Managing Director.
- iv. Only in exceptional circumstances, Employees from public areas are brought over the wall and given unpublished Price Sensitive Information on need to know basis under intimation of Compliance Officer.

6.2. Trading Plan:

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.

Trading Plan shall:

- i. not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
- ii. 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;
- iii. entail trading for a period of not less than twelve months;
- iv. not entail overlap of any period for which another trading plan is already in existence;
- v. set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
- vi. not entail trading in securities for market abuse.

The Compliance Officer shall consider the Trading Plan made as above and shall approve it forthwith. However, he shall be entitled to take expressed undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per provisions of the Regulations.

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.

However, 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 unpublished price sensitive information and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Plan 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.

For approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

7. TRADING WINDOW

7.1. The trading period, i.e. the trading period of the stock exchanges, called 'trading window', is available for trading in the Company's securities.

7.2. The trading window shall be, inter alia, closed 7 days prior to and during the time the unpublished price sensitive information is published.

7.3. The Compliance Officer shall intimate the closure of trading window to all the designated employees of the Company when he determines that a designated person or class of designated persons can reasonably be expected to have possession of unpublished price sensitive information. Such closure shall be imposed in relation to such securities to which such unpublished price sensitive information relates.

7.4. The Compliance Officer after taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, shall decide the timing for re-opening of the trading window, however in any event it shall not be earlier than forty-eight hours after the information becomes generally available.

Other than the period(s) for which the Trading Window is closed as specified hereinabove, the same shall remain open for dealing in the Securities of the Company.

8. PRE CLEARANCE OF TRADE IN SECURITIES

8.1. All the persons covered by the Code who propose to acquire/sell Securities of the Company which are more than Rs. 10 Lacs in value or 50,000 shares or 1% of the total shareholding or voting rights, whichever is lower, should pre-clear the transaction. However, no designated person shall be entitled to apply for pre-clearance of any proposed trade if such designated person is in possession of unpublished price sensitive information even if the trading window is not closed and hence he shall not be allowed to trade. The pre-dealing procedure shall be hereunder:

- i. A Designated Person shall make a pre-clearance application to the Compliance Officer in the prescribed format **in Annexure I** along with an undertaking (**Annexure II**) stating that he/she has not contravened the provision of this Code.
- ii. If any person covered by the Code, obtained any Price Sensitive Information after executing the undertaking but prior to transacting in Securities of the Company, he/she shall inform the Compliance Officer and refrain from dealing in Securities of the Company.
- iii. All the persons covered by the Code shall execute their order within 7 Days of pre clearance of trade. If the transaction is not executed within 7 Days of such clearance, fresh approval of the Compliance Officer is required.

8.2. All Designated Persons shall conduct their dealings in the securities of the Company only in the “Valid Trading Window” period and shall not enter into “Contra Trade” i.e. opposite or reverse transactions, in the securities of the Company during the next six months following the prior transaction. The 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 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 discharged for remittance to the Board for credit to the Investor Protection and Education Fund administered by the Board under the Act. When the trading window is closed, the Specified Persons shall not trade in the Company’s securities in such period.

8.3. In the case of subscription in the primary market (initial public offers), the above mentioned entities shall hold their investments for a minimum period of 30 days. The holding period would commence when the securities are actually allotted.

8.4. In case the sale of securities is necessitated by personal emergency the holding period may be waived by the Compliance Officer after recording in writing his reasons in this regard. The application for the waiver of the minimum period of holding of the securities shall be made by the employee in the format specified in **Annexure V** to this Code.

9. DISCLOSURE REQUIREMENTS

9.1. General:

- i. The disclosures to be made by any person under this code shall include those related to trading by such person’s immediate relatives, and by any other person for whom such person takes trading decisions.
- ii. The disclosures of trading in securities shall also include trading in derivatives of Securities and the traded value of the derivatives shall be taken in to account for purposes of this code.
- iii. The disclosures made under this code shall be maintained for a period of five years.

9.2. Initial Disclosure:

- i. Every Promoter, Key Managerial Personnel and Director of the Company and any other person for whom such person takes trading decisions shall disclose his holding of securities of the Company as on the date of these regulations taking effect, within 30 days in **Form A** (Annexure VI);
- ii. Every person on appointment as a Key Managerial Personnel or a Director of the Company or Designated Employee or upon becoming a Promoter shall disclose his holding of securities of the Company and any other person for whom such person takes trading decisions as on the date of appointment or

becoming a promoter, to the Company within seven days of such appointment or becoming a Promoter in **Form B** (Annexure VII).

9.3. Continual Disclosure:

Every Promoter, Designated Employee and director of Company and any other person for whom such person takes trading decisions 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 ten lakh rupees or such other value as may be specified by the Compliance Officer from time to time in **Form C** (Annexure VIII).

9.4. Disclosure by the Company to the Stock Exchange(s):

The Company shall notify the particulars of the trading to the all Stock Exchanges on which the securities of the Company are listed within two working days of receipt of disclosures or from becoming aware of such information.

9.5. Disclosure by other connected persons:

The Compliance officer may, at his/ her discretion require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the company in **Form D** (Annexure IX) and at such frequency as may be determined by the company in order to monitor compliance with these regulations.

10. GENERAL PROVISION

The Compliance Officer shall maintain records of all the declarations in the appropriate form given by the directors / designated employees for a minimum period of five years.

The Compliance Officer shall place before the Managing Director / Chief Executive Officer or a committee specified by the company, all the details of the dealing in the securities by the employees / director / officer of the company and the accompanying documents that such persons had executed under the pre-dealing procedure.

11. PENALTIES

11.1. 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).

11.2. 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. The penalties will be as per the Securities Contract (Regulation) Act, 1956.

11.3. The action by the Company shall not preclude SEBI and other authorities from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

12. AMENDMENT

The Board of the Company reserves its right to amend or modify this code in the whole or in part, at any time without assigning any reason whatever. However, no such amendment or modification will be binding on the concerned unless the same is notified in writing.

13. CONCLUSION

All Designated Persons are advised to familiarize themselves with the SEBI Regulations and comply with the same, as well as with this code; both in letter and in spirit. Designated Persons are also advised to ensure compliance by their Immediate Relatives.

ANNEXURE I

SPECIMEN OF APPLICATION FOR PRE-DEALING APPROVAL

**To,
The Compliance Officer
AHIMSA INDUSTRIES LIMITED
102, Iscon elegance, Nr. Shapath-5,
Prahladnagar Junction, S. G. Highway,
Ahmedabad-380015
Gujarat, India**

SUBJECT: APPLICATION FOR TRADING IN SECURITIES OF THE COMPANY

Dear Sir/Madam,

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

1.	Name of the Applicant		
2.	Designation		
3.	Number of securities held as on date		
4.	Folio No. / DP ID / Client ID No.)		
5.	The proposal is for		(a) Purchase of securities (b) Subscription to securities (c) Sale of securities
6.	Proposed date of dealing in securities		
7.	Estimated number of securities proposed to be acquired/subscribed/sold		
8.	Price at which the transaction is proposed		
9.	Current market price (as on date of application)		
10.	Whether the proposed transaction will be through stock exchange or off-market deal		
11.	Folio No. / DP ID / Client ID No. where the securities will be credited / debited		

I enclose herewith the form of Undertaking signed by me.

Yours faithfully,

Place:

(Signature of the Employee)

Date:

ANNEXURE II

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

UNDERTAKING

**To,
The Compliance Officer,
AHIMSA INDUSTRIES LIMITED
102, Iscon elegance, Nr. Shapath-5,
Prahladnagar Junction, S. G. Highway,
Ahmedabad-380015
Gujarat, India**

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

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

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

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

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

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

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

Signature: _____

Date: _____

Place: _____

ANNEXURE III

PRE-CLEARANCE ORDER

PCO: _____

Date: _____

This is to inform you that your request for dealing in _____ (Nos.) of shares of the Company as mentioned in your above mentioned application is approved. Please note that the said transaction must be completed within 7 days from today i.e. on or before _____ (Date)

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

For, **AHIMSA INDUSTRIES LIMITED**

Compliance Officer

Note: Please provide all the information. Incomplete forms will not be accepted.

ANNEXURE IV

FORMAT FOR DISCLOSURE OF TRANSACTION

(To be submitted within 2 days of transaction/ dealing in securities of the Company)

**To,
Compliance Officer
AHIMSA INDUSTRIES LIMITED
Ahmedabad**

REF: Pre-clearance Request dated: _____ & PCO dated: _____

I hereby confirm that:

I have not bought / sold / subscribed to any securities of the Company due to the following reason:

OR

I have bought / sold / subscribed to _____ securities as mentioned below on _____ (date).

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

I agree to not execute a contra trade for a period of 6 months. In case there is any urgent need to sell these securities within the said period, I shall approach the Compliance Officer for necessary approval.

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

Signature

Name:

Designation & Department:

Date: _____

Place: _____

ANNEXURE V

**To,
The Compliance Officer,
AHIMSA INDUSTRIES LIMITED
Ahmedabad**

**SUBJECT: WAIVER OF MINIMUM HOLDING PERIOD FOR SECURITIES OF THE
COMPANY**

Dear Sir,

I have purchased/ Acquired _____ equity shares of the Company on _____ and due to the below mentioned reason, I wish to sell _____ equity shares before the end of 6 months/ 30 days from the date of purchase/ allotment. Please grant me waiver with respect to the holding of Equity shares for minimum period of 6 months/ 30 days.

Reason for waiver:

Thanking you,

Signature

Name:

Designation & Department:

Date: _____

Place: _____

ANNEXURE VI

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	
		Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms

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

Signature:

Name:

Designation:

Date:

Place:

ANNEXURE VII

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/appointment of Director/KMP	
			Type of security (For e.g. - Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee Terms

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

Signature:

Name:

Designation:

Date:

Place:

ANNEXURE VIII

FORM C: Continual Disclosure

**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 e.g. – Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	No.	Pre transaction	Post transaction	From	To			Buy	Sell			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
												Val ue	Num ber of units (contracts * lot size)	Val ue	Num ber of units (contracts * lot size)	

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

Signature:

Name:

Designation:

Date:

Place:

ANNEXURE IX**FORM D: Continual Disclosure****Securities and Exchange Board of India (Prohibition of Insider Trading)
Regulations, 2015 [Regulation 7 (3)]**

Name of the company: _____

ISIN of the company: _____

Transactions by Other connected persons as identified by the company

Name, PAN No., CIN/DIN, & address of Promoter/ Employee / Director with contact nos.	Connection with Company	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 e.g. - Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For e.g. - Shares, Warrants, Convertible Debentures etc.)	No.	Pre transaction	Post transaction	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:

Name:

Designation:

Date:

Place:

ANNEXURE IX

**FORMAT OF HALF YEARLY/ ANNUAL STATEMENTS OF HOLDINGS OF SECURITIES
OF THE COMPANY BY DIRECTOR/ DESIGNATED EMPLOYEES AND THEIR
IMMEDIATE RELATIVES**

To,
Compliance Officer
AHIMSA INDUSTRIES LIMITED
Ahmedabad

Half Yearly/ Annual disclosure of Securities Transactions and Shareholding as on
_____ (Date)

The details of the Securities Transactions of the undersigned as Director/ Designated Employees (including immediate relatives) during half year/ year ended on _____ (date), in the shares of Ahimsa Industries Limited are as under:

Particulars	Self	Dependent Members	Family
No. shares held on _____			
No. Shares bought during the period/ year			
No. Shares sold during the period/ year			
No. shares held on _____			

We hope that you will find the same in order.

Thanking you

Signature:
Name:
Designation:

Date:
Place: