



**CODE OF INTERNAL PROCEDURES AND CONDUCT FOR  
PREVENTION OF INSIDER TRADING IN SECURITIES AND  
POLICY FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE  
SENSITIVE INFORMATION (UPSII)**

**[INSIDER TRADING CODE – 2015]**

## Table of Contents

Sr. No.	Contents	Page No.
1.	Introduction and Purpose	3 – 3
2.	Objectives	3 – 3
3.	Definitions	4 – 6
4.	Policy and its applicability	6 – 8
5.	Code of Conduct for Designated Persons	8 - 9
6.	Disclosures	8 – 10
7.	Penalty for contravention of this Code	10 – 11
8.	Acknowledgement of Receipt of code of Conduct for Prevention of Insider Trading of Securities	11 – 11
9.	Annexures	12 – 20
10.	Policy for fair Disclosure of unpublished price sensitive information (UPSI)	21 – 22

*This document is copyright protected in content, presentation, and intellectual origin, except where noted otherwise. You may not modify, remove, augment, add to, publish, transmit, participate in the transfer or sale of, create derivative works from, or in any way exploit any of the elements of this document, in whole or in part without prior written permission from Electrotherm (India) Limited.*

## (CODE OF INTERNAL PROCEDURES AND CONDUCT FOR PREVENTION OF INSIDER TRADING IN SECURITIES OF ELECTROTHERM (INDIA) LIMITED)

### I. Introduction & Purpose:

This Code of Internal Procedures and Conduct for Prevention of Insider Trading in Securities of the Company is made by the Company as per SEBI's Notification dated 15.01.2015 and the SEBI (Prohibition of Insider Trading) Amendment Regulations, 2018. Accordingly to the said amendments, all listed companies have to ensure effective compliances as described under the existing regulations and as amended from time to time.

This Insider Trading Code aims to define, establish and clarify the standards for behavior in Electrotherm (India) Limited (hereinafter referred as 'the Company') and the Company's position in relation to:

- 1) Prevention of 'Insider Trading' in securities of the Company;
- 2) Maintenance of Confidentiality of unpublished price sensitive information;
- 3) Adherence to and compliance with the SEBI regulation governing Prohibition of Insider Trading in listed entities.

Every Designated Person (as defined hereinafter) has a duty to safeguard the confidentiality of all Unpublished Price Sensitive Information obtained in the course of his or her work in the Company or which comes to his or her knowledge during his or her association with the Company. The Designated Person or any Immediate Relative of such Designated Persons shall not derive any benefit or assist others to derive any benefit from the access to and possession of any Unpublished Price Sensitive Information which is not in public domain and thus constitutes insider information.

### II. Objectives:

The Company is committed to:

- i) Preserving the confidentiality and preventing misuse of any unpublished price sensitive information about the Company or any of its securities;
- ii) Adherence to transparency and fairness in dealing with all stakeholders of the Company; and
- iii) Strict compliance with applicable regulations of the Securities and Exchange Board of India.

The objective of this Insider Trading Code is to set out the standards, and regulate and/or monitor compliance of Insider Trading Regulations of the Company by all "Insiders" and "Connected Persons" and their responsibility to preserve and maintain confidentiality of unpublished price sensitive information that may or is expected to affect the price of securities of the Company.

### III. Definitions: Definitions of some of the key terms used in the Code are given below:

- i) **“Board”** means Board of Directors of Electrotherm (India) Limited.
- ii) **“Code”** means this Code of Internal Procedures and Conduct for regulating, monitoring and reporting of trading by insiders of Electrotherm (India) Limited also referred to as ‘Insider Trading Code 2015’.
- iii) **“Company”** means Electrotherm (India) Limited and its subsidiaries and may be referred to as ‘the Company’ in this or in relation to Insider Trading Code;
- iv) **“Connected Person”** and **“Deemed Connected Person”** means any person who is or has during the past six months has been associated with the company, directly or indirectly, or in any capacity including by reason of frequent communication with officers of the Company 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 with the Company (whether temporary or permanent), that allows such person, directly or indirectly, access to unpublished price sensitive information of the Company or in relation to securities of the Company;

Any person(s) falling within the following categories shall be deemed to be connected persons, unless the contrary is established:

- (a) an immediate relative of Connected Persons; or
- (b) a holding company or associate company or subsidiary company; or
- (c) an intermediary as specified in Section 12 of the SEBI 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 the Company or his immediate relative or banker of the Company, has more than ten per cent, of the holding or interest.

- v) **“Compliance Officer”** means Company Secretary or such other Senior Officer designated by the Board and reporting to the Board, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under SEBI regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the Insider Trading Code of the Company under the overall supervision of the Board of Directors of the Company.

Explanation : “financially literate” shall mean a person who has the ability to read and understand basis financial statements i.e. balance sheet, profit and loss account, and statement of cash flows.

- vi) **“Designated Persons”** means and includes:
- i. Directors of the Company and its material subsidiaries
  - ii. All promoters
  - iii. Key Managerial Personnel of the Company and its material subsidiaries
  - iv. Chief Executive Officer and employees upto two levels below Chief Executive Officer of the Company and its material subsidiaries who are in M-7 and M-9 Level
  - v. All employees in Finance, Accounts, IT and Secretarial Department of the Company and its material subsidiaries
  - vi. Any other employee of the Company, as may be notified by the Compliance Officer of the Company with the approval of the Board.
- vii) **“Insider”** means any person who is,
- (i) a connected Person; or
  - (ii) in possession of or having access to unpublished price sensitive information.
- viii) **“Immediate Relative”** means the spouse of the concerned person and includes parents, siblings and children of such person or of the spouse, provided any of them is financially dependent on such person, or consults such person while taking any decision relating to Trading of securities.
- ix) **“Key Managerial Personnel” or “KMP”** means person as defined in Section 2(51) of Companies Act, 2013;
- x) **“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.
- xi) **“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.

- xii) **“Regulations”** shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.
- xiii) **“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.
- xiv) **“Trading day”** means a day on which the recognized Stock Exchanges are open for Trading.
- xv) **“Trading in Securities”** or **“Trade”** means an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in the securities of the Company, either as principal or agent, including by way of pledging;
- xvi) **“Trading Window”** shall mean the trading period of the stock exchanges which is available for trading in the Company’s securities;
- xvii) **“Trading Plan”** is a plan formulated by an Insider and presented to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on behalf of the Insider in accordance with such plan as per Clause 5(1) of the SEBI Regulations.
- xviii) **“unpublished price sensitive information”** 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 followings;
  - 1) periodical financial results of the company;
  - 2) dividends (both interim and final);
  - 3) Change in capital structure;
  - 4) Mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
  - 5) Change in key managerial personnel

Words and expressions used and not defined in these regulations shall have same meaning as contained in SEBI (Prohibition of Insider Trading) Regulations, 2015.

#### **IV. Policy and Its Applicability:**

##### **a. Applicability**

This Insider Trading Code shall come into effect from April 1, 2019 and shall apply to all the Designated Persons.

Promoters of the Companies and other connected persons shall ensure compliance

with the restrictions and /or disposal requirements specified under the Regulations as applicable.

This Insider Trading Code shall replace the earlier Insider Trading Code relating to Prohibition of Trading in the securities of the Company.

## **b. Policy**

1. No Designated Person - when in possession of any unpublished price sensitive information about, or in relation to the Company or any of its securities - shall: Trade or have dealings in the securities of the Company, either on his/her behalf or on behalf of any other person;
2. Communicate, provide or allow access to, or counsel, directly or indirectly, any unpublished information relating to the Company or any of its securities, to any other person, except on a need to know basis in furtherance of legitimate purposes in relation to the Company.
3. All Directors, Key Managerial Personnel and /or Designated Persons or their Immediate Relatives shall conduct their trading in the securities of the Company only during or in a valid trading window strictly in compliance with this Code, more specifically Clause V (i) of this Code – Code of Conduct for Designated Persons.
4. Trading Plans

As an exception to the condition that a Designated Person shall not trade when in possession of unpublished price sensitive information, any Designated Person may - subject to prior approval of a Trading Plan by the Compliance Officer and public disclosures - commence trading on his or her behalf in the securities of the Company as per the approved Trading Plan during a period of 12 months (excluding the Trading Window closure period) provided that such trading plan shall not commence earlier than 6 months from such Trading Plan approval and such Trading plan(s) shall be irrevocable and to be mandatorily implemented.

Trading Plan shall 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 and the second trading day after the disclosure of such financial results. Trading Plan shall not entail overlap of any period for which another trading plan is already in existence. Trading Plan shall also mandatorily 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. Trading Plan shall not entail trading in securities market for abuse.

The implementation of Trading Plan shall not commence, if any unpublished price sensitive information in possession of Insider at the time of formulation of trading plan has not become public. In such cases, Compliance officer shall confirm

deferment of such plan until unpublished price sensitive information becomes public.

## **V. Code of Conduct for Designated Persons:**

- i. Any Designated Person who intends to conduct Trading either in his/her own name or in the name of his/her Immediate Relative(s) may trade or deal in the securities of the Company only during any non-window closure period, without obtaining pre-clearance of such trade(s) from the Compliance Officer and such trade and/or dealing (in one or more tranches) in every quarter shall be limited to the lower of the following (hereinafter called “threshold”):

- 25,000 Equity Shares of the Company of Re 10 each; or
- Rs. 750,000 calculated based on traded value of Securities.
- 1% of total shareholding/ voting rights or more

Pre-clearance will not be necessary if such Trade to be carried out does not exceed the above threshold.

However, no Insider shall be entitled to apply for or seek any pre-clearance of proposed trade(s) if such Insider is in possession of unpublished price sensitive information even if the trading window is not closed. Any trade(s) executed based on pre-clearance shall be concluded within 7 (seven) trading days after the date of pre-clearance.

Provided that every Designated Person who is permitted to trade shall not execute (i) any derivative trades; and/or (ii) any contra-trade within a period of 6 (six) months from the original trade. In an event of acquisition of any securities by the Designated Person, contra-trade shall mean sale of such securities and vice-versa. Any violation of this condition/restriction, inadvertently or otherwise, shall entail disgorgement of profits from such trade and remittance for credit to the Investor Protection and Education Fund of SEBI.

- ii. Trading Window shall remain closed for trading in securities of the Company by Designated Persons in relation to any of the following ensuing events around which, or that would ordinarily give rise to, Unpublished Price Sensitive Information about the Company or any of its securities are likely to exist and such information is/are likely to materially affect the price of the securities of the Company.

- Financial Results – whether Unaudited or Audited;
- Dividend declaration;
- Change in Capital Structure;
- Any transaction(s) relating to Corporate Action events including mergers, demergers, acquisitions, delisting, disposal and/or expansion of business;
- Change(s) in Key Managerial Personnel of the Company;

Such Trading Window closure shall commence from the date end of every quarter till 48 hours after the declaration / announcement of such financial results by the



Company. Trading Window closure for events other than financial results shall be the period as may be communicated by the Compliance Officer of the Company from time to time.

Trading Window shall also be applicable to any other person having a contractual or fiduciary relation with the Company including but not restricted to auditors, accountancy firms, law firms, analysts, consultants, etc., advising or assisting the Company. All the Designated Persons or their Immediate Relatives and the category of persons mentioned in this clause shall not be involved in the Trading either in their own name or in the name of their Immediate Relatives when the Trading Window is closed.

In case of Employee Stock Option Schemes (ESOPs) exercise of option may be allowed in the period when the Trading Window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when the Trading Window is closed.

### iii. Procedure for pre clearance

An application may be made by the Designated person(s) who intends to deal in the securities of the Company when not in possession of any unpublished price sensitive information, to the Compliance officer in the prescribed Form given in **Annexure 1** to this Code, indicating the estimated number of securities that the Designated Persons intend to deal in and such Form shall be accompanied by an undertaking (as per the draft given in **Annexure 2**) duly executed in favour of the Company by such Designated Persons;

All Designated Persons shall execute their deals in respect of securities of the Company within **seven** trading days after the approval of pre-clearance is given and shall file the details of such deal with the Compliance Officer within **2 (two) days** of the execution of the deal as per **Annexure 3**. In case the transaction pre-cleared is not undertaken, a report as per **Annexure 4** shall be filed to that effect.

### iv. Holding period

In case of subscription in the primary market, the Insiders shall hold their investments for a minimum period of **30 days**. The holding period would commence when the securities are actually allotted. The Compliance Officer may waive off the holding period in case of sale of securities in personal emergency after recording reasons for the same. However, no such sale will be permitted when the Trading window is closed.

## VI. Disclosures:

All the Designated Persons shall be required to submit the following details of the transactions in the Securities of the Company either in their own name or in the name of their Immediate Relatives to the Compliance Officer:

## - Initial Disclosure (In Annexure 5 and Annexure 6)

Every Designated Person shall disclose his/her holdings in Securities of the Company including that of his/her Immediate Relatives within 30 days from May 15, 2015 when this Insider Trading Code shall come in to effect;

Any person on becoming a Designated Person shall disclose his/ her holding in the Securities of the Company including that of his/her Immediate Relatives within 7 (seven) days of becoming a Designated Person;

## - Annual Disclosure

Every Designated Person shall disclose his/her holdings in Securities of the Company including that of his/her Immediate Relatives as on March 31 of the relevant financial year, within 7 (seven) days in the specified format;

## - Continual Disclosure

Every Designated Person shall disclose to the company the number of such securities acquired or disposed by him/her or his/her Immediate Relatives within 2 (two) trading days of such transaction or receipt of intimation of allotment of securities, 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 Rs. Ten Lakhs, in **Annexure 7** or such other form as may be prescribed by SEBI. The Compliance Officer shall notify the particulars of such disclosures to the stock exchange on which the securities are listed within 2 (two) working days of receipt of disclosure or from becoming aware of such information.

If any Designated Person acquires, disposes or trades in securities of the Company subsequent to the initial disclosure, the details of such dealings shall be disclosed to the Compliance Officer of the Company within 2 (two) working days of such acquisition, disposal or trade in **Annexure 7**. The disclosures made under this Code shall be maintained for a period of five years

## VII. Penalty for contravention of this Code:

All Designated Persons shall be individually responsible for complying with the provisions of this Insider Trading Code including to the extent the provisions hereof are applicable to his/her Immediate Relatives.

Any Designated Person who trades in securities or communicates any information for trading in securities, in contravention of this Code shall be subject to disciplinary action by the Company and liable to be penalized. Appropriate disciplinary action which may be taken by the Company may include wage-freeze, suspension from employment, ineligibility for future participation in employee stock option plans, etc., as may be decided by the Board.

Actions, if any by the Company for such violations shall not preclude SEBI from taking any

action under the Regulations or the SEBI Act 1992. The SEBI may also initiate the Criminal Proceedings under section 24 or take any action under Chapter VI of the Act. As per Section 15G of SEBI Act, 1992, Penalty for insider trading is :

- a. either on his own behalf or on behalf of any other person, deals in securities of a body corporate listed on any stock exchange on basis of any unpublished price sensitive information or
- b. communicates any unpublished price sensitive Information to any person, with or without his request for such information except as required in the ordinary course of business or under any law
- c. counsels or procures for any other person to deal in any securities of any body corporate on the basis of unpublished price sensitive information

shall be liable to a **penalty of Rs. 25.00 Crore (Rupees : Twenty five Crores Rupees) OR there times the amount of profit made out of insider trading whichever is higher**

In case it is observed by the Compliance Officer that there has been a violation of the SEBI Regulations by the Designated Person including that of his/her Immediate Relatives, the Compliance Officer shall forthwith inform the Board and inform SEBI about such violation.

\*\*\*\*\*

## Acknowledgement of Receipt of code of Conduct for Prevention of Insider Trading of Securities:

### ACKNOWLEDGEMENT FORM

I have received and read the Company's Code of Conduct for Prevention of Insider Trading of Securities. I understand the standards and policies contained in the same and also understand that there may be additional policies or laws specific to my employment.

I, the undersigned, do solemnly agree to comply with the Code for Prevention of Insider Trading of Securities.

If I have any questions regarding the nature, applicability and scope of this for Prevention of Insider Trading of Securities, I know I can consult the Company Secretary of the Company, knowing that my questions or reports or complaints will be maintained in confidence.

I further agree to sign annually the acknowledgement form provided at the end of this for Prevention of Insider Trading of Securities, and return the same to the Company Secretary of the Company.

---

**Name of Director / Employee**

---

**Signature of Director / Employee**

---

**Date of Signing**

## ANNEXURE 1 SPECIMEN OF APPLICATION FOR PRE-CLEARANCE APPROVAL

Date:

To,  
The Compliance Officer,  
**Electrotherm (India) Limited**  
A-1 Skylark Apartment,  
Satellite Road, Satellite,  
Ahmedabad – 380 015

Dear Sir/Madam,

### Application for Pre-trading approval in securities of the Company

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

1.	Name, Address and PAN 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 trading in securities	
7.	Estimated number of securities proposed to be acquired/ subscribed/ sold	
8.	Price at which transaction is proposed	
9.	Current Market price (as on date of application)	
10.	Whether the proposed transaction will be made through stock exchange or off- market	

In connection with my request for approval to deal In connection with my request for approval to deal in \_\_\_\_ shares of the Company, as required by the Insider Trading Code of

the Company, I hereby state and undertake that:

1. Neither do I have access to nor do I have any information that could be construed as 'Unpublished Price Sensitive Information' up to the signing of this undertaking.
2. In the event, where I have access or receive any information that could be construed as 'Price Sensitive Information', after signing 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.
3. I confirm that I have not contravened the provisions of the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 nor the Insider trading Code of the Company.
4. I have made full and true disclosures in the matter.
5. Neither do I have access to nor do I have any information that could be construed as 'Unpublished Price Sensitive Information' up to the signing of this undertaking.
6. In the event, where I have access or receive any information that could be construed as 'Price Sensitive Information', after signing 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.
7. I confirm that I have not contravened the provisions of the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 nor the Insider trading Code of the Company.
8. I have made full and true disclosures in the matter.

Yours faithfully,

---

(Signature of Employee)

**ANNEXURE 2**

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

**UNDERTAKING**

To,  
The Compliance Officer,  
**Electrotherm (India) Limited**  
A-1 Skylark Apartment,  
Satellite Road, Satellite,  
Ahmedabad – 380 015

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 Insider Trading Code (the Code)) up to the time of signing this Undertaking.

In the event that I have access to or have 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 2 (two) 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 trading days of the receipt of approval failing which I shall once again seek pre-clearance.

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

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

\* Indicate number of shares

## ANNEXURE 3

### FORMAT FOR PRE- CLEARANCE ORDER

To,  
Name : \_\_\_\_\_

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

This is to inform you that your request for trading in \_\_\_\_\_ (nos) shares of the Company as mentioned in your application dated \_\_\_\_\_ is approved. Please note that the said transaction must be completed on or before \_\_\_\_\_ (date) that is within 7 (seven) trading days from today.

In case you do not execute the approved transaction /deal on or before the aforesaid date you would have to seek fresh pre-clearance before executing any transaction/deal in the securities of the Company. Further, you are required to file the details of the executed transactions in the attached format within 2 days from the date of transaction/deal. In case the transaction is not undertaken a 'Nil' report shall be necessary.

Yours faithfully,  
For **Electrotherm (India) Limited**

**Compliance Officer**

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

Encl: Format for submission of details of transaction



## ANNEXURE 4

### FORMAT FOR DISCLOSURE OF TRANSACTIONS

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

To,  
The Compliance Officer,  
**Electrotherm (India) Limited**  
A-1 Skylark Apartment,  
Satellite Road, Satellite,  
Ahmedabad – 380 015

I hereby inform that, I :

- have not bought/sold/ subscribed any securities of the Company
- have bought/sold/subscribed to \_\_\_\_\_ securities as mentioned below on \_\_\_\_ (date)

Name, Address and PAN of holder	No. of Securities dealt with	Bought/sold/subscribed	DP ID/Client ID / Folio No	Price (Rs.)

I undertake to preserve documents evidencing proof of above transaction for a period of 3 years and produce the same to the Compliance officer /SEBI when required.

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 transactions(s).

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

Signature : \_\_\_\_\_

Name :

Designation:

## ANNEXURE 5 FORMAT FOR INITIAL DISCLOSURE OF SECURITIES

To,  
The Compliance Officer,  
Electrotherm (India) Limited  
A-1 Skylark Apartment,  
Satellite Road, Satellite,  
Ahmedabad – 380 015

I, \_\_\_\_\_ (holding PAN \_\_\_\_\_) and residing at \_\_\_\_\_, in my capacity as \_\_\_\_\_ of the Company hereby submit the following details of securities held in the Company as on \_\_\_\_\_ (date of becoming Specified Person).

### I. Details of securities held by me :

1	Type of Securities	
2	No. of Securities held	
3	Folio. No.	
4	Beneficiary A/c Client ID	

### II. Details of dependent(s) :

Pursuant to the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Insider Trading Code, I hereby declare that I have the following dependents:

1.	Name & PAN of the dependent	
2.	Relation with Director/ Key Managerial Personnel/ Designated Employee	

### III. Details of securities held by dependent(s) :

1.	Relationship	
2.	Type of Securities	
3.	No. of Securities held	
4.	Folio. No.	
5.	Beneficiary A/c Client ID	

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

Signature : \_\_\_\_\_

Name :

Designation:

## ANNEXURE 6 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 : Electrotherm (India) Limited  
ISIN of the company : INE822G01016

### Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/ immediate relatives/ others etc)	Securities held as on the date of regulation coming into force		% of Shareholding	Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option Contracts held as on the date of regulation coming into force	
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	6	7	8	9

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

Signature:

Designation:

Date:

Place:

## ANEXURE- 7

### DISCLOSURE OF CHANGES IN SHAREHOLDING

To,  
The Compliance Officer,  
Electrotherm (India) Limited  
A-1 Skylark Apartment,  
Satellite Road, Satellite,  
Ahmedabad – 380 015

I, \_\_\_\_\_, in my capacity as \_\_\_\_\_ of the Company hereby submit the following details of change in holding of securities of the Company:

#### Details of change in securities held by dependent :

Name, PAN No. & Address of the Shareholder	
No. of securities held before the transaction	
Date of Receipt of allotment, advice/ Acquisition of /sale of securities	
Nature of transaction & Quantity of Purchase /Sale/Others	

#### Details of change in securities held by dependent family members:

Name, PAN No. & Address of the Shareholder	
No. of securities held before the transaction	
Date of Receipt of allotment, advice/ Acquisition of /sale of securities	
Nature of transaction & Quantity of Purchase /Sale/Others	

I/We declare that I/We have complied with the requirement of the minimum holding period of six months with respect to the securities purchased/sold.

I hereby declare that the above details are true, correct and complete in all respects.

Date : Signature:

## **POLICY FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSII)**

Electrotherm (India) Limited ('ET') shall adhere to the practices and procedures detailed in this Fair Disclosure Policy document, effective May 15, 2015, in order to ensure fair disclosure of events and occurrence that could potentially impact price of listed securities of the Company in the market.

### **A. The Company shall follow the Principles of Fair Disclosures detailed hereunder:**

1. The Company will make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. The Company will make, uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
3. The Compliance Officer of the Company shall act as Chief Investors Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company will make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company will provide appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. The Company will ensure that information, if shared, with analysts and research personnel is not unpublished price sensitive information.
7. The Company will develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
8. The Company will handle all unpublished price sensitive information on a need-to-know basis.

### **B. Communication or procurement of Unpublished Price Sensitive Information**

1. 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 to legitimate purposes, performance of duties or discharge of legal obligations.
2. No personal shall procure from or cause the communication by any insider of Unpublished Price Sensitive Information, relating to a company or securities listed or

proposed to be listed except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

3. Any person in receipt of Unpublished Price Sensitive Information pursuant to a legitimate purpose shall be considered as Insider and due notice shall be given to such persons to maintain confidentiality of such Unpublished Price Sensitive Information.

**Explanation :** 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 this Code.

4. The Company is ensuring 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 as mentioned above alongwith the Permanent Account Number or any other identifier authorised 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.