



SRIKALAHASTHI PIPES LIMITED

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

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

(PURSUANT REGULATION 9 OF SEBI (PROHIBITION OF INSIDER TRADING)
REGULATIONS 2015)

EFFECTIVE FROM 15TH MAY 2015



SRIKALAHASTHI PIPES LIMITED

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

DEFINITIONS : Definitions of some of the terms used in the Code are given below :

- (a) **"Board"** means the Board of Directors of SRIKALAHASTHI PIPES LIMITED.
- (b) **"Code"** means Code of Conduct to Regulate, Monitor and Report Trading by Insiders including any modification(s) or amendment(s) made thereto from time to time or any replacement made thereof by the Company.
- (c) **"Company"** means SRIKALAHASTHI PIPES LIMITED
- (d) **"Compliance Officer"** means Company Secretary or such other senior officer designated by the Board, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board.
- (e) **"Connected Person"** shall mean the following who shall have access directly or indirectly to unpublished price sensitive information or is reasonably expected to have such access:
 - (1) Promoter
 - (2) Designated Person, which shall include:
 - (i) All Directors on the Board of the Company
 - (ii) All Key Managerial Personnel of the Company
 - (iii) Senior Management Level i.e. one level below the Board as may be approved from time to time;
 - (iv) All executives working with the departments of Company Secretariat, Finance & Accounts and Legal;
 - (v) Any other executive as may be determined and informed by the Company from time to time.
 - (vi) Immediate Relatives of the aforesaid.

Note : In case any Designated Person separates from the services of the Company due to superannuation/ resignation/termination etc. he/she shall continue to be considered as a Designated Person for a further period of 6 (six) months subsequent to the date of his/her separation from the Company as envisaged under the Regulations.



SRIKALAHASTHI PIPES LIMITED

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

- (3) 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:
- i. Auditors as defined under Companies Act 2013, Accountancy firms, law firms, analysts, consultants, market intermediaries
 - ii. a holding company or associate company or subsidiary Company; or
 - iii. an intermediary as specified in Section 12 of the SEBI Act or an employee or director thereof; or
 - iv. an investment company, trustee company, asset management company or an employee or director thereof; or
 - v. an official of a stock exchange or of clearing house or corporation; or
 - vi. a member of board of trustees of a mutual fund or
 - vii. a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
 - viii. 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
 - ix) an official or an employee of a self-regulatory organization recognised or authorized by the Board; or
 - x) a banker of the Company; or
 - xi) 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.
 - xii) an immediate relative of Connected Persons; or
- (f) **“Dealing in Securities”** means an act of buying, selling, or agreeing to buy, sell the securities of the Company either as principal, agent or otherwise.
- (g) **“Generally available Information”** means information that is accessible to the public on a non-discriminatory basis
- (h) **“Key Managerial Personnel”** means person as defined in Section 2(51) of the Companies Act, 2013.
- (i) **“Immediate Relative”** means the spouse of the 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 in securities.



SRIKALAHASTHI PIPES LIMITED

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

- (j) **"Insider"** means any person who,
- is a Connected Person, or
 - is in possession of, or has access to Unpublished Price Sensitive Information.
- (k) **"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
- (l) **"SEBI"** means the Securities and Exchange Board of India.
- (m) **"Securities"** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 or any modification thereof except units of a mutual fund
- (n) **"Trading"** means buying and selling in Securities of the Company, and **"Traded"** shall be construed accordingly.
- (o) **"Trading Day"** means a day on which the recognized stock exchanges are open for Trading.
- (p) **"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 as per Clause 5(1) of the SEBI Regulations.
- (q) **"Trading Window"** shall mean the trading period of the Stock Exchanges which is available for trading in the Company's securities.
- (r) **"Takeover Regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;
- (s) **"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 following: -
- financial results;
 - dividends;
 - change in capital structure;
 - mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
 - changes in key managerial personnel; and
 - material events in accordance with the listing agreement.



SRIKALAHASTHI PIPES LIMITED

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

- (t) **Working day** shall mean the working day when the regular Trading is permitted on the concerned stock exchange where the Securities of the Company are listed

Words and expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislations

APPLICABILITY

This Code shall be applicable to all the Insiders, as the case may be, from time to time.

PRESERVATION OF PRICE SENSITIVE INFORMATION

- 1 No Insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to a company or securities to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligation
- 2 No person shall procure from or cause the communication by any Insider of unpublished price sensitive information, relating to a company or securities listed except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

B NEED-TO-KNOW BASIS

- a. 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/her legal obligations.
- b. "need to know" basis means that Unpublished Price Sensitive Information 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 appearance of misuse of the information.
- C Unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction which would:



SRIKALAHASTHI PIPES LIMITED

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

- (1) entail an obligation to make an open offer under the Takeover Regulations where the Board is of informed opinion that the proposed transaction is in the best interests of the Company;
- (2) not attract an obligation to make an open offer under the Takeover Regulations but where the Board 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 may determine.

However, the Board 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 CHINESE WALL

- (a) To prevent the misuse of Unpublished Price Sensitive Information, the Company has adopted a “Chinese Wall” policy whereby those areas of the Company which routinely have access to Unpublished Price Sensitive Information, considered “inside areas” are separated from areas which deal with sale/marketing/investment advice or other departments providing support services, considered “public areas”.
- (b) The Designated Persons in the inside area shall not communicate any Unpublished Price Sensitive Information to any one in public area.
- (c) The Designated Persons in inside area may be physically segregated from Designated Persons in public area and the Company may choose to demarcate various departments as inside area.
- (d) Only in exceptional circumstances Designated Persons from the public areas may be brought “over the wall” and given Unpublished Price Sensitive Information on the basis of “need to know” criteria, under intimation to the Compliance Officer.

5 LIMITED ACCESS TO CONFIDENTIAL INFORMATION:

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



SRIKALAHASTHI PIPES LIMITED

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

TRADING PLANS

- 1 **Insider who may be** perpetually in possession of Unpublished Price Sensitive Information shall be entitled to formulate a Trading Plan for dealing in securities of the Company and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan in the prescribed Form enclosed as **Annexure I**. After approval of such trading plans, the Compliance Officer shall notify the same to the concerned Stock Exchange where the securities of the Company are listed.

- 2 Trading Plan shall:
 - (i) Provide for a cooling period of six months from the public disclosure of Trading Plan, before commencement of trading by or on behalf of the Insider;
 - (ii) Not entail Trading during the period close to the declaration of financial results. Thus there shall be no 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 Company and the second trading day after the disclosure of such financial results;
 - (iii) Shall envisage trading for a period of at least 12 months ;
 - (iv) Not entail overlap of any period for which another trading plan is already in existence;
 - (v) Set out the nature of Trading envisaged therein, (i.e., acquisition or disposal), the value and number of Securities of the Company to be Traded, and specific dates or time intervals on which Trading shall take place.
 - (vi) Supported by undertaking in the prescribed Form enclosed as **Annexure -II**.
 - (vii) Shall not envisage Trading for market abuse or breach the SEBI (Prohibition of Fraudulent and Unfair Trade Practices Relating to the Securities Market) Regulations, 2003.

- 3 The Compliance Officer shall review the Trading Plan submitted as above to assess whether the plan would have any potential violation of regulations under Code. The Compliance Officer shall be entitled to take seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.

- 4 The Trading Plan once approved shall be irrevocable and the Insider shall mandatorily



SRIKALAHASTHI PIPES LIMITED

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

have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.

Provided that the implementation of the trading plan shall not be commenced, if any unpublished price sensitive information is 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 and in such event the Compliance Officer shall confirm that the commencement ought to 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.

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

TRADING WINDOW

- 1 The trading window shall be closed for a minimum period of seven days prior to the Board meeting or for the period to be notified by the Compliance officer as and when the proposal on matters related to Unpublished Price Sensitive Information is placed before the Board and would open not earlier than 48 hours after information becomes generally available.
- 2 Insider shall not trade in securities when the trading window is closed. All persons 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, as may be specified by the Company having or expected to have Unpublished Price Sensitive Information shall also not trade in securities when the trading window is closed.
- 3 In addition to the circumstances specified in Clause 1 above, the Trading Window shall also be closed when the Compliance Officer determines that an Insider is reasonably expected to be in possession of Unpublished Price Sensitive Information, provided however, the Trading Window shall be closed in relation to only those Securities of the



SRIKALAHASTHI PIPES LIMITED

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

Company to which such Unpublished Price Sensitive Information relates to. The time for re-opening of the Trading Window shall be determined by the Compliance Officer after analyzing various factors including the fact that the Unpublished Price Sensitive Information has become accessible to the public on a non-discriminatory basis and being capable of assimilation by the market and such time for re-opening of the Trading Window shall not be in any event earlier than 48 (forty eight) hours after the Unpublished Price Sensitive Information has become accessible to the public on a non-discriminatory basis.

- 4 The remaining days of a year other than the days mentioned under Clause 1 and 3 above shall be called "Valid Trading Window".
- 5 Insider shall conduct all their Trading either in their own name or in the name of their Immediate Relatives **only during a Valid Trading Window** and shall not deal in any transaction involving the Trading when the Trading Window is closed.

HOLDING PERIOD

Insiders who buy or sell any number of Securities of the Company, shall not enter into a contra trade, i.e. reverse or setting off sell or buy any number of Securities during the next 6 (six) months following the prior transaction. In case of any 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 SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

PRE-CLEARANCE OF TRADES

- 1 Designated Person, who intend to deal in the securities of the Company when the Valid Trading Window is open and if the value of the securities traded, whether in one transaction or series of transactions over any calendar quarter, aggregates **In excess of Rs.10,00,000 (Rupees Ten lakhs) should apply for pre-clearance of the transaction.** However, no Designated Person shall be entitled to apply for pre-clearance of any proposed trade if such 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.



SRIKALAHASTHI PIPES LIMITED

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

- 2 The pre-dealing procedure shall be hereunder:
- (i) An application may be made in the prescribed Form enclosed as **Annexure-I** to the Compliance officer indicating the estimated number or value of securities that the Insider intends to deal in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the company in this behalf.
 - (ii) An undertaking in the prescribed Form enclosed as **Annexure-III** shall be executed in favour of the Company incorporating, *inter alia*, the following clauses, as may be applicable:
 - (a) That he/she does not have any access or has not received “Unpublished Price Sensitive Information” up to the time of signing the undertaking.
 - (b) That in case he/she has access to or receives “Unpublished Price Sensitive Information” after the signing of the undertaking but before the execution of the transaction he/she shall inform the Compliance Officer of the change in his position and that he/she would completely refrain from dealing in the securities of the Company till the time such information becomes public
 - (c) That he/she has not contravened this Code as notified by the Company from time to time.
 - (d) That he/she undertakes to submit the necessary report within two working days of execution of the transaction or a “Nil” report, after the expiry of one week from the date of the pre-clearance approval, if the transaction is not undertaken;
 - (e) That he/she is aware that, he/she shall be liable to face penal consequences as set forth in this Code including disciplinary action under this Code, in case the above declarations are found to be misleading or incorrect at any time;
 - (f) That he/she hereby undertakes not to conduct Trading in the sanctioned period in case the Trading Window is declared closed subsequently;
 - (g) That he/she has made a full and true disclosure in the matter.
 - (iii) The Compliance Officer shall maintain a list of such securities as ‘restricted list’ which shall be used as a basis for approving or rejecting applications for preclearance of trades.
- 3 The competent person or authority to accord pre-clearance shall be as follows:



SRIKALAHASTHI PIPES LIMITED

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

(i) For Chairman & Whole-time Director:	Compliance Officer
(ii) For Directors on the Board of Directors, CFO and Compliance Officer:	Wholetime Director
(iii) For other Connected Persons:	Compliance Officer.

- 4 An Insider shall execute their order in respect of securities of the Company within 7 (Seven) working days after the approval of pre-clearance is given. Insider shall file within 2 (two) days of the execution of the deal, the details of such deal with the Compliance Officer in the prescribed form enclosed as Annexure IV. In case the transaction is not undertaken, a report to that effect shall be filed.
- 5 If the order is not executed within seven days after the approval is given, the Designated Person must obtain fresh pre-clearance for the transactions to be executed..
- 6 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.
- 7 The Compliance Officer shall also maintain a register of waiver of restriction on holding period and shall record thereon the name of the Designated Persons, details of Securities of the Company for which waiver is granted, date of such waiver and the grounds for grant of the waiver.

REPORTING REQUIREMENTS FOR TRANSACTION IN SECURITIES

1 DISCLOSURE BY EVERY PROMOTER AND DESIGNATED PERSON

(a) INITIAL DISCLOSURE:

- (i) Every Promoter and Designated Person shall disclose his holding of securities of the Company including that of his/her immediate relatives as on the date of these regulations taking effect, to the Company within thirty days of Code taking effect in Form A enclosed as Annexure V.



SRIKALAHASTHI PIPES LIMITED

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

- (ii) Every person on appointment as a Designated Person or upon becoming a Promoter shall disclose his holding of securities of the Company 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** enclosed as **Annexure VI**.

(b) ANNUAL DISCLOSURE

Every Promoter and Designated Person shall disclose all holdings in Securities of the Company including that of his/her Immediate Relatives, as on March 31 of the relevant financial year and in the format prescribed in **Annexure -VII**, within seventh day of the next month.

(c) CONTINUAL DISCLOSURE

Every Promoter and Designated Person shall disclose the number of Securities of the Company acquired or disposed by him or her or by his/her Immediate Relatives, within 2 (two) Trading Days of such transaction, **if the value of such Securities Traded, whether in one transaction or a series of transactions over a calendar quarter aggregates to a Traded value of more than Rupees ten lakhs.**

The Compliance Officer shall notify the concerned stock exchanges in which the Securities of the Company are listed, about the particulars of the above Trading, within two Trading Days of the receipt of such disclosure or from becoming aware of such information.

Every Promoter and Designated Personal shall make disclosure in prescribed Form enclosed as **Annexure VIII**.

Disclosure of the incremental transactions after aforesaid disclosure shall be made when the transactions effected after the prior disclosure cross the threshold specified above

II DISCLOSURES BY OTHER CONNECTED PERSONS

The Compliance Officer may, in addition to the abovementioned disclosures, require any Connected Person or class of Connected Persons to make disclosures regarding holdings in Securities of the Company and Trading in format prescribed in **Annexure IX**



SRIKALAHASTHI PIPES LIMITED

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

and at such frequency as may be determined by the Compliance Officer in consultation with the Board in order to monitor compliance with the Regulations.

The Compliance Officer shall maintain records of all the declarations, initial disclosures, continual disclosures and disclosures by Insider.

The Compliance Officer shall maintain a register of Disclosure of Securities of the Company held by Promoter and Designated Person.

The Compliance Officer shall place before the Board or person so authorized by the Board in this behalf by the Chairman of the Board on a monthly basis, the details of all the disclosures reported pursuant to the Code.

12 PENALTY FOR CONTRAVENTION

- (a) Every Insider 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).
- (b) Any Insider who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalised and appropriate action may be taken by the Company.
- (c) Specified Persons who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, etc.
- (d) The actions by the Company as aforesaid, shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations 2015.



SRIKALAHASTHI PIPES LIMITED

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

ANNEXURE -I

APPLICATION FOR PRE-CLEARANCE OF TRANSACTIONS IN SECURITIES OF THE COMPANY

OR

APPLICATION FOR TRADING PLAN

Date: _____

The Company Secretary
SRIKALAHASTHI PIPES Ltd.
Rachagunneri - 517 641
Srikalahasthi Mandal
Chittoor Dist. Andhra Pradesh

Dear Sir,

In terms of the Company's Code, I/We hereby request you to (1) Pre-clear my/our intended transaction in Securities of the Company or (2) Approve Trading Plan for dealing in securities of the Company as detailed hereunder:

Number of Securities in the Company held as on date of application (including the securities held by immediate relative)	
Depository Participant Name	
Depository Participant ID	
Beneficiary Client ID	
Estimated number of Securities proposed to be purchase or sale	
Estimated consideration value (No. of shares*closing market price of previous day)	
Whether proposed transaction under self name or by immediate relative.	
Name of immediate relative, if transaction is made by immediate relative	

Yours truly,

Signature: _____

Name: _____

Designation: _____

Emp ID: _____



SRIKALAHASTHI PIPES LIMITED

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS
ANNEXURE -II

UNDERTAKING FOR TRADING PLAN

Date: _____

The Company Secretary
SRIKALAHASTHI PIPES Ltd.
Rachagunneri - 517 641
Srikalahasthi Mandal
Chittoor Dist. Andhra Pradesh

Dear Sir,

I/We hereby undertake as follows:

- (a) That I/We do not have any access or has not received "Unpublished Price Sensitive Information" up to the time of signing the undertaking.
- (b) That in case, I/We have access to or receives "Unpublished Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction, I/We shall inform the Company Secretary of the change in my/our position and that I/We would completely refrain from dealing in the securities of the Company till the time such information becomes public
- (c) That I/We have not contravened this Code as notified by the Company, from time to time.
- (d) That I/We hereby undertake not to conduct Trading in the sanctioned period in case the Trading Window is declared closed subsequently;
- (e) That I/We have made a full and true disclosure in the matter
- (f) That I/We are aware that, I/We shall be liable to face penal consequences as set forth in this Code including disciplinary action under this Code, in case the above declarations are found to be misleading or incorrect at any time;

Yours truly,

Signature: _____

Name: _____

Designation: _____

Emp ID.: _____



SRIKALAHASTHI PIPES LIMITED

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

ANNEXURE- III

UNDERTAKING FOR PRE-CLEARANCE OF TRANSACTIONS IN SECURITIES OF THE COMPANY

Date: _____

The Company Secretary
SRIKALAHASTHI PIPES Ltd.
Rachagunneri - 517 641
Srikalahasthi Mandal
Chittoor Dist. Andhra Pradesh

Dear Sir,

I/We hereby undertake as follows:

- (e) That I/We do not have any access or has not received "Unpublished Price Sensitive Information" up to the time of signing the undertaking.
- (f) That in case, I/We have access to or receives "Unpublished Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction, I/We shall inform the Company Secretary of the change in my/our position and that I/We would completely refrain from dealing in the securities of the Company till the time such information becomes public
- (g) That I/We have not contravened this Code as notified by the Company, from time to time.
- (h) That I/We undertake to submit the necessary report within two working days of execution of the transaction or a "Nil" report, after the expiry of one week from the date of the pre-clearance approval, if the transaction is not undertaken;
- (i) That I/We hereby undertake not to conduct Trading in the sanctioned period in case the Trading Window is declared closed subsequently;
- (f) That I/We have made a full and true disclosure in the matter
- (g) That I/We are aware that, I/We shall be liable to face penal consequences as set forth in this Code including disciplinary action under this Code, in case the above declarations are found to be misleading or incorrect at any time;

Yours truly,

Signature: _____

Name: _____

Designation: _____

Emp ID.: _____



SRIKALAHASTHI PIPES LIMITED

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

FORMAT FOR DISCLOSURE OF PRE-APPROVED TRANSACTIONS

ANNEXURE-IV

Date: _____

The Wholetime Director/Company Secretary
SRIKALAHASTHI PIPES Ltd.
Rachagunneri - 517 641
Srikalahasthi Mandal
Chittoor Dist. Andhra Pradesh

Dear Sir,

DETAILS OF PRE-APPROVED TRANSACTION

Ref: Your Approval letter No. _____ dated _____

I/We hereby inform you that I/We

- **have not bought/sold/subscribed any Securities of the Company**
- **have bought/sold/subscribed to the _____ Securities of the Company (give description) as mentioned below on _____ (insert date)**

Name of holder	First of joint holder	No. of Securities dealt with	Bought/sold/subscribed	DP ID/ Client ID form) or Folio No. for physical where the Securities will be debited or credited	Consideration amount

In connection with the aforesaid transaction(s), I/We hereby undertake to preserve, for a period of 5 (Five) years and produce to the Compliance Officer/SEBI any of the following documents:



SRIKALAHASTHI PIPES LIMITED

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

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/We agree to hold the above Securities of the Company for minimum holding period as specified under this Code.

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

In case there is any urgent need to sell these Securities of the Company within the said minimum period of holding, I/We shall approach the Company (Wholetime Director/Company Secretary) for necessary approval (applicable in case of purchase / subscription).

Yours truly,

Signature: _____

Name: _____

Designation: _____

Emp ID.: _____



SRIKALAHASTHI PIPES LIMITED

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS
ANNEXURE -V

FORM A FORM OF INITIAL DISCLOSURE

Date: _____

Name of the Company: **SRIKALAHASTHI PIPES LIMITED**

ISIN of the Company: **INE943C01027**

<u>Name, PAN, CIN/DIN & address</u> <u>with contact nos.</u>	<u>Category of person</u> <u>(Promoters/</u> <u>Designated Persons</u>	<u>Securities held as</u> <u>on the date of</u> <u>regulation</u> <u>coming into force</u>	<u>% of</u> <u>shareholding</u>

Yours truly,

Signature: _____

Name: _____

Designation: _____

Emp ID.: _____



SRIKALAHASTHI PIPES LIMITED

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS
ANNEXURE -VI

FORM B
FORM OF INITIAL DISCLOSURE

Date: _____ -

Name of the Company: **SRIKALAHASTHI PIPES LIMITED**

ISIN of the Company: : **INE943C01027**

**DETAILS OF SECURITIES HELD ON APPOINTMENT OF DESIGNATED PERSONS OR UPON BECOMING
A PROMOTER OF THE COMPANY**

Name, PAN, CIN/DIN & address with contact nos.	Category of person {Promoters/ Designated Persons	Securities held as on the date of regulation coming into force	% of shareholding

Yours truly,

Signature: _____

Name: _____

Designation: _____

Emp ID.: _____



SRIKALAHASTHI PIPES LIMITED

Annexure - VII

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

Date: _____

FORM FOR ANNUAL DISCLOSURE

Sl No	Name, PAN No. & Address of Promoter/Designated Persons	No. & % of shares/ Designated Persons	Date of receipt of allotment advice / acquisition / sale of shares	Date of intimation to Company	Mode of	No. & % of shares/	Trading member through whom the trade was executed with SEBI Registration No. of the FIM	Exchange on which the trade was executed	Buy quantity	Buy Value	Sell quantity	Sell Value

Yours truly,

Signature: _____

Name: _____

Designation: _____

Emp ID.: _____



SRIKALAHASTHI PIPES LIMITED

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

ANNEXURE VIII

FORM C FORM OF CONTINUAL DISCLOSURE

Date: _____

Name of the Company: **SRIKALAHASTHI PIPES LIMITED**

ISIN of the Company: : **INE943C01027**

DETAILS OF CHANGE IN HOLDING OF SECURITIES OF PROMOTER & DESIGNATED PERSONS

Name, PAN, CIN/DIN & address of Promoter/Designated Persons with contact nos.	Category of Person (Promoters/Designated Persons)	Securities held	Securities acquired/Disposed	% of shareholding		Date of allotment <u>advice</u>		Date of intimation to the company	Mode of	Exchange on which the trade was executed
				Pre-transaction	Post-transaction	From	To			

Yours truly,

Signature: _____

Name: _____

Designation: _____

Emp ID.: _____



SRIKALAHASTHI PIPES LIMITED

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

ANNEXURE IX

FORM D
FORM OF CONTINUAL DISCLOSURE

Date: _____

Name of the Company: **SRIKALAHASTHI PIPES LIMITED**

ISIN of the Company: **INE943C01027**

DETAILS OF TRANSACTIONS BY OTHER CONNECTED PERSONS OF THE COMPANY

Name, PAN, CIN, DIN & address of connected persons, with contact nos.	Connection with (Company)	Securities held prior to acquisition/disposal	Securities acquired/Disposed	% of shareholding		Date of allotment		Date of intimation to the Company	Inter-se transfer etc.	Exchange on which the trade was executed
				Pre transaction	Post transaction	From	To			

Yours truly,

Signature: _____

Name: _____

Designation: _____

Emp ID.: _____