

SHANKARA BUILDING PRODUCTS LIMITED

CODE FOR PROHIBITION OF INSIDER TRADING

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1. INTRODUCTION

Insider Trading is dealing (buying and/ or selling) in the securities by the shareholder of a company, by any connected or deemed to be connected persons while in possession of any material un-published price sensitive information, in breach of a fiduciary duty or other relationship of a trust and confidence, to gain personal benefit out of such dealing.

The Securities and Exchange Board of India (Prohibition of Insider Trading) (Amendment) Regulations 2018 (the “**Regulations**”) replaced the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015. The Regulations requires every listed company to interalia formulate a code of conduct to regulate, monitor and report trading by its employees and other “connected persons” (as defined under the Regulations) towards achieving compliance with these Regulations and enforce a code of internal conduct and procedures to prohibit insider trading in securities of the Company and to strengthen the legal framework for the same.

In compliance with the Regulations, the Company has introduced a Code for Prohibition of Insider Trading (this “**Code**”). This Code shall come into force with effect from 1st April, 2019

OBJECTIVE

Shankara Building Products Limited (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 Person of the Company has a duty to safeguard the confidentiality of all such information which he/ she obtains in the course of performance of official duties. Directors, officers and Designated Persons of the Company should not use their position to gain personal benefit from insider trading and therefore this Code is implemented by the Company.

2. DEFINITIONS

- a) “**Act**” means the Securities and Exchange Board of India Act, 1992 (15 of 1992), as amended.
- b) “**Board**” means the Securities and Exchange Board of India.
- c) “**Board of Directors**” means the Board of Directors of the Company as constituted from time to time.

- d) **“Code”** means this Code of Conduct for prevention of Insider Trading, as notified hereunder, including any amendments/modifications made from time to time.
- e) **“Calendar Quarter”** means a period of 3 consecutive calendar months, ending with the last day of March, June, September or December.
- f) **“Company”** means Shankara Building Products Limited.
- g) **“Compliance Officer”** means the Company Secretary of the Company or any senior officer, designated so and reporting to the Board of Directors or head of the organization in case board is not there, 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 of directors of the listed company or the head of an organization, as the case may be.

Explanation – For the purpose of this regulation, “financially literate” shall mean a person who has the ability to read and understand basic financial statements i.e. balance sheet, profit and loss account, and statement of cash flows];

- h) **“Connected Person”** means any person who is or has during the six months prior to the concerned act been associated with the 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.

Without prejudice to the generality of the foregoing, the persons falling within the following categories shall also be deemed to be Connected Persons unless the contrary is established:

- an immediate relative of connected persons specified above;
- a holding company or associate company or subsidiary company;
- an intermediary associated with the securities market as specified in Section 12 of the Act or an employee or director thereof;

- an investment company, trustee company, asset management company or an employee or director thereof;
- an official of a stock exchange or of clearing house or corporation;
- 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;
- 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;
- an official or an employee of a self-regulatory organization recognized or authorized by the Board;
- a banker of the Company; or
- 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 10% of the holding or interest.

i) **“Employee(s)”** mean a permanent and full time employee(s) of the Company including group companies whose financial statements are consolidated with the Company but does not include promoters and immediate relative of the promoters.

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 and who could be deemed Connected Person.

l) **“Insider”** means any person who is a Connected Person or in possession of or having access to Unpublished Price Sensitive Information regardless of how he came in possession or had access.

m) **“Key Managerial Personnel/KMP”**, in relation to the Company, means:

- (i) the Chief Executive Officer or the Managing Director or the Manager;
- (ii) the Company Secretary;
- (iii) the Whole-Time Director;
- (iv) the Chief Financial Officer;

- n) **“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 and includes persons in control of the Company and persons named as such in the offer documents.
- o) **“Regulations”** shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.
- p) **“Securities”** shall mean the securities being the shares of the Company as listed by the Company..
- q) **“Takeover Regulations”** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.
- r) **“Trading”** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in Securities, and “trade” shall be construed accordingly.
- s) **“Trading Window”** means trading period for trading in Company’s Securities as specified by the Compliance Officer;
- t) **“Trading Day”** means a day on which the recognized stock exchanges are open for trading.
- u) **“Trading Plan”** shall have the meaning ascribed to the term in Clause 7.1 of this Code
- v) **“Unpublished Price Sensitive Information “or “UPSI”** means any information, relating to the Company or its Securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the Securities and shall, ordinarily including but not restricted to, information relating to the following: –
- (i) financial results;
 - (ii) dividends;
 - (iii) change in capital structure;
 - (iv) mergers, de-mergers, acquisitions, delisting, 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 Obligations and Disclosure Requirements) Regulations, 2015, as amended

w) **“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 phrases used in the Code and not defined hereinabove shall have the same meaning as defined under the Act, the Regulations, 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 legislation, each as amended.

3. COMPLIANCE OFFICER

3.1 The Company Secretary has been designated as the Compliance Officer of the Company by the Board of Directors of the Company pursuant to a resolution passed at the meeting of the Board of Directors held on **19TH SEPTEMBER, 2016**.

3.2 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.

3.3 The Compliance Officer shall be responsible for setting forth the policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of UPSI, monitoring of trades and the implementation of the Code as specified in the Regulations under the overall supervision of the board of directors of the Company.

3.4 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.

4. PRESERVATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION

4.1 All UPSI shall be handled within the Company 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.

Unpublished Price Sensitive Information may be communicated, provided, allowed access to or procured by any Connected Person/Employee/Board of Directors, in connection with a transaction which entails:

- 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 sharing of such UPSI is in the best interests of the Company;
- where Unpublished Price Sensitive Information is disseminated to be made generally available at least two Trading Days prior to the sharing of such information being effected in such form as the Board of Directors may determine to be adequate and fair to cover all relevant and material facts.
- The Board of Directors may require any parties having access or knowledge of Unpublished Price Sensitive Information 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.
- The Board of Directors shall ensure that a structured digital database is maintained containing the names of such persons or entities as the case may be with whom Unpublished Price Sensitive Information is shared under this regulation along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such databases shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.

4.2 Need to know basis – Unpublished 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 UPSI to discharge their duty and whose possession of such UPSI will not give rise to a conflict of interest or apprehension of misuse of the UPSI. All unpublished price sensitive information directly received by any Employee should immediately be reported to the Board of Directors.

5. COMMUNICATION OR PROCUREMENT OF UNPUBLISHED PRICE SENSITIVE INFORMATION

5.1 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 of legitimate purposes, performance of duties or discharge of legal obligations.

5.2 No person shall procure from or cause the communication by any Insider of Unpublished Price Sensitive Information, relating to a Company or securities listed or except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

5.3 The Board of Directors of the Company shall make a policy for determination of "legitimate purposes" as a part of "Codes of Fair Disclosure and Conduct" formulated under regulation 8 of the Regulations.

5.4 Any person in receipt of Unpublished Price Sensitive Information pursuant to a Legitimate Purpose as defined under the Fair Disclosure Code of the Company shall be considered an "insider" for purpose of these regulations and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with these regulations.

6. TRADING WHEN IN POSSESSION OF UNPUBLISHED PRICE SENSITIVE INFORMATION

6.1 No insider shall trade in securities that are listed or proposed to be listed on stock exchange when in possession of Unpublished Price Sensitive Information.

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

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

Provided that such unpublished price sensitive information was not obtained under sub regulation (3) of regulation 3 of the Regulations;

Provided further that such off-market trades shall be reported by the insiders to the company within two working days. Every company shall notify the particulars of such trades to the stock exchange on which the securities are listed within two trading days from receipt of the disclosure or from becoming aware of such information.

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

Provided that such unpublished price sensitive information was not obtained by either person under sub-regulation (3) of regulation 3 of the Regulations.

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

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

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

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

(b) appropriate and adequate arrangements were in place to ensure that these regulations are not violated and no unpublished price sensitive information was communicated by the individuals possessing the information to the individuals taking trading decisions and there is no evidence of such arrangements having been breached;

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

6.2 In the case of connected persons the onus of establishing, that they were not in possession of unpublished price sensitive information, shall be on such connected persons and in other cases, the onus would be on the Board.

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

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**”).

7. TRADING PLAN

7.1 The Trading Plan shall:

- not entail commencement of trading on behalf of the Insider earlier than six months from the public disclosure of the plan;
- 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;

- entail trading for a period of not less than twelve months;
- not entail overlap of any period for which another trading plan is already in existence;
- 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
- not entail trading in securities for market abuse.

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

- a. Provided that pre-clearance of trades shall not be required for a trade executed as per an approved trading plan
- b. Provided further that trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

7.3 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 Trading 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.

7.4 Upon approval of the Trading Plan, the Compliance Officer shall notify the plan to the stock exchanges on which the Securities are listed.

8. TRADING WINDOW

8.1 Trading restriction period shall be the period commencing from the end of last day of every quarter of the financial year till 48 hours

after the declaration of the financial results of the respective quarter. The trading window shall be, inter alia, closed 7 days prior to and during the time the unpublished price sensitive information is published. Designated Persons and their immediate relatives shall not trade in securities when the trading window is closed.

- 8.2 The Compliance Officer shall intimate the closure of trading window to all the Designated Persons 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.
- 8.3 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 48 hours after the information becomes generally available.
- 8.4 The trading window shall also be applicable to any person having contractual or fiduciary relation with the Company, such as auditors, accountancy firms, law firms, analysts, consultants etc. assisting or advising the company.
- 8.5 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.

9. PRE CLEARANCE OF TRADE IN SECURITIES:

- 9.1 All the persons covered by the Code who proposes to acquire/sell Securities of the Company which are [more than Rs. 10 Lakhs in value or 50,000 shares or 1% of the total shareholding or voting rights, whichever is lower], should pre-clear the transaction. However, KMP/Board of Directors/Employee (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. The pre-dealing procedure shall be hereunder:
- A Designated Person shall make a pre-clearance application to the Compliance Officer in the prescribed format Form 1 along with an undertaking stating that he/she has not contravened the provision of this Code.

- If any person covered by the Code, obtained any Unpublished 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 trading in Securities of the Company.
- All the persons covered by the Code shall execute their order within 7 Working Days of pre clearance of trade. If the transaction is not executed within 7 Working Days of such clearance, fresh approval of the Compliance Officer is required.

9.2 The Compliance Officer shall confidentially maintain a list of such Securities as a “restricted list” which shall be used as the basis for approving or rejecting applications for preclearance of trades.

9.3 Prior to approving any trades, the Compliance Officer shall seek declarations to the effect that the Designated Person for pre-clearance is not in possession of any unpublished price sensitive information. He shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.

10. CONTRA TRADE

10.1 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 the Regulations and this Code. Should a contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Board for credit to the Investor Protection and Education Fund administered by the Board under the Act.

11. DISCLOSURE REQUIREMENTS

11.1 Initial Disclosure

Every Promoter, Key Managerial Personnel and director of the Company shall disclose his holding of securities of the Company as on the date of these regulations taking effect, within 30 Working Days in Form A;

Every person on appointment as a Key Managerial Personnel or a director of the Company or Designated Person 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 7 Working Days of such appointment or becoming a Promoter in Form B.

11.2 **Continual Disclosure**

Every Promoter, Designated Person 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.

11.3 **Disclosure by the Company to the Stock Exchange(s)**

The Company shall within 2 Working Days the receipt of disclosures as mentioned as aforesaid, disclose to all Stock Exchanges on which the securities of the Company are listed, the information received as aforesaid.

Disclosure by any other connected persons

The Company shall at its discretion may require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the company in such form and at such frequency as may be determined by the Company to monitor compliance with these regulations.

12. 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.

13. PENALTIES FOR CONTRAVENTION

Every Designated Person shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her dependents).

Any Designated Person who trades in Securities or communicates any information for trading in securities, in contravention of this Code may be penalized and appropriate action may be taken by the Company. The penalties will be as per the Act.

Sanction for violations

Any contravention of these regulations shall be dealt with by the Board in accordance with the Act.

Power to remove difficulties.

In order to remove any difficulties in the interpretation or application of the provisions of these regulations, the Board shall have the power to issue directions through guidance notes or circulars.

Provided that where any direction is issued by the Board in a specific case relating to interpretation or application of any provision of these regulations, it shall be done only after affording a reasonable opportunity of being heard to the concerned persons and after recording reasons for the direction.

Repeal and Savings

(1) The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992 are hereby repealed.

(2) Notwithstanding such repeal,—

(a) the previous operation of the repealed regulations or anything duly done or suffered thereunder, any right, privilege, obligation or liability acquired, accrued or incurred under the repealed regulations, any penalty, forfeiture or punishment incurred in respect of any offence committed against the repealed regulations, or any investigation, legal proceeding or remedy in respect of any such right, privilege, obligation, liability, penalty, forfeiture or punishment as aforesaid, shall remain unaffected as if the repealed regulations had never been repealed; and

(b) anything done or any action taken or purported to have been done or taken including any adjudication, enquiry or investigation commenced or show-cause notice issued under the repealed regulations prior to such repeal, shall be deemed to have been done or taken under the corresponding provisions of these regulations;

(3) After the repeal of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992, any reference thereto in any other regulations made, guidelines or circulars issued thereunder by the Board shall be deemed to be a reference to the corresponding provisions of these regulations.

The action by the Company shall not preclude SEBI and other authorities from taking any action in case of violation of the Regulations. In case the Regulations or any statutory provisions are more stringent than those contained in the Code, the Regulations / statutory provisions shall prevail.

This Code is subject to any further amendments as notified by Securities Exchange Board of India or as amendment/modified by the Board of Director in accordance with the Act.

FORM A

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (a) read with Regulation 6 (2) – Initial Disclosure to the Company]

Name of the company : **Shankara Building Products Limited**

ISIN of the company : **INE274V01019**

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
		Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5

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

Details of Open Interest (OI) in derivatives of the company held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

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		
Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
6	7	8	9	10	11

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

Name & Signature :
 Designation :
 Date :
 Place :

FORM B

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (b) read with Regulation 6(2) – Disclosure on becoming a director/KMP/Promoter]

Name of the company : **Shankara Building Products Limited**
ISIN of the company : **INE274V01019**

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
			Type of security (For e.g. – Shares,Warrants,Convertible Debentures etc.)	No.	
1	2	3	4	5	6

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

Details of Open Interest (OI) in derivatives of the company held on appointment Promoter, Key Managerial Personnel (KMP), Director upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation 6(2)

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			
Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
7	8	9	10	11	12

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

Name& Signature :
 Designation :
 Date :
 Place :

FORM C

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

Name of the company : **Shankara Building Products Limited**

ISIN of the company : **INE274V01019**

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 & contact nos.	Category of Person (Promoters/ KMP / Directors/ immediate relatives/ others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/ disposal		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.)
		Type of security (For e.g. - Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For e.g. - Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Pledge/ Revoke/ Invoke)	Type of security (For eg. - Shares, warrants, Convertible Debentures, etc.)	No. And % of shareholding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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

Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2)

Trading in derivatives (Specify type of contract, Futures or Options, etc.)						Exchange on which the trade was executed
Type of contract	Contract Specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
15	16	17	18	19	20	21

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

Name &Signature :

Designation :

Date :

Place :

Prevention of Insider Trading - Pre clearance of trades

FORM 1

**The Compliance Officer
Shankara Building Products Limited
G-2, Farah Winsford, 133 Infantry Road,
Bangalore-560001**

SUB: APPLICATION FOR TRADING IN SECURITIES OF THE COMPANY

Dear Sir,

I, _____ Director / Employee of the Company, propose to trade in the Equity Shares of the Company as per details hereunder:

Relationship with Employee / Director (in case of :
relation)

No. of Equity Shares held by the person as on date :
of the application

Date of Last Disclosure :

DP ID :

Client ID :

Particulars of proposed transaction in Equity Shares of the Company:

Number Equity Shares held before the Proposed Transaction (A)	Number of Equity Shares proposed to be Sold (B)	Number of Equity Shares proposed to be acquired (C)	Balance holding (A)+(C)/(A)-(B)

I confirm that:

- i) I and my relatives (We) do not have access to any price sensitive information and have complied with the code of conduct for prevention of insider trading as specified by the Company from time to time.
- ii) I/We shall execute the trade of Equity Shares within 7 Working Days of your approval failing which we shall apply again to you for your approval.
- iii) I/We shall hold Equity Shares of the Company for a minimum period of 30 Working Days from the date of acquisition.

I/We further confirm that the aforesaid facts are true and correct and shall be fully responsible for any wrongful acts done by me or my relatives including such penalties as may be imposed by the Company.

You are requested to provide the pre-clearance of trade for the above transaction.

Thanking you,
Yours sincerely,
Place:
Date:

Prevention of Insider Trading - Pre clearance of trades

FORM 2

**The Compliance Officer
Shankara Building Products Limited
G-2, Farah Winsford, 133 Infantry Road,
Bangalore-560001**

Sub.: 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 Working 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 Working Days.

Reason for waiver:

Thanking you,

Signature :
Name :
Designation & Department :
Date :