

Aditya Birla ARC Limited

(A subsidiary of Aditya Birla Capital Ltd.)



PROTECTING INVESTING FINANCING ADVISING

ADITYA BIRLA ARC LIMITED

**CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT INSIDER TRADING BY
DESIGNATED PERSONS**

EFFECTIVE FROM MAY 1, 2019 as amended on July 13, 2022

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1. PREAMBLE

Trading in the Company's listed securities by any person based on certain inside information that is not generally available to the public, which can materially affect the securities price upon coming into public domain is known as 'insider trading'. Such insider trading may also distort price of the securities on the stock exchanges and the investor who does not have access to such insider information is placed at a great disadvantage. Needless to mention, this kind of profiteering by insiders, misusing confidential information available to them by virtue of their position or connection with the Company, erodes investors' confidence in the integrity of the management of the Company and is not only unethical and immoral but indeed illegal and can attract criminal liability.

In its capacity as an Asset Reconstruction Company, Aditya Birla ARC Limited (“**ABARC**” or “**the Company**”) and its Connected Persons are likely to possess or have access to Unpublished Price Sensitive Information (as defined below) of a portfolio companies or their associate entities (such as listed promoter entity) whose Securities are listed or proposed to be listed.

This Code of Conduct (“**the Code**”) has been formulated to put in place a framework for prohibition of insider trading in the Company’s listed securities and or such listed Securities or proposed to be listed Securities and to regulate, monitor and report trading by Designated Persons.

Every Insider is required to familiarize himself with the Code and it will be the responsibility of every Insider to ensure compliance of this Code and other related statutes.

In case any regulatory or statutory provisions, including but not limited to the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time (“**PIT Regulations**”), are more stringent than those contained in this Code, the said regulatory or statutory provisions will prevail over the Code.

2. DEFINITIONS:

Unless the context otherwise requires or unless otherwise defined or provided for herein, the capitalized terms used in this Code shall have the following meanings:

- (i) “**ABARC**” or “**Company**” means Aditya Birla ARC Limited, any of its subsidiary(ies), and, whenever applicable, trust(s) created, maintained, managed, administered or operated by the Company
- (ii) “**ABCL**” means Aditya Birla Capital Limited
- (iii) “**Acquired Entity**” means any company or Body Corporate whose Securities are listed or proposed to be listed and whose Financial Asset(s) have been acquired, restructured, financed or re-financed by entering into assignment agreement, restructuring agreement, financing / re-financing arrangement or such other transaction agreement, deed or arrangement.

- (iv) “**Appropriate Authority**” severally and jointly means the Chief Executive Officer (“CEO”) and the Compliance Officer
- (v) “**Board**” means the Board of Directors of ABARC, which term shall be deemed to include any committee which the Board may have constituted or hereinafter constitute, *inter alia*, to exercise its powers or to deal in any matter relating to or concerning the subject matter of this Code.
- (vi) “**Body Corporate**” includes a company incorporated outside India, but does not include—
(a) a co-operative society registered under any law relating to co-operative societies; and
(b) any other body corporate (not being a company as defined under the Companies Act, 2013), which the Central Government may, by notification, specify in this behalf.
- (vii) “**Compliance Officer**” means the Company Secretary of the Company or such other senior officer designated as such by the Board.
- (viii) “**Connected Person**”, with respect to an Acquired Entity and a Proposed Entity, means:
- A. any person who is or has during the six months prior to the concerned act been associated with such 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 such company or holds any position including a professional or business relationship between himself and such company whether temporary or permanent, that allows such person, directly or indirectly, access to UPSI or is reasonably expected to have such access.
- A. Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established, -
(a) an immediate relative of connected persons specified herein above; or
(b) a holding company or associate company or subsidiary company; or
(c) an intermediary as specified in section 12 of the Securities and Exchange Board of India Act, 1992 or an employee or director thereof; or
(d) an investment company, trustee company, asset management company or an employee or director thereof; or
(e) an official of a stock exchange or of clearing house or corporation; or
(f) a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
(g) a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
(h) an official or an employee of a self-regulatory organization recognized or authorized by the Board; or
(i) a banker of the company; or
(j) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten per cent. of the holding or interest.
- (ix) “**Designated Person(s)**” means
a) All employees of the Company engaged in acquisition / resolution of any FA, accounts

- & finance, legal, compliance and secretarial functions, by whatever name called, of the Company and includes persons or employees of Aditya Birla Group (“the Group”) / other companies or entities, if any, who are engaged, associated, deputed or assigned to carry out above mentioned functions;
- b) Members of Asset Acquisition and Resolution Committee or such other committee as the Board may constitute, from time to time, for acquisition and / or resolution of any FA; and
 - c) such other person(s) as the Appropriate Authority may specify from time to time
- (x) **“Financial Asset”** or **“FA”** means debt or receivables and includes
- a) a claim to any debt or receivables or part thereof, whether secured or unsecured; or
 - b) any debt or receivables secured by, mortgage of, or charge on, immovable property; or
 - c) a mortgage, charge, hypothecation or pledge of movable property; or
 - d) any right or interest in the security, whether full or part underlying such debt or receivables; or
 - e) any beneficial interest in property, whether movable or immovable, or in such debt, receivables, whether such interest is existing, future, accruing, conditional or contingent; or
 - f) any beneficial right, title or interest in any intangible asset given on hire or financial lease or conditional sale or under any other contract which secures the obligation to pay any portion of the purchase price of such asset or an obligation incurred or credit otherwise provided to enable the borrower to acquire such tangible asset; or
 - g) any right, title or interest on any intangible asset or license or assignment of such intangible asset, which secures the obligation to pay any unpaid portion of the purchase price of such intangible asset or an obligation incurred or credit otherwise extended to enable the borrower to acquire such intangible asset or obtain license of the intangible asset; or
 - h) any other financial assistance as may be provided under the SARFESI, the RBI Guidelines or any other applicable statute or law.
- (xi) **“Grey List”** means list containing Proposed Entities from the date of their becoming Proposed Entity till removal of the same from the Grey List.

Explanation:

- A) Any Proposed Entity shall remain in the Grey List till:
- a) The concerned Proposed Entity becomes an Acquired Entity; or
 - b) The expiry of six months from the date on which it is agreed, decided or resolved, by CEO or AARC or Board of the Company, to not to acquire, finance, re-finance, restructure, / pursue the acquisition, financing, re-financing, restructuring of Financial Assets of any such Proposed Entity whichever is earlier.
- B) CEO / Business Head shall intimate to the Compliance Officer the date of entry in and / or removal from the Grey List of any Proposed Entity.

- (xii) **“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.
- (xiii) **“Insider”** with respect to the Company, any Acquired Entity and / or any Proposed Entity means
- A Connected Person;
 - A Designated Person; or
 - A person who is in possession of or having access to UPSI.
- (xiv) **“Need –to Know”** The Designated Persons who are privy to Unpublished Price Sensitive Information, shall handle the same strictly on a “Need to Know” basis. This means the Unpublished Price Sensitive Information shall be disclosed only to those persons who need to know the same in furtherance of a legitimate purpose, the course of performance or discharge of their duty and whose possession of UPSI will not in any manner give rise to a conflict of interest or likelihood of misuse of the information.
- (xv) **“Proposed Entity”** means any company or Body Corporate whose Securities are listed or proposed to be listed and:
- whose Financial Asset(s) are proposed to be acquired, restructured, financed, re-financed and / or considered for acquisition, restructuring, financing, re-financing by the Company; and
 - any UPSI in respect of which has / have been shared, provided or communicated to any Connected Person in the ordinary course of business of the Company.

Apart from above, the Appropriate Authority may declare any other company or Body Corporate as Proposed Entity by recording justification / reason thereof.

- c) **“RBI”** means Reserve Bank of India
- d) **“RBI Guidelines”** means the Securitisation Companies and Reconstruction Companies (Reserve Bank) Guidelines and Directions, 2003 as amended and modified from time to time and such other applicable guidelines, directions and circulars as may be issued by RBI from time to time.
- e) **“Restricted List”** means list containing Acquired Entities from the date of their becoming Acquired Entities till removal of the same from the Restricted List.

Explanation:

Acquired Entity(ies) shall remain in the Restricted List till the Financial Assets pertaining to such Acquired Entity(ies) is resolved pursuant to the provisions of the SARFESI or RBI Guidelines.

CEO / Business Head shall intimate to the Compliance Officer the date of entry in and / or removal from the Restricted List of any such Acquired Entity.

- f) “**SARFAESI**” means the Securitisation and Reconstruction of Financial Assets and Enforcement of Security Interest Act, 2002 as amended, enacted or re-enacted from time to time.
- g) “**Security(ies)**” means Securities as defined in Regulation 2(h) of the Securities Contracts (Regulation) Act, 1956, which is listed or proposed to be listed and includes the following:
- a) Shares (Equity & Preference)
 - b) Debentures
 - c) Derivatives
 - d) Currency Futures
 - e) Commodity Futures
 - f) Any other security(ies) not specifically excluded from the purview of this Code
- h) “**Trading**” means and includes subscribing, buying, selling, dealing, pledging or agreeing to subscribe, buy, sell, deal in, pledge any securities, whether directly or indirectly .

For the purpose of this Code, Trading shall include Trading in or through portfolio management account.

- i) “**Trading Day**” means a day on which the recognized stock exchanges are open for trading.
- j) “**Trading Window**” means the period other than the Restricted / Shut Period.
- k) “**Unpublished Price Sensitive Information**” or “**UPSI**” means any information, relating to a Acquired Entity or Proposed Entity or its securities (listed or proposed to be listed), directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of such securities and shall, ordinarily including but not restricted to, information relating to the following: –
- a) financial results;
 - b) dividends;
 - c) change in capital structure;
 - d) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
 - e) changes in key managerial personnel;
 - f) structuring or re-structuring of any debt, credit or financing facilities availed or to be availed;
 - g) any information pertaining to sale / transfer of disposal of company’s debt by banks / financial institution.

Words and expressions used and not defined in this Code but defined in the Companies Act, 2013 and rules made thereunder, the RBI Guidelines, SARFESI, the Securities and Exchange Board of India Act, 1992 and regulations made thereunder, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the SEBI (Prohibition of Insider Trading) Regulations, 2015 shall have the meanings respectively assigned to them in those legislation(s).

3. RESTRICTION ON COMMUNICATION AND PREVENTION OF MISUSE OF UPSI

(i) Restriction on communication or procurement of UPSI

No Insider shall communicate, provide or allow access to any UPSI to any person including other Insiders except where such communication is in furtherance of “legitimate purposes”, performance of duties or discharge of legal obligations or otherwise provided under any applicable law or the Code.

No person shall procure from or cause the communication by any Insider of UPSI, relating to the Company, any Acquired Entity or any Proposed Entity, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

Explanation: UPSI may be shared in the ordinary course of business by an Insider with partners, collaborators, lenders, customers, suppliers, bankers, legal advisors, auditors, agents, 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 (“**legitimate purpose**”).

Any such person in receipt of UPSI pursuant to a “legitimate purpose” shall be considered an Insider and due notice shall be given to such persons to maintain confidentiality of such UPSI in compliance with this Code, either through an email, engagement letter, confidentiality agreement, memorandum of understanding or other documented mode of communication.

(ii) Maintenance of Digital Database for Sharing of UPSI

The Compliance Officer shall maintain a structured digital database containing the nature of UPSI, the names of such persons who have shared the UPSI and also the names of such persons with whom UPSI is shared along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available.

For the purpose of above, the CEO / Business Head shall provide the Compliance Officer with the required details for maintaining the structured digital database.

(iii) Chinese Wall

All information shall be handled within the organization on a need-to-know basis. Persons in acquisition and resolution of FA shall be segregated from other employees of the Company.

Any person, who needs access to inside areas shall first seek a prior approval of his departmental head and also give reasons for seeking entry into the inside areas.

Any information shared for “legitimate purpose” as defined in the Code shall not be construed as “crossing the wall” under this Code.

(iv) **Prevention of misuse of UPSI**

- a) No Insider shall Trade in the securities of the Company and also the securities of Acquired Entity or Proposed Entity while in possession of UPSI.
- b) No Insider shall indulge in manipulative / fraudulent / fictitious / off market Trading or actions in their own account, their Immediate Relatives' account(s) or company account(s).
- c) No Insider shall indulge in any front running under any circumstances.

(v) **Exceptions trading when in possession of UPSI**

The restrictions provided in Clause 3 (iv)(a) shall not apply in the following scenarios:

- a) Exercise of stock options in respect of which the exercise price was pre-determined in compliance with applicable regulations; and
- b) Save as otherwise provided Clause 4 (iii), in such other scenarios as provided in the PIT Regulations.

4. RESTRICTED LIST, GREY LIST AND TRADING IN SECURITIES

(i) Restricted list of securities

The Compliance Officer shall maintain a Restricted List of securities.

The Compliance Officer, or such other person authorized by the Compliance Officer, shall circulate the Restricted List at such intervals, as he may deem fit, to all the employees and Designated Persons and such other persons as he may deem fit. Provided that the Restricted List shall be circulated to the above persons within one working day of addition, deletion or modification of any entry in the said list.

(ii) Grey List of Securities

The Compliance Officer shall maintain a Grey List of securities.

The Compliance Officer, or such other person authorized by the Compliance Officer, shall circulate the Grey List at such intervals, as he may deem fit, to all the employees and Designated Persons and such other persons as he may deem fit. Provided that the Grey List shall be circulated to the above persons within one working day of addition, deletion or modification of any entry in the said list.

(iii) Trading in securities

- a) Any Trading in any of the Securities listed in the Restricted List by all the Directors, employees and / or Designated Persons shall be prohibited.
- b) Any Trading in any of the Securities listed in the Grey List by Designated Persons shall be prohibited.
- c) However, Trading in above Securities may be permitted pursuant to a trading plan formulated and approved by the compliance officer / other appropriate authority of the concerned company / Body Corporate pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015. If desired by the concerned Director, employee or Designated Person, the Compliance Officer of ABARC shall facilitate in submitting aforesaid trading plan to the concerned company / Body Corporate.

5. Trading Plan

The SEBI (PIT) Regulations envisages the concept of formulation of a “Trading Plan” whereby Insiders, who may be perpetually in possession of UPSI, can plan for trades to be executed in the future in pursuance of a pre-determined trading plan and thus enable them to trade in securities of the Company in a compliant manner in accordance with the SEBI(PIT) Regulations.

I) Formulation of Trading Plan

An Insider shall formulate the trading plan subject to compliance with the following provisions:

- (a) Commencement of trading under the trading plan shall take place only after six months from public disclosure of the trading plan.
- (b) There shall be no trading in the securities of the Company between the period beginning twentieth trading days before the last day of any financial period and second trading day after disclosure of such Financial Results.
- (c) The trading plan shall be for a **minimum period of twelve months**.
- (d) There shall be no overlap with any period for which another trading plan is in place.
- (e) The trading plan should set-out of the following details:
 - i. Value of trades to be effected or the number of securities to be traded;
 - ii. Nature of the trade i.e. acquisition/disposal;
 - iii. Intervals at or dates on which trades shall be effected.
- (f) Trading plan should not entail trading in securities for market abuse.

The Insider shall present the formulated Trading Plan to the Compliance Officer (as per the specimen enclosed) for approval and public disclosure.

The implementation of the trading plan shall not be commenced if any UPSI in possession of the Insider, at the time of formulation of the plan, has not become generally available at the time of the commencement of implementation and in such event the Compliance Officer shall confirm that the commencement ought to be deferred until such UPSI becomes generally available information.

II) Approval of Trading Plan by the Compliance Officer

The Compliance Officer shall:

- (a) review the trading plan to assess whether the plan would have any potential for violation of the SEBI (PIT) Regulations;
- (b) seek express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan;
- (c) seek declarations from the Insiders that they are not in possession of UPSI or for ensuring that any UPSI in their possession will become generally available before they commence executing his trades.

The trading plan once approved shall be irrevocable and the Insider has to mandatorily implement the plan, without deviating from it or to executing any trade in the securities outside the scope of the trading plan.

The Trading Plan as approved by the Compliance Officer shall be notified to the Stock Exchanges, pursuant to which trades may be carried out on his behalf in accordance with such plan.

No application should be made for pre-clearance of trades during the shut period.

The restriction on contra trade shall not be apply, if such contra trades were part of the Trading Plan, duly approved by the Compliance Officer.

6. Trading Period

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

Unless otherwise specified by the Compliance Officer, the Trading Window for Trading in Securities of the Company shall be closed for the Designated Persons when the Compliance Officer determines that a Designated Person or class of Designated Persons are reasonably expected to have access to UPSI, including for the following purposes-

- a. declaration of financial results,
- b. declaration of dividends,
- c. change in capital structure,
- d. Mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions of an amount involving more than 20% of the networth of the Company as on the date of last audited financials and
- e. changes in key managerial personnel,

Restricted/Shut Period

In respect of announcement of Quarterly/ Half Yearly/ Yearly Financial Results by the Company, Restricted/Shut Period would commence from 1st of the month subsequent to close of the respective quarter/half year/ year and such restriction shall remain in force until 48 hours after the announcement of Financial Results by the Board of Directors of the Company.

7. DISCLOSURES AND RECORD KEEPING

- (i) All Designated Persons shall provide annual declaration cum undertaking, as per the format prescribed in Annexure I, confirming adherence to this Code of Conduct to the Compliance Officer within seven days or within such period as may be prescribed by the Compliance Officer from the end of each half year or at such intervals as may be prescribed by the Compliance Officer or the Board.
- (a) Any Disclosures, records or reports under this Code shall be maintained by the Company for a minimum period of eight years.
- (b) Every Designated Person of the Company, shall disclose their holding of securities of the Company and also that of their Immediate Relatives to the Company within 30 days of the SEBI (PIT) Regulations becoming effective, in the enclosed **Form A**.

Every Designated Person shall disclose to the Company the number of securities acquired or disposed of within 2 (two) trading days of such transaction if the value of securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of 10 (ten) Lakh Rupees, in the enclosed **Form B**

- (c) The Compliance Officer or the Board may notify or amend, from time to time, any disclosure(s) in such form and manner as may be deemed fit to prevent, control or mitigate insider trading in any securities.

8. CONTRAVENTION OF CODE

(i) Without prejudice to the power of RBI, SEBI or any other government or regulatory authority, the Appropriate Authority shall initiate inquiries on becoming aware of leak of UPSI or suspected leak of UPSI or violation / contravention of this Code.

⇒ If any person is found to have contravened Clause 3(i), 3(iv) or 4(iii) of this Code, the Appropriate Authority shall prepare a report on contravention(s) and present the same to a Disciplinary Action Committee (“DAC”) consisting of any one Director of ABARC, CEO, CFO / Head – Accounts, Compliance Officer and Head – Legal and Permanent Invitee being Head – HR (in case of contravention by an employee of the Company). Provided that if the contravention has been committed by any of the above, then such member / person shall be excluded from the DAC for the purpose of considering and initiating appropriate actions for contravention of the Code.

The DAC shall review the report of the Appropriate Authority, may call for further information, investigate the contravention, give an opportunity of being heard to the person and stipulate any sanctions and disciplinary actions including but not limited to wage freeze, suspension, recovery, claw-back etc.

⇒ In case of contravention of any other clause(s) of the Code:

- (a) First instance of contravention – The concerned person who has contravened the Code shall be reprimanded by the Appropriate Authority, Senior Management or by the Board, as the case may be.
- (b) Second and subsequent contravention(s) - Appropriate Authority shall prepare a report on contravention(s) and present the same to a DSC. Provided that if the contravention has been committed by any of the above, then such member / person shall be excluded from the DAC for the purpose of considering and initiating appropriate actions for contravention of the Code.

The DAC shall review the report of the Appropriate Authority, may call for further information, investigate the contravention, give an opportunity of being heard to the person and stipulate any sanctions and disciplinary actions including but not limited to wage freeze, suspension, recovery, claw-back etc.

- (ii) Any action, in-action or acquittal on or of any Insider / Designated Person under this Code shall not absolve or release such Insider / Designated Person from any inquiry, adjudication, sanction, action or proceedings (whether civil or criminal) which may be initiated or dealt with against such Insider / Designated Person under the Regulations or any other applicable act, laws (whether civil or criminal), rules, regulations, bye-laws, guidelines, circulars, or codes.
- (iii) Employees are requested to acquaint themselves with the Whistle Blower mechanism of the Company and any Employee can report leak of UPSI under the Whistle-Blower Policy of the Company.
- (iv) The Compliance Officer shall report to and the Board of Directors and / or the Audit Committee shall review compliance with the provisions of this Code.

9. Review Audit Committee

The Audit Committee of the Company shall once in each year shall review the compliance of the provision of this Code and the SEBI (PIT) Regulations and also verify the adequacy and effectiveness of the internal controls in place to ensure compliance of the SEBI (PIT) Regulations.

Board of Directors of the Company

The Board of Directors of the Company shall once in each year shall review compliance of this Code.

10. Actual or suspected leak of UPSI

On becoming aware of actual or suspected leak of UPSI of the Company by any Promoter, Director, Key Managerial Person, employee, other Designated Person, support staff or any other known or un-known person, the concerned person shall inform to the Compliance Officer who in turn will intimate the Managing Director/CEO of the Company.

11. DISCLAIMER:

This Code is an internal code of conduct and one of the measures to avoid insider trading. Every Insider is required to familiarize himself with the extant RBI Guidelines, SEBI Regulations, other applicable acts, laws, rules and regulations and Insider Trading Policy (by whatever name called), if any, of the Acquired Entities as it will be the responsibility of each Insider (and his Relatives) to ensure compliance of such applicable acts, laws, rules and regulations.

12. AMENDMENT TO THE CODE

The Compliance Officer shall review and modify this Code, in consultation with the CEO, at least once in a year or as and when required. It may further be clarified that if and when any act, rules, regulations or guidelines concerning the subject matter of this Code (including definitions, forms and formats) are promulgated, amended, enacted, re-enacted or modified, this Code

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shall, unless otherwise prescribed, be deemed to be amended to take into account / give effect to such act, rules, regulations or guidelines.

FORMATS:

Form I –Declaration cum Undertaking from Designated Persons

Form A

Form B

FORM – I

DECLARATION CUM UNDERTAKING

I _____, _____ of Aditya Birla ARC Limited (“Company”), do hereby solemnly affirm that, during the year ended _____:

(Please select whichever is applicable)

I have, in letter and spirit and to the best of my knowledge and belief, complied with the provisions of the Code of Conduct to Regulate, Monitor and Report Insider Trading by Designated Persons of the Company.

OR

I have, in letter and spirit and to the best of my knowledge and belief, complied with the provisions of the Code of Conduct to Regulate, Monitor and Report Insider Trading by Designated Persons of the Company, **except the following**:

Brief description of the non-compliance (*attached separate sheet(s), if required*):

Signature :

Date :

Place :

FORM A
SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (a) read with Regulation 6 (2) – Initial disclosure to the company]

Name of the company: _____

ISIN of the company:

Details of Securities held by Designated person

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoters/ Promoter Group/ KMP / Directors/ Immediate relative to/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding
		Type of security (Foreg.–Shares, Warrants, Convertible	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.

Name & Signature:

Designation:

Date:

Place:

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FORM B

SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]

Name of the company: _____

ISIN of the company: _____

Details of change in holding of Designated Person of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN, & address with contact nos.	Category of Designated (Promoters/Promoter)	Securities held prior to acquisition/disposal	Securities acquired/Disposed	Securities held post acquisition/ disposal	Date of allotment of shares/sale of shares specify	Date of Intimation to company	Mode of acquisition / disposal (on market/public / rights/preferential
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1	2	3	4	5	6	7	8	9	10	11	12	13	14
	Group/ KMP/ Directors/ Immediate relative to/others etc.	Type of securit y (For eg. – Shares , Warra nts, Conver tible Debent ures etc.)	No. and % of share holdin g	Type of securit y (For eg. – Shares, Warrant s, Conver tible Debent ures etc.)	No.	Valu e	Transa ction Type (Buy/ Sale/ Pledge / Revok e/ Invoke)	Type of securit y (For eg. – Shares, Warrants , Conver tible Debentur es etc.)	No. and % of shareholding	From	To		offer / off market/ Inter-se transfer, ESOPs etc.)

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

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