

Rungta Irrigation Limited



An ISO 9001:2008 Certified Company

Rungta Irrigation Limited



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CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSONS AND THEIR IMMEDIATE RELATIVES

[This version of code of conduct to regulate, monitor, and report trading by designated persons and their immediate relatives were amended on 7th February, 2019 and has been effective from 1st April, 2019.]

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Preface:

Chapter – IV & Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 provides for the formulation of a “*code of conduct to regulate, monitor and report trading by its designated persons and immediate relatives of designated persons*” (hereinafter referred to as “Code”).

Company has duly formulated a Code of Internal Procedure and Conduct for regulating, monitoring and reporting of trading (“Code”) pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015.

Above Regulations were amended/ modified on December 31, 2018 and made effective from April 1, 2019

Code is made effective from April 01, 2019 pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“Regulations”) as amended up to date. The code is implemented with the approval of the Board by adopting minimum standards as set out in Schedule B of the Regulations, without diluting the provision of the Regulations and other provisions of the Regulations in any manners.

Definitions:

“**Act**” means the Securities and Exchange Board of India Act, 1992.

“**Board**” means the Board of Directors of the Company.

“**Code**” or “**Code of Conduct**” shall mean the this ‘Code of Internal Procedures and Conduct for regulating, Monitoring and Reporting of trading by Designated Persons’ of Company as amended from time to time.

“**Company**” means Rungta Irrigation Limited.

“**Compliance Officer**” means a compliance officer within the meaning of Regulation 2(1)(c) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“Insider Trading Regulation”) and as identified and designated by the Board to administer the Code of Conduct and other requirements under the Insider Trading Regulation.

“**Connected Person**” shall have the meaning as ascribed to the term ‘connected person’ under Regulation 2(1)(d) of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Designated Person shall include:

- i. every director, for the time being on the Board of the Company
- ii. every employee in the grade of Assistant General Managers and above;
- iii. Key Managerial Personnel (KMP), every employee in the finance, accounts, secretarial and legal department as may be determined and informed by the Compliance Officer; and all promoters of the company
- iv. any other employee or person as may be determined and informed by the Compliance Officer from time to time.

“**Director**” means a member of the Board of Directors of the Company.

“**Employee**” means every employee of the Company including the Directors in the employment of the Company.

“**Insider**” shall have the same meaning as define under Regulations or any modification thereof.

“**Promoter**” shall have the meaning assigned to it under the Regulation 2(h) of Insider Trading Regulation or any modification thereof;

“**Securities**” shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund;

“**Takeover regulations**” means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;

“**Trading**” means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any

securities, and "trade" shall be construed accordingly.

"**Trading Day**" means a day on which the recognized stock exchanges are open for trading;

"**Unpublished Price Sensitive Information**" shall have the same meaning as define under Regulation 2(n) of Insider Trading Regulation or any modification thereof;

"**Regulations**" shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.

"**Specified Persons**" means the Directors, Connected Persons, the insiders, the Designated Persons and the Promoters and immediate relatives taken collectively.

Unless the content otherwise requires, words or expression contained in the Code shall bear the same meaning as in the Act, SEBI (Prohibition of Insider Trading) Regulations, 2015, SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, SEBI (Listing Obligation and Disclosures Requirements) Regulation, 2015, Companies Act, 2013 & Its Rules made thereunder or any statutory modification thereof in force in case of conflict, order of preference will be the same as mentioned above.

Compliance Officer:

The Compliance Officer to administer the Code of Conduct and other requirements under these regulations.

The Compliance Officer shall report to the Board and in particular, shall provide reports to the Chairman of the Audit Committee, if any, or to the Chairman of the Board at such frequency as may be stipulated by the Board from time to time, but not less than once in a year.

The Compliance Officer shall assist all employees in addressing any clarifications regarding interpretation and/or compliance of any provision of Code of Conduct.

Protection and communication of Price Sensitive Information:

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

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The Company shall take adequate security control measures for the safe storing and transmission of unpublished price sensitive information.

No insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to the 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 obligations.

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

- (i) 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;
- (ii) not attract the 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.

For the purposes of the above, 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 purpose as hereinabove mentioned, and shall not otherwise trade in securities of the company when in possession of unpublished price sensitive information.

The Designated Managing Director as appointed under Sub-regulation (1) of Regulation 9 of the Regulations shall be responsible for formulation and implementation of a process for how and when people are brought 'inside' on sensitive transactions. Company shall ensure that individuals are made aware of the duties and responsibilities attached to the receipt of Inside Information, and the liability that attaches to misuse or unwarranted use of such information.

Trading when in possession of unpublished price sensitive information:

Save as provided in this Code of Conduct and/or the Regulations, no insider shall trade in the securities of the Company when in possession of unpublished price sensitive information.

Designated Persons, their immediate relatives and the persons mentioned in Sub-regulation (4) of Regulation 9 of the Regulations shall be governed by the code of conduct governing dealing in securities of the Company.

Designated Persons may execute trades subject to compliance with the provisions of this Code of Conduct and Regulations.

Chinese Wall & Crossing Wall:

1. Chinese Wall

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

- a. The employees working within an insider area are prohibited from communicating any confidential or inside information to employees in public areas without the prior approval of Compliance Officer.
- b. Employees within a Chinese Walls have a responsibility to ensure the Chinese wall is not breached deliberately or inadvertently. Known or suspected breaches of the Chinese wall must be referred to the Compliance Officer immediately.
- c. The Employees in inside area may be physically separated from the Employees in public area.
- d. The demarcation of various departments as inside area shall be determined by the Compliance Officers in consultation with the Board.

2. Crossing the wall

- a. If an employee/outsider receives inside information from the inside area of the Company, it is treated that the said employee or outsider has crossed the wall. Pursuant to '**Crossing the Wall**', the employee becomes an insider. Such employee/ outsider must be subject to all restrictions and prohibitions as required under this Code of Conduct, Regulations and policies relating to Chinese Walls. An employee is no longer a temporary insider when the inside information is published or no longer significant to the market.
- b. If any person crosses the wall, the same should be immediately reported to the Compliance Officer. The Compliance Officer shall make sure that all restrictions are imposed on such employee relating to the protection to unpublished price sensitive information.
- c. The Compliance Officer when satisfied that the insider information is generally available may lift such restrictions imposed on such employee.

Trading Window and its Opening/ Closure:

The Company shall use a notional trading window as an instrument of monitoring trading by the Designated Persons. The Compliance Officer shall ensure that the trading window is closed when he determines that a Designated Person or class of Designated Persons can reasonably be expected to have possession of unpublished price sensitive information. Notwithstanding the foregoing, unless otherwise specified by the Compliance Officer, the Trading

Window for Dealing in Securities of the Company shall be closed for the following purposes:

- i) declaration of financial results (quarterly and annual), stand alone and consolidated,
- ii) declaration of dividends (interim and final),
- iii) issue of Securities by way of public/rights/bonus etc.,
- iv) any major expansion plans or execution of new projects,
- v) amalgamation, mergers, takeovers and buy-back,
- vi) disposal of whole or substantially whole of the undertaking, and
- vii) any significant changes in policies, plans or operations of the Company.

As per the Latest Notification dated April 1,2019 Clause 4 of the Schedule B of PIT Regulations was amended as

“Trading restriction period can be made applicable from the end of every quarter till 48 hours after the declaration of financial results.”

In respect of declaration of financial results, the Trading Window shall remain closed from the end of every quarter on which the quarterly or annual standalone/consolidated financial results, as the case may be, are declared. Trading restriction period can be made applicable from the end of every quarter till 48 hours after the declaration of financial results.

Designated Persons and their immediate relatives shall not trade in securities when the trading window is closed.

The gap between clearance of accounts by audit committee and board meeting should be as narrow as possible and preferably on the same day to avoid leakage of material information.

The Compliance Officer, 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 determine the timing for re-opening of the trading window which in any event shall not be earlier than forty-eight hours after the information becomes generally available.

Pre-clearance of trades:

When the trading window is open, trading by Designated Persons shall be subject to preclearance by the Compliance Officer, if the value of the proposed trades is Rs. 10 Lakhs (market value) and above.

The pre-dealing procedure shall be hereunder:

- i) An application is to be made in the prescribed Form as per **Annexure 1** to the Compliance Officer.
- ii) A declaration in the format as per **Annexure 2** shall be submitted along with the application to the effect that:
 - (a) the applicant for pre-clearance is not in possession of any unpublished price sensitive information on the date of making the application;
 - (b) if the applicant gets possession of any unpublished price sensitive information after making the application but before the execution of the transaction, he shall inform the Compliance Officer of the change in his position and that he would completely refrain from dealing in the securities of the Company till the time such unpublished price sensitive information becomes public;
 - (c) he has not contravened the Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading by Insiders as notified by the Company from time to time; and
 - (d) he has made a full and true disclosure of the matter.

All applicants shall execute their order in respect of securities of the Company within 7 trading days after the approval of pre-clearance is given in **Annexure 3**. The Specified Person shall file within 2 (two) days of the execution of the deal or the time period provided in relevant regulation(s), which ever is greater, the details of such deal with the Compliance Officer in the prescribed format as per **Annexure 4**.

All trades that have been pre-cleared by the Compliance Officer, have to be executed by the Designated Persons within 7 trading days from the date of pre-clearance, failing which Designated Persons shall require fresh pre-clearance for the trades to be executed.

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All Designated Persons who are permitted to trade under this Code shall not execute a contra trade within six months from the execution of the original trade. The Compliance Officer, for reasons to be recorded in writing, may grant relaxation from strict application of such restrictions, provided that such relaxation does not violate the provisions of this Code and Regulations. Should a contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund administered by it under the Act. However, this shall not be applicable for trades pursuant to exercise of stock options, if any, issued by the Company.

Other Restrictions:

The disclosures to be made by any person under this Code shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.

The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account for purposes of this Code.

The disclosures made under this Code shall be maintained for a period of five years.

Disclosures:

Every Promoter, member of the promoter group, Key Managerial Personnel and Director of the Company shall comply with the requirements of Regulation 7(1)(a) of the Regulations;

Every person on appointment as a key managerial personnel or a Director of the Company or upon becoming a promoter or member of the promoter group shall disclose his holding of securities of the Company as on the date of appointment or becoming a Promoter, to the Company within 7 (seven) days of such appointment or becoming a Promoter.

Every Promoter, employee and Director of the Company shall disclose to the Company the number of such securities of the Company 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 SEBI from time to time.

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The Company shall notify the particulars of such trading to the stock exchanges within two trading days of receipt of the disclosure or from becoming aware of such information.

The Compliance Officer is empowered to 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 he may determine.

Designated persons shall disclose names and Permanent Account Number or any other identifier authorized by law of the following persons to the company on an annual basis and as and when the information changes:

- a) immediate relatives;
- b) persons with whom such designated person(s) shares a material financial relationship

[The term "material financial relationship" shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding twelve months, equivalent to at least 25% of such payer's annual income but shall exclude relationships in which the payment is based on arm's length transactions.];

- c) phone, mobile and cell numbers which are used by them;
- d) the names of educational institutions from which they have graduated; and
- e) names of their past employers, on a one time basis.

The Compliance officer shall maintain records of all the declarations in the appropriate form given by the Directors / officers / Designated Persons for a minimum period of five years.

Penalty for contravention of the Code of Conduct:

Any Designated Persons who contravene any provision of this Code shall be barred from dealing in the securities of the Company for a period of six months.

Notwithstanding the aforesaid, Designated Persons who contravene any provision of this Code, shall also be subject to disciplinary action by the Board, which may include wage freeze, suspension, recovery, claw back, ineligibility for future participation in employee stock option plans, etc.

Any punitive action taken by the Board against any Designated Persons for any violation of this Code or the Regulations shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Reporting to SEBI:

In case it is observed by the Board, that there has been a violation of the Regulations, it shall inform SEBI promptly.

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ANNEXURE - I
SPECIMEN OF APPLICATION FOR PRE - DEALING APPROVAL

Date: _____

To,
The Compliance Officer,
Rungta Irrigation Limited
ISIN of the company:
101, Pragati Tower, 26 Rajendra place, Delhi-110008

Internal use
Recd date and time:
Sign :

Dear Sir/Madam,

Subject: Application for pre-dealing approval in securities of the Company

Pursuant to the Regulations, I seek approval for purchase/ sale/ subscription of the _____ Securities (give description) of the Company as per the details given below:

Name : _____

State whether

Director Promoter Designated Employee/KMP/Others

Rungta Irrigation Limited

EMPL NO. _____	DESIGNATION _____
DEPARTMENT _____	
LOCATION _____	



Nature of transaction (Buy/ sell/ subscribe)	*Name of Proposed Buyer/ Seller & relationship with applicant	As per ISO 9001:2008 Certified Company	No. of securities of purchase/ allotment	Approval no. and date for purchase/ allotment) if any	DP/BEN ID of the account / folio no. where the securities will be credited/ debited	No. of Securities held in such Account/ Folio No.
					DP ID _____ BEN ID _____ FOLIO NO _____	

- * Applicable for off market transaction.
- ** Applicable only if the application is in respect of sale of securities.
- *** Applicable only if the application is in respect of sale of Securities for which an earlier purchase sanction was granted by the Compliance Officer.

I enclose herewith the form of Undertaking duly signed by me.

Yours faithfully,

(Signature)

Designation: _____

Note : This application has to be necessarily submitted either by hand or through electronic mail at the dedicated e-mail id secretarial@thehitechgears.com and followed by a hard copy.

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ANNEXURE-II

UNDERTAKING

(TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-DEALING)

To,
The Compliance Officer,
Rungta Irrigation Limited
ISIN of the company:
101, Pragati Tower, 26 Rajendra place,
Delhi-110008

Internal use
Recd date and time:
Sign :

I, _____ S/D/W/o _____, resident of _____, hereby declare that I am a/an _____ Director/ Employee/ KMP/ Promoter of M/s. The Hi-Tech Gears Limited

I, further declare:

1. that, I am not in possession of or otherwise privy to any unpublished Price Sensitive Information up to the time of signing this undertaking.
2. that, in case, I have access to or receive any price sensitive information after signing this Undertaking but before execution of the transaction, I shall inform the Compliance Officer of the change in my position and I would completely refrain from dealing in the securities of the Company till the time such Price Sensitive Information becomes public.
3. that, I declare that I have not contravened the Code as notified by the Company from time to time.
4. that, I undertake to submit the necessary report within four days of execution of the transaction or a 'Nil' report if the transaction is not undertaken.
5. that, I am aware and I shall be liable to face penal consequences including disciplinary action as set forth in the Code of the Company, in case the above declarations are found to be misleading or incorrect at any time.
6. that, I hereby agree to indemnify and keep the Company, its Directors & Compliance Officer indemnified from and against any and/or all penalties/fines that may be imposed on them by the Securities and Exchange Board of India and/or any other statutory authorities as a result of violation by me of the SEBI (Prohibition of Insider Trading) Regulations, 2015 Regulation and the Code prescribed by the Company.
7. that, I declare that I have made full and true disclosure in the matter.

(Signature)
Name
Designation

ANNEXURE-III
FORMAT FOR PRE-DEALING APPROVAL LETTER

Date: _____

Approval No: HGL/S&L/SEBI (IT) REG/ _____ /20 / _____

To
Mr./Mrs. _____
Emp No.: _____
Designation: _____

SUB: PRE-DEALING APPROVAL/DISAPPROVAL FOR _____ SECURITIES

REF: YOUR APPLICATION DATED _____

Dear Mr. /Mrs. _____

With reference to your above application seeking approval for undertaking certain transactions in securities of the Company detailed therein please be informed that you are hereby authorized/ not authorized to undertake the transaction(s) as detailed in your said application.

This approval is being issued to you based on the various declarations, representations and warranties made by you in your said application.

This approval letter is valid till _____ (i.e. for {1} week). If you do not execute the approved transaction /deal on or before this date you would have to seek fresh pre-dealing approval before executing any transaction/deal in the securities of the Company. Further, you are required to file the details of the executed transactions in the attached format within two {2} days from the date of transaction/deal.

In case the transaction is not undertaken a "Nil" report shall be required to be furnished by you within 4 (four) days after the validity period of the approval letter.

Yours truly,
For Rungta Irrigation Limited

Compliance Officer

Encl: Format for submission of details of transaction

ANNEXURE-IV
FORMAT FOR DISCLOSURE OF PRE-APPROVED TRANSACTIONS

(To be submitted within 2 (Two) days of transaction/dealing in securities of the Company when transaction is undertaken otherwise within 2 (Two) days after the expiry of the validity period of the approval letter issued in this behalf)

To,
The Compliance Officer,
Rungta Irrigation Limited
ISIN of the company:
101, Pragati Tower, 26 Rajendra place,
Delhi-110008



Dear Sir,

SUB: DETAILS OF PRE-APPROVED TRANSACTION FOR _____ SECURITIES
REF: YOUR APPROVAL LETTER NO. _____ DATED _____

This is to inform you that I,

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

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SYMBOL OF QUALITY

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Name of holder and relationship with applicant	** First or joint holder	No. of securities dealt with	Bought / Sold/Subscribed*	DP ID/CLIENT ID (electronic form) or Folio no. for physical Sec. will be debited or credited *	Price (In Rs.)	Balanced after approved sale/ purchase etc.

** "F" first holder "J" joint holder

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 3 (Three) years and produce to the Compliance Officer/SEBI any or all of the following documents:

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 declare that the above information is correct and that the provisions of the Company's Code of Conduct for prevention of Insider Trading and/or applicable laws/rules/ regulations made thereunder have not been contravened for effecting the above said transaction(s).

I agree to hold the above securities for a minimum period of 30 days. In case there is any personal emergency or urgent need to sell these securities within the said period, I shall approach the Company (Compliance Officer) for necessary approval (applicable in case of purchase / subscription).

Yours truly,

Signature: _____

Name: _____

Designation _____

Emp No: _____

Dept/ Div. : _____

* Strike out whichever is not applicable

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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 Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

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

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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

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

Signature: _____ Name:

Designation:

FORM B

SEBI (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:

ISIN of the Company:

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP /Directors / Immediate relative to / Others etc	Securities held as on the date of regulation coming into force		% of Shareholding
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	Number(s)	
		Rungta Irrigation Limited		

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 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).

Open Interest of the Future contracts held at the time of becoming Promoter/appointment of Director/KMP			Open Interest of the Option Contracts held at the time of becoming Promoter/appointment of Director/KMP		
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

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

options Signature: _____

Name:

Designation

:

FORM C

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 Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN, & address with contact Nos	Category of Person (Promoters/ KMP / Directors / Immediate relative to / 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 / disposal (on market/public/ rights/ preferential offer / off market/ Inter-se transfer, ESOPs etc.)
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge / Revoke/ Invoke)	Type of security (For eg. Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To		

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)	

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

Signature: _____ Name:
Designation:

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FORM D (Indicative format)

SEBI (Prohibition of Insider Trading) Regulations, 2015[Regulation 7(3) Transactions by Other connected persons as identified by the company Details of trading in securities by other connected persons as identified by the company]

Name of the Company:

ISIN of the Company:

Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN, & address with contact	Connect ion with company	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 / disposal (on market/public/ rights/ preferential offer / off market/ Inter-se transfer, ESOPs etc.)
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No	Value	Transaction Type (Buy/Sale/ Pledge/ Revoke/ Invoke)	Type of security (For eg. Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To		

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)	

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

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Signature: _____ Name:
Designation:



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