

# CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

Of

**DHATRE UDYOG LIMITED**

**(Formerly Known as Narayani Steels Limited)**

**DHATRE UDYOG LIMITED**

(FORMERLY NARAYANI STEELS LIMITED)

**Phone no:** +91 33 4804 0592 | **Email:** [info@dhatre.com](mailto:info@dhatre.com) | **Website:** [www.dhatre.com](http://www.dhatre.com)

**Registered Office:** ERGO Tower, Plot No. A1-4, Block - EP & GP, Unit No. 1406 14th Floor, Sector - V, Salt Lake City, Kolkata - 700 091

**Factory:** D.No: Survey No: 202/31-38 Modavalsa, Village: Denkada Mandal, Vizianagaram : 535006

**CIN : L24319WB1996PLC82021**

**DHATRE UDYOG LIMITED**  
**(Formerly Known as Narayani Steels Limited)**

**CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING**

This Code of Conduct may be known as “Dhatre Code of Conduct for Prohibition of Insider Trading” (herein after referred to as the "Code of Conduct").

This code has been made pursuant to Regulation 8 & 9 of the SEBI (Prohibition of Insider Trading) Regulation, 2015 as amended from time to time and may be modified by the Board of Directors of the Company from time to time.

This Code has been designed to enhance the standards of governance and to comply with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations 2015.

**I. DEFINITIONS**

1.	<b>“Act”</b> means the Securities & Exchange Board of India Act, 1992 as may be amended from time to time.
2.	<b>“Board”</b> means Board of Directors of the Company (Dhatre Udyog Limited).
3.	<b>“Code”</b> means this Code of Conduct for Prevention of Insider Trading including modifications made thereto from time-to-time.
4.	<b>“Company”</b> means Dhatre Udyog Limited.
5.	<b>“Compliance Officer”</b> means the Company Secretary of the Company, designated so and reporting to the board of directors or head of the organization in case board is not there, who 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these Regulations under the overall supervision of the board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;
6.	<b>“Connected Person”</b> means –

	(i)	Any person who is or has during the six months prior to the concerned act been associated with a 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.
	(ii)	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 in clause (i); or
	(b)	A holding company or associate company or subsidiary company; or
	(c)	An intermediary as specified in section 12 of the Act or an employee or director thereof; or
	(d)	An investment company, trustee company, asset management company or an employee or director thereof; or
	(e)	An official of a stock exchange or of clearing house or corporation; or
	(f)	A member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
	(g)	A member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
	(h)	An official or an employee of a self-regulatory organization recognized or authorized by the Board; or
	(i)	A banker of the company; or
	(j)	A concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten per cent. of the holding or interest;
	7.	<b>“Designated Person”</b> means -
	(i)	All Directors whether executive, non-executive or independent;
	(ii)	All Promoters of the Company
	(iii)	Chief Executive Officer (CEO), Chief Financial Officer (CFO) and Company Secretary (CS);
	(iv)	All employees of Manager cadre and above in Finance, Accounts and Secretarial Department;
	(v)	All employees of General Manager cadre and above in all other Departments of the Company;
	(vi)	Such other employees as may be determined by the Company from time-to-time.
	8.	<b>“Generally available information”</b> means information that is accessible

		to the public on a non-discriminatory basis;
	9.	<b>"Immediate relative"</b> 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;
	10.	<b>"Insider"</b> means any person who is: i) a connected person; or ii) in possession of or having access to unpublished price sensitive information;
	11.	<b>"Promoter"</b> shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof;
	12.	<b>"Regulation"</b> means Securities and Exchange Board of India (Prohibition of Insider Trading), Regulations 2015 as amended from time to time.
	13.	<b>"Securities"</b> 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;
	14.	<b>"Specified"</b> means specified by the Board in writing;
	15.	<b>"Takeover regulations"</b> means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;
	16.	<b>"Trading"</b> means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;
	17.	<b>"Trading day"</b> means a day on which the recognized stock exchanges are open for trading;
	18.	<b>"Trading Window"</b> means the period during which, trading in the Company's shares by insiders shall be permissible.
	19.	<b>"Unpublished price sensitive information"</b> means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: -.
		(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 listing agreement.
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## II. INTERPRETATION

- 1) Words and expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation.
- 2) This Code can be modified/amended/alterd only by Board of Directors of the Company.
- 3) But in case of any statutory modification or amendment or alteration of the provisions of Securities and Exchange Board of India (Prohibition of Insider Trading), Regulations 2015, the newly modified/amended/alterd provisions of the Regulation shall be deemed to be implemented in the Code immediately with effect from the date of the statutory notification for modification or amendment or alteration etc.

The amended code should be placed before the Board of Directors of the Company in the Board Meeting held immediately after the date of statutory notification for modification/amendment/alteration etc; of the Regulation for noting.

## III. CODE

1.0	<b>Compliance Officer</b>	
	1.1	The Company has appointed Company Secretary as the Compliance Officer for the purpose of this Code of Conduct.
	1.2	The Compliance officer 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;
	1.3	The compliance officer shall maintain a record of the insiders and any changes made in the list of insiders.
	1.4	The compliance officer shall assist all the employees in addressing any clarifications regarding the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time and the company's code of conduct.

	1.5	The Compliance Officer shall report on insider trading to the Board and to the Chairman of the Audit Committee on annual basis.
<b>2.0</b>		<b>Preservation of Confidentiality of UPSI / Confidential Information</b>
	<b>2.1</b>	Insiders and their immediate relatives shall not 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.
	<b>2.2</b>	Price Sensitive Information is to be handled on a “need to know” basis, i.e., No 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.
	<b>2.3</b>	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 proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
	<b>2.4</b>	Notwithstanding anything contained in this regulation, an unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction that would:-
	<b>2.4.1</b>	entail 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 proposed transaction is in the best interests of the company;
	<b>2.4.2</b>	not attract the obligation to make an open offer under the takeover regulations but where the board of directors of the company 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 of directors may determine.
	<b>2.5</b>	All information shall be handled within the Company on a need-to-know basis and no UPSI shall be communicated to any person except in furtherance of the insider's legitimate purposes, performance of duties or discharge of his legal obligations.

2.6		<p>The Company has put in place policies and procedures (hereinafter referred as Chinese Walls) to manage UPSI and prevent the inadvertent spread and misuse of UPSI. Chinese Walls are designed to curb on passing of UPSI. Employees, who are in possession of UPSI, have a responsibility to ensure that UPSI should not be shared or disclosed to any persons except their legal obligations. All non-public information directly / indirectly received by any employee should immediately be reported to the head of the department. Management shall ensure that appropriate policies, procedures and physical arrangements are implemented for the relevant businesses and that these are complied with by all affected employees. Local policies should address not only the maintenance of Chinese Walls and how these implemented and controlled but also procedures for crossing the wall. The establishment of Chinese Walls is not intended to suggest that within Insider Areas material, Confidential Information can circulate freely. Within Insider Areas, the 'need-to-know' policy is fully in effect.</p>
2.7		Confidential Information / UPSI shall be kept with adequate security.
<b>3.0</b>		<b>Trading Plan</b>
3.1		<p>An insider shall be entitled, at his option, to formulate a trading plan for dealing in securities of the Company and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out with such plan.</p> <p>Such trading plan shall:</p>
	(i)	not entail commencement of trading on behalf of the Insider earlier than six months from the public disclosure of the plan;
	(ii)	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;
	(iii)	entail trading for a period of not less than twelve months;
	(iv)	not entail overlap of any period for which another trading plan is already in existence;
	(v)	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
	(vi)	not entail trading in securities for market abuse

	<b>3.2</b>	The Compliance Officer shall review such trading plan to assess whether the plan would have any potential for violation of these regulations 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 the plan.
	<b>3.3</b>	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 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 Compliant Officer shall confirm that the commencement ought to be deferred until such UPSI becomes generally available information so as to avoid a violation of sub-regulation (1) of regulation 4.
	<b>3.4</b>	Upon approval of the trading plan, the Compliance Officer shall notify the plan to the stock exchanges on which the securities are listed.
	<b>3.5</b>	A notional window shall be used as an instrument of monitoring trading by Designated Persons. The Compliance Officer should close trading window when he determines that a Designated Person or class of Designated Persons can reasonably be expected to have possession of UPSI. Such closure shall be imposed in relation to such securities to which such UPSI relates. During closure of notional window, Designated Persons and their immediate relatives shall not trade in securities when the trading window is closed.
<b>4.0</b>		<b>Prevention of misuse of "Price Sensitive Information".</b>
	<b>4.1</b>	All directors/officers and designated employees of the company shall be subject to trading restrictions as enumerated below.
	<b>4.2</b>	Trading Window
	<b>4.2.1</b>	The trading window shall be closed 7 days prior to UPSI is unpublished.
	<b>4.2.2</b>	During closure of trading window, Designated Persons shall not trade in the securities of the Company.



		<b>4.2.3</b>	After taking into account various factors including UPSI in question becoming generally available and being capable of assimilation by the market, the Compliance Officer shall determine timing of re-opening of the trading window however in any event it shall be forty-eight hours after the information becomes generally available.
		<b>4.2.4</b>	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.
		<b>4.2.5</b>	All directors/officers/designated employees of the company shall conduct all their dealings in the securities of the Company only when the trading window is open and shall not deal in any transaction involving the purchase or sale of the company's securities during the periods when trading window is closed or during any other period as may be specified by the Company from time to time.
		<b>4.2.6</b>	The Trading window shall be opened 48 (forty Eight) hours after the unpublished price sensitive information becomes generally available.
<b>5.0</b>		<b>Pre-clearance of trades</b>	
	<b>5.1</b>	When the trading window is open, any Designated Person shall trade in Securities of the Company subject to pre-clearance by the Compliance Officer if the value of the proposed trades is above Rs.10 Lakhs. However, no Designated Person shall be entitled for pre-clearance of any proposed trade if such Designated Person is in possession of UPSI even if the trading window is not closed.	
	<b>5.2</b>	Designated Person and their immediate relatives who propose to execute trade in Securities of the Company shall submit an application duly filled and signed to the Compliance Officer. The format of application is annexed as Annexure "A" and "B".	
	<b>5.3</b>	Prior to approving any trades, the Compliance Officer shall seek declarations to the effect that the applicant for pre-clearance is not in possession of any UPSI. He shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.	
	<b>5.4</b>	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 pre-clearance of trades.	
	<b>5.5</b>	The Compliance Officer shall approve / reject pre-clearance application within Seven Trading days in Annexure "C".	

	<b>5.6</b>	Designated Person shall execute pre-cleared trade within seven trading days from approval and shall report his trade details to Compliance Officer in Annexure "C" within 7 trading days from the trade. In case non-trading, Designated Person shall report his decision of non-trading along with reasons to Compliance Officer in Annexure "C".
	<b>5.7</b>	In case of failure in executing trade within seven trading days, Designated Person shall be required to take fresh pre-clearance for the trades to be executed in Annexure "A" and "B".
	<b>5.8</b>	Designated Person who is permitted to trade shall not execute a contra trade within next six months from previous transaction. The Compliance Officer is empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing without violating the Regulations. If contra trade is 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 for credit to the Investor Protection and Education Fund.
<b>6.0</b>		<b>Code of Fair Disclosure</b>
	<b>6.1</b>	UPSI which will impact on price of Security shall be promptly disclosed to general public.
	<b>6.2</b>	UPSI shall not be disseminated selectively but it should be disseminated uniformly and universally.
	<b>6.3</b>	Compliance Officer shall be a chief investor relations officer to deal with dissemination of information and disclosure of UPSI.
	<b>6.4</b>	The Company shall give appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
	<b>6.5</b>	The following practice shall be complied while meeting with analysts, institutional investors and other investor relations conferences:
		<b>6.5.1</b> No UPSI shall be shared with them and only information available in public domain shall be shared.
		<b>6.5.2</b> Any of the designated company officials shall remain present during meeting with them.
		<b>6.5.3</b> Transcripts or records of proceedings of meeting with them shall be placed on website of the Company within 30 days from meeting.
	<b>6.6</b>	All UPSI shall be handled on a need-to-know basis.

<b>7.0</b>		<b>Disclosure by Certain Persons</b>
	<b>7.1</b>	<b>Initial Disclosure</b>
	<b>7.1.1</b>	Every promoter, key managerial personnel, director, Designated Person of the company shall disclose his holding of securities as on the date of these regulations taking effect, to the Company within thirty days of these regulations taking effect;
	<b>7.1.2</b>	Every person on appointment as key managerial personnel or a director of the Company or upon becoming a promoter shall disclose his holding of Securities as on the date of appointment or becoming a promoter, to the Company within seven days of such appointment or becoming a promoter.
	<b>7.2</b>	<b>Continual Disclosure</b>
	<b>7.2.1</b>	Every promoter, director and Designated Person of the Company 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 Rs.10 lakh or such other value as may be specified.
	<b>7.2.2</b>	The Company shall notify the particulars of such trading to the stock exchange on which the securities are listed within two working days of receipt of the disclosure or from becoming aware of such information.
	<b>7.3</b>	<b>Annual Disclosure</b>
		Every promoter, director and Designated Person of the Company shall disclose their holding of Securities on annual basis within 60 days from conclusion of every financial year of the Company.
	<b>7.4</b>	<b>Disclosure by Other Connected Person</b>
		The Compliance Officer at his discretion may require any other connected person or class of connected person to make disclosures of holding and trading in securities of DESTINY as and when he deems fit in order to monitor compliance with these regulations
<b>8.0</b>		<b>Reporting to the Board and Maintenance of Disclosures</b>
	<b>8.1</b>	The Compliance Officer shall place before the chairman on a quarterly basis, details of trading in securities of DESTINY by designated persons and accompanying documents that such persons had executed under the pre-clearance procedure as envisaged under this code.

	8.2	The Compliance Officer shall maintain records of all the declarations in appropriate forms given by the designated persons for a minimum period of 5 (Five) years.
	8.3	The Secretarial Section shall acknowledge the receipt of the declaration form received.
<b>9.0</b>		<b>Penalty for contravention of code of conduct</b>
	9.1	Penalty for Non-Compliance
		Any insider who trades in securities in contravention of the provisions of this Code or the SEBI (Prohibition of Insider Trading) Regulations, 2015 shall be guilty of insider trading and shall be inter-alia liable for punishment and penalty as mentioned in this Code and in the Securities & Exchange Board of India Act, 1992. Designated person who violate the code shall be subject to disciplinary action by the Company which may include wage freeze, suspension, ineligibility for future participation in employee stock options plans etc.
	9.2	Penalty for Non-Compliance with the Code of Conduct
		Any employee/officer/Director who trades in securities or communicates any information for trading in securities, in contravention of the code of conduct may be penalized and appropriate action may be taken by DESTINY. The action by the Company shall not preclude SEBI from taking any action in case of Violation of SEBI (Prohibition of Insider Trading Regulations), 2015.

**Notes:**

- a) The action by DHATRE shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading), Regulations, 2015.
- b) In case it is observed by the Compliance Officer that there has been a violation of the Regulations, SEBI shall be informed by DHATRE.
- c) The Managing Committee of the Board or the Compliance Officer may decide the penalty within the above framework by taking into consideration the factors such as knowledge of price sensitive information, level of management responsibility of the individual concerned, number of securities transacted, whether the breach occurred as a result of deliberate intent or not, etc.
- d) Penalties recovered as per framework will be remitted to SEBI Investor Protection and Education Fund account.

## **V. GENERAL**

Employees are advised to pursue the Code and Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time, carefully and acquaint themselves with all the provisions contained therein.

The Compliance Officer will be available for clarification / assistance that may be necessary.

**DHATRE UDYOG LIMITED**

(Formerly Known as Narayani Steels Limited)

**ANNEXURE A**

**Application - Cum Undertaking for Pre-Clearance of Trades**

Date:

The Compliance Officer  
DHATRE UDYOG LIMITED  
Kolkata

From:

Designation:

With reference to the Code of Conduct of Dhatre Udyog Limited (DHATRE) for Prevention of Insider Trading, I hereby give notice that I propose to carry out the following transaction in DESTINY's securities for myself / As Joint Holder / My immediate relative.

<b>Transaction (Sale/Purchase)</b>	<b>Type of Security</b>	<b>Number of Security</b>

I hereby declare that:

- (a) I do not have any access nor have I received or possess "Unpublished Price Sensitive Information" upto the time of signing the undertaking.
- (b) That in case I have access to or receive "Unpublished Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction, I shall inform the Compliance Officer of the change in my position and that I would completely refrain from trading in the securities of DHATRE till the time such information becomes public.
- (c) That I have not contravened the code of conduct for prevention of insider trading as notified by DHATRE from time to time.
- (d) That I have made a full and true disclosure in the matter.

Signature of the Employee/Director \_\_\_\_\_

**DHATRE UDYOG LIMITED**

**Annexure B**

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

To,  
The Compliance Officer  
DHATRE UDYOG LIMITED  
Kolkata

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

Dear Sir/Madam,

I, \_\_\_\_\_, \_\_\_\_\_ of the Company residing at \_\_\_\_\_, am desirous of dealing in \_\_\_\_\_ Shares of the Company as mentioned in my application dated for pre-clearance of transaction.

I further declare that I am not in possession of or otherwise privy to any unpublished Price Sensitive Information (as defined in the Company's Code of Conduct for prevention of Insider Trading (the Code) up to the time of signing this Undertaking.

In the event that I have access to or received any information that could be construed as "Price Sensitive Information" as defined in the Code, after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public.

I declare that I have not contravened the provisions of the Code as notified by the Company from time to time.

I undertake to submit the necessary report within Seven days of execution of the transaction / a 'Nil' report if the transaction is not undertaken.

If approval is granted, I shall execute the deal within 7 days of the receipt of approval failing which I shall seek pre-clearance.

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

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

# DHATRE UDYOG LIMITED

## Annexure C

### PRE-CLEARANCE ORDER

PCO No. \_\_\_\_\_

Date:

To,  
\_\_\_\_\_(Applicant)

This is to inform you that your request for dealing in \_\_\_\_\_ shares of the Company as mentioned in your application dated \_\_\_\_\_ is approved. Please note that the said transaction must be completed on or before \_\_\_\_\_ [date].

In case you do not execute the approved transaction /deal on or before the aforesaid date you would have to seek fresh pre-clearance before executing any transaction/deal in the securities of the Company. Further, you are required to file the details of the executed transactions in the prescribed forms as per DHATRE's Code of Conduct for Insider Trading. In case the transaction is not undertaken a 'Nil' report shall be necessary.

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

Compliance Officer

*Note:*

- 1. Please provide all the information. Incomplete forms will not be accepted.*
- 2. Please ensure that you have not made any opposite transaction within previous 6 months.*



## ANNEXURE D

Name of the company: **DHATRE UDYOG LIMITED**

ISIN of the company: **INE715T01023**

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 Share-holding
		Type of security (For eg. – 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.*

Name & Signature: \_\_\_\_\_

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

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

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

### Notes:

- 1) Separate disclosures should be made in respect of the immediate relatives. Immediate relatives may include the spouse of a person, a parent, sibling and child of such person or their spouse, any of whom is either dependent financially on such a person, or consults such a person in taking decisions relating to trading in securities.
- 2) This declaration will include separate details of shares held in the first name, joint names or as a guardian.

## ANNEXURE E

Name of the company: **DHATRE UDYOG LIMITED**

ISIN of the company: **INE715T01023**

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 Share-holding
			Type of security (For eg.-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.*

Name & Signature: \_\_\_\_\_

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

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

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

### Notes:

1. Separate disclosures should be made in respect of the immediate relatives. Immediate relatives may include the spouse of a person, a parent, sibling and child of such person or their spouse, any of whom is either dependent financially on such a person, or consults such a person in taking decisions relating to trading in securities.
2. This declaration will include separate details of shares held in the first name, joint names or as a guardian.

## ANNEXURE F

Name of the company: **DHATRE UDYOG LIMITED**

ISIN of the company: **INE715T01023**

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 with Contact nos.	Category of Person (Promoter/s/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 share-holding	Type of security (For eg. - Shares, Warrants, Convertible Debentures, etc.)	No.	V	Transaction Type (Buy/Sale/Pledge/Revok e/Invoke)	Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No. and % of share-holding	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.*

Name & Signature: \_\_\_\_\_

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

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

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

**Notes:**

- 1) Separate disclosures should be made in respect of the immediate relatives. Immediate relatives may include the spouse of a person, a parent, sibling and child of such person or their spouse, any of whom is either dependent financially on such a person, or consults such a person in taking decisions relating to trading in securities.
- 2) This declaration will include separate details of shares held in the first name, joint names or as a guardian.

## ANNEXURE G

Name of the company: **DHATRE UDYOG LIMITED**

ISIN of the company: **INE715T01023**

Details of trading in securities by other connected persons as identified by the Company

Name, PAN No., 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/any	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 share-holding	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 share-holding	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.*

Name & Signature: \_\_\_\_\_

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

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

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

**Notes:**

- 1) Separate disclosures should be made in respect of the immediate relatives. Immediate relatives may include the spouse of a person, a parent, sibling and child of such person or their spouse, any of whom is either dependent financially on such a person, or consults such a person in taking decisions relating to trading in securities.
- 2) This declaration will include separate details of shares held in the first name, joint names or as a guardian.
- 3) This declaration will include separate details of shares held in the first name, jointnames or as a guardian.