



INSIDER TRADING CODE

JUNIPER GREEN ENERGY LIMITED

(Formerly known as Juniper Green Energy Private Limited)

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A. PREAMBLE

This document embodies the code, practices, procedure and policy on insider trading to be followed by the Company effective from the commencement of listing and trading of the equity shares of the Company on the stock exchange(s), i.e. BSE Limited or the National Stock Exchange of India Limited, in accordance with applicable laws.

Juniper Green Energy Limited (hereinafter referred to as the “**JGEL**” or “**Company**”) in compliance with Regulations 3(2A), 8(1), 9(1) and 9A(5) the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“**PIT Regulations**”) has formulated the code, practices, procedure and policy on insider trading which consist of three parts:

- (i) Part A- Code of conduct to regulate, monitor and report trading by designated persons and their immediate relatives;
 - (ii) Part B- Code of practices and procedures for fair disclosure of unpublished price sensitive information and policy of determination of legitimate purpose; and
 - (iii) Part C- Policy and procedure for inquiry in case of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information
- (collectively hereinafter referred to as “**Insider Trading Code**” or “**Code**”).

For the avoidance of doubt, the provisions of this Insider Trading Code shall be applicable to the Company in accordance with the timelines and stages prescribed under the PIT Regulations, including when the Company is considered as ‘proposed to be listed’, at which point the relevant provisions shall become applicable with immediate effect.

B. OBJECTIVE

Insider Trading Code has been formulated to:

- (a) preserve the confidentiality of all unpublished price sensitive information, to prevent misuse of such information and to maintain the highest ethical standards while dealing in securities of the Company by the insiders
- (b) to put in place a framework for prohibition of insider trading in securities and to strengthen the legal framework relating thereto.
- (c) to preserve the confidentiality of unpublished price sensitive information, prevent its misuse, and uphold the highest ethical standards in handling such information. It aims to ensure that any disclosure of unpublished price sensitive information is made in a fair, transparent, and timely manner, thereby avoiding any undue impact on the price discovery of the Company’s securities in the market.
- (d) to outline the principles for determining “legitimate purposes” for which unpublished price sensitive information may be shared by an insider with persons within or outside the Company.

C. DEFINITIONS

- a) “**Act**” means the Securities and Exchange Board of India Act, 1992 as amended from time to time.
- b) “**Applicable Law**” means the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, including any amendments thereto, or any statute, law, listing agreement, regulation, ordinance, rule, judgment, order, decree, bye-law, clearance, directive, guideline, policy, requirement, notifications and clarifications, circulars or other governmental instruction and/or mandatory standards and or guidance notes as may be applicable in the matter of trading by an Insider.
- c) “**Audit Committee**” means Audit Committee of the Board constituted as per the regulatory requirements.
- d) “**Board**” shall mean the board of Directors of the Company.
- e) “**Company**” shall mean Juniper Green Energy Limited.
- f) “**Chief Investor Relations Officer**” means a senior officer of the Company appointed by the Board of Directors to deal with the dissemination of information and disclosure of UPSI in a fair and unbiased manner.
- g) “**Compliance Officer**” means any senior officer, designated so and reporting to the Board, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under the Insider Trading Regulations, and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules

of preservation of UPSI (*defined hereinafter*), monitoring of trades and the implementation of the codes specified under the Insider Trading Regulations under the overall supervision of the Board or the head of an organization, as the case may be.

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

- h) “**Connected Person**” shall have the meaning ascribed to it under 2(1)(d) of PIT Regulations and shall include **Deemed to be a Connected Person** as defined in PIT Regulations means
- i) “**Contra Trade**” means a trade or transaction which involves Trading in any number of securities of the Company and within 6 (six) months of such transaction, trading or transacting in an opposite transaction involving Trading in securities.
- j) “**Designated Persons**” shall have the meaning ascribed to it under 5(G) of PIT Regulations
- k) “**Generally Available Information**” means information that is accessible to the public on a non-discriminatory basis and shall not include any unverified event or information reported in print or electronic media
- l) “**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;

Note: It is hereby clarified that “spouse” of a person will be considered immediate relative irrespective of whether he/she is financially dependent or consults such a person in taking decisions relating to trading in securities.

- m) “**Insider**” means any person who is:
 - i) Connected Person; or
 - ii) Designated Person; or
 - iii) in possession of or having access to Unpublished Price Sensitive Information.
- n) “**Key Managerial Personnel**” or “**KMP**” means person as defined in Section 2(51) of the Companies Act, 2013.
- o) “**Leak of UPSI**” means communication of information which is/deemed to be UPSI by any person, who is in possession of UPSI, to any other person, directly or indirectly, overtly or covertly or in any manner whatsoever, except for legitimate purposes, performance of duties or discharge of legal obligations.
- p) “**Legitimate Purpose**” shall include sharing of Unpublished Price Sensitive Information in the ordinary course of business by an Insider with partners,(for clarity, service professionals will not be considered as ‘partners’ for the purpose of this definition) collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of Insider Trading Regulations.
- q) “**Material Subsidiary**” shall mean a material subsidiary of the Company in accordance with Regulation 16(1)(c) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the materiality policy of the Company, each as amended.
- r) “**Need to know basis**” UPSI should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of information.
- s) “**Relative**” shall means (i) spouse of the person; (ii) parent of the person and parent of its spouse; (iii) sibling of the person and sibling of its spouse; (iv) child of the person and child of its spouse; (v) spouse of the person listed at point (iii); and spouse of the person listed at point (iv).
- t) “**Securities**” shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956, as amended.
- u) “**Stock Exchange**” means a recognised Stock Exchange as defined under clause (f) of Section 2 of the Securities Contracts (Regulation) Act, 1956, as amended.

- v) **“Takeover Regulations”** means the Securities and Exchange Board India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, or any modification thereof.
- w) **“Trading”** means and includes subscribing, redeeming, switching, buying, selling, pledging/ de-pledging, dealing, or agreeing to subscribe, redeem, switch, buy, sell, deal in any securities, and “trade” shall be construed accordingly.
- x) **“Trading Day”** means a day on which the Stock Exchanges are open for trading.
- y) **“Unpublished Price Sensitive Information or “UPSI”** shall have the meaning ascribed to it under 2(1)(n) of PIT Regulations.

Words and expressions used but not defined in this Code of Practices shall have the same meaning assigned to them in Insider Trading Code or the PIT Regulations, the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and the rules and regulations made thereunder, as the case may be or in any amendment thereto. In case of any discrepancy between the PIT Regulations and the terms defined herein, the meaning as ascribed under the PIT Regulations, shall prevail.

D. DISCLOSURES

This Code and any amendment thereof will be published on the Company’s official website and formulation and publication of the same shall be confirmed to the Stock Exchange(s) where the securities of the Company are listed. The Company shall disclose the Insider Trading Code as required under PIT Regulations and other applicable law.

E. REVIEW AND AMENDMENTS

The Board reserves the power to review and amend this Code from time to time. All provisions of this Code would be subject to revision / amendment in accordance with applicable laws as may be issued by relevant statutory, governmental and regulatory authorities, from time to time. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant statutory, governmental and regulatory authorities are not consistent with the provisions laid down under this Code, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder.

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

I. Compliance Officer

- a) The Compliance Officer is responsible for compliance of policies, procedures, monitoring adherence to the Insider Trading Code and applicable laws for the preservation of UPSI, monitoring of trades and the implementation of the codes specified in the PIT Regulations under the overall supervision of the Board.
- b) The Compliance Officer shall maintain records of Designated Persons and any changes made to the list of Designated Persons, all the declarations submitted in the appropriate form given by the Designated Persons.
- c) The Compliance Officer shall ensure proper assistance to all the Designated Persons, other employees, Insiders and Connected Person in addressing any clarifications regarding the Insider Trading Regulations and this Insider Trading Code.
- d) The Compliance Officer shall in consultation with the the Board specify the prohibited period (i.e. closure of the trading window in accordance with the PIT Regulations) from time to time and make announcement/s thereof ensuring that prohibited period is intimated to all concerned before the commencement of the said period.
- e) The Compliance Officer shall recommend to the audit committee and/or the executive director or the Board, punitive measures or disciplinary action as deemed fit, in compliance with applicable laws, for any violation or contravention of this Code.
- f) The Compliance Officer shall report to the Board and in particular, shall provide reports to the chairman of the Audit Committee, or to the chairman of the Board, on a periodic basis but not less than once in a year. or at such frequency as may be stipulated by the Board.
- g) The Compliance Officer under the overall supervision and direction of the Board shall update, maintain and monitor the Structured Digital Database (“SDD”) containing the details of Designated Persons and Insiders with whom any UPSI has been shared or who may have access to any UPSI of the Company, in the ordinary course of business and for Legitimate Purpose. The Compliance Officer shall make the Designated Persons and Insiders aware of the duties and responsibilities attached to the receipt of UPSI, and the liability that attaches to misuse or unwarranted use of such information.
- h) The Compliance Officer shall restrict trading by Designated Persons by freezing Permanent Account Number (“PAN”) as per applicable SEBI Regulations / Circulars from time to time.

II. Preservation of UPSI

- a) All UPSI is to be handled on a Need to Know basis.
- b) To prevent the misuse of confidential information the Company adopts a ‘Chinese Wall’ policy thereby separating those areas of the Company which routinely have access to confidential information, considered as ‘inside areas’ from those areas which deal with sale / marketing / investment advice or other departments providing support services, considered as ‘public areas’.
- c) The employees in the inside areas shall not communicate any UPSI to any one in public area. Demarcation of various departments as ‘inside area’ shall be implemented by the Compliance Officer, in consultation with the Chief Executive Officer or the Board of the Company. In exceptional circumstances i.e. in furtherance of legitimate purposes, performance of duties or discharge of legal obligations, any Designated Person may be permitted to ‘cross the wall’ and give UPSI to any person on a Need to Know basis, under intimation to and with prior approval of the Compliance Officer.
- d) No Insider shall communicate, provide, or allow access to any UPSI, 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.
- e) No person shall procure from or cause the communication by any insider of UPSI, relating to the Company or securities, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

- f) However, UPSI may be communicated, provided, allowed access to or procured, in connection with a transaction which:
- (i) entails an obligation to make an open offer under the Takeover Regulations where the Board is of informed opinion that sharing of such information is in the best interests of the Company; or
 - (ii) does not attract the obligation to make an open offer under the Takeover Regulations but where the Board is of the informed opinion that sharing of such information is in the best interests of the Company and the information that constitutes UPSI 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 to be adequate and fair to cover all relevant and material facts.
- g) For the above purposes, the Board shall require the parties to such transactions 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 of this clause V and shall not otherwise trade in securities of the Company when in possession of UPSI.
- h) Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password etc.
- i) An SDD shall be maintained containing the nature of UPSI and the names of such persons or entities with whom information is shared or who has shared such information along with the PAN or any other identifier authorized by law where PAN is not available. Such databases shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database. This SDD should be preserved for a period of not less than eight years after completion of the relevant transactions. The Board shall ensure compliance with this clause in consultation with the Compliance Officer.

III. **Prevention of misuse of UPSI**

All Designated Persons and their Immediate Relatives shall be subject to trading restrictions enumerated herein. As a general overriding rule, no Designated Person (including their Immediate Relatives), Insider shall trade in securities of the Company when in possession of UPSI. When a person who is in possession of UPSI, has traded in securities, his trades would be presumed to be motivated by the knowledge and awareness of such information in his possession except in the circumstances and exceptions specified under the PIT Regulations.

IV. **Trading Plan**

An Insider shall be entitled to formulate a trading plan and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan. This gives an option to persons who may be perpetually in possession of Unpublished Price Sensitive Information and enabling them to trade in securities in a compliant manner.

1. Trading Plan shall:

- (i) not entail commencement of trading on behalf of the Insider earlier than 120 calendar days from the public disclosure of the plan;
- (ii) not entail overlap of any period for which another trading plan is already in existence;
- (iii) set out following parameters for each trade to be executed:
 - (a) either the value of trade to be effected or the number of securities to be traded
 - (b) nature of the trade
 - (c) either specific date or time period not exceeding five consecutive trading days
 - (d) price limit, that is an upper price limit for a buy trade and a lower price limit for a sell trade (to be rounded off to the nearest numeral), subject to the range as specified below:
 - (d)(i) for a buy trade: the upper price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent higher than such closing price;
 - (d)(ii) for a sell trade: the lower price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent lower than such closing price.

While the parameters in sub-clauses (a), (b) and (c) shall be mandatorily mentioned for each trade, the parameter in sub-clause (d) shall be optional. Price limit in sub-clause (d) shall be rounded off to the nearest numeral.

Insider may make adjustments, with the approval of the compliance officer, in the number of securities and price limit in the event of corporate actions related to bonus issue and stock split occurring after the approval of trading plan and the same shall be notified on the stock exchanges on which securities are listed.

- (iv) not entail trading in securities for market abuse.
- 2. The Compliance officer shall review the trading plan to assess whether the plan would have any potential for violation of the PIT Regulations. The Compliance Officer 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.
- 3. The Trading Plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the plan, without being entitled to execute any trade in the securities outside the scope of the trading plan or to deviate from it except due to permanent incapacity or bankruptcy or operation of law. However, the implementation of the trading plan shall not be commenced, if at the time of formulation of the plan, the Insider is in possession of any UPSI and the said information has not become generally available at the time of the commencement of implementation. Further, if the insider has set a price limit for a trade under clause 1 (iii)(d) above, the insider shall execute the trade only if the execution price of the security is within such limit. If price of the security is outside the price limit set by the insider, the trade shall not be executed.
- 4. In case of non-implementation (full/partial) of trading plan due to either reasons enumerated in (3) or failure of execution of trade due to inadequate liquidity in the scrip, the following procedure shall be adopted:
 - (i) The insider shall intimate non-implementation (full/partial) of trading plan to the compliance officer within 2 trading days of end of tenure of the trading plan with reasons thereof and supporting documents, if any. ii.
 - (ii) Upon receipt of information from the insider, the compliance officer, shall place such information along with his recommendation to accept or reject the submissions of the insider, before the Audit Committee in the immediate next meeting. The Audit Committee shall decide whether such non-implementation (full/partial) was bona fide or not.
 - (iii) The decision of the Audit Committee shall be notified by the compliance officer on the same day to the stock exchanges on which the securities are listed.
 - (iv) In case the Audit Committee does not accept the submissions made by the insider, then the compliance officer shall take action as per this Code.
- 5. The compliance officer shall approve or reject the trading plan within two trading days of receipt of the trading plan and notify the approved plan to the stock exchanges on which the securities are listed on the day of approval.
- 6. The provisions regarding pre-clearance of trades and trading window norms shall not be applicable for a trade executed as per an approved Trading Plan.

V. Trading window and pre- clearance of trades

- 1. Trading Window
 - (i) 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 by the Designated Persons and their Immediate Relatives. In addition to such periods prescribed by the Compliance Officer, the Trading Window shall be closed from the end of every quarter till 48 hours after the declaration of financial results. The gap between clearance of accounts by the Audit Committee and the Board meeting should be as narrow as possible and preferably on the same date to avoid leakage of material information.
 - (ii) In addition to the above, Trading window may be closed by the Company during such times in addition to the above period as it may deem fit from time to time including when the Compliance Officer determines that a Designated Person or a class of Designated Persons can be reasonably expected to possess UPSI till 48 hours after the UPSI is made public and becomes generally available.

- (iii) No Designated Person and their Immediate Relatives shall trade in the securities of the Company when the Trading Window is closed.
- (iv) It shall be the responsibility of the Designated Persons to advise their Immediate Relatives of Trading Window period closures.
- (v) The trading window restrictions shall not apply in respect of the following transactions:
 - (a) as specified in clauses (i) to (iv) and (vi) of the proviso to sub-regulation (1) of regulation 4 of PIT Regulations and in respect of a pledge of shares for a bonafide purpose such as raising of funds, subject to pre-clearance by the compliance officer and compliance with the respective regulations made by the Board.
 - (b) which are undertaken in accordance with respective regulations made by SEBI such as acquisition by conversion of warrants or debentures, subscribing to rights issue, further public issue, preferential allotment or tendering of shares in a buy-back offer, open offer, delisting offer or transactions which are undertaken through such other mechanism as may be specified by SEBI from time to time.

2. Pre- clearance of Trades

- (i) All Designated Persons who intend to Trade in the Securities of the Company (either in their own name or in any Immediate Relative's name) i.e. buy or sell or deal in Securities and if value of the Securities likely to be traded, whether in one transaction or a series of transactions in calendar quarter, aggregates to a traded value in excess of Rs. 10,00,000 (Rupees Ten Lakh Only), shall make an application for pre-clearance in the format set out in **Form D** to the Compliance Officer indicating the estimated number of units of Securities that the Designated Person or Immediate Relative(s) intends to trade, the details as to the depository with which he / she / it has a security account, the details as to the securities in such depository mode and such other details as specified in the form.
- (ii) Prior to approving any trades, the Compliance Officer shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any UPSI. The Compliance Officer shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.
- (iii) The restrictions contained in this clause shall also apply to Immediate Relatives in respect the concerned Designated Person in respect of which the concerned Designated Person shall be responsible for the compliance under the Insider Trading Code.
- (iv) In case the Compliance Officer and/ or Immediate Relatives intend to trade in the shares of the Company, the Compliance Officer shall obtain pre-clearance, as per pre-clearance procedure & restrictions prescribed under this Code.

VI. Other restrictions

Following additional restrictions shall apply wherein pre-clearance for the trade has been sought by Designated Persons:

- (i) All the pre-approved trades shall in respect of the shares of the Company shall be executed within seven Trading Days after the approval of pre-clearance is given, failing which, fresh pre-clearance for trades to be executed shall be obtained.
- (ii) The concerned persons shall disclose to the Compliance Officer in **Form E** the number of Securities acquired or disposed of for which pre-clearance is obtained within two Trading Days of such transaction
- (iii) The concerned persons shall disclose to the Company in **Form E** the number of securities not traded, in respect of transactions for which pre-clearances is obtained within seven Trading Days after the approval of pre-clearance is given.
- (iv) The disclosures to be made by any person under this Insider Trading Code shall include those relating to trading by such person's Immediate Relatives.
- (v) Designated Persons and/or their Immediate Relatives shall be prohibited from entering into derivative transactions in respect of Securities of the Company.

- (vi) Any Designated Person who is permitted to trade shall not execute a Contra Trade within six months. In case any Contra Trade is executed, inadvertently or otherwise, in violation of the restriction, the profits from such trade shall be liable to be disgorged for remittance to the SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act. This shall not be applicable for exercise of employee stock options (however, any sale of shares received pursuant to exercise of stock options will be covered).
- (vii) In case any Contra Trade is necessitated by personal emergency, the holding period of six months as specified above may be waived by the Compliance Officer after recording in writing his/her reasons in this regard, subject to the Insider Trading Regulations. An application for waiver of holding period shall be made to the Compliance Officer through concerned Departmental Head in **Form F**.

VII. Reporting requirements for transactions in securities

(i) Initial Disclosures

- a) Every person on appointment as a Key Managerial Personnel or a Director of the Company shall disclose his holding of securities of the Company as on the date of appointment, to the Company within seven days of such appointment in **Form A**.
- b) The Compliance Officer shall maintain records of all such disclosures for a minimum period of five years.

(ii) Continual Disclosures

- a) Every promoter, member of promoter group, Designated Person and director of the Company shall disclose to the Company in **Form B**, 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 Lakhs (Rupees Ten lakh only).
- b) Every company shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.

Explanation. — It is clarified for the avoidance of doubts that the disclosure of the incremental transactions after any disclosure, shall be made when the transactions effected after the prior disclosure cross the threshold specified in sub-clause (a) above.

- c) Designated Persons shall be required to 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:

(i) Immediate Relatives

(ii) persons with whom such Designated Person(s) shares a 'material financial relationship'

(iii) Phone, mobile and cell numbers which are used by them

In addition, the names of educational institutions from which Designated Persons have graduated and names of their past employers shall also be disclosed on a one time basis.

Explanation –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 from a Designated Person during the immediately preceding twelve months, equivalent to at least 25% of the annual income of such Designated Person but shall exclude relationships in which the payment is based on arm's length transactions.

- d) The Company shall provide the information including PAN number of Promoter(s) including member(s) of the promoter group, designated person(s), director(s), and employees up to two levels below the Managing Director (hereinafter collectively referred to as “Entities”) as soon as it is listed on the stock exchanges, and thereafter on the same day of any change in details of the Entities, to a designated depository in the format and manner prescribed by the Depositories. For PAN exempt entities, the Investor's Demat account number(s) shall be specified by the Company.

- e) The Company may, at its discretion, require any Connected Person(s) to make disclosure of its holdings and trading in securities of the Company in the prescribed **Form C** and at such frequency as may be determined by the Compliance Officer.
- f) Each Designated Person shall submit to the Compliance Officer (a) information in accordance with **Form G** enclosed hereto within seven days of such person's appointment, and submit any change in the information so submitted within seven days of such change; and (b) an annual declaration in **Form H** enclosed hereto within thirty days of the end of each financial year.
- g) The Compliance Officer shall maintain records of all such disclosures for a minimum period of five years.

VIII. Penalty for contravention of the code of conduct

- (i) Every Designated Person and his/ her Immediate Relatives shall be individually responsible for complying with the provisions of the Code. Any Designated Person or his/ her Immediate Relatives who trade in Securities or communicates any information for trading in Securities, in contravention of this Code may be penalized and appropriate action may be taken by the Board.
- (ii) The Compliance Officer shall report all the breaches of this Code to the Board. In the event of a breach of the Insider Trading Regulations, the Company shall promptly inform the Stock Exchanges where Securities of the Company are traded, in such form and manner as may be specified by SEBI from time to time.
- (iii) Designated Persons who violate the Code may also be subject to disciplinary action by the Company, which may include wage freeze, suspension, recovery, claw back, ineligibility for future participation in employee stock option plans, etc. Any amount collected under this shall be remitted to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

PART B- CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION AND DETERMINATION OF LEGITIMATE PURPOSE

I. Unpublished Price Sensitive Information

- a) The Company shall promptly disclose UPSI that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
- b) The Company shall endeavour to make uniform and universal dissemination of UPSI and due care will be taken to avoid selective disclosure.
- c) Material events will be disseminated as mandated by the stock exchanges in Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time.
- d) In case if the UPSI that gets disclosed selectively, inadvertently or otherwise, prompt steps shall be taken by the Company to make such information generally available by disseminating the said UPSI either in the forms of notification to stock exchanges, press releases or upload information on the website of the Company or any other means as may be feasible.

II. Designation and Role of Chief Investor Relations Officer

- a) The Board of Directors, of the Company shall appoint or nominate, from time to time, the Chief Investor Relations Officer (“**CIRO**”) for the purpose of the Code. The Company shall ensure that it shall be responsible for dissemination of information and disclosure of UPSI.
- b) In the temporary absence of the CIRO for any reason whatsoever, the managing director of the Company shall nominate any other official of the Company to be responsible for dissemination of information and disclosure of UPSI.

III. Principles of preservation and fair disclosure

To adhere to the principles as mentioned in Schedule A to the PIT Regulations, the Company shall ensure the following:

- a) All UPSI shall be handled on a need-to-know basis and in accordance with the provisions of the Insider Trading Regulations and any other applicable codes, policies and procedures of the Company.
- b) It is clarified that information to be termed UPSI should be specific and intended to be generally made available at a point of time to ensure it does not lead to creation of a false market in securities. For the purpose of disclosure, the CIRO may consult such officials within the Company to ensure the correctness and credibility of the UPSI. The CIRO shall authorise disclosure or dissemination of UPSI (1) by way of intimation to the stock exchanges, such that further disclosure can be made from the stock exchange websites; (2) on the official website to ensure official confirmation and documentation; and (3) in any other manner as may be decided by the CIRO to facilitate uniform and universal dissemination of UPSI.
- c) Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
- d) Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
- e) Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- f) Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- g) Information disclosure/ dissemination should normally be approved in advance by the CIRO. If the information is accidentally disclosed without prior approval, the person responsible must inform the CIRO immediately, even if the information is not considered price sensitive and if required, the CIRO shall take all reasonable steps to rectify the same.

Sharing of information with analysts, institutional investors and research personnel

- i. The Company shall ensure that: (a) no UPSI is disclosed selectively to any one or group of research analysts or investors, to the disadvantage of other stakeholders; and (b) any information shared with analysts and research personnel is not UPSI and is generally available. If any UPSI is shared in any meetings with analysts/ research personnel/ investor meets, it will tantamount to selective disclosure and the Company will be required to disclose audio recordings or transcripts of proceedings where UPSI is shared. Recordings and transcripts of the quarterly earning calls or other interactions with analysts/ investors shall be made available on the Company's website as required under applicable law.
- ii. Company shall ensure to develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.

Responding to Market Rumours

The CIRO shall ensure that appropriate and fair responses are provided to queries on news reports and requests for verification of market rumours by regulatory authorities within the prescribed timelines under applicable law. In case a query/request has been received from any stock exchange, a copy of such reply shall be sent to other stock exchange(s) also where securities of the Company are listed, if any.

IV. Policy for determination of "Legitimate purposes"

The UPSI can be shared by an Insider for Legitimate purposes as per its "Policy for Determination of Legitimate Purposes" (**Annexure A**), provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.

ANNEXURE A- POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES

I. Objective

The objective of this policy is to identify 'Legitimate Purposes' for performance of duties or discharge of legal obligations, which will be considered as an exception for procuring UPSI relating to the Company. The assessment of whether sharing of UPSI for a particular instance would tantamount to 'legitimate purpose' would be a subjective assessment and would have to be evaluated on the specific facts and circumstances of each case.

II. Scope

This Policy applies to all insiders and persons acting on behalf of the Company who are in possession of or have access to UPSI.

III. Legitimate Purpose

'Legitimate Purpose' shall include sharing of UPSI by an insider in the ordinary course of business or on a need-to-know basis not limited to with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals, other advisors or consultants, regulators, government authorities, or any other persons.

Provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.

IV. Principles for Determining Legitimate Purpose

This Policy sets out the principles that should be considered while assessing if the purpose for which UPSI is shared or proposed to be shared is for "Legitimate Purpose". Primarily, the following factors should be considered to determine the legitimate purpose:

- a) whether sharing of such information is in the ordinary course of business of the Company;
- b) whether information is sought to be shared to evade or circumvent the prohibitions of the Insider Trading Regulations;
- c) whether sharing the information is in the best interests of the Company or in furtherance of a genuine commercial purpose;
- d) whether the information is required to be shared for enabling the Company to discharge its legal and/or contractual obligations;
- e) whether the nature of information being shared is commensurate to the purpose for which access is sought to be provided to the recipient.

V. Digital Database

A structured digital database shall be maintained containing the nature of UPSI and the names of such persons or entities with whom information is shared or who has shared such information along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such databases shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database. This digital database should be preserved for a period of not less than eight years after completion of the relevant transactions and in the event of receipt of any information from SEBI regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.

VI. Restrictions on Communication and Trading by Insiders

Any other person with whom UPSI is shared pursuant to a “legitimate purpose” shall be considered as an “insider” for purpose of the PIT Regulations and due notice shall be given to such persons to maintain confidentiality of such UPSI in compliance with the Insider Trading Regulations.

The Company shall inform the recipient of UPSI, by way of written intimation and/or agreement, e.g. non-disclosure or confidentiality agreement, covering that (i) the information being shared is UPSI and that the Company is the exclusive owner of such UPSI; (ii) upon receipt of UPSI, the recipient would be deemed to be an Insider subject to the provisions of the PIT Regulations and the recipient must maintain confidentiality of the UPSI at all times; (iii) the recipient may use the UPSI only for the approved purposes for which it was disclosed and the recipient should provide a written undertaking that he/she/it shall not undertake trades in the securities of the Company while in possession of the UPSI, subject to applicable law; and (iv) the recipient must extend all co-operation to the Company, as may be required in this regard.

PART C- POLICY AND PROCEDURE FOR INQUIRY IN CASE OF LEAK OF UPSI OR SUSPECTED LEAK OF UPSI

- I. Any Information (written or oral or electronic) regarding a Leak of UPSI or suspected Leak of UPSI may be received by the Company from the following sources:
 - (i) Internal: through the whistleblower process as specified under the Company's Vigil Mechanism/ Whistle Blower Policy; or any Leak of UPSI or suspected Leak of UPSI detected through the internal controls implemented by the Company;
 - (ii) External: any entity or persons, other than the employees or directors of the Company, whether based on the complaint received from a whistleblower or otherwise;
(above information shall be collectively referred to as "**Complaint**").
- II. The Vigilance Officer in terms of the Company's Vigil Mechanism/ Whistle Blower Policy, shall report the Complaint to the Audit Committee within a reasonable period of time from the date of receipt of such Complaint.
- III. The Audit Committee shall review the Complaint and shall discuss with the Vigilance Officer on potential next steps including but not limited to seeking any additional information from the complainant, considering an investigation and appointment of an investigation panel consisting of internal employees and/ or external agencies. If the Complaint implicates the Vigilance Officer, then such officer shall recuse himself/ herself from the said inquiry process.
- IV. If the Audit Committee mandates an investigation, then the identified panel of investigators shall conduct the investigation into the Complaint and present their findings to the Vigilance Officer. The executive summary of the investigation shall be reported to the Audit Committee by the Vigilance Officer. If the Complaint implicates the Vigilance Officer, then the investigation findings shall be presented directly to the Audit Committee.
- V. Based on the update provided by the Vigilance Officer (except cases where the Complaint implicates the Vigilance Officer), the Audit Committee shall put forward its recommendation to the Board. The Board, on receipt of such recommendation and after due review/deliberations, shall decide on the next steps.

FORM A

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (1) (b) read with Regulation 6(2) = Disclosure on becoming a director/KMP/Promoter/Member of the promoter group]

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 or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (KMP / Director or Promoter or member of the promoter group/ Immediate relative to/others, etc.)	Date of appointment of KMP/Director / OR Date of becoming Promoter/ member of the promoter group	Securities held at the time of appointment of KMP/Director or upon becoming Promoter or member of the promoter group		% of Shareholding
			Type of Security (For e.g. – Shares, Warrants, Convertible Debentures, Rights entitlements 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, as amended.

Details of Open Interest (OI) in derivatives on the securities of the company held on appointment of KMP or Director or upon becoming a Promoter or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).

Open Interest of the Future contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group			Open Interest of the Option Contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group		
Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
7	8	9	10	11	12

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

Date:

Place:

Signature :

Name :

Designation :

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 Securities of Promoter, Member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoter/member of the promoter group/designated person/Director s/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.)	Exchange on which the trade was executed
		Type of security For e.g. – Shares, Warrants, Convertible Debentures, Rights	No. and % of shareholding	Type of security (For e.g. – Shares, Warrants, Convertible Debenture	No	Value	Transaction Type (Buy/ Sale/ Pledge / Revoke/ Invoke)	Type of security (For e.g. – Shares, Warrants, Convertible	No. and % of Shareholding	From	To			

		entitlement s etc.)		s, Rights entitlement s Etc.)				e Debenture s, Rights entitlement s Etc.)						
1	2	3	4	5	6	7	8	9	10	11	1 2	13	14	15

Note: “Securities” shall have the meaning as defined under regulation 2(1)(I) of SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended
Value of transaction excludes taxes/brokerage/any other charges

Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or Director of a listed company and immediate relatives of such persons 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)	
16	17	18	19	20	21	22

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

Name:

Signature:

Date:

Place:

FORM C

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

[illegible]

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
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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, as amended
Value of transaction excludes taxes/brokerage/any other charges

Details of trading in derivatives on the securities of the company by other connected persons as identified by the company

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)	
16	17	18	19	20	21	22

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

Name:

Signature:

Date:

Place:

FORM D
FORM FOR PRE-CLEARANCE OF TRANSACTIONS:

[as per Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and Clause 6(b)(i)&(ii) of Code of Conduct to Regulate, Monitor and Report trading by Designated Persons and their Immediate Relatives]

To
The Compliance Officer
Juniper Green Energy Limited [formerly known as Juniper Green Energy Private Limited]
Add: 1103A & 1103B, 11th Floor, Hemkunt Chamber, 89, Nehru Place New Delhi- 110019, India

Pursuant to the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended and the Company' s Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons and their Immediate Relatives, I seek approval to purchase / sell / subscribe/pledge/otherwise deal in securities of the Company as per details given below:

1.	Name of the applicant	
2.	Designation	
3.	Department	
3.	Employee Code No.	
2A.	Relationship with the Applicant (Self/Immediate Relative)	
4.	Number and value of securities in the Company held as on date	
5.	Folio No. / DP ID and Client ID	
6.	Nature of proposed trading	a) Purchase of securities [in the open market/ off-market] b) Sale of securities [in the open market/ off-market] c) Subscription to securities d) Pledge e) Other
7.	Proposed date of trading in securities	

8.	Estimated number of securities proposed to be purchased/ sold/subscribed to/pledged/otherwise dealt with	
9.	Folio No. / DP ID and Client ID where the securities will be credited /debited	
10.	Current Market Price (as on the date of application)	
11.	Whether the proposed transaction will be through stock exchange or off-market trade	

I hereby apply for the pre-clearance of the transaction(s) referred above. In relation to the above trading, I undertake that:

- i. That I do not have any access nor have I received any “Unpublished Price Sensitive Information” up to the time of signing this undertaking.
- ii. That in case I have access to or receive “Unpublished Price Sensitive Information” after the execution of this 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 the Company till the time such information becomes public.
- iii. That I have not contravened the Code of Conduct to Regulate, Monitor and Report trading by Designated Persons and their Immediate Relatives (“**Code**”) as notified by the Company from time to time or any applicable laws on prohibition of insider trading.
- iv. That I have made a full and true disclosure in the matter.
- v. That I will go ahead with the transaction only after receiving the required clearance.
- vi. That I will execute the order in respect of the securities of the Company within 7 Trading Days after the approval of pre-clearance is given, failing which, fresh clearance shall be obtained.
- vii. That I shall inform the Company (in Form E) within 2 days of transaction / trading in securities of the Company, the details of the securities traded or within 7 Trading Days from pre-clearance approval, the details of the securities not traded (in respect of which pre approval had been obtained).
- viii. In the event of the transaction for which pre-clearance has been obtained being in violation of the Code or the applicable laws, (a) I will, unconditionally, release, hold harmless and indemnify to the fullest extent, the Company and its directors and officers, (the ‘**Indemnified Persons**’) for all losses, damages, fines, expenses, suffered by the Indemnified Persons, (b) I will compensate the Indemnified Persons for all expenses incurred in any investigation, defense, crisis management or public relations activity in relation to this transaction and (c) I authorize the Company to recover from me, the profits arising from this transaction and remit the same to the Securities and Exchange Board of India (“**SEBI**”) for credit of the Investor Protection and Education Fund administered by the SEBI.

Date:
Place:

Signature : _____
Name:
Designation:

FORM E
FORM FOR DISCLOSURE OF TRANSACTIONS

[as per Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and Clause 7(b) and 7(c) of Code of Conduct to regulate, monitor and report trading by Designated Persons and their Immediate Relatives]

(To be submitted within two days of transaction / trading in securities of the Company or end of 7 Trading Days from pre-clearance approval)

The Compliance Officer

Juniper Green Energy Limited [formerly known as Juniper Green Energy Private Limited]
Add: 1103A & 1103B, 11th Floor, Hemkunt Chamber, 89, Nehru Place New Delhi- 110019,
India

Pre-Approval Reference No.: _____

I hereby inform that I

- have not bought / sold/ subscribed any securities of the Company (Reason _____)
- have bought/sold/subscribed/ pledged/ otherwise dealt with _____ securities as mentioned below on_(date)

Name of holder	No. of securities dealt with	Bought/sold/subscribed/ pledged/ otherwise dealt with	DP ID/Client ID / Folio No	Price (Rs.)

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

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 agree to hold the above securities for a minimum period of six months/undertake that no contra trade shall be entered within a period of six months. In case there is any urgent need to sell these securities within the said period, I shall approach the Compliance Officer for necessary approval (applicable in case of purchase / subscription).

I declare that the above information is correct and that no provisions of the Company' s Code of Conduct to Regulate, Monitor and Report trading by Designated Persons and their Immediate Relatives and/or applicable laws/regulations have been contravened for effecting the above said transactions(s).

Date:
Place:

Signature : _____
Name:
Designation:

FORM F
APPLICATION FOR WAIVER OF MINIMUM HOLDING PERIOD

[As per Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and Clause 7(g) of Code of Conduct to Regulate, Monitor and Report trading by Designated Persons and their Immediate Relatives]

To
The Compliance Officer
Juniper Green Energy Limited [formerly known as Juniper Green Energy Private Limited]
Add: 1103A & 1103B, 11th Floor, Hemkunt Chamber, 89, Nehru Place New Delhi- 110019, India

Dear Sir,

I request you to grant me waiver of the minimum holding period of 6 months as required under the Company's' Code of Conduct to Regulate, Monitor and Report

Trading by Designated Persons and their Immediate Relatives, with respect to _____ securities of the Company held/ sold by me/ (name of family dependent)/ on _____ (*insert date*) pursuant to pre-clearance approval granted by the Compliance Officer on ____ (*insert date*). I desire to sell/ purchase the _____ securities of the Company because of the under-mentioned emergency [*mention reasons in brief along with supporting documents*]

Thanking you

Your faithfully,

Signature : _____

Name:

Designation:

Date :

Place :

FORM G

Name _____

Employee Code : _____

Sr. No .	Particulars	Name	PAN & Address	Phone and mobile number used by persons	No. and % of total Shareholding	Whether financially dependent or consults you for trading decisions (Y/N)
1.	Spouse					
2.	Father					
3.	Mother					
4.	Spouse's Father					
5.	Spouse's Mother					
6.	Son					
7.	Son's Wife					
8.	Daughter					
9.	Daughter's husband					
10.	Brother					
11.	Sister					
12.	Spouse's Brother					
13.	Spouse's Sister					
14.	If you are member of Hindu Undivided Family					
15.	Name of persons with whom material financial relationship* is shared					

**“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 from a designated person during the immediately preceding 12 months, equivalent to at least 25% of the annual income of such designated person but shall exclude relationships in which the payment is based on arm's length transactions.*

Date: _____

Place: _____

Signature : _____

Name: _____

Designation: _____

FORM H
ANNUAL DECLARATION

To
The Compliance Officer
Juniper Green Energy Limited
[formerly known as Juniper Green Energy Private Limited]

Add: 1103A & 1103B, 11th Floor, Hemkunt Chamber, 89, Nehru Place New Delhi-
110019, India

ISIN of the Company:

Financial Year Ending:

Details of Holding as at the end of the financial year:

Name, PAN, CIN/ DIN & address with contact nos.	Category of Person	Securities held at the end of financial year		
		Type of security (For e.g. – Shares, Warrant, Convertible Debentures etc.)	No. and % of total Shareholding	Value
1	2	3	4	5

Details of change in holding during the financial year:

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 e.g. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For e.g. – Shares, Warrants, Convertible Debentures Etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge / Revoked/ Invoke)	Type of security (For e.g. – Shares, Warrants, Convertible Debentures Etc.)	No. and % of Shareholding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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

Details of trading in derivatives by such person

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

Date:
Place:

Signature : _____
Name:
Designation: