

BATLIBOI LIMITED

CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

[Under the SEBI (Prohibition of Insider Trading) Regulations, 2015]

1. **Introduction:**

‘Insider trading’ means trading in Securities of a company by its Directors, Employees or other Insiders while in possession of Unpublished Price Sensitive Information (“UPSI”). Such trading by Insiders erodes the investors’ confidence in the integrity of the management and is unhealthy for the capital markets.

The Securities and Exchange Board of India (SEBI), in its endeavor to protect the interests of investors in general, had formulated the SEBI (Prohibition of Insider Trading) Regulations, 1992 under the powers conferred on it under the SEBI Act, 1992, which came into effect from November 19, 1992 and the same were made applicable to all companies whose shares were listed on Indian stock exchanges.

To strengthen these regulations and to create a framework for prevention of insider trading to facilitate legitimate business transactions, SEBI had constituted a committee under the Chairmanship of Hon’ble Justice N.K. Sodhi in April 2013. Some of the recommendations of the committee were considered and approved by SEBI Board and accordingly, Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as the ‘Regulations’) were notified by SEBI on January 15, 2015 which will become effective from May 14, 2015. The Regulations not only regulate trading by insiders but also seek to prohibit insider trading.

The relevant extract of Regulations 3(1), 3(2), 4(1) of the Regulations, which prohibit insider trading, is quoted below:

“3(1) No insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.”

“3(2) No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to a company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.”

“4(1) No insider shall trade in securities that are listed or proposed to be listed on a stock exchange when in possession of unpublished price sensitive information....”

2. **Objective:**

The Company endeavors to preserve the confidentiality of all un-published price sensitive information(s) and to prevent misuse of such information(s). The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations.

Every “**Insider**”, as defined in the SEBI Insider Trading Regulations, has a duty to safeguard the confidentiality of all such information(s) obtained in the course of his/her work at the Company or by virtue of his/her relationship with the Company. No Insider shall use his/her position to gain personal benefit or to provide benefit to any third party. Such persons are prohibited from communicating and/or counseling others with respect to the securities of the Company. Such persons should also refrain from profiteering by using the unpublished price sensitive information(s).

3. **Definitions**

- (a) “**Company**” means Batliboi Limited
- (b) “**Board**” means Board of Directors of the Company.
- (c) “**Code**” means this Code of Conduct for Prevention of Insider Trading and Code of Corporate Disclosure Practices, as applicable, including modifications made thereto from time to-time.
- (d) “**Compliance Officer**” means any senior officer, designated so and reporting to the board of directors or head of the organization in case board is not there, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board of directors of the listed company or the head of an organization, as the case may be;
- (e) “**Connected Person**” 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 Securities and Exchange Board of India Act, 1992 or an employee or director thereof; or
 - d) an investment company, trustee company, asset management company or an employee or director thereof; or
 - e) an official of a stock exchange or of clearing house or corporation; or

- f) a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
 - g) a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
 - h) an official or an employee of a self-regulatory organization recognised 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;
- (f) "**Generally available information**" means information that is accessible to the public on a non-discriminatory basis;
- (g) "**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;
- (h) "**Insider**" means any person who is:
- i) a connected person; or
 - ii) in possession of or having access to unpublished price sensitive information;
- (i) "**Promoter**" 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;
- (j) "**Securities**" shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund;
- (k) "**Takeover regulations**" means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;
- (l) "**Trading**" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly ;
- (m) "**Trading day**" means a day on which the recognized stock exchanges are open for trading;
- (n) "**Unpublished Price Sensitive Information**" ("**UPSI**") 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 Securities of the Company and shall, ordinarily include but not be restricted to, information relating to the following:
- (i) financial results ;
 - (ii) dividends;
 - (iii) change in capital structure;

- (iv) mergers, de-mergers, acquisitions, de-listings, 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/regulations
- (o) **“Employees”** means every employee of the Company (whether working in India or abroad) including the Directors in the employment of the Company.
- (p) **“Designated Person”** shall mean and include —
- i. Directors; and
 - ii. Such Employees and Connected Persons (including representatives of the auditors, accountancy firms, law firms, analysts, consultants, etc.) as identified by the Compliance Officer in consultation with the Board in line with the objectives of the Code.;
- (q) **“Director”** means a member of the Board of Directors of the Company.
- (r) **“Specified Persons”** means all Directors, Employees and Connected Persons of the Company (including all Designated Persons).

Words and expressions used and not defined in these code 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 there under shall have the meanings respectively assigned to them in those legislation.

4. Compliance Officer:

The Board of the Company shall appoint the Company Secretary as the Compliance Officer to ensure compliance and for effective implementation of the Regulations and also this Code across the Company.

The Compliance Officer shall report to the Board of the Company.

The Company Secretary shall hold the position of the Compliance Officer so long as he/she remains the Company Secretary. In the event of the office of the Company Secretary falling vacant till such time a successor is appointed, the Managing Director/whole time director shall, in the interim period act as the Compliance Officer.

In order to discharge his/her functions effectively; the Compliance Officer shall be adequately empowered and provided with adequate manpower and infrastructure to effectively discharge his/her function. In the performance of his/her duties, the Compliance Officer shall have access to all information and documents relating to the Securities of the Company.

The Compliance Officer shall act as the focal point for dealings with SEBI in connection with all matters relating to the compliance and effective implementation of the Regulations and this Code.

- a) The Company has appointed its Company Secretary as Chief Investor Relations Officer (senior level employee) under the new Insider Trading Regulations, 2015, who shall report to Chairman/ Whole Time Director/ Managing Director/Chief Financial Officer of the Company.

- b) The Chief Investor Relations Officer is authorized by the Company to ensure proper and timely dissemination of information and disclosure of unpublished price sensitive information.
- c) The Compliance Officer shall maintain a record of the officers and designated employees and any changes made in the list of designated employees.
- d) The Compliance Officer shall also maintain records of all the Applications, Undertakings, Declarations, Disclosures etc. submitted by Officers and Designated Employees and their dependants for a minimum period of five years from the date of receipt of the document.
- e) 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.

Duties of the Compliance Officer:

The Compliance Officer shall be responsible for:

- i) setting forth policies in relation to the implementation of the Code and the Regulations in consultation with the Board/Audit Committee.
- ii) prescribing procedures for various activities referred to in the Code.
- iii) compliance with the policies and procedures referred hereinabove.
- iv) monitoring adherence to the rules for the preservation of UPSI.
- v) grant of pre-trading approvals to the Designated Persons for trading in the Company's Securities by them / their Immediate Relatives and monitoring of such trading.
- vi) implementation of this Code under the general supervision of the Audit Committee and the overall supervision of the Board of the Company.

5. Preservation of "Unpublished Price Sensitive Information"

Specified Persons privy to confidential information shall, in preserving the confidentiality of information, and to prevent its wrongful dissemination, adopt among others, the following safeguards:

- a) maintain the confidentiality of all un-published Price Sensitive Information(s) and shall not pass on, directly or indirectly, such information to any person by way of making a recommendation for the purchase or sale of Shares of the Company or otherwise.
- b) keep secure all files/papers containing confidential un-published Price Sensitive Information(s). Computer files must have adequate security of login and password, etc.
- c) handle the unpublished Price Sensitive Information(s) on a "need to know" basis, i.e. such Information shall be disclosed only to those persons 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 the information(s).
- d) immediately report to the Chairman/Compliance Officer all non-public Price - Sensitive information directly received by him/her.

6. Chinese Wall

To prevent the misuse of un-published Price Sensitive Information(s), the Company has adopted a 'Chinese Wall' policy which separates those departments which routinely have access to un-published Price Sensitive Information(s), considered 'inside areas' from those departments which deal with marketing or other departments providing support services, considered 'public areas'.

As per the said policy:

- a. The Employees in the inside areas are not allowed to communicate any un-published Price Sensitive Information(s) to anyone in the public areas.
- b. The Employees in inside area may be physically separated from the Employees in public area.
- c. The demarcation of various departments as inside area shall be determined by the Compliance Officers in consultation with the Board.
- d. Only in exceptional circumstances, Employees from the public areas are brought 'over the wall' and given un-published Price Sensitive Information(s) on the basis of 'need to know'.

7. Restriction on trading in Shares of the Company

All Directors, Officers, Designated Persons and Connected Persons of the Company shall be subject to trading restrictions as enumerated below:

a) Trading window:

- i) The trading period, for trading in the Company's securities, called as "trading window", shall be closed during the time the information referred to in this para is un-published.
- ii) All the Directors, Officers, Designated Persons and Connected Persons shall not deal in any transaction involving the purchase or sale of shares of the Company during the periods when "Trading Window" (i.e. trading period) is closed.
- iii) The Trading Window shall be closed from earlier date that is 10 days prior to the end of the respective quarter, half-year, or financial year, as the case may be:
 - Declaration of Financial results (quarterly, half-yearly and annually).
 - Declaration of dividends (interim and final).
 - Issue of securities by way of public/rights/bonus etc.
 - Any major expansion plans or execution of new projects.
 - Amalgamation, mergers, takeovers and buy-back.
 - Disposal of whole or substantially whole of the undertaking.
 - Any changes in policies, plans or operations.
 - Such other information, as the Chairman/ Whole Time Director/ Managing Director/Compliance Officer may prescribe from time to time.
- iv) The Trading Window shall automatically get opened 48 hours (two days) after the information referred above in para (iii) is made public.
- v) All the Directors, Officers, Designated Persons and Connected Persons shall conduct all their dealings in the securities of the Company only when the Trading Window is open and no Designated Person, Connected persons or their Immediate Relatives shall trade in the Securities of the Company during the period the Trading Window is closed or during any other similar period as may be specified by the Compliance Officer from time-to-time.

b) Trading Plans:

- i) An insider shall 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.

- ii) An Insider shall submit trading plan before six months from commencement of trading.
- iii) Insider shall not enter into the transaction between the twentieth (20th) trading day prior to the last day of any financial period for which results are required to be announced and the second trading day after the disclosure of such financial results.
- iv) The trading plan shall be for a period not less than twelve months and if another trading plan is already in existence no other plan shall not be accepted covering the same time period.
- v) Insider in his trading plan shall set out number of Securities to be traded along with the nature of the trade and time gap between the trade and dates on which such trade shall be effected.
- vi) Compliance officer shall review the trading plan, approve and monitor the implementation of the plan.
- vii) 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.
- vii) The Insider shall not execute the aforesaid trading plan if any unpublished price sensitive information 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 Insider shall execute trading plan when such information shall become public.
- viii) After approval the trading plan Compliance Officer shall inform the BSE about the approved trading plan and the same will be broadcast on Company's website.
- ix) Insider shall submit trading plan along with the declaration and application in **Annexure — I** or any other format specified by SEBI or BSE.

c) **Pre Clearance of Trades:**

- i) Every Designated Person shall obtain a pre-trading approval as per the procedure prescribed hereunder for any Trading in the Securities of the Company proposed to be undertaken by such Designated Person / his / her Immediate Relatives. Such pre-trading approval would be necessary, only if the cumulative trading (including trading in derivatives of Securities, if permitted by law) whether in one transaction or a series of transactions in any financial year exceeds Rs. 10 lakhs (market value).
- ii) An application shall be made in prescribed Form, attached as **Annexure-II**, to the Compliance Officer indicating the estimated number of shares that the Insider intends to deal in, the depository with which he/she has an account and the details as to his/her shareholding before and after the intended transaction.
- iii) An undertaking in prescribed Form, attached as **Annexure - III** shall be executed in favour of the company by such directors, officers, designated employees incorporating, inter-alia, following clauses, as may be applicable:
 - a) That the director, officer, designated Persons does not have any access or has not received "Price Sensitive Information" upto the time of signing the undertaking.

- b) That in case the employee, director, officer has access to or receives "Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction he/she shall inform the Compliance Officer of the change in his position and that he/she would completely refrain from dealing in the securities of the Company till the time such information becomes public.
- c) That he/she has not contravened the code of conduct for prevention of insider trading as notified by the Company from time to time.
- d) That he/she has made a full and true disclosure in the matter.

Other restrictions:

- i. Transaction must be executed within one week from the next day after the approval of pre-clearance obtained from the Compliance Officer. If transaction is not executed within one week, the directors, officers, designated Persons must obtain pre-clearance for the intended transaction once again.
- ii. All the directors, officers, designated Persons who buy or sell any number of shares of the Company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction. All the directors, officers, designated employees shall also not take positions in derivative transactions in the shares of the Company at any time.
- iii. In case of subscription in the primary market (initial public offers), all the directors, officers, designated employees must hold their investments in securities of the Company for a minimum period of 30 days. The holding period would commence when the securities are actually allotted.
- iv. In case sale of securities is necessitated by personal emergency, the holding period may be waived by the Compliance Officer after recording in writing his/her reasons in this regard.

8. Reporting Requirements for transactions in securities

a) Initial Disclosures:

- i) Every Promoter, key managerial personnel, Director and Designated Person (as and when identified by the Board) of the Company shall disclose their holding, and the holding of their Immediate Relatives and of any other person for whom such person takes trading decisions, of the Company's Securities (including derivatives) to the Compliance Officer within 30 (thirty) days of the Regulations taking effect (i.e., by May 15, 2015) or forthwith on being identified as a Designated Person, as the case may be, in prescribed format (**see Annexure - IV**).
- ii) Every person on appointment as a key managerial personnel or a Director of the Company or upon becoming a Promoter of the Company or on being identified as a Designated Person shall disclose their holding, and the holding of their Immediate Relatives and of any other person for whom such person takes trading decisions, of the Company's Securities (including derivatives) as on the date of appointment or becoming a Promoter, to the Company within 7 (seven) days of such appointment or becoming a Promoter or on being identified as a Designated Person, as the case may be, in prescribed format (**see Annexure - V**).

b) Continual Disclosures:

- i. Every promoter, employee and director 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 Ten Lakh rupees or such other value as may be specified by SEBI time to time, in the format (see **Annexure - VI**).

Compliance Officer of the Company shall notify the particulars of such trading to the BSE Ltd. on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.

c) Disclosures by other connected persons:

All the directors, officers, designated persons and connected persons shall submit to the Compliance Officer the following statement:

- i. Annual statement of shareholding in Company's securities as on 31st March, in every financial year within 15 days time from the end of financial year in the prescribed Form, attached as **Annexure-VII**. If the statement/disclosure is not received within 15 days as mentioned above, it shall be presumed as **nil** transaction during such year.
- ii. Such other information as may be required from time to time.

9. Penalty for contravention of Code of Conduct

- a. Any directors, officers, designated persons 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 the Company.
- b. Any directors, officers, designated employees who violate the Code of Conduct shall also be subject to disciplinary action by the Company, which may include wage/promotion freeze, suspension, ineligibility for future participation in employee stock option plans, etc. or any other action as the Company deem fit.
- c. Action taken by the Company for violation of the Regulations and the Code against any person will not preclude SEBI from taking any action for violation of the Regulations or any other applicable laws/rules/regulations.
- d. Under Section 15G of the SEBI Act, any Insider who indulges in insider trading in contravention of Regulation 3 is liable to a penalty which shall not be less than Rs. 10 lakhs but which may extend to Rs.25 crores or three times the amount of profits made out of insider trading, whichever is higher. Under Section 24 of the SEBI Act, anyone who contravenes the Regulations is punishable with imprisonment for a maximum period of ten years or with fine which may extend to Rs.25 crores or with both. Further, in case any person fails to pay the penalty imposed by the adjudicating officer or fails to comply with any of his directions or orders, he shall be punishable with imprisonment for a term which shall not be less than one month but which may extend to ten years, or with fine, which may extend to twenty-five crore rupees or with both.
- e. In case it is observed by the Compliance Officer that there has been a violation of the

Regulations by any person, he/she shall forthwith inform the Audit Committee of the Company about the violation. The penal action will be initiated on obtaining suitable directions from the Audit Committee. The Compliance Officer shall simultaneously inform SEBI about such violation. The person against whom information has been furnished by the Company/Compliance Officer to SEBI for violations of the Regulations/Code shall provide all information and render necessary co-operation as may be required by the Company/Compliance Officer or SEBI in this connection.

10. Trading by Compliance Officer

All restrictions on trading of securities of the Company shall also be applicable to the Compliance Officer. Compliance Officer shall seek pre-clearance, if applicable, from the Chairman/Managing Director/Whole Time Director.

CLARIFICATIONS:

For all queries concerning this Code, please contact the Compliance Officer.

Trading' Plan

(Under Code of Conduct of the Company read with SEBI Insider Trading Regulation, 2015)

To,
 The Compliance Officer
 Batliboi Limited
 Bharat House, 5th Floor,
 104, Bombay Samachar Marg,
 Fort, Mumbai – 400001.

Dear Sir /Madam,

Ref: DP's name DP ID / CLIENT ID

Name & Address of insider

Your approval is solicited for proposed Trading Plan for purchase & sale of securities of the Company in physical / demats form. I am furnishing details of trade to be made in six month after approval of the proposed trading plan:

Sr. No.	Nature of Trade	Number of Securities to be	Time intervals between Two	Date of propose trade

1. I confirm that I do not have access to the unpublished price sensitive information and also have not received unpublished price sensitive information till today;
2. that in case I have access to the price sensitive information or receives it after approving the trading plan I shall inform the change and refrain from dealing in securities till the information becomes public;
3. that I have not contravened the code of conduct for prevention of insider trading as notified by the Company;
4. that whatever is stated above is true and correct to the best of my knowledge and nothing has been concealed.

Yours truly,

Signature

Name:
 Designation:

Department:
 Employee Code:

Application for pre-clearance of trade

(Under Code of Conduct of the Company read with Insider Trading regulation, 2015)

To,
The Compliance Officer
Batliboi Limited
Bharat House, 5th Floor,
104, Bombay Samachar Marg,
Fort, Mumbai – 400001.

Dear Sir /Madam,

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct for Prevention of Insider Trading, I seek approval for purchase/sale/subscription of the -----Securities of the Company in physical /demats form as per the details given below:

DP ID / CLIENT ID:

Name & Address:

State whether:

- Director
- Designated Person
- Immediate Relative

I enclose herewith the form of Undertaking signed by me.

Yours faithfully,

(Signature of Applicant)

PRE-CLEARANCE ORDER

PCO NO. _____

DATE: _____

This is to inform you that your request for dealing in _____ (No.) shares of the Company as mentioned in your above application are approved. Please note that the said transaction must be completed within 7 (seven) days from today i.e. on or before _____ [date].

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.*

**UNDERTAKING/DECLARATION TO BE ACCOMPANIED
WITH THE APPLICATION FOR PRE CLEARANCE OF TRADE**

I, _____, resident of _____ hereby declare that I am Designated Person of KJMC Financial Services Limited, (hereinafter referred to as 'Company') do hereby solemnly declare and undertake as under:

1. that I am working with the company with effect from _____
2. that I intend to purchase ----- of the Company in Physical / demat form immediately on receipt of clearance for trade;
3. that I am aware of the Company's code of conduct for Prohibition of Insider Trading (**PIT**) and agree to comply with the Company's code of conduct and ethics from time to time.
4. that I do not have any access or has not received "Price Sensitive Information" upto the time of signing the undertaking.
5. In the event that I have access to or receive "Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction for which approval is sought, I shall inform the compliance officer of the Company of the change in my position and that I would completely refrain from dealing in the securities of the company till the time such information becomes public.
6. that I shall not communicate, counsel or procure directly and indirectly any unpublished Price Sensitive Information (PSI) as mentioned in Company's code of conduct to any person who while in possession of such unpublished PSI & shall keep the confidential information which is in my possession secured.
7. that I shall undertake to submit the necessary disclosure in the requisite form to the compliance officer of the Company within two Trading Days of execution of the transaction /a Nil report if the transaction is not undertaken.
8. that I shall undertake to seek pre-clearance of the compliance officer for any securities transaction and shall make an application, submit required forms duly filled and signed.
9. that I shall give half yearly statement of shareholding in Company's securities as on 30th September and 31st March, in every financial year within 15 days time from the end of each half year in the prescribed Form.
10. that I have not contravened the code of conduct for prevention of insider trading as notified by the Company and shall be fully liable in any event of contravention/ noncompliance of the same.
11. That I have made a full and true disclosure in the matter

Signature of the Applicant:

Date:

FORM A**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015****[Regulation 7 (1) (a) read with Regulation 6 (2) – Initial disclosure to the company]**Name of the company: **BATLIBOI LIMITED**ISIN of the company: **INE177C01022****Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)**

Name, PAN, CIN/DIN & Address with Contact Nos.	Category of person (Promoters/ KMP/ Director Immediate/ relatives/ others etc)	Securities held as on the Date of Regulation coming into force		% of Shareholding
		Type of Security (For Eg. Shares, Warrants, Convertible Securities etc)	No.	
1	2	3	4	5

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

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

Open Interest of the Futures Contract held as on the date of Regulation Coming into force			Open Interest of the Options Contract held as on the date of Regulation Coming into force		
Contract Specifications	Number of units (Contracts * lot size)	Notional value in Rupees terms	Contract Specifications	Number of units (Contracts *lot size)	Notional value in Rupees terms
6	7	8	9	10	11
N.A	N.A	N.A	N.A	N.A	N.A

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

Date:

Name & Signature

Place:

Designation

FORM B**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015****[Regulation 7 (1) (b) read with Regulation 6 (2)]**Name of the company: **BATLIBOI LIMITED**ISIN of the company: **INE177C01022****Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation 6(2)**

Name, PAN, CIN/DIN & Address with Contact Nos.	Category of person (Promoters/ KMP/ Director Immediate/ relatives/others etc)	Securities held as at the time of becoming Promoter/appointment of Director/KMP		% of Shareholding
		Type of Security (For Eg. Shares, Warrants, Convertible Securities etc)	No.	
1	2	3	4	5

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

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

Open Interest of the Futures Contract held at the time of becoming Promoter/appointment of Director/KMP			Open Interest of the Options Contract held at the time of becoming Promoter/appointment of Director/KMP		
Contract Specifications	Number of units (Contracts * lot size)	Notional value in Rupees terms	Contract Specifications	Number of units (Contracts *lot size)	Notional value in Rupees terms
6	7	8	9	10	11
N.A	N.A	N.A	N.A	N.A	N.A

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

Date:

Name & Signature

Place:

Designation

FORM C

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

Name of the company: BATLIBOI LIMITED

ISIN of the company: INE177C01022

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 of Promoter/Employee / Director with contact nos.	Category of Person (Promoters/ KMPs/ Directors/ immediate relatives/ others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed		% of shareholding			Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition (market purchase/public rights/preferential offer / off market/ Inter-se transfer etc.	Trading in derivatives (Specify type of contract, Futures or Options etc.)				Exchange on which the trade was executed			
		Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For e.g. – Shares, Warrants, Convertible Debentures)	No.	Pre transaction	Post transaction	From	To	Buy			Sell	Valu e	Numb er of units (contra cts * lot size)	Valu e	Numb er of units (contra cts * lot size)			
		6	7	8	9	10	11	12	13	14			15							
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17				

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

Date:

Name & Signature

Place:

Designation

FORM D

Annual Disclosure

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (3) read with Regulation 6 (2)]

Date:

To
The Compliance Officer
Batliboi Limited
Bharat House, 5th Floor,
104, Bombay Samachar Marg,
Fort, Mumbai-400001.

I. Annual Statement of Shareholdings of Promoter / Key Managerial Personnel / Director / Officer / Connected Person / Designated Employee and their immediate relatives* as on _____

Name	Designation Department	No. of shares held on _____	No. of shares bought during the year	No. of shares sold during the year	No. of shares held as on _____	Folio No. / DP ID/ Client ID

II. Details of Shares held by **Relatives / Dependent Family Members (as applicable)

Name of Relative	Relationship	No. of shares held on _____	No. of shares bought during the year	No. of shares sold during the year	No. of shares held as on _____	Folio No. / DP ID. / Client ID.

I / We declare that I / We have complied with the requirements of minimum holding period of 30 days with respect to the shares sold – (yes/ no / NA)

Yours truly,

Signature
(Name & Designation)

Emp No. _____
(# To be filled by the Employees)

* ***“Immediate Relative”*** means the spouse of the Designated person and includes parent, sibling and child of such designated person or of the spouse, who are either financially dependent on the Designated Person or consult the Designated Person in taking decisions relating to trading in securities.

1. Delete whichever is not applicable
2. Connected person should mention the nature of the association.
3. Applicable to Director.
Applicable to Officer / Designated Employee and Connected Person.

****LIST OF RELATIVES**

*Pursuant to Section 2(77) and Rule 4 of Companies (Specification of definitions details) Rules,
2014*

1. Members of Hindu Undivided Family
2. Spouse
3. Father (including Step Father)
4. Mother (including step mother)
5. Son(including step son)
6. Son's wife
7. Daughters
8. Daughter's husband
9. Brother (including step brother)
10. Sister (including Step Sister)

Signature

(Name & Designation)

Date:

Place: