
**DIC INDIA LIMITED-CODE OF FAIR DISCLOSURE, CONDUCT &
INTERNAL PROCEDURE FOR PREVENTION OF INSIDER
TRADING**

Effective from April 1, 2019



Color & Comfort

CIN: L24223WB1947PLC015202
Transport Depot Road, Kolkata 700088

DIC INDIA LIMITED

CODE OF FAIR DISCLOSURE, CONDUCT & INTERNAL PROCEDURE FOR PREVENTION OF INSIDER TRADING

PREAMBLE

The Code of Conduct will be known as “DIC India Limited-Code of Fair Disclosure, Conduct & internal Procedure for prevention of Insider Trading”(Code) issued pursuant to Regulation 8 & 9 of the Security & Exchange Board of India(Prohibition of Insider Trading) Regulations, 2015 and the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 (“Regulations”)

1. The decision of Board of Directors (defined below) with regard to all matters relating to this Code will be final and binding on all concerned. The Board of Directors shall have power to modify or replace this Code, in part or in full, as appropriate and as may be brought thought fit from time to time.
2. This Code supersedes the earlier DIC INDIA LIMITED- Code of Fair Disclosure, Conduct & Internal Procedure for prevention of Insider Trading approved the Board in its meeting held on June 29, 2015.
3. The Code has been duly approved by the Board of Directors on March 31, 2019 and shall come into effect on April 1, 2019.
4. The definition of terms mentioned in the Regulations, as may be amended from time to time, is applicable to this Code and not intentionally repeated in this Code.

PART- I

Code of Conduct

1. DEFINITION

- A. “**Board of Directors**” means the Board of Directors of the Company.
- B. “**Company**” means DIC India Limited.
- C. “**Compliance Officer**” means the Company Secretary as may be appointed by the Board of Directors for purposes of this Code from time to time.
- D. “**Designated Person(s)**” shall include :
 - i. Every Promoter of the Company including their nominees and representatives acting on behalf of the Promoters;
 - ii. Every director of the Company including whole time Director(s) and every Key Managerial Person(KMP)
 - iii. Executive Assistant/Secretaries to Executive Directors;

- iv. Every employee upto two level below Whole Time Director of the Company and its Material Subsidiary(ies)
 - v. Every employee in the grade of General Manager and above;
 - vi. Every employee in the Corporate Secretarial, Finance / Accounting, Internal Audit, Legal, HR, IT, Purchasing, SCM and Technology functions. All non-unionised employees in Safety, QA, Plant and Operation department
 - vii. Any other employee /person as may be determined by the Board from time to time in consultation with the management of the Company considering the objectives of the Code;
 - viii. Any employee who has access to UPSI and
 - ix. Immediate Relatives of all the above persons.
- E. **“Employee”** means every employee of the Company whether permanent or contractual basis including the Directors in the employment of the Company.
- F. **“Legitimate Purpose” shall include sharing of unpublished price sensitive information** in ordinary course of business by an Insider with Partners, Collaborators/ Lenders, Customers, Suppliers, Merchant Banker, Legal Advisors, Auditors, Insolvency Professionals or other advisors or consultants provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.
- G. **“Need to Know basis”** means that Unpublished Price Sensitive Information 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 the information.
- H. **“Whistle Blower”** means an employee who reports instance of leak of price sensitive information under this Policy.

1. Purpose of this Code

This Code of conduct has been adopted by the Board of Directors to regulate, monitor and report trading of securities of the Company by its Designated persons and immediate relatives of Designated persons in compliance of the provisions of these Regulations.

2. Restrictions on Communication & trading by Insiders

A. All Unpublished Price Sensitive Information (UPSI) shall be handled within the Company on a need-to-know basis and no UPSI shall be communicated by an Insider to any person (including another Insider) except in furtherance of the insider's legitimate purposes, performance of duties or discharge of his legal obligations or under the circumstances specified under the Regulations after due compliance of the provisions.

B. Any person receiving UPSI from an Insider shall use it only for furtherance of legitimate purposes, performance of duties or discharge of his legal obligations. **Such person(s) shall be**

also be considered as Insider and due notice shall be given to such person to maintain Confidentiality.

C. A **structural digital database** of such persons (mentioned in A & B above) shall be maintained as specified in the Regulations.

3. Restrictions on Trading and Trading plan

A. No Insider shall trade in securities while in possession of UPSI except when the transaction is carried out pursuant to statutory and/or regulatory obligation to carry out bonafide transaction.

B. Trading plan

The option for submitting trading plan as envisaged in Regulation 5 of the Regulations shall not be available for any Designated persons under this Code.

4. Disclosure of trading by Insider

A. Initial Disclosure

Every promoter Key Managerial Person and Director of the Company shall disclose his holding of securities of the Company within thirty (30) days of these regulations taking effect in Form B (Annexure VI).

Every person on appointment as KMP or a Director of the Company or upon becoming a promoter shall disclose his holding of securities of the Company a on the date of appointment or becoming of promoter within seven(7) days of such appointment of becoming Promoter in Form B (Annexure VI).

B. Continual Disclosure

- a. Every Designated Person shall disclose to the Company the number of such securities acquired or disposed of within two trading days of such transaction, if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 10 lakhs in Form C (Annexure VII).

Provided however that the Designated Persons shall make disclosures to the Company even if the changes are within the abovementioned limits.

- b. The Company at its discretion, may require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the company in order to monitor compliance with these regulations, in form D (Annexure VII).

- c. The disclosure shall be made within 2 trading days of the execution of the transaction.

5. Duties of Compliance Officer

- A. The Company Secretary of the Company shall be the Compliance Officer for the purpose of this Code.
- B. The Compliance Officer shall be responsible for setting forth policies, procedures, monitoring, adherence to the rules for the preservation of the Unpublished Price Sensitive Information, pre-clearance of trades of the Securities by Designated Persons and their relatives, monitoring of trades of the Securities by the Designated Persons and the implementation of this Code under the overall supervision of the Board of Directors
- C. The Compliance Officer shall maintain a list of the Designated Persons and any changes thereof.
- D. The Compliance Officer shall maintain all records in the prescribed form submitted by the Designated Persons for a minimum period of five (5) years from the submission.
- E. The Compliance Officer shall announce the period when the Trading Window is closed and re-opened. The Compliance Officer shall inform such period to any person having contractual or fiduciary relation with the Company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the Company.
- F. The Compliance Officer shall assist all the Designated Persons in addressing any clarifications regarding the Regulations and this Code.
- G. The Compliance Officer shall report to the Board of Directors and, in particular, provide reports to the Chairman of the Audit Committee the Chairman of the Board on compliances with the Regulations on a half-yearly basis.
- H. Compliance Officer shall make necessary time bound disclosures with Stock exchanges as mandated in these regulations and shall also inform the SEBI if there is any violation of the Regulations.

6. Duties of Designated Persons and Their Relative

- A. Designated Person shall maintain confidentiality of all Unpublished Price Sensitive Information.
- B. Designated person shall be required to disclose names and PAN or any other identifier authorized by law, of the following persons, to the Company, on an annual basis and as when the information changes:

- a. Immediate Relatives;
- b. Person with whom such designated person(s) share a material financial relationship; &
- c. Phone, mobile and cell number which are used by them.

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 loan/gift during immediate preceding 12 months, equivalent to at least 25% of such payer's annual income but shall exclude relationships in which the payment is based on arm's length transactions.

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

- C. Designated Person shall not pass on any Unpublished Price Sensitive Information to any person directly or indirectly by way of making a recommendation for the purchase or sale of Securities.
- D. Designated Person shall communicate the Unpublished Price Sensitive Information with other Designated Persons only on a "need to know" basis. The Unpublished Price Sensitive Information may be disclosed only to those within the Company who need such Unpublished Price Sensitive Information to discharge their legitimate duties or for other legitimate purposes.
- E. Designated Person shall keep files containing the Unpublished Price Sensitive Information secured and make the electric files containing the Unpublished Price Sensitive Information have adequate security of login and password, etc.
- F. Designated Person and their immediate relatives shall not trade the Securities when the Trading Window is closed i.e. shall not purchase, sale or deal in the Securities by themselves or pass on the Unpublished Price Sensitive Information to others to enable them to deal in the Securities during the period when the Trading Window is closed or during any other period as may be specified by the Company from time to time.
- G. Designated Person shall, and shall cause their immediate relatives to, obtain approval for the proposed trading of the Securities before entering into such trading from the Compliance Officer by making an application in the prescribed **Pre-dealing Form** (as per **Annexure I**) (which is available with the Compliance Officer) and submitting an undertaking in favour of the Company in the prescribed form (as per **Annexure II**) if they intend to deal in the Securities. Minimum threshold limit for compliance with this Code shall be two thousand and five hundred (2,500) equity shares of the Company. Therefore, in case of trading of two thousand and five hundred (2,500) or more equity shares of the Company, Designated Person shall, and shall cause their immediate relatives shall obtain pre-dealing approval and other disclosure compliances under this Code.

- H. Designated Person shall, and shall cause their immediate relatives to, upon approval of the pre-dealing application by the Compliance Officer (as per **Annexure IV**), execute their order in respect of the Securities within seven (7) days from the date of the pre-dealing approval. If the order is not executed within such seven-day (7-day) period, the Designated Person or their immediate relatives shall obtain a fresh pre-dealing approval again. Within four (4) days of the execution of the trading, the details of such trading shall be filed with the Compliance Officer in the prescribed form. In case the trading is not undertaken, a report to that effect shall be filed (**as per Annexure V**).
- I. Designated Person shall not, and shall cause their immediate relatives not to, make any **contra trade** within six (6) months of the last trading for which the contra trade is being considered. Should a contra trade be executed inadvertently or otherwise in violation of such restriction, and where the aggregate traded value of the contra trade executed in one transaction or a series of transactions is Indian Rupee five hundred thousand (Rs 500,000) or more, the profits from such trade shall be disgorged for remittance to the SEBI in terms of Clause 10 of Schedule B of the Regulations. In case the sale of the Securities is necessitated by personal emergency or exceptional circumstances, the holding period and contra trade period may be waived by the Compliance Officer after recording in writing his reasons in this regard (as per **Annexure III**) and subsequently ratified by the Board of Directors but no such trading should be permitted when the Trading Window is closed.
- J. Designated Person shall not, and shall cause their immediate relatives not to, trade in any Securities at any time when he/she is in possession of the Unpublished Price Sensitive Information or otherwise where approval for the trading is not given by the Company.

7. TRADING WINDOW

- i. in case of consideration and declaration of financial results, the trading window shall close from the end of every quarter/half year/year till 48 hours after the declaration of the financial results.
- ii. In all other cases the Trading Window shall be closed from or ten (10) days prior to the happening of, *inter alia*, each of the events listed below and remain closed not earlier than forty-eight (48) hours after the publication of the same. The Trading Window may be further closed by the Company during such time in addition to the above period as it may deem fit from time to time. This rules on the Trading Window shall also be applicable to any person having contractual or fiduciary relation with the Company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the Company.
 - a. declaration of dividends (interim and final);
 - b. issue of Securities by way of public/rights/bonus etc.;
 - c. change in key managerial personnel;
 - d. any major expansion plan or execution of new project;
 - e. amalgamation, mergers, takeovers and buy back;

- f. disposal of whole or substantially the whole of the undertaking; and
- g. any changes in important policies, plans or operations of the Company.

8. INTERNAL CONTROL-INSTITUTIONAL MECHANISM

A. The Company shall place adequate and effective system of internal control to ensure compliance of the Regulations to prevent insider trading.

B. A system shall be put in place to identify UPSI. All employees who have access to UPSI shall be identified as designated employee.

C. All UPSI shall be identified and marked confidential and shall be shared with a caveat "to be used only for legitimate purposes and further communicated on need to know basis only.

D. Every employee and other person(s) with whom UPSI is shared shall enter into a confidentiality agreement/be served notice to this effect. For this purposes confidentiality agreement shall be signed by

- i. Parties which are existing as on 31st March, 2019 and with whom the Company has shared Unpublished Price Sensitive information; and
- ii. Parties which whom the company intends to share any Unpublished Price Sensitive information.

E. Process to be followed in sensitive transaction(s)

i. In case of Specific Transaction(s)

The Managing Director/Compliance officer shall give prior notice to employee who are brought inside on sensitive transaction(s) and also made aware about the duties and responsibilities attached to receipt of inside information and liability that attaches to misuse or unwarranted use of such information on case to case basis.

ii. In general

Non-disclosure Agreement shall be executed with every incoming/existing employee of the Company.

F. Six monthly review of effectiveness of internal controls to be undertaken by Internal Audit team and the findings be presented to the Audit Committee.

G. Whistle Blowing in case of leak of Unpublished Price Sensitive Information ("UPSI")

- i. Any instance of leak of UPSI should be on the basis of a direct first- hand experience of the Whistle Blower. It should not be based on any secondary, unreliable source such as grapevine or any other form of informal communication.

- ii. The Whistle Blower may report leak of UPSI by an email to the Whistle Blower Committee of the Company at www.ethicspoint.com mentioning the subject line "LEAK OF UPSI" for examination and inquiry.
- iii. On the basis of the reporting, the Whistle Blower Committee will be convened and immediate examination conducted on the "Leak of UPSI" before conduct of inquiry. The Audit Committee and BOD will be presented with the findings of the immediate examination conducted and before any inquiry is launched.
- iv. Based on the initial findings and reporting of the Whistle Blower Committee to the Audit Committee, the Audit Chairman may instruct the Whistle Blower Committee to take further actions to proceed with the inquiry.
- v. The finding of the inquiry by Whistle blower committee will be presented to the Audit Committee and BOD for further recommendations. The Company shall take further action based on the recommendations of the Audit Committee & Board of Directors.
- vi. The instance of leak of UPSI made by the Whistle Blower must be genuine with adequate supporting data/proof. If it is established that the allegation was made with mala-fide intentions or was frivolous in nature or was not genuine, the Whistle Blower shall be subject to Disciplinary Action. The Audit Committee and BOD takes a serious view on intentional, false and mala-fide reporting and may recommend serious disciplinary actions to be taken

H. Chinese Wall

- i. To prevent the misuse of confidential information, the Company has adopted a "Chinese Wall" policy separating those areas of the Company which routinely have access to confidential information, considered "inside areas" from those areas which deal with sale/marketing/operations or other departments providing support services, considered "public areas".
- ii. In exceptional circumstances, Designated Persons from the public areas may be brought "over the wall" and given confidential information on the basis of "need to know" criteria, under intimation to the compliance officer.
- iii. the Company has adopted the security rating of Documents and will implement "Confidential Level 1" as information that are price sensitive and restricted. Such information with the classification "Confidential Level 1" will be information to be controlled under the Code.

I . Dissemination of "Price Sensitive Information"

- i. No information shall be passed by way of making a recommendation for the purchase or sale of securities of the Company.

ii. The following guidelines shall be followed while dealing with analysts, research personnel, media persons & institutional investors:

- a. Only public information to be provided.
- b. Unanticipated questions may be taken on notice and a considered response given later. If the answer includes unpublished price sensitive information, a public announcement should be made before responding.

J. Efforts shall be made to hold the meetings of Audit Committee and Board meeting (for considering financial results) on the same day.

9. Penalty for Contravention

In the event that Designated Person trades the Securities or communicates any Unpublished Price Sensitive Information for trading in the Securities in contravention of this Code, such Designated Person shall be penalised, and the Company shall take appropriate action against such Designated Person after giving reasonable opportunity of being heard. Such Designated Person shall also be subject to disciplinary action including wage freeze, suspension etc.

In addition to the action taken by the Company, Designated Person violating the Regulations shall also be subject to action by the SEBI as per the SEBI Act. In case of any violation, the Company shall intimate the same to the SEBI.

10. Disclaimer

This policy is only internal code of conduct and one of the measures to avoid insider trading. Every insider/Designated person is required to familiarize himself with the SEBI regulation as it will be the responsibility of each insider to ensure compliance of this code, SEBI regulation and other related statutes fully.

11. SEBI Regulations/Statutory Provisions to Prevail

Please note that in case the SEBI regulation or any statutory provisions are more stringent than those contained in the code, the SEBI regulations/ statutory provisions will prevail.

PART-II

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

The following principles shall be followed by the Company to ensure timely and adequate disclosure of price sensitive information:

1. 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.
2. Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
3. Designation of a senior officer as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.
7. Developing 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.
8. Handling of all unpublished price sensitive information on a need-to-know basis.

ANNEXURE I

Form for Permission from the Company regarding proposed purchase/sale of Equity shares/listed securities of the Company

Date:

The Compliance Officer

DIC India Limited

Transport Depot Road

Kolkata - 700088

Dear Sir,

I, Mr/Mrs jointly with Mr/Mrs.....and Mr/Mrs..... wish to purchase/sell(nos.) equity shares/listed securities of the Company. The details are as follows: Name of the Depository in which shares held	DP ID/ Client ID
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An undertaking in the prescribed format is enclosed for your perusal and records in this connection.

Please grant your permission for the said transaction.

Thanking You,

Yours Faithfully,

Name of Employee:

Division:

Department:

Employee Code:

Note: Permission should be obtained in case of purchase/sale of any equity shares

ANNEXURE II

Undertaking To Be Submitted along with the Application for Pre-Clearance

Date:

The Compliance Officer

DIC India Ltd.

Transport Depot Road

Kolkata - 700088

Dear Sir,

I, _____ son/ daughter of _____ am holding along with joint holders _____ shares of DIC India Limited and wish to acquire/ dispose off _____ shares within seven trading days of approval and do hereby affirm that

- (a) I have no access to or do not have in my possession any "Unpublished Price Sensitive Information" upto the time of signing this undertaking;
- (b) In the event I have access to or receive "Unpublished Price Sensitive Information" after signing of this undertaking but before execution of the transaction I shall inform the Compliance Officer and refrain from dealing in the securities of VIL until that such time the information becomes public;
- (c) I have not contravened the Company's Code of Conduct to Regulate, Monitor and Report Trading of Company's Securities by Insiders or any of the provisions of SEBI (Prohibition of Insider Trading) Rules, 2015 (the "Regulations");
- (d) That this transaction will not amount to a contra trade in terms of Clause 10 of Schedule B of the Regulations;
- (e) That the shareholding mentioned above are the total shares held by me either individually or jointly with others and the total transactions undertaken by me during the year till date does not exceed the traded value of Rs 500,000.
- (f) That the information mentioned above and the undertaking and declaration given is true to my knowledge.

Thanking You,

Yours Faithfully,

Name of Employee:

Division:

Department:

Employee Code:

ANNEXURE III

Form of Application for Waiver of Minimum Holding Period

Date:

The Compliance Officer

DIC India Limited

Transport Depot Road

Kolkata - 700088

Dear Sir,

I request you to grant me waiver of the minimum holding period of 30 days as required under the Code of Internal Procedure and Conduct & Code of Corporate Disclosure Practices of DIC India Limited with respect to(nos.) shares of the company held by me/ (name of relative) singly/jointly, acquired by me on(date). I desire to deal in the said shares on account of.....(give reasons).

Thanking You,

Yours Faithfully,

Name of Employee:

Division:

Department:

Employee Code:

ANNEXURE IV

Form of grant of Pre-Clearance by the Compliance Officer

DIC India Limited

Sub: PRE-CLEARANCE ORDER

Ref.: Your Application dated

This is to inform you that your request for dealing in(nos.) shares of the company as mentioned in your above-mentioned application is approved. Please note that the said transaction must be completed on or before.....(date) that is within 7 days from today failing which a fresh application for Pre – Clearance of the said Transaction will have to be made to the undersigned.

For DIC India Limited.

Compliance officer

Date:

ANNEXURE- V

Form of Confirmation of Deal

(To be submitted within 4 days of transaction/Dealing in Securities of the Company)

Date:

The Compliance Officer

DIC India Limited

Transport Depot Road, Kolkata - 700088

Dear Sir,

DETAILS OF TRANSACTION

Ref: Your Approval letter No. _____ dated _____ (in case of Pre-approved transaction)

I hereby inform you that I

- have not bought/sold/subscribed any Securities of the Company
- have bought/sold/subscribed to the _____ Securities (give description) as

mentioned below on _____ (insert date) Name of holder	** First or joint holder	No. of Securities dealt with	Bought / Sold/ Subscribed	DP ID/CLIENT ID (electronic form) or Folio no. for physical where the Sec. will be debited or credited	Price (Rs)
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** "F" first holder "J" joint holder

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 3

(Three) years and produce to the Compliance Officer/SEBI any of the following documents:

1. Broker's contract note
2. Proof of payment to/from brokers
3. Extract of bank passbook/statement (to be submitted in case of demat transactions).
4. Copy of Delivery instruction slip (applicable in case of sale transaction)

I declare that the above information is correct and that no provisions of the Company's Insider Trading Code and/or applicable laws/regulations have been contravened for effecting the above said transaction(s).

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

Thanking You,

Yours Faithfully,

Signature: _____

Name of Employee:

Division:

Department:

Employee Code:

ANNEXURE-VI

**FORMAT FOR DISCLOSURE ON BECOMING PROMOTER/APPOINTMENT AS DIRECTOR/KMP
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: DIC India Limited

ISIN of the company: INE303A01010

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

Name, PAN No., CIN/ DIN & address With Contact nos.	Category of Person (Promoters/ KMP /Directors/ immediate relatives / others etc.)	Date of appointment of Director / KMP OR Date of becoming Promoter	Securities held at the time of Becoming Promoter/ appointment of Director/KMP		% of Shareholding	Open Interest of the Future contracts held at the time of Becoming Promoter/ appointment of Director/KMP		Open Interest of the Option Contracts held at the time of Becoming Promoter/ appointment of Director/KMP	
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of Units (contracts * lot size)	Notional value in Rupee terms	Number of Units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4		5	6		7	

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

Signature:

Date:

Designation:

Place:

**ANNEXURE VII
DISCLOSURE FORCHANGE IN SHAREHOLDING
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: DIC India Limited

ISIN of the company: INE303A01010

**Details of change in holding of Securities of Promoter, Employee or Director of a listed
company and other such persons as mentioned in Regulation**

Name , PAN, CIN/D IN, & addre ss Of Prom ote/ Emplo yee / Direct or with conta ct nos.	Categ ory of Perso n (Prom oter /KMP / Direct or/ Imme diate Relati ve/ other s etc.)	Securities held prior to acquisition/ disposal		Securities acquired/ Disposed		% of Shareholdin g		Date of allotm ent advice/ acquisi tion Of shares/ sale of shares specify		Date of Intim ation to Comp any	Mode of acquisi tion (marke t Purcha se/ public rights/ prefere ntial offer / off market / Inter- se transfe r etc.	Trading in derivatives (Specify type of contract, Futures or Options etc)				Excha nge on whic h the trade Was execu ted
		Type of securit y (For eg. – Shares, Warra nts, Conver tible Debent ures etc.)	N o	Type of securit y (For eg. – Shares, Warra nts, Conver tible Deben tures etc.)	N o	Pre- tran sacti on	Post - tran sacti on	Fro m	t o			Buy		Sell		
												Val ue	of units (contr acts * lot size)	Val ue	of units (contr acts * lot size)	
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.*

Signature:

Date:

Designation:

Place:

ANNEXURE VIII
DISCLOSURE FORHOLDING/CHANGE IN SHAREHOLDING
Form D (Indicative format)

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
Regulation 7(3) – Transactions by Other connected persons as identified by the company

Name of the company: DIC India Limited

ISIN of the company: INE303A01010

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

Name, PAN, CIN/ DIN & address of Connected persons, as identified by the co. With contact nos.	Connection With Co.	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 eg. – Shares, Warrants, Convertible Debentures etc.)	No	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No	Pre-transaction	Post-transaction	From	to			Buy		Sell			
												Value	of units (contracts * lot size)	Value	of units (contracts * lot size)		
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.

Signature:

Date:

Name:

Place: