

**Code of Practices and Procedures for Fair  
Disclosure of Unpublished Price Sensitive  
Information Policy**

**Of**

**Kasliwal Projects Limited**  
**(Formerly known as Kasliwal Projects Private Limited)**  
**("The Company")**

**(Effective from 03<sup>rd</sup> March, 2025 approved by Board of Director on 03<sup>rd</sup> March,  
2025)**



**KASLIWAL PROJECTS LIMITED (FORMERLY KNOWN AS KASLIWAL PROJECTS PRIVATE LIMITED) ("The Company")** is committed to fair disclosure of information about the Company without advantage to any particular person(s). The Company will adhere to the following principles for fair disclosure of Unpublished Price Sensitive Information relating to the Company and/ or its securities without diluting the provisions specified in SEBI (Prohibition of Insider Trading Regulations), 2015, ("**Insider Trading Regulations**"). (**Effective from 03<sup>rd</sup> March, 2025 approved by Board of Director on 03<sup>rd</sup> March, 2025**)

1. The Company shall promptly make disclosure about any Unpublished Price Sensitive Information that would impact discovery no sooner than credible and concrete information comes into being and as soon as the information or the decisions are validated by the Board of Directors of the Company to stock exchange and upload such information on the Company's official website in order to make such information generally available to investors and members of the Company.
2. The Company shall make uniform and universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure by disclosing the information to the exchange(s) where the securities of the company are listed, immediately, and simultaneously uploading the same on the Company's website.
3. In case of selective disclosure of Unpublished Price Sensitive Information inadvertently or otherwise, the Company shall make prompt dissemination of such Unpublished Price Sensitive Information to ensure that such information is generally available.
4. The Company shall ensure that information shared with analysts and research personnel is not Unpublished Price Sensitive Information.
5. The Company Secretary & Compliance Officer of the Company shall act as the Chief Investor Relations Officer of the Company under SEBI (Prohibition of Insider Trading) Regulations, 2015 to deal with dissemination of information and disclosure of Unpublished Price Sensitive Information.
6. The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
7. The Company shall take reasonable steps to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences are generally available by uploading such transcripts and records available to the Company on the Company's official website to ensure official confirmation and documentation of disclosures made.
8. Unpublished Price Sensitive Information shall be handled on a "need-to-know" basis i.e. Unpublished Price Sensitive Information shall be disclosed only to those within the Company, who need the information to discharge their duty.



## CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS

### 1. PREAMBLE

- 1.1. **KASLIWAL PROJECTS LIMITED (FORMERLY KNOWN AS KASLIWAL PROJECTS PRIVATE LIMITED)**, the Company endeavors to preserve the confidentiality of Unpublished Price Sensitive Information and to prevent the misuse of such information. The Company is committed to transparency, fairness in dealing with all the stakeholders and in ensuring adherence to all laws and regulations in force.
- 1.2. The Securities Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, (the "**Regulations**"), make it mandatory for every public listed company to lay down a code of conduct for regulation, monitoring and reporting of insider trading by employees of the Company, including directors, and other "connected persons" (as defined in the Regulations), in relation to the securities of the Company (this "**Code**" or the "**Code**").
- 1.3. This Code is applicable to every Designated Employee of the Company (as defined below), their Immediate Relatives (as defined below) and other connected persons (as defined in the Regulations) (together referred to as "**Designated Persons**"), and each such Designated Person has a duty to safeguard the confidentiality of all information obtained, including during the course of his or her employment at the Company.

### 2. DEFINITIONS AND INTERPRETATIONS

#### Definitions

- 2.1. Terms used but not defined herein, shall unless the context requires otherwise have the meaning assigned to them below:

**"Act" or "SEBI Act"** means the Securities and Exchange Board of India Act, 1992.

**"Board" or "Board of Directors"** means the Board of Directors of the Company.

**"Code" or "Code of Conduct"** shall mean the Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of trading by insiders of XXX as amended from time to time.

**"Company"** means Kasliwal Projects Limited (Formerly known as Kasliwal Projects Private Limited) ("KPL")

**"Compliance Officer"** means Company Secretary or such other senior officer, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under the Regulations designated so and reporting to the Board of Directors 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 the Regulations under the overall supervision of the Board of Directors of the Company and other requirements under the Regulations;



***“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 Act or an employee or direct or thereof; or
  - (d) an investment company, trustee company, asset management company or an employee or director thereof; or
  - (e) an official of a stock exchange or of clearing house or corporation; or
  - (f) a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
  - (g) a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
  - (h) an official or an employee of a self-regulatory organization recognized or authorized by the Board; or
  - (i) a banker of the Company; or
  - (j) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of the Company or his immediate relative or banker of the Company, has more than ten per cent, of the holding or interest.

***“Dealing in Securities”*** means an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or otherwise deal in the securities of the Company either as a principal or an agent;

***“Designated Employee”*** means:

- a. Promoters of the company;
- b. All directors of the Company (executive, non-executive and independent, whether whole-time or not);
- c. All Key Managerial Personnel and Senior Management of the company;
- d. All functional / departmental heads of the Company by whatever name called
- e. All employees in the finance and accounts, treasury, costing, MIS, legal and secretarial and internal audit function/department;
- f. All Employees of the Company and employees of its material subsidiaries who are
  - i. up to two levels below the chief executive officer, and
  - ii. in specified departments including secretaries to whole-time directors or Key Managerial Personnel/ Senior Management and the information technology department;



- g. The Company secretary of the Company
- h. Any support staff of the Company, such as IT staff or secretarial staff, including part – time employees, secondees, interns, etc. who have access to Unpublished Price Sensitive Information; and
- i. Any other employee of the Company designated by the Board of Directors in consultation with the Compliance Officer, from time to time;
- j. Any other employee or other Connected Person of the Company, as may be designated or notified by the Company from time to time for meeting the objectives of the Code

**“Director”** means a member of the Board of Directors;

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

**“Financial results”** mean the quarterly, half yearly or annual financial statements of the Company;

**“Generally Available Information”** means information that is accessible to the public Compliance Officer a non-discriminatory basis;

**“Immediate Relative”** for the purpose of this Code means spouse of a Designated Employee, and includes parent, sibling and child of such Designated Employee or of the spouse, any of whom is either dependent financially on such Designated Employee or consults such Designated Employee in taking decisions relating to trade in Securities;

**“Informant”** means an individual(s), who voluntarily submits to the Board a Voluntary Information Disclosure Form (as prescribed under the Schedule D of the Insider Trading Regulations) relating to an alleged violation of insider trading laws that has occurred, is occurring or has a reasonable belief that it is about to occur, in a manner provided under Insider Trading, regardless of whether such individual(s) satisfies the requirements, procedures and conditions to qualify for a reward.

**“Insider”** means any person who is (a) a “Connected Person” or (b) any person in possession of or having access to Unpublished Price Sensitive Information;

**“Insider Trading”** shall have the meaning set forth in the Companies Act, 2013 and the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended;

**“Key Managerial Person”** means person as defined in Section 2(51) of the Companies Act, 2013 and shall include:

- (a) chief executive officer or the managing director or the manager of the Company;
- (b) company secretary of the Company;
- (c) whole-time director of the Company;
- (d) chief financial officer of the Company;
- (e) such other officer, not more than one level below the directors who is in whole- time employment, designated as key managerial personnel by the Board; and
- (f) such other officer as may be prescribed under the Securities and Exchange Board of India Act, 1992, as amended.



**"Listing Agreement"** means the listing agreements entered into/to be entered into by the Company with the stock exchanges, as amended;

**"Material Financial Relationship"** shall have the meaning assigned to it under the Insider Trading Regulations.

**"Need to know"** shall mean:

- (a) 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; or
- (b) that all information that is not Generally available Information, if directly received by any Employee should immediately be reported to the head of the department.

**"Prohibited Period"** means the period of time when the trading Window is close and as specified in clause 5;

**"Promoter"** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended or the Companies Act, 2013, as amended or any modification thereof, which includes:

- (a) who has been named as such in a draft offer document or offer document or is identified by the issuer in the annual return referred to in section 92 of the Companies Act, 2013;
- (b) who has control over the affairs of the issuer, directly or indirectly whether as a shareholder, director or otherwise;
- (c) in accordance with whose advice, directions or instructions the board of directors of the issuer is accustomed to act:

Provided that nothing in sub-clause (c) shall apply to a person who is acting merely in a professional capacity.

**"Promoter Group"** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018.

**"Reward"** means any gratuitous monetary amount for which an Informant is declared eligible as per the provisions of the Insider Trading Regulations;

**"SEBI"** means the Securities and Exchange Board of India;

**"Senior Management"** shall mean the officers and personnel of the issuer who are members of its core management team, excluding the Board of Directors, and shall also comprise all the members of the management one level below the Chief Executive Officer or Managing Director or Whole Time Director or Manager (including Chief Executive Officer and Manager, in case they are not part of the Board of Directors) and shall specifically include the functional heads, by whatever name called and the Company Secretary and the Chief Financial Officer.

**"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;



***“Specified Persons”*** means the Directors, Connected persons, the Insiders, the Designated Employees, Promoters and their immediate relatives collectively.

***“Stock Exchange”*** means a recognized Stock Exchange as defined under clause (f) of Section 2 of the Securities Contracts (Regulation) Act, 1956, as amended.

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

***“Trading”*** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities of the company, and “trade” shall be construed accordingly;

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

***“Trading Window”*** means the period of time when trading is allowed; and

***“Unpublished Price Sensitive Information”*** means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: –

Words and expressions used and not defined in this Code but defined in the Regulations, Act, Companies Act, 2013, the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or the Depositories Act, 1996 (22 of 1996) shall have the meanings respectively assigned to them in those legislations, as amended from time to time.

## **Interpretations**

2.2. This Code shall be interpreted as follows:

- 2.2.1. terms that have not been defined in the Code shall have the meaning assigned to them in the Regulations;
- 2.2.2. this Code can be modified/amended/alterd only by the Board of Directors subject to the condition that such alteration shall not be inconsistent with the provisions of the Regulations;
- 2.2.3. reference to a statute or a statutory provision includes to the extent applicable at any prevalent time: (a) that statute or statutory provision as from time to time consolidated, modified, re-enacted, replaced by any statute or statutory provision; and (b) any subordinate legislation or regulation made under the relevant statute or statutory provision;
- 2.2.4. Unless the context otherwise requires, all words (whether gender specific or gender neutral) shall be deemed to include each of the masculine, feminine and neuter genders and words importing the singular include the plural and vice- versa; and
- 2.2.5. Any reference to a person includes any individual, firm, corporation, partnership, company, trust, association, joint-venture, government or agency or political subdivision thereof or other entity of any kind, whether or not having separate legal personality. A reference to any person in this Code shall when the context permits include such person’s executives, administrators, heirs, legal representatives and permitted successors and assigns.



### **3. COMPLIANCE OFFICER**

- 3.1. The Company has designated the Company Secretary as the Compliance Officer. The Compliance Officer shall report to the Board of the Company and shall provide reports on insider trading on half-yearly basis to the Chairman of the Audit Committee and to the Chairman of the Board.
- 3.2. The Compliance Officer shall be responsible for, *inter alia*, the following;
  - 3.2.1. maintenance of records required under the Regulation including (i) the record of Designated Employees substantially in the format set out in Annexure I hereto and any changes made in the list of Designated Employees; and (ii) a record of declarations for a minimum period of five years;
  - 3.2.2. in consultation with the Chairman of the Company and as directed by the Board, the specification and announcement of a prohibited period;
  - 3.2.3. maintenance of record of Prohibited Periods specified from time to time;
  - 3.2.4. The Compliance Officer shall maintain a record of the Designated Employees and any changes made in the list of Designated Employees;
  - 3.2.5. Setting forth policies, procedures, monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information, approval of the trading, plan pre-clearing of Designated Persons, monitoring of trading and the implementation of this Code under the overall supervision of the Board;
  - 3.2.6. The Compliance Officer shall maintain a database of the violations of Code of Conduct by Designated Persons and immediate relatives of Designated Persons;
  - 3.2.7. The Compliance Officer shall assist all Employees in addressing any clarifications regarding the Insider Trading Regulations and the Code;
  - 3.2.8. To assist the Board in identifying the Designated Persons to be covered by the code of conduct on the basis of their role and function in the organization and the access that such role and function would provide to unpublished price sensitive information in addition to seniority and professional designation.

### **4. UNPUBLISHED PRICE SENSITIVE INFORMATION**

#### **Preservation of Unpublished Price Sensitive Information**

- 4.1. Designate Persons shall maintain the confidentiality of all Unpublished Price Sensitive Information and shall not pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sale of Securities.
- 4.2. All information is to be handled within the Company on a "need-to-know" basis and no Unpublished Price Sensitive Information, relating to a Company or Securities listed or proposed to be listed, should be communicated to any person except in furtherance of the Insider's legitimate purposes, performance of duties or discharge of his legal obligations.



4.3. 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 the legitimate purposes, performance of duties or discharge of his legal obligations. For purposes of the Code, 'legitimate purposes' shall include sharing of Unpublished Price Sensitive Information in the ordinary course of business by an Insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing shall not be carried out to evade or circumvent the prohibitions of the Insider Trading Regulations in accordance with the determination made under the Code Of Practices And Procedures For Fair Disclosure Of Unpublished Price Sensitive Information.

4.4. Any person in receipt of Unpublished Price Sensitive Information pursuant to a 'legitimate purpose' shall be considered an Insider for purposes of the Insider Trading Regulations and due notice shall be given to such persons to maintain confidentiality of such Unpublished Price Sensitive Information in compliance with the Insider Trading Regulations.

For the purposes of this clause, the Board shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the purpose provided in this clause and shall not otherwise trade in Securities of the Company when in possession of Unpublished Price Sensitive Information.

4.5. Notwithstanding anything contained herein, Unpublished Price Sensitive Information may be communicated, provided, allowed access to or procured, in connection with a transaction which would entail:

- (a) 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
- (b) not attracting the obligation to make an open offer under the Takeover Regulations but where the Board is of informed opinion that sharing such information is in the best interests of the Company and the information that constitutes Unpublished Price Sensitive Information is disseminated to be made Generally available Information at least two trading days prior to the proposed transaction being affected in such form as the Board may determine to be adequate and fair to cover all relevant and material facts.
- (c) The Board shall ensure that a structured digital database is maintained containing the names of such persons or entities as the case may be with whom information is shared under this regulation 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.

#### **Limited access to confidential information**

4.6. Files containing confidential information shall be kept secured. Computer files must have adequate security of login and password, etc. Files containing confidential information should be deleted/destroyed after its use. No such related documents should be kept lying at any place accessible to other employees/persons.



- 4.7. If any Designated Person wants to cross the "Chinese Wall", they shall seek permission from the Compliance Officer in writing stating the reasons/justification for doing so, which permission shall be obtained from the Board. The Compliance Officer shall require such Designated Person to produce an undertaking that the information will not be shared with any other person except as permitted and neither he nor the person with whom the information is shared or their Immediate Relatives shall trade in or induce others to trade in the Securities of the Company.

#### **Identification of Inside Areas and Public Areas (Chinese Wall)**

- 4.8. To prevent the misuse of confidential information the Company shall establish procedures and processes which separate/demarcate those areas of the Company which routinely have access to Unpublished Price Sensitive Information, considered "Inside Areas" from other departments providing support services, considered "Public Areas".
- 4.9. The Designated Persons in an Inside Area shall not communicate any Unpublished Price Sensitive Information to anyone in Public Area.
- 4.10. Even on a particular side of the Chinese Wall, Unpublished Price Sensitive Information may not be shared among Designated Persons or any other recipient of such information, except on a need-to-know basis.
- 4.11. In exceptional circumstances persons from Public Areas may be brought "over the wall" and given confidential information strictly on "need-to-know basis". Upon the transmission of Unpublished Price Sensitive Information in the foregoing manner, the relevant person from the public area, if not already a Designated Person, will be deemed to be a Designated Person and shall become bound by this Code.
- 4.12. ***Crossing the Chinese Wall:*** To complete or assist in a particular mandate or assignment of an Inside Area of the Chinese Wall, assistance of Designated Persons in the Public Area may be required for discussion on or as a part of a team for such mandate or assignment. In such an instance, the Designated Persons in the Public Area would be considered as having "Crossed the Chinese Wall" and have come on the Inside Area of the Chinese Wall, only during the duration of the mandate/assignment. Approval of the Head of the concerned business must be obtained to Cross the Chinese Wall and such precautions taken, as may be stipulated. Such "crossing of Chinese Wall" should be reported to the Compliance Officer for his records.
- 4.13. ***Responsibilities post Crossing of the Wall:*** While any Designated Persons from the Public Area is in the Inside Area after having crossed the Chinese Wall, he shall strictly maintain the confidentiality of the transaction or Unpublished Price Sensitive Information and will be subject to general principles governing confidentiality and the handling and use of Unpublished Price Sensitive Information.
- 4.14. Persons crossing the Chinese Wall shall be provided with only such information as is reasonably necessary and appropriate for him to accomplish the purpose for which the Chinese Wall is crossed from the Public Area to the Inside Area.



## **5. PROHIBITION OF INSIDER TRADING**

### **Prohibition**

#### **5.1. No insider shall:**

- 5.1.1. Trade in Securities of the Company, either on their own behalf or on behalf of any other person when in possession of any Unpublished Price Sensitive Information; or
- 5.1.2. Communicate, provide or allow access to any Unpublished Price Sensitive Information or Securities listed or proposed to be listed to any person including other insiders except where such communication is for legitimate purposes, performance of duties or discharge of legal obligations.

### **Trading plan**

#### **5.2. 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 and subject to the Regulations.**

#### **5.3. Trading plans shall:**

- a) not entail commencement of trading on behalf of the Insider earlier than six months from the public disclosure of the plan;
- b) not entail trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced by the Issuer of the Securities and the second trading day after the disclosure of such financial results;
- c) entail trading for a period of not less than twelve months;
- d) not entail overlap of any period for which another trading plan is already in existence;
- e) set out either the value of trades to be affected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be affected; and
- f) not entail trading in securities for market abuse.

#### **5.4. The Compliance Officer shall review the trading plan made above and shall assess whether the plan would have any potential for violation of the Insider Trading Regulations. He shall be entitled to take express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per the provisions of the Insider Trading Regulations.**

Provided that pre-clearance of trade shall not be required for a trade executed as per an approved trading plan.

Provided further that trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.



- 5.5. 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.

Provided that 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 Unpublished Price Sensitive Information and the said information has not become generally available at the time of the commencement of implementation. The commencement of a trading plan shall be deferred until such Unpublished Price Sensitive Information becomes generally available information. Further, the Insider shall also not be allowed to deal in securities of the Company, if the date of trading in securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.

- 5.6. Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

#### **Trading Restrictions**

- 5.7. Designated Persons shall not indulge in Trading during a Prohibited Period.
- 5.8. The following events shall trigger a prohibited period, the duration of which shall be in accordance with clause 5.9 below:
- 5.8.1. declaration of financial results;
  - 5.8.2. declaration of dividends, whether interim or final;
  - 5.8.3. issue of securities by way of public issue, rights issue or bonus issue;
  - 5.8.4. acquisition, amalgamation, merger, de-merger, take-over of companies/businesses, delisting, disposals or expansion of business, new projects or such other transactions in respect of the Company;
  - 5.8.5. buy-back and splitting of Securities or any other change in capital structure;
  - 5.8.6. changes in key managerial personnel;
  - 5.8.7. any change in policies, plans or operations of the Company;
  - 5.8.8. material events in accordance with the Listing Agreement.
- 5.9. The Prohibited Period shall begin on earlier of (i) seven days before the day on which the meeting of the Board of Directors is proposed to be held to consider the events set out in Clause 5.8; and (ii) the date of circulation of agenda papers pertaining to any of the events set out in Clause 5.8 above. The Trading Window shall open 48 hours after the close of the board meeting at which decisions in respect of the above events are made public, whichever is later, or at a later date as may be determined by the Compliance Officer. The Company shall intimate the beginning of the Prohibited Period to all Designated Persons.



- 5.10. Designated Persons shall undertake trading only when the trading window is open and shall not trade during the Prohibited Periods or all other periods when the Compliance Officer determines that a Designated Person or class of Designated Persons can reasonably be expected to have possession of Unpublished Price Sensitive Information.
- 5.11. The Compliance Officer shall confidentially maintain a list of Securities as a "restricted list" which shall be used as a basis for approving or rejecting applications for preclearance of trades.
- 5.12. The Trading Window and Prohibited Period 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.
- 5.13. Options under an ESOP may be exercised during a Prohibited Period. However, sale of Securities allotted on exercise of such options shall not be allowed during a Prohibited Period.

#### **Trading Window and Window Closure**

- 5.14. Trading window shall mean a notional trading window which shall be used as an instrument of monitoring trading by Designated Persons.
- 5.15. The trading window shall be closed when the Compliance Officer determines that a Designated Person or class of Designated Persons can reasonably be expected to have possession of Unpublished Price Sensitive Information. Such closure shall be imposed in relation to such Securities to which such Unpublished Price Sensitive Information relates.
- 5.16. When the trading window is closed, the Designated Persons and their Immediate Relatives shall not Deal in Securities of the Company. The trading restriction period shall be made applicable from the end of every quarter till 48 hours after the declaration of financial results. The gap between clearance of accounts by audit committee and board meeting should be as narrow as possible and preferably on the same day to avoid leakage of material information.
- 5.17. All Designated Persons and their Immediate Relatives shall conduct their dealings in the securities of the Company only in a valid trading window and shall not deal in any transaction involving the purchase or sale of the Company's Securities during the periods when the trading window is closed, or during any other period as may be specified by the Company from time to time.
- 5.18. The Compliance Officer shall intimate the closure of the trading window to all the Designated Persons of the Company.
- 5.19. The Compliance Officer after considering various factors including the Unpublished Price Sensitive Information in question becoming generally available and being capable of assimilation by the market, shall decide the timing for re-opening of the trading window. In any event such re-opening shall not be earlier than forty-eight hours after the information becomes generally available.



## Pre-clearance or Pre-dealing of Trading

All Designated Persons & Promoters who intend to deal in securities of the Company in their own name or in the name of their dependent family members (above the minimum threshold limit), shall obtain pre-clearance of the transactions as per the pre-dealing procedure as described hereunder.

No Designated Person shall be entitled to apply for pre-clearance of any proposed trade if such Designated Person is in possession of Unpublished Price Sensitive Information even if the Trading Window is not closed.

- 5.20. An application for pre-clearance of Trading shall be made out to the Compliance Officer substantially in the form set out in **FORM – I & FORM – V**.
- 5.21. The application shall incorporate, *inter alia*, the following clauses:
- 5.22.1. the estimated number of securities that the Designated Person intends to deal in, the details as to the depository with which he has a security account, the details as to the Securities in such depository mode and such other details as may be required by the Compliance Officer;
  - 5.22.2. An undertaking shall be executed in favor of the Compliance Officer and the Company, by such Designated Person which shall *inter alia* state that the applicant is not in possession of any Unpublished Price Sensitive Information.
  - 5.22.3. An undertaking that in case the Designated Person has access to or receives Unpublished Price Sensitive Information after the signing of the undertaking but before the execution of the transaction he/she shall inform the Compliance Officer of such change in position and that he/she would completely refrain from dealing in the Securities of the Company till the time such information becomes public.
  - 5.22.4. An undertaking that he/she has not contravened the Code as notified by the Company from time to time and has made a full and true disclosure in the matter
- 5.22. The Compliance Officer shall on receiving an application for pre-clearance provide the relevant Designated Person with an acknowledgement on duplicate of the application.
- 5.23. If the application for pre-clearance has been duly completed in accordance with **FORM – I**, the Compliance Officer shall grant approval, at his sole discretion, within (2) working days from the date of acknowledgement.
- 5.24. The Compliance Officer shall retain copies of all applications and acknowledgements.
- 5.25. The Compliance Officer shall confidentially maintain a list of such Securities as a “restricted list” which shall be used as the basis for approving or rejecting applications for pre-clearance of trades
- 5.26. All Designated Persons and their Immediate Relatives shall execute their trade in respect of Securities of the Company within seven Trading Days after the approval of pre-clearance is given. The Designated Person shall file within two Trading Days of the execution of the deal, the details of such deal with the Compliance Officer. In case the transaction is not undertaken, a report to that effect shall be filed in the **FORM – II**.
- 5.27. If the order is not executed within seven Trading Days after the approval is given, the employee/



director must seek fresh pre-clearance of the transaction.

- 5.28. Designated Persons who trade in any Securities of the Company shall not execute a contra trade during the next six months following the prior transaction. Designated Persons shall also not take positions in derivative transactions in the Securities of the Company at any time. To the extent permitted under the Regulations, the Compliance Officer may, in his discretion, grant relaxation from this restriction for reasons to be recorded in writing provided that such relaxation does not violate the Regulations. In case a contra trade is executed inadvertently or otherwise in violation of such restriction the profit from such trade shall be liable to be disgorged for remittance to the Securities and Exchange Board of India for credit to the investor protection and education fund administered by it under the SEBI Act.
- 5.29. In case of subscription for Securities in the primary market (IPO) and to the extent required under the Regulations, Designated Persons shall hold their investments for a minimum period of 30 days commencing from the allotment of the relevant Securities to such Designated Persons.
- 5.30. The Compliance Officer may waive off the holding period in case of sale of securities in personal emergency upon receipt of an application on this behalf in prescribed **FORM - III** and after recording reasons in writing for the same. However, no such sale will be permitted when the trading window is closed.

#### **Other Restrictions**

- 5.31. For the avoidance of doubt, equity shares allotted or granted to designated employees pursuant to an ESOP shall not be subject to the restrictions on holding securities prescribed herein.
- 5.32. No Designated Persons shall apply for pre-clearance of any proposed Trade by such Designated Person or his/her Immediate Relative, if such Designated Person or his/her Immediate Relative is in possession of Unpublished Price Sensitive Information even if the trading window is not closed.
- 5.33. The disclosures to be made by any person under this Code shall include those relating to trading by such person's Immediate Relatives, and by any other person for whom such person takes trading decisions.
- 5.34. The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be considered for the purposes of this Code.
- 5.35. The disclosures made under this Code shall be maintained for a period of five years.
- 5.36. The Company shall not discharge, terminate, demote, suspend, threaten, harass, either directly or indirectly, or discriminate against any Employee who files a Voluntary Information Disclosure Form under the Insider Trading Regulations, irrespective of whether the information is considered or rejected by SEBI or he or she is eligible for a Reward under the Insider Trading Regulations, by reason of: (a) filing a Voluntary Information Disclosure Form under the Insider Trading Regulations; (b) testifying in, or otherwise assisting or aiding SEBI in any investigation, inquiry, audit, examination or proceeding instituted or about to be instituted for an alleged violation of the insider trading laws, or in any manner aiding the enforcement action taken by the Board; (c) breaching any confidentiality agreement or



provisions of any terms and conditions of employment or engagement solely to prevent any employee from cooperating with SEBI in any manner.

For the purpose of this Clause, 'Employee' shall mean any individual who during employment may become privy to information relating to violation of insider trading laws and files a Voluntary Information Disclosure Form under the Insider Trading Regulations and is a director, partner, regular or contractual employee, but does not include an advocate.

It is further clarified that the Company does not require any Employee to establish that: (a) SEBI has taken up any enforcement action in furtherance of information provided by such person; or (b) the information provided fulfils the criteria of being considered as an 'original information' under the Insider Trading Regulations. No Employee that has filed a Voluntary Information Disclosure under the Insider Trading Regulations will be required to notify the Company of such filing, or seek its prior permission or consent or guidance of any person engaged by the Company, as the case may be, before or after such filing.

## **6. DISCLOSURES**

### **6.1 Initial Disclosure**

Every promoter, key managerial personnel and director of the company and any other person for whom such persons take trading decisions shall disclose his holding of securities of the company as on the date of these regulations taking effect within thirty days in **FORM A**;

Every person on appointment as a key managerial personnel or a director of the company or Designated Employee or upon becoming a promoter shall disclose his holding of securities of the company and any other person for whom such persons takes trading decisions as on the date of appointment or becoming a promoter, to the company within seven days of such appointment or becoming a promoter in **FORM B**.

### **6.2 Continual Disclosure**

Every promoter, member of the Promoter Group, designated employee and director of company and any other person for whom such persons takes trading decisions 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 Rupees One Million or such other value as may be specified by the Compliance Officer from time to time in **Form C**. The disclosure shall be made within two trading days of:

- a) the receipt of intimation of allotment of Securities; or
- b) the acquisition or sale of Securities or voting rights as the case may be.

Every Insider shall disclose to the Company the number of such Securities acquired or disposed of through an off-market inter-se transaction within two Trading Days of such transaction.

### **6.3 Disclosure by the Company to the Stock Exchange(s):**

The company shall notify the particulars of such trading as mentioned in clause 6.2 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.



**7. RECORDS OF DISCLOSURES RECEIVED BY THE COMPANY**

- 7.1. The Compliance Officer shall maintain records of all declarations in the appropriate form made by the Designated Persons for a minimum period of five years. The Compliance Officer shall also maintain a record of the Designated Employees and any changes made in the list of the Designated Employees.
- 7.2. The Compliance Officer shall place before the Managing Director of the Company on a monthly basis, all the details of the dealing in the Securities by the Designated Persons of the Company together with the accompanying documents provided by the Designated Persons in accordance with this Code.

**8. REPORTING REQUIREMENTS FOR DESIGNATED PERSONS**

- 8.1. All Designated Persons shall disclose the annual statement of all Securities of the Company held as on March 31 every year, in the format set out in **FORM - IV** on or prior to April 25 of the next Financial Year.
- 8.2. All Designated Persons shall disclose along with the annual statement referred in (8.1) above a list of all their Immediate Relatives and of persons with whom such Designated Persons have Material Financial Relationship along with telephone and mobile numbers used by them and their respective permanent account number issued by the Income-Tax Department. In the absence of permanent account number, any other identifier authorized by law shall be disclosed. In absence of both documents, the Compliance Officer shall decide on the identifier supposed to be disclosed.
- 8.3. All Designated Persons shall on a one-time basis disclose the names of all educational institutions from where they have graduated and names of past employers, within 15 days of being a Designated Person.
- 8.4. The Compliance Officer shall maintain records of all the declarations/undertakings / forms as mentioned in this Code, and received from time to time, for a period of five Years.
- 8.5. The Compliance Officer shall take steps for disclosures required under this Code to also be made through electronic filing in accordance with the system devised by the stock exchange.

**9. INTERNAL CONTROL**

- 9.1. The chief executive officer or managing director or such other analogous person of the Company shall put in place adequate and effective system of internal controls to ensure compliance with the requirements given in Insider Trading Regulations to prevent insider trading. Further, the Board is to ensure that the requirements are met by such persons under the Insider Trading Regulations.
- 9.2. The internal controls shall include the following:
- a) Identification of all the Designated Persons.
  - b) All the Unpublished Price Sensitive Information shall be identified, and its confidentiality shall be maintained as per the requirements of the Insider Trading Regulations.



- c) adequate restrictions shall be placed on communication or procurement of Unpublished Price Sensitive Information as required by the Insider Trading Regulations
  - d) lists of all employees and other persons with whom Unpublished Price Sensitive Information is shared shall be maintained and confidentiality agreements shall be signed, or notice shall be served to all such employees and persons
  - e) All other relevant requirements specified under the Insider Trading Regulations shall be complied with.
  - f) periodic process review to evaluate effectiveness of such internal controls.
- 9.3. The Audit Committee of the Company or other analogous body for intermediary or fiduciary shall review compliance with the provisions of the Insider Trading Regulations at least once in a financial year and shall verify that the systems for internal control are adequate and are operating effectively.
- 9.4. The Company shall formulate written policies and procedures for inquiry in case of leak or suspected leak of Unpublished Price Sensitive Information, which shall be approved by the Board and accordingly initiate appropriate inquiries on becoming aware of such information and inform the Board promptly of such leaks, inquiries and results of such inquiries.
- 9.5. If an inquiry has been initiated by the Company in case of leak or suspected leak of Unpublished Price Sensitive Information the relevant intermediaries and fiduciaries shall co-operate with the Company in connection with such inquiry conducted by the Company.

#### **10. DISSEMINATION OF PRICE SENSITIVE INFORMATION**

- 10.1. No information shall be passed by Designated Persons by way of making a recommendation for the purchase or sale of Securities of the Company.
- 10.2. Disclosure or dissemination of Unpublished Price Sensitive Information with special reference to analysts, media persons and institutional investors. The following guidelines shall be followed while dealing with analysts and institutional investors:
- g) Only public information is to be provided.
  - h) At least two Company representatives be present at meetings with analysts, media people and institutional investors.
  - i) Unanticipated questions may be taken into notice and a considered response given later. If the answer includes Unpublished Price Sensitive Information, a public announcement should be made before responding.
  - j) Simultaneous release of information after every such meeting.
- 10.3. Where disclosure of Unpublished Price Sensitive Information is required to be made to any person in the course of a transaction, such disclosure shall be made on a "need to know" basis. Any such disclosure shall be made in accordance with the Insider Trading Regulations. The following process shall be followed in bringing persons to whom Unpublished Price Sensitive Information is disclosed as 'insiders':



- a) All such persons shall be required to enter into agreements to contract confidentiality and non-disclosure obligations, in accordance with regulation 3(4) of the Insider Trading Regulations;
- b) The Compliance Officer shall explain to all such persons the obligations and consequences of breach of obligations set out in the Insider Trading Regulations.
- c) The Compliance Officer shall maintain a list of all persons brought in as 'insiders' pursuant to this Code.

## **11. PENALTIES FOR CONTRAVENTION**

- 11.1. Every Designated Person shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her dependents)
- 11.2. Any Designated Person who trades 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 Company
- 11.3. Specified persons who violate the Code shall be subject to appropriate Disciplinary Action which may include wage freeze, suspension, recovery, clawback, ineligibility for future participation in employee stock option plans, etc.
- 11.4. The Disciplinary Action taken by the Company shall not preclude SEBI from taking any action if a violation of this Code also results in a violation of the Regulations.

## **12. INFORMATION**

Where there is a violation of the Regulations, the Compliance Officer or the Company shall immediately inform SEBI about such violation.

## **13. GENERAL**

- 13.1. All Specified Persons are advised to review this Code and the Regulations carefully and acquaint themselves with all the provisions contained therein.
- 13.2. 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 or amendment in accordance with the applicable law as may be issued by relevant statutory, governmental or regulatory authorities, from time to time. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant 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.
- 13.3. For any assistance, advice or clarification on any questions, doubts or difficulties that may arise in the interpretation of this Code, you may contact the following persons:

Name & Designation	Contact Number	Email address
Nitish Padam Jain	+91-9167345511	nitish@kasliwalprojects.com



**KASLIWAL PROJECTS LIMITED**  
(Formerly known as Kasliwal Projects Private Limited)

**CODE OF CONDUCT FOR REGULATING, MONITORING AND REPORTING OF TRADING BY  
INSIDERS**

**FORM - I [Refer Clause 5.21 & 5.22]**

**APPLICATION TO DEAL IN SECURITIES OF KASLIWAL PROJECTS LIMITED**

To: Compliance Officer

From:

Designation:

Employee Code:

Department / Unit:

I hereby give notice that I propose to carry out the following transaction:

Transaction Sale / Purchase	No. of Shares/ Derivatives proposed to be bought/sold	DP & Client ID No (In case of Demat)

**UNDERTAKING**

I hereby undertake and confirm:

- a) that I do not have any access or have not received Unpublished Price Sensitive Information up to the time of signing this undertaking.
- b) that in case I obtain access to or receive any Unpublished Price Sensitive Information after the signing 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 dealing in the Securities of the Company till the time such information becomes public.
- c) that I have not contravened the code of conduct for prevention of insider trading as notified by the Company from time to time.
- d) that I have made a full and true disclosure in this application.

Name

(Signature)

Date:



**KASLIWAL PROJECTS LIMITED**  
(Formerly known as Kasliwal Projects Private Limited)

**CODE OF CONDUCT FOR REGULATING, MONITORING AND REPORTING OF TRADING BY  
INSIDERS**

**FORM – II [Refer Clause 5.27]**

**REPORT ON REASON FOR NOT COMPLETING THE APPROVED TRANSACTION**

To: Compliance Officer

From:  
Employee Code:

Designation:  
Department / Unit:

I hereby give reasons for not executing the approved transaction as per the following details:

Date of Pre- clearance	No. of Shares/ Derivatives proposed to be bought / sold	DP & Client ID No (In case of Demat)	Reasons

Name

(Signature)

Date:



**KASLIWAL PROJECTS LIMITED**  
(Formerly known as Kasliwal Projects Private Limited)

**CODE OF CONDUCT FOR REGULATING, MONITORING AND REPORTING OF TRADING BY  
INSIDERS**

**FORM - III [Refer Clause 5.31]**

**APPLICATION FOR WAIVER OF MINIMUM HOLDING PERIOD**

From:  
Employee Code:

Designation:  
Department / Unit:

Through: Department Head

Dear Sir,

I request you to grant me waiver of the minimum holding period of 30 days as required under the Company's code of conduct for regulating, monitoring and reporting of trading by Insiders, with respect to shares of the Company held by me/ (name of family dependent)/jointly acquired by me on\_\_\_\_(date). I desire to deal in the said shares because of the under-mentioned emergency [mention reasons in brief along with supporting documents]

Thanking you

Your faithfully,

Name

(Signature)

Date:



**KASLIWAL PROJECTS LIMITED**  
(Formerly known as Kasliwal Projects Private Limited)

**CODE OF CONDUCT FOR REGULATING, MONITORING AND REPORTING OF TRADING BY INSIDERS**

**FORM - IV [Refer Clause 8.1]**

**DISCLOSURE OF HOLDINGS IN SECURITIES KASLIWAL PROJECTS LIMITED  
BY DIRECTORS / DESIGNATED PERSONS**

Date:

To: Compliance Officer :

From:  
Employee Code:

Designation:  
Department / Unit:

**I. DETAILS OF HOLDINGS BY DIRECTOR/DESIGNATED PERSON IN HIS OWN NAME  
(WHETHER SINGLY OR JOINTLY)**

All holdings in Securities of Kasliwal Projects Limited as on March 31, 20\_\_.

Securities held at March 31, 20__	Value in ₹	Folio No./DP ID/ Client ID

**II. DETAILS OF DEALINGS & HOLDINGS BY IMMEDIATE RELATIVE(S) (WHETHER SINGLY OR JOINTLY)**

Securities held at March 31, 20__	Value in ₹	Folio No./DP ID & /Client ID

I declare that I have complied with the provisions of the Regulations and/or the Code. I declare that above details are true, correct and complete in all respect.

\_\_\_\_\_  
Please sign and return even if you have nothing to declare.



**KASLIWAL PROJECTS LIMITED**  
(Formerly known as Kasliwal Projects Private Limited)

**CODE OF CONDUCT FOR REGULATING, MONITORING AND REPORTING OF TRADING BY  
INSIDERS**

**FORM - V**

From:  
Employee Code:

Designation:  
Department / Unit:

LIST OF RELATIVES/IMMEDIATE RELATIVES

1.	Spouse	
2.	Father (Including step- father)	
3.	Mother (Including step-mother)	
4.	Son's (Including step- son)	
5.	Son's wife	
6.	Daughter	
7.	Daughter's husband	
8.	Brother's (Including step-brother)	
9.	Sister (Including step- sister)	
10.	If you are member of Hindu Undivided	

Name

(Signature)

Date:



**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), Senior Management (SMP) 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 and 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 or member of the promoter group	Securities held at the time of becoming Promoter/appointment of Director/KMP or becoming Promoter or member of the promoter group	No.	% of Shareholding
1	2	3	4 Type of security (For e.g. – Shares, Warrants, Convertible Debentures, Rights entitlements, etc.)	5	6

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

**Details of Open Interest (OI) in derivatives of the company held on appointment of Key Managerial Personnel (KMP), Senior Management (SMP) or Director or upon becoming Promoter or member of the promoter group of a listed company immediate relative of such persons and by and 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	Open Interest of the Option Contracts held as on the date of regulation coming into force
Contract Specifications	Contract Specifications
Number of units (contracts * lot size)	Number of units (contracts * lot size)
Notional value in Rupee terms	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

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

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

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

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



**ANNEXURE**  
**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 person 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/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/ disposal of shares specify	Date of intimati on to company	Mode of acquisition / disposal (on market/p ublic/ rights/ preferenti al 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 entitlements, etc.)	No. and % of shareholding	Type of security (For e.g. Shares, Warrant s, Converti ble Debentu res,	No.	Value	Transa ct ion Type (Purch ase/ Sale/ Pledge / Revoc ation/ etc.)	Type of security (For e.g. Shares, Warrants, Convertib le Debenture s, Rig	No. and % of Shareholding	From To				







**Form C (Indicative format)**

**SEBI (Prohibition of Insider Trading) Regulations, 2015**

**Regulation 7(3) - Transactions by Other Connected Persons as identified by the Company Details of trading in securities by other connected persons as identified by the company**

Name, PAN, CIN/DIN, & address with contact nos. of other connected persons as identified by the company	Connection with Company	Securities held prior to acquisition/disposal	Securities acquired/Disposed	Securities held post acquisition/disposal	Date of allotment / advice / acquisition / disposal of shares specify	Date of intimating to company	Mode of acquisition/disposal (on market/public/trade rights/ Preferential offer / off market/ Inter-se transfer, ESOPs etc.)	Exchange on which trade was executed				
		Type of security Forand No. of shareholding e.g. - Shares, Warrant s, Converti ble Debentur es, Rights entitlem	Type of security (For e.g. - Shares, Warrants , Converti ble Debentur es, Rights	No. of security (For e.g. - Shares, Warrants , Converti ble Debentur es, Rights	Value	Transaction Type (Purchase/ Sale/ Pledge / Revocation/ Others-Please Specify)	Type of security (For e.g. - Shares, Warrants , Converti ble Debentur es, Rights entitleme	No. of Sharehold	From To			



Director

For KASLWAL PROJECTS LTD.

		ents, etc.)		entitlements, etc.)				nts, etc.)							
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	

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