

**SHUBHAM POLYSPIN LIMITED**  
**(CIN: U17120GJ2012PLC069319)**

**CODE OF CONDUCT TO PROHIBITION OF INSIDER  
TRADING**

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(Revised by the Board of Directors at its meeting held on 30<sup>th</sup> March, 2019)

## **A. INTRODUCTION:**

The Securities and Exchange Board of India (SEBI) to protect the interest of Investors in general, had formulated the SEBI (Insider Trading) Regulation, 2015 under the powers conferred on it under the SEBI Act, 1992.

The board of directors of every listed company whose securities are listed on a stock exchange and market intermediary shall formulate a code of conduct to regulate, monitor and report trading by its employees and other connected persons towards achieving compliance with these regulations, adopting the minimum standards set out in Schedule B to these regulations of the SEBI (Insider Trading) Regulation, 2015, without diluting the provisions of these regulations in any manner.

The Code is intended to serve as a guiding charter for all concerned persons associated with the functioning of the Company and their adequate disclosure of Price Sensitive information to the investor community by the Company to enable them to take informed investment decisions with regard to the Company's Securities.

[The Original Code was come into force from 11<sup>th</sup> August, 2018.](#)

This Code shall come into force from 1<sup>st</sup> [April](#), 2019.

## **B. APPLICATION AND SCOPE:**

This Code shall apply to the Designated Persons and their Immediate Relatives. The provisions of this Code shall be applicable irrespective of whether the Securities are held by Designated Persons solely or jointly along with any other Persons(s) or by their immediate relative.

Employees and connected persons designated on the basis of their functional role (“designated persons”) in the organization shall be governed by an internal code of conduct governing dealing in securities. The Board of Directors shall in consultation with the compliance officer specify the designated persons to be covered by such code on the basis of their role and function in the organization.

## **C. DEFINITIONS:**

1. “**Act**” means the Securities and Exchange Board of India Act, 1992.
2. “**Code**” or “**Code of Conduct**” shall mean the Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of trading by insiders of “**Shubham Polyspin Limited**” as amended from time to time.
3. “**Company**” means “**Shubham Polyspin Limited**”.
4. “**Compliance Officer**” means any senior officer, designated so and reporting to the Board of Directors, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board of Directors of the listed company or the head of an organization, as the case may be;
5. “**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 Director thereof; or
  - (d). an investment Company, trustee Company, asset management Company or an employee or director thereof; or
  - (e). an official of a stock exchange or of clearing house or corporation; or
  - (f). a member of Board of trustees of a mutual fund or a member of the Board of Directors of the asset management Company of a mutual fund or is an employee thereof; or
  - (g). a member of the Board of Directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
  - (h). an official or an employee of a self-regulatory organization recognized or authorized by the Board; or
  - (i). a banker of the company; or
  - (j). a concern, firm, trust, Hindu undivided family, Company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten percent of the holding or interest;

## **6. Designated Person**

The term “Designated Person” shall consist of:

- i. The Directors of the Company.
- ii. Managing Director/ Chief Financial Officer/ Company Secretary of the Company and its material subsidiary(ies).
- iii. All promoters of the Company.
- iv. Auditors of the Company.
- v. Employees of the material subsidiary(ies), present or future, as may be decided by the Board of the respective material subsidiary(ies), who could be reasonably expected to have access to UPSI.

vi. Immediate Relatives of Persons specified in (i) to (v) above.

vii. Any other Person designated by the Company on the basis of their functional role and such function would provide access to UPSI.

~~6.7.~~ **"Generally available Information"** means information that is accessible to the public on a non-discriminatory basis.

~~7.8.~~ **"Immediate Relative"** means a spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities.

~~8.9.~~ **"Insider"** means any person who,

(i) a connected person; or

(ii) in possession of or having access to unpublished price sensitive information.

~~9.10.~~ **"Promoter"** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof.

~~10.11.~~ **"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;

~~11.12.~~ **"Takeover regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;

~~12.13.~~ **"Trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;

~~13.14.~~ **"Trading Day"** means a day on which the recognized stock exchanges are open for trading;

~~14.15.~~ **"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:

- i. financial results (quarterly and annual);
- ii. dividends (both interim and final);
- iii. change in capital structure;
- iv. mergers, de-mergers, acquisitions, de-listings, disposals and expansion of business and such other transactions;
- v. changes in key managerial personnel; and
- vi. ~~material events in accordance with the listing agreement.~~

**Note:** Words and expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation.

#### **D. ROLE OF COMPLIANCE OFFICER:**

1. The Compliance Officer shall report to the Board of Directors of the Company and in particular, shall provide quarterly reports to the Chairman of the Audit Committee or to the Chairman of the Board of Directors in relation to the mandates of the Regulations and Code of Conduct.
2. The Compliance Officer shall assist all employees in addressing any clarifications regarding the Regulations and the Code of Conduct.
3. The Compliance Officer shall monitor, review and approve all the Trading Plans.
4. The Compliance Officer shall, based on his discretion and occurrence of specific events detailed in this Code of Conduct, regulate and monitor the Trading Window of the securities of the Company.
5. The Compliance Officer may inquire any employee in relation to Trading of securities and handling of unpublished price sensitive information of the Company.

6. The Compliance Officer may require any other persons (law firms, consultants, investment bankers, vendors, customers, bankers etc.) to disclose shareholding and trading in securities of the Company.
7. The Compliance Officer shall confidentially maintain a list of such securities as a restricted list which shall be used as their basis for approving or rejecting application for pre- clearance of trades.
8. The Compliance Officer will propose necessary changes to this Code as and when the same are necessitated. The proposal will be considered by the Board of Directors of the Company and, if approved, will take effect immediately following the Board Meeting in which such proposals are approved.
9. The Compliance Officer will maintain a record (either manual or in electronic form) of the Designated Persons and their immediate relatives and changes thereto from time to time, in consultation with Managing Director/Whole Time Director/ Manager/ Chief Executive Officer of the Company.

## **E. CONFIDENTIALITY OF PRICE SENSITIVE INFORMATION AND CHINESE WALLS:**

### **(i) CONFIDENTIALITY OF PRICE SENSITIVE INFORMATION:**

1. The Designated Persons shall maintain the confidentiality of all Unpublished Price Sensitive Information. The Designated Persons shall not pass on such information to any person, directly or indirectly.
2. The Unpublished Price Sensitive Information is to be handled on a “need-to-know” basis, i.e. Unpublished Price Sensitive Information should be communicated only to those Designated Persons and/or to such other persons who need the information in furtherance of their legitimate purpose, performance of duties or discharge of their legal obligation and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.

~~3. Any Unpublished Price Sensitive Information directly received by any employee, not entitled or required to have access of such information in its ordinary course of business or performance of duties or discharge of his legal obligations should immediately be reported to the Compliance Officer.~~

- ~~4. The Compliance Officer may require any person having contractual or fiduciary relation with the Company to formulate policies to safely handle Unpublished Price Sensitive Information relating to the securities of the Company.~~
- ~~5. The Company while dealing with any market intermediary, client, agent or any other person, who is required to handle Unpublished Price Sensitive Information shall ensure that such person has formulated a code of conduct as per the requirements of the Regulations~~

For the purpose of this clause, “legitimate purpose” shall include sharing of UPSI in the ordinary course of business by the Specified Persons with existing or proposed partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants or sharing of UPSI for any other genuine or reasonable purpose as may be determined by the Chief Financial Officer or the Company Secretary of the Company.

Provided however that such sharing shall not be carried out to evade or circumvent the prohibitions of the Regulations.

Provided further that, other provisions / restrictions as prescribed under the Regulations or any other law for the time being in force in this behalf, as may be amended from time to time, shall be observed.

- A. Unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction which entails:
  - a) an obligation to make an open offer under the takeover regulations where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the Company; or
  - b) not attracting the obligation to make an open offer under the takeover regulations but where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the Company and the information that constitute unpublished price sensitive information is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the Board of Directors may determine.



However, the Board of Directors 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 limited purpose and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information

### **Issue of Notice to the recipient of UPSI:**

Any person in receipt of UPSI including that for a “legitimate purpose” shall be considered as “Insider” for the purposes of the Regulations and due notice shall be given, including as a part of any agreement, to such persons by the Company Secretary and Compliance Officer and / or Head – Legal, immediately on receipt of such information:

- i. To make such person aware that the information shared is or would be UPSI.
- ii. To make such person aware about the Code and the duties and responsibilities attached to the receipt of such UPSI and the liability attached to misuse.
- iii. To instruct such person to maintain confidentiality about such UPSI in compliance with these regulations.

### **Digital Database of recipient of UPSI:**

The Company Secretary and Compliance Officer shall be responsible to maintain a structured digital database of such persons or entities, as the case may be, with whom the information is shared under the Regulation, which shall contain the following information:

- i. Name of such recipient of UPSI;
- ii. Name of the organization or entity to whom the recipient represents;
- iii. Postal address and/ or email ID of such recipient; and
- iv. Permanent Account Number (PAN) or any other identifier authorized by law, where PAN is not available.
- v. such other detail or information as may be required by the Regulations

### **Need to Know:**

- i. “need to know basis” means that UPSI should be disclosed only to those who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or misuse of the information.
- ii. All non-public information relating to the Company directly received by any employee of the Company should immediately be reported to his/ her Head of the Department.

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

Physical files containing confidential information shall be kept secure and computer files must be kept under adequate security of login id and password.

### **Leakage of UPSI and Inquiry in case of Leakage:**

The Managing Director/Compliance Officer of the Company shall formulate written policies and procedures for inquiry in case of any leakage of UPSI or suspected leakage of UPSI, which shall be approved by the Board and accordingly initiate appropriate inquiries on becoming aware of any leakage of UPSI or suspected leakage of UPSI and inform the Board promptly of such leakages, inquiries and result of such inquiries.

All UPSI shall be identified and its confidentiality shall be maintained as per the requirements of this Code.

Managing Director/ Chief Financial Officer/ Company Secretary of the Company shall decide on how and when any person(s) should be brought ‘inside’ in any proposed or ongoing sensitive transaction(s).

The Person(s) who may be brought inside any proposed or ongoing sensitive transaction(s) of the Company, could be existing or proposed partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, etc. of the Company, for legitimate purpose, which shall include the following:

- i. in the ordinary course of business;
- ii. in furtherance of performance of duties;

iii. for discharge of contractual, legal or statutory obligations;

iv. for any other genuine or reasonable purpose as may be determined by the Managing Director/ Chief Financial Officer/ Company Secretary/ Head-Legal of the Company; and

v. for any other purpose as may be prescribed under the Act, Regulations, Listing Regulations and/ or Company Law or any other law for the time being in force, in this behalf, as may be amended from time to time.

The Managing Director/Compliance Officer shall put in place adequate and effective system of internal controls to ensure compliance with the requirements of this Code to prevent Trading by an Insider which is prohibited.

The Audit Committee of the Company shall review compliance with the provisions of this Code at least once in a Financial Year and shall verify that the systems for internal control are adequate and are operating effectively.

**(ii) CHINESE WALLS AND CROSS THE WALL:**

**a. CHINESE WALLS:**

1. The Compliance Officer shall monitor and regulate the Company's Chinese walls and Cross the wall procedures.
2. In general, Chinese Walls separate areas that have access to confidential inside information from those who do not have such access. The Company shall formulate Chinese Walls to operate as barriers to the passing of inside information and confidential information and a means of managing Conflicts of Interest.
3. The Chinese Walls designed to manage confidential information and prevent the inadvertent spread and misuse of inside information, or the appearance thereof. Board shall understand where Chinese Walls have been set up or where they are needed according to this Policy, corporate governance requirements or Regulations.
4. The employees working within an insider area are prohibited from communicating any confidential or inside information to employees in public areas without the prior approval of Compliance Officer.

5. Employees within a Chinese Walls have a responsibility to ensure the Chinese Wall is not breached deliberately or inadvertently. Known or suspected breaches of the Chinese Wall must be referred to the Compliance Officer immediately.
6. The Company shall ensure that appropriate policies, procedures and physical arrangements are implemented for the relevant businesses and that such policies are complied with by all affected employees.
7. The establishment of Chinese Walls is not intended to suggest that within insider areas material, confidential information can circulate freely. Within insider areas, the need-to-know shall be in effect.

**b. CROSSING THE WALL:**

1. If an employee/outsider receives inside information from the inside area of the Company, it is treated that the said employee or outsider has crossed the wall. Pursuant to crossing the wall, the employee becomes an insider. Such employee/outsider must be subject to all restrictions and prohibitions as required under this Code of Conduct, Regulations and policies relating to Chinese Walls. An employee is no longer a temporary insider when the inside information is published or no longer significant to the market.
2. The Compliance Officer must formulate policies on actions to be taken when employees receive information from inside area behind the Chinese wall, information that cannot be discussed between the employees of different verticals.
3. If any person crosses the wall, the same should be immediately reported to the Compliance Officer. The Compliance Officer shall make sure that all restrictions are imposed on such employee relating to the protection to Unpublished Price Sensitive Information.

## **F. TRADING WINDOW:**

1. The Compliance Officer shall notify a 'trading window' during which the Designated Persons may Trade in the Company's securities after securing pre-clearance from the Compliance Officer in accordance with these Rules.
2. Designated Persons shall not Trade in the Company's securities when the trading window is closed.
3. The Trading Window shall be, inter alia, closed 7 days prior to and during the time the unpublished price sensitive information is published.
4. Additionally, the trading window shall be closed in particular for a employees/connected person Designated or class of persons Designated on the basis of their functional role in Companies, 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, for such periods as determined by the Compliance Officer.
5. The trading window may be re-opened after closure, not earlier than 48 hours after the UPSI in question becomes generally available. 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.
6. The Designated Persons and their immediate relatives who have traded in accordance with the provisions of this code shall not execute a contra trade within 6 (six) months of such trade.

## **G. PRECLEARANCE:**

1. When the trading window is open, trading by designated persons shall be subject to pre-clearance by the Compliance Officer, if the value of the proposed trades is above Rs. 10,00,000 in value of shares i.e. thresholds limit as decided by the Board of Directors. No designated person shall 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.
2. 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 preclearance of trades.
3. Designated Persons may Trade in the securities of the Company when the trading window is open, after obtaining approval of the Compliance Officer by submitting an application as per **Annexure 1** and an undertaking as per **Annexure 2**.
4. The Compliance Officer shall not approve any proposed Trade by Designated Person if the Compliance Officer determines that such Designated Person is in possession of UPSI even though the trading window is open.
5. The Compliance Officer may, after being satisfied that the application and undertaking are true and accurate, approve Trading by a Designated Person, on the condition that the Trade so approved shall be executed within seven trading days following the date of approval.
6. The Designated Persons shall, within seven trading days after the pre-clearance is given, execute the Trade in respect of which the pre-clearance has been accorded. If the Trade is not executed within seven trading days after the pre-clearance is given, the Designated Persons, as the case may be, shall obtain pre-clearance again in accordance with the procedure detailed in **Annexure -3**.
7. A Designated Person who Trades in securities without complying with the preclearance procedure as envisaged in Rules or gives false undertakings and/or makes misrepresentations in the undertakings executed by him/her while complying with the pre-clearance procedure shall be subjected to the penalties as envisaged in these Rules.

## **H. DISCLOSURE REQUIREMENTS:**

### **1) Initial Disclosure:**

- a. Every Promoter, member of the Promoter Group, Key Managerial Personnel, Director of the Company and each of their Immediate Relatives shall disclose his holding of securities of the Company within thirty days of these Rules taking effect as per Form A set out in Annexure 4.
- b. Every person on appointment as a Key Managerial Personnel or a director of the Company or upon becoming a Promoter, member of the Promoter Group shall disclose his / her and Immediate Relatives' holding of securities of the Company as on the date of appointment or becoming a promoter, to the Company within seven days of such appointment or becoming a promoter, as per Form B set out in Annexure 5.

~~Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter shall disclose his / her and Immediate Relatives' holding of securities of the Company as on the date of appointment or becoming a promoter, to the Company within seven days of such appointment or becoming a promoter, as per Form B set out in Annexure 5.~~

### **2) Continual Disclosure:**

Every Promoter, member of Promoter Group, Designated Person~~employee~~, Director of the Company and each of their Immediate Relatives shall disclose as per Form C set out in **Annexure 6** 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. 10,00,000/-.

### **3) Disclosure to the Stock Exchange:**

The Compliance Officer shall notify the stock exchanges, particulars of the Trades, within two trading days of receipt of the disclosure or from becoming aware of such information.

### **4) Disclosures by other Connected Persons:**

The Compliance Officer may, require any other Connected Person to disclose the holdings and trading in securities of the Company as per Form D set out in **Annexure 7** at such frequency as he may determine.

## **I. PENALTY FOR CONTRAVENTION OF CODE OF CONDUCT:**

In the event a Designated Person or his immediate relatives, trade in Securities or communicates any information for trading in Securities in contravention of this Code or otherwise violates the provisions of this Code, such Person shall be referred to the Audit Committee of Directors. The Board may, on the recommendations of the Audit Committee, decide on the appropriate disciplinary action (which may include wage freeze, suspension etc.).

Information to SEBI in case of violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Any violation of the Code of Conduct and the Regulations shall be immediately intimated in the prescribed manner. to the Compliance Officer or the Board of the Company.

In case it is observed by the Board of Directors that there has been a violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015 in relation to securities of the Company, the same shall be immediately intimated to SEBI.



## APPLICATION FOR PRE-TRADING APPROVAL

To,  
The Compliance Officer,  
Shubham Polyspin Limited

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Insider Trading Policy, I seek approval to purchase / sell / subscribe \_\_\_\_\_ equity shares of the Company as per details given below:

1.	Name of the applicant	
2.	Designation	
3.	Number of securities held as on date	
4.	Folio No. / DP ID / Client ID No.	
5.	The proposal is for	(a) Purchase of securities (b) Subscription to Securities (c) Sale of securities
6.	Proposed date of trading in securities	
7.	Estimated number of securities proposed to be purchased/subscribed/sold	
8.	Current market price (as on date of application)	
9.	Whether the proposed transaction will be through stock exchange or off-market trade	
10.	Folio No. / DP ID / Client ID No. where the securities will be credited / debited	

I enclose herewith the Undertaking signed by me.

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

**Date:**

**Name:** \_\_\_\_\_

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

To,  
The Compliance Officer,  
Shubham Polyspin Limited

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

I further declare that I am not in possession of any unpublished price sensitive information up to the time of signing this Undertaking.

In the event that I have access to or receive any unpublished price sensitive information after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from trading in the securities of the Company until such information becomes public.

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

In the event of this transaction being in violation of the Rules or the applicable laws, (a) I will, unconditionally, release, hold harmless and indemnify to the fullest extent, the Company and its Directors and officers, (the 'indemnified persons') for all losses, damages, fines, expenses, suffered by the indemnified persons, (b) I will compensate the indemnified persons for all expenses incurred in any investigation, defense, crisis management or public relations activity in relation to this transaction and (c) I authorize the Company to recover from me, the profits arising from this transaction and remit the same to the SEBI for credit of the Investor Protection and Education Fund administered by the SEBI.

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

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

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

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

**Date:**

**Name:**

**DISCLOSURE OF TRANSACTIONS**

(To be submitted within 7 days of transaction / trading in securities of the Company)

To,  
The Compliance Officer,  
Shubham Polyspin Limited

I hereby inform that I

- have not bought / sold/ subscribed any securities of the Company
- have bought/sold/subscribed to \_\_\_\_\_ securities as mentioned below on \_\_\_\_ (date)  
**(strike out whichever is not applicable)**

<b>Name of holder</b>	<b>No. of securities Traded</b>	<b>Bought / sold / subscribed</b>	<b>DP ID/Client ID/Folio No.</b>	<b>Price (Rs.)</b>

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

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

**Date:**

**Name:**

## FORM A

**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015  
[Regulation 7 (1) (a) read with Regulation 6 (2)]**

To,  
The Compliance Officer,  
Shubham Polyspin Limited  
(ISIN of the Company: INE01J501010)

**Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2) of SEBI Regulation**

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/ immediate relatives/ others etc)	Securities held as on the date of regulation coming into force		% of Shareholding	Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option Contracts held as on the date of regulation coming into force	
		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	8	9

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

Date:

Signature:

Place:

Designation:

## FORM B

**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015  
[Regulation 7 (1) (b) read with Regulation 6(2)]**

To,  
The Compliance Officer,  
Shubham Polyspin Limited  
(ISIN of the Company: INE01J501010)

**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) of SEBI Regulations.**

Name, PAN No., CIN/DIN & Address with contact nos.	Category of Person (Promoters/ KMP / Directors/im mediate 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	5	6		7	

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

Date:

Signature:

Place:

Designation:

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

To,  
The Compliance Officer,  
Shubham Polyspin Limited (ISIN of the Company: INE01J501010)

**Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2) of the SEBI Regulation.**

Name, PAN No., CIN/DIN, & address Of Promoter/ Employee / Director with contact nos.	Category of Person (Promoters/ KMP / Directors/ immediate relatives/ others etc.)	Securities held prior to acquisition/ disposal		Securities acquired/ Disposed		% of shareholding		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of Intimation to company	Mode of acquisition (market purchase/ public rights/ preferential offer / off market/Inter-se transfer etc	Trading in derivatives (Specify type of contract, Futures or Options etc)		Exchange on which the trade was executed	
		Type of security (For 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	Number of units (contract * lot size)	Value	Number of units (contracts * lot size)

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

**Date:**

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

**Place:**

**Designation:**

## FORM D

**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**

**Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).**

Name, PAN No., CIN/DIN, & address Of connected persons, as identified by the company with contact nos.	Connecti on with company)	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 transa ction	Post Transac tion	From	To			Buy		Sell			
												Value	Number of units (contract * lot size)	Value	Number of units (contracts * lot size)		

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

Date:

Place:

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

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