



**B.L. KASHYAP AND SONS LIMITED**

**CODE OF CONDUCT  
FOR  
PREVENTION OF INSIDER TRADING  
  
AND  
FAIR DISCLOSURE OF  
UNPUBLISHED PRICE SENSITIVE INFORMATION**

Approved by the Board of Directors on 04<sup>th</sup> February 2015

First amended 07<sup>th</sup> February 2025

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

### **PURSUANT TO SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015**

Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015, the Board of Directors of the Company had approved amended this “Code of Conduct” at their meeting on Wednesday, 04th February, 2015.

In line with the provisions of the above said regulations of 2015 issued on 15<sup>th</sup> January, 2015, the following Code of Conduct to regulate, monitor and report trading by insiders has been formulated and adopted by the Board of Directors of B.L. KASHYAP AND SONS LIMITED, is being applicable w.e.f. 15<sup>th</sup> May, 2015.

#### **Purpose & Objective**

The purpose of this code of conduct is to make a procedure and policy to be followed by the employees and concerned persons of B.L. KASHYAP AND SONS LIMITED with a prime motive to prevent, curb and prohibit the menace of Insider Trading for the betterment of investors and the securities market.

In furtherance of the above said objectives a model code of conduct has been formulized, intending to achieve the following objectives:

- ❖ To establish a mechanism to regulate, monitor and report trading by its employees and other connected persons towards achieving compliance with these regulations and prohibition of insider trading to safeguard the interest of the investors.
- ❖ To provide a strict policy for the Prohibition of Insider Trading and to preserve the confidentiality while dealing with Unpublished Price Sensitive Information to maintain a fair and transparent environment for the investors.

## **1. DEFINITIONS**

- 1.1 “Act” means the Securities and Exchange Board of India Act, 1992.
- 1.2 “Board” means the Securities and Exchange Board of India;
- 1.3 “Code” or “Code of Conduct” shall mean the Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of trading by insiders of B.L. Kashyap and Sons Limited as amended from time to time.
- 1.4 “Company” means B.L. Kashyap and Sons Limited.
- 1.5 “Compliance officer” means Company Secretary or any senior officer, designated so and reporting to the board of directors or head of the organization in case board is not there, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board of directors of the listed company or the head of an organization, as the case may be.
- 1.6 “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 recognised or authorized by the Board; or
  - (i) a banker of the Company; or
  - (j) a concern, firm, trust, hindu undivided family, company or association of persons wherein a director of the Company or his immediate relative or banker of the Company, has more than ten per cent, of the holding or interest.
- 1.7 "Dealing in Securities" means an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in the securities of the Company either as principal or agent.
- 1.8 "Designated Employee(s)" shall include:
- (i) every employee in the grade of General Managers and above;
  - (ii) every employee in the finance, accounts, secretarial and legal department as may be determined and informed by the Compliance Officer; and
  - (iii) any other employee as may be determined and informed by the Compliance Officer from time to time.
- 1.9 "Director" means a member of the Board of the Company.
- 1.10 "Employee" means every employee of the Company including the Directors in the employment of the Company.
- 1.11 "Generally available information" means information that is accessible to the public on a non-discriminatory basis and shall not include unverified event or information reported in print or electronic media."
- 1.12 "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
- 1.13 "Insider" means any person who is:
- (i) a connected person; or
  - (ii) in possession of or having access to unpublished price sensitive information.
- 1.14 "Key Managerial Person" means person as defined in Section 2(51) of the Companies Act, 2013.
- 1.15 "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:
- 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 or any modification thereof;
- 1.16 "Securities" shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof;
- 1.17 "Takeover regulations" means the Securities and Exchange Board of India (Substantial

Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;

- 1.18 "Trading" means and includes subscribing, redeeming, switching, buying, selling, dealing, or agreeing to subscribe, redeem, switch, buy, sell, deal in any securities, and "trade" shall be construed accordingly.
- 1.19 "Trading Day" means a day on which the recognized stock exchanges are open for trading;
- 1.20 "Unpublished Price Sensitive Information (UPSI)" means: 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;
  - (ii) dividends;
  - (iii) change in capital structure;
  - (iv) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
  - (v) changes in key managerial personnel.
- 1.21 "Regulations" shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.
- 1.22 "Specified Persons" means the Directors, connected persons, the insiders, the Designated Employees and the promoters and immediate relatives are collectively referred to as Specified Persons.

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.

- 1.23 "Prescribed Forms" means forms prescribed under SEBI (Prohibition of Insider Trading) Regulations, 2015.

**1.24 COMPLIANCE OFFICER**

- 1.25 The company secretary of the company shall be a compliance officer for the purpose of this code.
- 1.26 The compliance officer shall be responsible for setting forth policies, procedures, monitoring adherence to the Code and Regulations for the preservation of Unpublished Price Sensitive Information, pre-clearing of designated persons, monitoring of trades and implementation of this Code of conduct under the overall supervision of the Board of Directors.
- 1.27 The compliance officer shall maintain the record of the Persons and shall make changes to such record as and when received the intimation of changes from the HR Department.
- 1.28 The compliance officer shall Assist all employees in addressing any clarifications regarding SEBI (Prohibition of insider Trading) Regulation, 2015 and the company's Code of conduct.

- 1.29 The compliance officer shall maintain the record of all the declarations given by the Designated Persons for a minimum period of five years.
- 1.30 Reviewing the trading plan and accessing the potential of the plan for violation of the Regulations, if any
- 1.31 Notify the trading plan to the stock exchanges where the securities are listed, on approval of the plan,
- 1.32 Reporting to the Board on the compliance of this Regulation.

## **2. PRESERVATION OF “UNPUBLISHED PRICE SENSITIVE INFORMATION”**

- 2.1 Insider shall maintain the confidentiality of all UPSI coming into their possession or control.

To comply with this confidentiality obligation, the Insiders and their immediate relatives shall not:

- (i) communicate, provide or allow access of UPSI to any person directly or indirectly, including by way of making a recommendation for the purchase or sale of Securities of the Company unless such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations; or
- (ii) discuss UPSI in public places, or
- (iii) disclose UPSI to any Employee who does not need to know the information for discharging his or her duties, or
- (iv) recommend to anyone that they may undertake Trading in Securities of the Company while being in possession, control or knowledge of UPSI, or
- (v) be seen or perceived to be Trading in Securities of the Company while in possession of UPSI.

- 2.2 Need to Know basis:

The Insider, who is privy to UPSI, shall handle the same strictly on a “Need to Know basis.” This means the UPSI shall be disclosed only to those persons who need to know the same in furtherance of a legitimate purpose, the course of performance or discharge of their duty and whose possession of UPSI will not in any manner give rise to a conflict of interest or likelihood of misuse of the information.

- 2.3 Limited access to confidential information:

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

- ❖ Files containing confidential information shall be kept secure.
- ❖ Computer files must have adequate security of login and password, etc.
- ❖ Follow the guidelines for maintenance of electronic records and systems as may be prescribed by the Compliance Officer from time-to-time in consultation with the person in charge of the information technology function.

### **3. TRADING WHEN IN POSSESSION OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

3.1 No insider shall trade in securities that are listed or proposed to be listed on a stock exchange when in possession of unpublished price sensitive information:

Provided that the insider may prove his innocence by demonstrating the circumstances including the following: –

- (i) the transaction is an off-market *inter-se* transfer between insiders who were in possession of the same unpublished price sensitive information without being in reach of regulation 3 and both parties had made a conscious and informed trade decision.

Provided that such unpublished price sensitive information was not obtained under sub-regulation (3) of regulation 3 of these regulations.

Provided further that such off-market trades shall be reported by the insiders to the company within two working days. Every company shall notify the particulars of such trades to the stock exchange on which the securities are listed within two trading days from receipt of the disclosure or from becoming aware of such information.

- (ii) the transaction was carried out through the block deal window mechanism between persons who were in possession of the unpublished price sensitive information without being in breach of regulation 3 and both parties had made a conscious and informed trade decision;

Provided that such unpublished price sensitive information was not obtained by either person regulation 3 of these regulations.

- (iii) the transaction in question was carried out pursuant to a statutory or regulatory obligation to carry out a bona fide transaction.

- (iv) the transaction in question was undertaken pursuant to the exercise of stock options in respect of which the exercise price was pre-determined in compliance with applicable regulations.]

- (v) in the case of non-individual insiders: –

- (a) the individuals who were in possession of such unpublished price sensitive information were different from the individuals taking trading decisions and such decision-making individuals were not in possession of such unpublished price sensitive information when they took the decision to trade; and

- (b) appropriate and adequate arrangements were in place to ensure that these regulations are not violated and no unpublished price sensitive information was communicated by the individuals possessing the information to the individuals taking trading decisions and there is no evidence of such arrangements having been breached;

- (vi) the trades were pursuant to a trading plan set up in accordance with regulation 5.

- 3.2 In the case of connected persons the onus of establishing, that they were not in possession of unpublished price sensitive information, shall be on such connected persons and in other cases, the onus would be on the Board.
- 3.3 The Board may specify such standards and requirements, from time to time, as it may deem necessary for the purpose of these regulations.

#### **4. TRADING PLANS**

- 4.1 i. An insider shall be entitled to formulate a trading plan for dealing in securities of the Company and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his/her behalf in accordance with such plan.
- ii. The Compliance Officer shall review and seek additional clarifications or undertakings, if required to approve the Trading Plan, if it complies with the SEBI Regulations and shall disclose the Trading Plan to the stock exchanges.
- 4.2 Such trading Plan shall:-
- (i) not entail commencement of trading on behalf of the insider earlier than one hundred and twenty calendar days from the public disclosure of the plan;
  - (ii) not entail overlap of any period for which another trading plan is already in existence;
  - (iii) Set out following parameters for each trade to be executed:
    - (i) either the value of trade to be effected or the number of securities to be traded;
    - (ii) nature of the trade;
    - (iii) either specific date or time period not exceeding five consecutive trading days;
    - (iv) price limit, that is an upper price limit for a buy trade and a lower price limit for a sell trade, subject to the range as specified below:
      - a. for a buy trade: the upper price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent higher than such closing price;
      - b. for a sell trade: the lower price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent lower than such closing price.
  - (iv) *not entail trading in securities for market abuse.*
- 4.2 The compliance officer shall review the trading plan to assess whether the plan would have any potential for violation of these regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.

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



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

- 4.3 The Trading Plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the plan, without being entitled to either execute any trade in the securities outside the scope of the trading plan or to deviate from it except due to permanent incapacity or bankruptcy or operation of law.

Provided that the implementation of the trading plan shall not be commenced if any unpublished price sensitive information in possession of the insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation.

- 4.4 In case of non-implementation (full/partial) of trading plan due to either reasons enumerated in sub-regulation 4 or failure of execution of trade due to inadequate liquidity in the scrip, the following procedure shall be adopted:

(i) The insider shall intimate non-implementation (full/partial) of trading plan to the compliance officer within two trading days of end of tenure of the trading plan with reasons thereof and supporting documents, if any.

(ii) Upon receipt of information from the insider, the compliance officer, shall place such information along with his recommendation to accept or reject the submissions of the insider, before the Audit Committee in the immediate next meeting. The Audit Committee shall decide whether such non-implementation (full/partial) was bona fide or not.

(iii) The decision of the Audit Committee shall be notified by the compliance officer on the same day to the stock exchanges on which the securities are listed.

(iv) In case the Audit Committee does not accept the submissions made by the insider, then the compliance officer shall take action as per the Code of Conduct.

- 4.5 The compliance officer shall approve or reject the trading plan within two trading days of receipt of the trading plan and notify the approved plan to the stock exchanges on which the securities are listed, on the day of approval.

## **5. TRADING WINDOW**

- i. 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 this Code of Conduct;
- ii. The trading window shall be closed for all Insiders from the 1st day immediately following the relevant calendar quarter till the conclusion of 48 hours after disclosure of such quarterly/ annual financial results of the company to stock exchanges;
- iii. 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.

- iv Additionally, the trading window shall be closed in particular for a Designated Person or class of Designated Persons when the Compliance Officer determines that a Designated Person or class of Designated Persons can reasonably be expected to have possession of UPSI, for such periods as determined by the Compliance Officer;
- v. The trading window may be re-opened after closure, not earlier than 48 hours after the UPSI in question becomes generally available.

## **6. PRE-CLEARANCE OF TRADES**

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 Lacs (Ten Lacs) in value over any calendar quarter:

The Compliance Officer shall inform his decisions regarding the clearance within 2 working days of receipt of applications for pre-clearance. In absence of the Compliance Officer said pre-clearance shall be approved by the Officer designated by the Compliance Officer.

Prior to approving any trades, the Compliance Officer shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any UPSI. He shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.

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;

The Compliance Officer shall submit an application to the MD/Whole-time Director for pre-clearance of his own dealings in the securities of the Company. The MD/Whole-time Director shall communicate his decision regarding the clearance within two working days of receiving the application for pre-clearance. Once cleared, the trade must be executed within seven days. If the order is not executed within seven days after approval is given, the employee/director must seek pre-clearance for the transaction again.

All Designated Persons who buy or sell any number of shares of the Company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction. All Specified Persons shall also not take positions in derivative transactions in the shares of the Company at any time. In case of any contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

The Compliance Officer may waive off the holding period in case of sale of securities in personal emergency after recording reasons for the same. However, no such sale will be permitted when the Trading window is closed.

- Note: This contra trade restriction shall not apply to trades executed pursuant to the exercise of stock options.

## **7.1 Reporting Requirements for transactions in securities**

### **Initial Disclosure**

Every person on appointment as a key managerial personnel or a director of the company or upon becoming a promoter or member of the promoter group shall disclose his 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.

In the event a new immediate relative comes into being or any existing immediate relative ceases to be dependent, the concerned Designated Person shall forthwith give a notice in writing of such change to the compliance officer.

### **Continual Disclosure**

Every promoter, member of the promoter group, designated person and director of every company shall disclose to the company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of ten lakh rupees.

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

Within 2 trading days of the receipt of disclosure, as above said, or from becoming aware of such information, the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed.

The Compliance officer shall maintain records of all the declarations in the appropriate form given under this Code for a minimum period of five years.

### **Other Disclosure**

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.

The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account for purposes of this Code.

The disclosures made under this Code shall be maintained for a period of five years.

**7. CODES OF FAIR DISCLOSURE AND CONDUCT**

1. The Board of Directors has formulated and published on its official website a Code of Practices and Procedures for Fair Disclosure of UPSI, which it will follow to adhere to each of the principles set out in Schedule A of the Regulations.
2. Each Code of Practices and Procedures for Fair Disclosure of UPSI, along with any amendments thereto, shall be promptly communicated to the stock exchanges where the securities are listed.

**8. PENALTY FOR CONTRAVENTION OF THE CODE OF CONDUCT**

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).
2. Any Designated Person who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalised and appropriate action may be taken by the Company.
3. Designated Persons who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligibility for future participation in employee stock option plans, etc.
4. The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

## **Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)**

In accordance with Regulation 8 of the SEBI (Prohibition of Insider Trading) Regulations, 2015, and in adherence to the principles set out in Schedule A of the said Regulations, the following Code of Practices and Procedures is framed to ensure transparency and fairness in the disclosure of Unpublished Price Sensitive Information (UPSI) and to prevent insider trading:

### **1. Prompt Public Disclosure of UPSI**

The Company shall ensure that any Unpublished Price Sensitive Information (UPSI) that could potentially affect the price of its securities is made public immediately, as soon as credible and concrete information becomes available. The aim is to make such information widely accessible to all market participants without delay.

### **2. Uniform and Universal Dissemination**

The Company shall ensure that any UPSI is disseminated in a uniform and consistent manner across all platforms to avoid selective disclosure. This will ensure that no particular group or individual has access to the information before it is available to the broader public and stakeholders.

### **3. Role of the Chief Financial Officer/Compliance Officer**

The Chief Financial Officer (CFO) or Compliance Officer of the Company shall act as the Chief Investor Relations Officer (CIRO) responsible for overseeing the dissemination of information and the disclosure of UPSI. This individual will ensure compliance with all applicable laws and regulations related to insider trading and disclosure practices.

### **4. Prompt Disclosure of Selectively Disclosed UPSI**

In case UPSI is disclosed selectively, either inadvertently or otherwise, the Company shall take immediate steps to ensure that such information is made generally available to all stakeholders. This will prevent any advantage from being gained by those privy to selective disclosures.

### **5. Response to News Reports and Market Rumors**

The Company shall ensure that it responds appropriately and promptly to queries from regulatory authorities, analysts, or any other relevant parties regarding news reports or rumors in the market. In doing so, the Company will provide accurate and verified information to prevent market speculation or misinformation.

#### **6. Prevention of UPSI Disclosure to Analysts or Research Personnel**

The Company shall ensure that any information shared with analysts, research personnel, or any other external parties does not constitute UPSI. Any sharing of information will be handled in a manner that prevents the dissemination of confidential or sensitive data.

#### **7. Best Practices for Communication with Analysts**

The Company shall adopt best practices for managing communication with analysts and during investor relations conferences. This includes making transcripts or records of meetings with analysts publicly available on the official website of the Company. These records will serve as an official confirmation of any disclosures made during such meetings and ensure transparency.

#### **8. Need-to-Know Basis for Handling UPSI**

The Company shall ensure that access to UPSI is restricted to individuals who require it to perform their duties and responsibilities. The principle of handling information on a "need-to-know" basis shall be strictly followed to prevent unauthorized disclosure of sensitive information.

## Annexure-A

### **B.L. KASHYAP AND SONS LIMITED**

Trading Plan under Regulation 5 of SEBI (Prohibition of Insider Trading) Regulation, 2015

To,  
 The Compliance Officer  
 B.L. KASHYAP AND SONS LIMITED  
 409, 4<sup>th</sup> Floor DLF-Tower-,Jasola,  
 New Delhi-110021

Name:
Designation:
Organisation:
Relationship With B.L. Kashyap and Sons Limited

As under the Code of Conduct for trading by Insiders of the Company, I....., (Applicant's name) the undersigned, hereby give my Trading Plan to Sell/Buy/Sell and Buy the Equity shares of the Company, as detailed below:

#### TRADING PLAN FOR THE PERIOD:

(Note: Trading Plan shall be for a minimum period of 12 months)

Details of shares Held:
Name of DP Agent:
Folio No.
DP ID:
Client ID:

S. No.	Shares Held		Option to fill Either Column D & E or Column F			Option to fill either (Proposed Quality or Proposed Value)			
	No. of share s	% to total sh. Capital	Interval of Trade		Dates of Trade	Proposed Quantity		Proposed Value	
			From	To		Buy	Sell	Buy	Sell
A	B	C	D	E	F	G	H	I	J
1									
2									

**\*\* I/We hereby declare that the shares to be sold have been held by me/us for a minimum period of 6 months. I/We request you to provide your approval for the Trading Plan.**

**Signature.....**

**Date**

**Place**

**Annexure B**
**B. L. KASHYAP AND SONS LIMITED**
**Insider Trading Policy**
**APPLICATION FOR PRE-TRADING APPROVAL**

To,  
The Compliance Officer,  
B. L. Kashyap and Sons 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.	Relationship with the Applicant (Self/Immediate Relative)	
4.	Number of securities held as on date	
5.	Folio No. / DP ID / Client ID No.	
6.	The proposal is for (a) Purchase of securities (b) Subscription to securities (c) Sale of securities (d) Pledge	
7.	Proposed date of trading in securities	
8.	Estimated number of securities proposed to be purchased/subscribed/sold/pledge	
9.	Current market price (as on date of application)	
10.	Whether the proposed transaction will be through stock exchange or off-market trade	
11.	Folio No. / DP ID / Client ID No. where the securities will be credited / debited	

I enclose herewith the Undertaking signed by me.

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

Name:

Date:



**B. L. KASHYAP AND SONS LIMITED****Insider Trading Policy****UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRECLEARANCE**

To,  
The Compliance Officer,  
B. L. Kashyap and Sons Limited

I, \_\_\_\_\_ being a designated person of the company as per the Rules for Trading in the securities of B. L. Kashyap and Sons Limited 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: \_\_\_\_\_

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

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