

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

INTRODUCTION:

SEBI has notified the Securities and Exchange Board of India (SEBI) (Prohibition of Insider Trading) Regulations, 2015 ("the Regulations") on 15th January, 2015 effective from 15th May, 2015 which has repealed the SEBI (Prohibition of Insider Trading) Regulations, 1992.

Pursuant to the aforesaid Regulations and the Listing Agreement entered into by the Company with the Stock Exchanges, all listed companies are required to implement a Code of Conduct to regulate, monitor, and report trading by the employees and connected persons, in order to protect investors' interest.

In compliance with the aforesaid Regulations, following Code of Conduct for regulating, monitoring, and reporting trading by the employees, insiders and connected person(s), has been adopted by the Board of Directors of the Dhabriya Polywood Limited (the Company) which shall be effective from 15th May, 2015. This Code replaces the existing Code of Conduct for Prevention of Insider Trading adopted by the Company.

1. DEFINITIONS

- 1.1 **"Act"** means the Securities and Exchange Board of India Act, 1992 and amendments thereto.
- 1.2 **"Board"** means the Securities & Exchange Board of India.
- 1.3 **"Board of Directors"** means the Board of Directors of Dhabriya Polywood Limited.
- 1.4 **"The Code"** or **"Code of Conduct"** shall mean the Code of fair disclosures, Internal Procedures and conduct for regulating, monitoring, and reporting of trading by the Insiders, employees and other connected person of the Company, as amended from time to time.
- 1.5 **"Company"** means Dhabriya Polywood Limited.
- 1.6 **"Compliance Officer"** means any senior officer, 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in this regulations under the overall supervision of the Board of Directors of the Company.
- 1.7 **"Connected Person"** means:
 - i. any person who is or has during the six months prior to the concerned act been associated with the 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 Designated 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) above; or
 - b. a holding company or associate company or subsidiary company or joint venture; 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 SEBI; 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 percent, of the holding or interest.
- 1.8 **“Designated Person(s)”** means connected persons and designated employees of the company.
- 1.9 **“Designated Employee(s)”** means a person occupying any of the following position in the Company:
- Director;
 - KMP;
 - Executive Director (not being member of the Board), “Chief Executive Officer or CEO”, “Chief Financial Officer or CFO”, or any such equivalent position;
 - Vice President or any such equivalent position;
 - General Manager or any such equivalent position;
 - Assistant Manager and above in the Finance & Accounts Department and the Legal & Secretarial Department;
 - Such other employee as may be determined and informed by the Compliance Officer from time to time.
- 1.10 **“Director”** means a member of the Board of Directors of the Company.
- 1.11 **“Employee”** means every employee of the Company who are in the employment of the Company including the Whole Time Directors/ Managing Director.
- 1.12 **“Generally Available Information”** means information that is accessible to the public on a non-discriminatory basis.
- 1.13 **“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.
- 1.14 **“Insider”** means any person who is,
- i. a Connected Person; or
 - ii. in possession of or having access to unpublished price sensitive information.
- 1.15 **“Key Managerial Person”** or **“KMP”** means person as defined in Section 2(51) of the Companies Act, 2013
- 1.16 **“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.
- 1.17 **“Regulations”** shall mean the SEBI (Prohibition of Insider Trading) Regulations, 2015, and amendments thereto.

- 1.18 **"Securities"** includes:
- i. Shares, scrips, bonds, debentures or other marketable securities of a like nature;
 - ii. Any kind of derivatives in the Securities of the Company; and
 - iii. Such other instruments recognized as securities under the Securities Contracts (Regulation) Act, 1956 and issued by the Company from time to time
- 1.19 **"Takeover regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.
- 1.20 **"Trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any Securities and "trade" shall be construed accordingly.
- 1.21 **"Trading Day"** means a day on which the recognized stock exchanges are open for trading.
- 1.22 **"Unpublished Price Sensitive Information" or "UPSI"** means any information, relating to 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 include but not restricted to, information relating to the following:
- i. financial results;
 - ii. dividends;
 - iii. change in capital structure;
 - iv. mergers, de-mergers, acquisitions, delisting's, 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

Words and expressions used and not defined in the Policy shall have the same meanings respectively assigned to them in the Regulations.

2. COMPLIANCE OFFICER

The Company Secretary of the Company shall act as the Compliance Officer for the purpose of this code and in the absence of the Compliance Officer, such other officer authorized by the Compliance Officer or the Chairman of the Board.

3. ROLE OF COMPLIANCE OFFICER

- 3.1 The Compliance officer shall report on insider trading to the Board of Directors of the Company and in particular, shall provide reports to the Chairman of the Audit Committee, if any, or to the Chairman of the Board of Directors at such frequency as may be stipulated by the Board of Directors.
- 3.2 The Compliance Officer shall assist all employees in addressing any clarification regarding the Securities & exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the Company's code of conduct.

4. PROHIBITION ON COMMUNICATION OR PROCUREMENT OF UNPUBLISHED PRICE SENSITIVE INFORMATION

- 4.1 No Insider shall communicate, provide, or allow access to any Unpublished Price Sensitive Information, relating to the Company or Securities listed or proposed to be listed to any person including other Insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- 4.2 No person shall procure from or cause the communication by any Insider of Unpublished Price Sensitive Information, relating to the Company or Securities listed or proposed to be listed

except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

5. TRADING WHEN IN POSSESSION OF UNPUBLISHED PRICE SENSITIVE INFORMATION

No Insider shall trade in Securities 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 promoters who were in possession of the same UPSI without being in breach of the provisions of the Regulations and both parties had made a conscious and informed trade decision;
- ii. 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 this Code 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;
- iii. the trades were executed pursuant to a trading plan approved by the Compliance Officer.

6. TRADING PLAN

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.

6.1 Trading Plan Shall:

- i. not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
- ii. 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;
- iii. entail trading for a period of not less than twelve months;
- iv. not entail overlap of any period for which another trading plan is already in existence;
- v. set out either the value of trades to be effected 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 effected; and
- vi. not entail trading in securities for market abuse.

6.2 The compliance officer shall consider the trading plan made as above and shall approve it forthwith. However, 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 provision of the regulations.

6.3 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.

However, 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 the 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.

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

7. TRADING WINDOW AND WINDOW CLOSURE

- 7.1 All the Insiders of the Company shall be governed by the Code for trading in Securities. Insider may execute trades subject to compliance with the Regulations. An Insider and their Immediate Relatives shall not trade in Securities when the trading window is closed. The restriction of executing trades during closure of 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.
1. The trading period of the stock exchanges, called "Trading Window", is available for trading in the Company's Securities.
 2. The Trading Window shall be, inter alia, closed 7 days prior to and during the time the unpublished price sensitive information is published.
 3. All specified persons shall conduct all 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, as referred to in point no. 2 above or during any other period as may be specified by the company from time to time.
 4. The Trading Window shall re-open forty-eight hours after the notification of these information to the Stock Exchange.
 5. The closure of the Trading Window for these events will be advised/ informed to all concerned by the Compliance Officer for the purpose of this Code.

In case of doubts on whether the information is unpublished and price sensitive, Employees/ Designated Employees may seek clarification from Compliance Officer.

8. PRE-CLEARANCE OF TRADES

All Designated Persons, who intends to trade in the securities of the Company, shall require prior clearance from the Compliance Officer in the manner mentioned below when the trading window is open and for exceeding the limits specified in Clause 7.2 (Continual disclosure). However, no Insider shall be entitled to apply for pre-clearance of any proposed trade if such Insider is in possession of Unpublished Price Sensitive Information even if the trading window is not closed and hence he shall not be allowed to trade.

- i. For the purpose of preclearance, an application shall be made to the Compliance Officer in Form E attached herewith.
- ii. An undertaking in Form F shall be executed in favor of the Company by such Designated Person incorporating, inter alia, the following clauses, as may be applicable:
 - a. That the Designated Person does not have any access or has not received "Price Sensitive Information" up to the time of signing the undertaking.
 - b. That in case the Designated Person has access to or receives "Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction he/she shall inform the Compliance Officer of the change in his position and that he/she would completely refrain from dealing in the Securities of the Company till the time such information becomes public.
 - c. That he/she has not contravened The Code as notified by the Company from time to time.
 - d. That he/she has made a full and true disclosure in the matter.
- iii. All Designated Employees and their Immediate Relatives shall execute their order in respect of Securities of the Company within one week after the pre-clearance is given. The Designated Employees shall file within 2 (two) days of the execution of the deal, the details of such deal with the Compliance Officer in the prescribed form. In case the transaction is not undertaken, a report to that effect shall be filed in the format as may be prescribed.

- iv. If the order is not executed within seven days after the approval is given, the Designated Person shall seek pre-clearance of the transaction again.
- v. All Designated Employees 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 Designated Employees shall also not take positions in derivative transactions in the shares of the Company at any time. In case 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 SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.
- vi. In case of trading of Securities by the Compliance Officer, he/ she shall require prior clearance from the Executive Chairman of the Company.

9. Reporting Requirements for transactions in Securities:

The following persons shall comply with the disclosure requirements as mentioned below:

	Disclosure	Categories required to make disclosures	Particulars	Time Period
9.1 a.	Initial Disclosure to the Company	<ul style="list-style-type: none"> ❖ Promoter ❖ Key Managerial Personnel ❖ Designated Employee 	Holding of Securities of the Company as on 15 th May, 2015. (date on which the Regulations come into force) including the statement of holdings of Immediate Relatives and any other person for whom they take trading decisions in the prescribed Form A	Within 30 days from 15 th May, 2015 (date on which the Regulations come into force).
b.	Initial Disclosure to the Company (Internal)	Upon appointment as: <ul style="list-style-type: none"> ❖ Promoter ❖ Key Managerial Personnel ❖ Designated Employee 	Holding of Securities of the Company as on <ul style="list-style-type: none"> ❖ the date of appointment as Key Managerial Personnel/ Designated Employee ❖ the date of becoming a promoter, including the statement of holdings of Immediate Relatives and any other person for whom they take trading decisions in the prescribed Form B	Within 7 days of <ul style="list-style-type: none"> ❖ appointment as Key Managerial Personnel/ Designated Employee ❖ the date of becoming a promoter
9.2 a.	Continual Disclosure to be made to the Company (Internal)	<ul style="list-style-type: none"> ❖ Promoter ❖ Employee ❖ Key Managerial Personnel ❖ Director ❖ Connected Person 	Number of Securities acquired or disposed of in case the value of Securities traded, whether in one transaction or a series of transactions over a calendar quarter, aggregates to a traded value in excess of ten lacs	Within 2 trading days of such transaction

			rupees or such other value as may be specified by SEBI, in the prescribed Form C (by Promoters, KMP, Directors, Employees) or Form D (Connected Person) including the transaction by the Immediate Relatives and any other person for whom they take trading decisions	
b.	Continual Disclosure to be made by the Company (Public)	Company required to notify the stock exchange	In case the value of Securities traded by a Promoter, Employee or Director, whether in one transaction or a series of transactions over a calendar quarter, aggregates to a traded value in excess of ten lacs rupees. Explanation - disclosure of incremental transaction after the above disclosure to be made when the transactions effected after the prior disclosure crosses the monetary threshold of ten lacs rupees or such other value as may be specified by SEBI	Within 2 trading days of receipt of the disclosure or from becoming aware of such information.
c.	Disclosure to the Company (Internal)	Designated Employees	Annual disclosure of their shareholding in Form A	Within 30 days of the close of financial year
9.3	Disclosure regarding the Trading Plan pursuant to which trades may be carried out by the Insider	Compliance Officer of the Company	Trading Plan received from the Insider.	As per Regulation

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

10. Penalty for contravention of the code of conduct

10.1 Every Designated Employee shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her Immediate Relatives).

- 10.2 Any Designated Employee 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 as decided by the Committee of Directors.
- 10.3 Designated Employee who violates the Code shall be suspended from trading in Securities of the Company or disciplinary actions in any other manner as may be decided by the Board or Committee thereof shall be initiated against him/her.
- 10.4 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.

11. GENERAL

- 11.1 A copy of the Regulations is available from the office of the Compliance Officer. Employees are advised to acquaint themselves with their obligations under the Regulations. The Compliance Officer is available for clarification/ assistance that may be necessary.
- 11.2 Every person, at the time of their recruitment in the Company, shall be briefed about this Code and a declaration shall be taken about their shareholding in the Company.
- 11.3 The Company, when entering into any contract with a party who shall be deemed to be a Connected Person under this Code, shall take an undertaking from the party that they shall not enter into trading of Securities of the Company, if they are in possession of any UPSI.
- 11.4 Any act or deed not mentioned under the Code shall be in accordance with the Regulations.

12. CODE OF FAIR DISCLOSURE.

A code of practices and procedures for fair disclosure of unpublished price sensitive information for adhering each of the principles is set out below:

1. Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
3. Designation of a senior officer as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. Appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.
7. Developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
8. Handling of all unpublished price sensitive information on a need-to-know basis.

FORM A
SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (a) read with Regulation 6 (2) – Initial disclosure to the company]

Name of the company: **DHABRIYA POLYWOOD LIMITED**
 ISIN of the company: **INE260RO1016**

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

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP/ Directors/immediate relative to/others etc.)	Securities held as on the date of regulation coming into force		% of Shareholding
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5

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

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

Open Interest of the 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		
Contract Specifications	Number of units (contracts* lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts* lot size)	Notional value in Rupee terms
6	7	8	9	10	11

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

Name & Signature:
 Designation:
 Date:
 Place:

FORM B
SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (b) read with Regulation 6 (2) -Disclosure on becoming a director/KMP/Promoter]

Name of the company: **DHABRIYA POLYWOOD LIMITED**
 ISIN of the company: **INE260RO1016**

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

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP/ Directors/immediate relative to/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
			Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	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 by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

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		
Contract Specifications	Number of units (contracts* lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts* lot size)	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:

FORM C
SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (2) read with Regulation 6(2) - Continual disclosure]

Name of the company: **DHABRIYA POLYWOOD LIMITED**

ISIN of the company: **INE260R01016**

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, CIN/ DIN, & address With contact nos.	Category of Person (Promoter s/ KMP / 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/sale of shares specify		Date of Intimation to company	Mode of acquisition / disposal (on market/public / rights/ preferential offer / off market/ Inter-se transfer, ESOPs etc.)
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No. and % Of share holding	Type of security (For eg. -Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/ Sale/Pledge /Revoke/ Invoke)	Type of Security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No. and % Of share holding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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

Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

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)	
15	16	17	18	19	20	21

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

Name & Signature:

Designation:

Date:

Place:

FORM D
SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (3) Transaction by other connected person as identified by the company]

Details trading in Securities by other connected person as identified by the company

Name, PAN, CIN/ DIN, & address with contact nos. of other connected person 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 of shares/sale of shares specify		Date of Intimation to company	Mode of acquisition / disposal (on market/publi c/ rights/ preferential offer / off market/ Inter-se transfer, ESOPs etc.)
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No. and % Of share holding	Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/ Sale/Pledg e /Revoke/ Invoke)	Type of Security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No. and % Of share holding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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

**Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company and other
such persons as mentioned in Regulation 6(2).**

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)	
15	16	17	18	19	20	21

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

Name & Signature:
Designation:
Date:
Place:

FORM E
APPLICATION FOR PRE-DEALING APPROVAL IN SECURITIES OF THE COMPANY

To,
The Compliance Officer
Dhabriya Polywood Limited
B-9D(1), Malviya Industrial Area,
Jaipur-302017

Dear Sir/ Madam,

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's code of conduct for Prevention of Insider Trading, I seek approval to purchase/sale/subscription of _____ equity shares of the company as per details given below:

1.	Name of the applicant	:	
2.	In case of Immediate Relative, name of employee and relation with him/her	:	
3.	Designation	:	
4.	Number and value of securities in the Company held as on date (with folio / DP ID/ Client ID No.)	:	
5.	The proposal is for*		i. Purchase of Securities ii. Subscription to securities iii. Sale of securities
6.	Proposed date of dealing in securities		
7.	Number of securities proposed to be acquired / subscribed / sold		
8.	Current market price (as on the date of application)		
9.	Whether the proposed transaction will be through stock exchange or off market deal		
10.	Proposed mode of dealing in securities *		i. Physical ii. Demat
11.	If securities are held / proposed to be dealt in dematerialized form		

Place:

Date:

Signature _____

* Strike whichever is not applicable

FORM F
UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-CLEARANCE

To,
The Compliance Officer
Dhabriya Polywood Limited
B-9D(1), Malviya Industrial Area,
Jaipur-302017

I _____ of the Company residing at _____, am desirous of dealing in _____ shares of the company. I hereby declare that:

- i. I have no access to nor do I have any information that can be construed as price sensitive information up to the time of signing of the undertaking.
- ii. In the event I get access to or receive 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 change and shall refrain from dealing in the securities of the Company till the information is made public.
- iii. I have not contravened the Code of Conduct to Regulate, Monitor and Report Trading by Insiders as notified by the Company from time to time.
- iv. I have made a full and true disclosure in the matter.
- v. I hereby declare that I shall execute my order in respect of securities of the Company within one week after the approval of pre-clearance is given. If the order is not executed within one week after the approval is given, I undertake to obtain pre-clearance for the transaction again.

Place:

Date:

Signature _____

* Strike whichever is not applicable

Form G
PRE DEALING APPROVAL LETTER

To,
Name:
Designation:

Dear Mr./Mrs.

This is to inform you that your request for dealing in _____ (no.) shares of the company as mentioned in your application dated _____ is approved. Please note that the said transaction must be completed on or before _____ (date) that is within 7 days from today.

In case you do not execute the approved transaction/deal on or before the aforesaid date you would have to seek fresh pre/clearance before executing any transaction/deal in the securities of the Company. Further you are required to file the details of the executed transactions in the attached format within 2 days from the date of transaction/deal. In case the transaction is not undertaken a 'NIL' report shall be necessary.

Yours Faithfully,
For Dhabriya Polywood Limited

Compliance Officer

Date:

Encl: Format for submission of details of transaction

Form H
FORMAT FOR DISCLOSURE OF TRANSACTIONS

(To be submitted within two {2} working days of transaction/Dealing in Securities of the Company)

To,
The Compliance Officer
Dhabriya Polywood Limited
B-9D(1), Malviya Industrial Area,
Jaipur-302017

Dear Sir,

I hereby inform you that I

- Have not bought/sold/subscribed any Securities of the Company
- Have bought/sold/subscribed to the _____ Securities as mentioned below on _____ (date)

Name of holder	No of securities dealt with	Bought/Sold/ Subscribed	DP ID/ Client ID/ Folio No.	Price (Rs.)

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 3 (Three) years and produce to the Compliance Officer/SEBI any of the following documents:

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

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

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

Date:

Signature:

Name:

Designation: