



दि न्यू इन्डिया एश्योरन्स कंपनी लिमिटेड

THE NEW INDIA ASSURANCE COMPANY LTD.

पंजीकृत एवं प्रधान कार्यालय : न्यू इन्डिया एश्योरन्स बिल्डिंग, 87, महात्मा गांधी मार्ग, फोर्ट, मुंबई - 400 001.

Regd. & Head Office : New India Assurance Bldg., 87, M.G. Road, Fort, Mumbai - 400 001.

CIN No. L66000MH1919GOI000526

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Website : www.newindia.co.in

Ref. No.: NIACL/CMD_Board Sectt/SE-08/2020-21

November 23, 2020

To,

The Manager
Listing Department
BSE Limited
Phiroze Jeejeebhoy Tower
Dalal Street
Mumbai 400 001

The Manager
Listing Department
The National Stock Exchange of India Ltd.
Exchange Plaza, 5th floor, Plot C/1,
G Block, Bandra-Kurla Complex
Mumbai 400 051

Scrip Code: (BSE – 540769/NSE – NIACL)

Dear Sir/Madam,

Sub: Intimation of amendment to the NIACL Insider Trading Code

Pursuant to the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended ("Regulations") the Code of Internal Procedures and Conduct for Prohibition of Insider Trading in dealing with the securities of The New India Assurance Co Ltd. (NIACL) ("NIACL Insider Trading Code") have been amended.

Further, in line with the said Regulations, a Policy on procedures to be followed while conducting an enquiry in the event of leak of suspected leak of unpublished price sensitive information ("NIACL Policy for inquiry of leak of UPSI") forming part of Insider Trading code has also been adopted by the Company.

The said policies are effective from November 11, 2020.

The NIACL Insider Trading Code including the Policy for inquiry of leak of UPSI is attached herewith. The above policies are made available on the Company's website www.newindia.co.in.

This is for your information and records.

Thanking You

For The New India Assurance Company Limited


Jayashree Nair



Company Secretary & Chief Compliance Officer

**CODE OF PRACTICES AND PROCEDURES AND
CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING IN
SECURITIES AND FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE
INFORMATION PURSUANT TO THE REQUIREMENTS OF THE
SECURITIES AND EXCHANGE BOARD OF INDIA
(PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015**

PART A

A.1 PREFACE

The New India Assurance Company Limited (the “**Company**”) endeavours to preserve the confidentiality of Unpublished Price Sensitive Information and prevents misuse of such information. We are committed to dealing with all stakeholders with full transparency and fairness, ensuring adherence to all laws and regulations and achieving highest standards of corporate governance.

As per Regulation 8(1) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time, the board of directors of every company, whose securities are listed on a stock exchange, shall formulate and publish on its official website, a code of practices and procedures for fair disclosure of Unpublished Price Sensitive Information that it would follow in order to adhere to each of the principles set out in Schedule A of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, without diluting the provisions of Regulations in any manner.

In compliance with the Regulations, this The New India Assurance Company Limited - Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“**Code**”) has been formulated, approved and adopted by the board of directors of The New India Assurance Company Limited at its meeting held on November 9th 2017.

Further, Securities and Exchange Board of India (Prohibition of Insider Trading) (Amendment) Regulations, 2020 notified on 17th July, 2020 substitutes sub-regulation 5 of Regulation 3 and inserts sub-regulation 6 under Regulation 3. Along with this, changes in Schedule B and Schedule C have also been made.

A.2 The Objective of the Code

This Code has been prepared by adopting the standards set out in Schedule A and Schedule B of the Regulations, as amended, in order to regulate, monitor and report trading by its employees and other Connected Persons towards achieving compliance with the Regulations.

The Code of The New India Assurance Co. Ltd. was amended on 11th November, 2020 and will be effective from immediate effect.

PART B

B.1 DEFINITION

For the purpose of the Code the following terms shall have the meanings assigned to them hereunder:

- i. **“Act”** means the Securities and Exchange Board of India Act, 1992;
- ii. **“Board”** means the Securities and Exchange Board of India.
- iii. **“Chief Investigating Officer”** shall be the Compliance Officer of the Company.
- iv. **“Chief Investor Relations Officer”** shall be a senior officer of the Company who shall deal with the dissemination of information and disclosure of Unpublished Price Sensitive Information. The “Chief Financial Officer” shall act as the “Chief Investor Relations Officer”.
- v. **“Calendar Quarter”** means a period of 3 consecutive calendar months, ending with the last day of March, June, September or December.
- vi. **“Code”** shall mean The New India Assurance Co. Ltd. - Code of Conduct to Regulate, Monitor and Report Trading by Insiders, as amended from time to time;
- vii. **“Code of Fair Disclosure and Conduct”** means the code of practices and procedures for fair disclosure of Unpublished Price Sensitive Information, as amended from time to time;
- viii. **“Company”** means The New India Assurance Company Limited
- ix. **“Compliance Officer”** means the Company Secretary of the Company and any senior officer, designated so or in absence of both, the Executive Director or such other senior officer, who is financially literate and is capable of appreciating requirements of legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring and adherence to the rules for preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in this Code of Conduct and Compliance officer shall function and carry out his responsibilities under the overall supervision of the Board of Directors of the Company.

Explanation – for the purpose of this regulation –financial literate shall mean a person, who has the ability to read and understand basic financial statement i.e. Balance Sheet, Statement of Profit and Loss, Cash Flow statement etc.

- x. **“Connected Person”** means:
 - a) 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 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,
 - b) access to Unpublished Price Sensitive Information of the Company or is reasonably

expected to allow such access.

c) 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:

- (i) an immediate relative of connected persons specified in Clause (a); or
- (ii) a holding company or associate company or subsidiary company of the Company; or
- (iii) an intermediary as specified in Section 12 of the Act or an employee or director thereof; or
- (iv) an investment company, trustee company, asset management company or an employee or director thereof; or
- (v) an official of a stock exchange or of clearing house or corporation; or
- (vi) 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
- (vii) 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
- (viii) an official or an employee of a self-regulatory organization recognized or authorized by the Board; or
- (ix) a banker of the Company; or
- (x) 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.
- (xi) "Director" means a member of the Board of Directors of the Company.
- (xii) Designated Employees/persons Designated Persons means such persons as the Board of Directors shall in consultation with the Compliance Officer specify to be covered by the Code of Conduct on the basis of their role and function in the organization and the access that such role and function would provide to UPSI in addition to seniority and professional designation and shall include:

- (i) Promoters of the Company;
- (ii) Directors of the Company
- (iii) Key Managerial Personnel (KMP) of the Company
- (iv) Employees irrespective of their cadre working in Corporate Finance and Accounts, Reinsurance Accounts, Foreign Accounts, Investment Department, Actuarial Department, CMD_Board Secretarial Department.
- (v) Any support staff of the Company such as IT Staff or outsourced staff of IT Vendor, who have access to Unpublished Price Sensitive Information.
 - a. Employees of material subsidiaries of the Company designated on the basis of their functional role or access to Unpublished Price Sensitive Information in the organization by their board of directors;
 - b. Chief Executive Officer (CEO) and employees up-to two level below CEO of the Company and material subsidiary, irrespective of their functional role in the Company or its material subsidiary or ability to have access to unpublished price sensitive information.
 - c. Any other Connected Person designated by the Company in consultation with the Compliance Officer based on their function and role; and
 - d. Immediate relative of (a.) to (i.) above.
- (vi) All Senior Executives
- (vii) General Managers of the Company;

All Employees, irrespective of their cadre working in Corporate Finance and Accounts department; Reinsurance Accounts, Foreign Accounts, Investment department, Actuarial department, CMD_Board Secretarial department, and employees who have access to UPSI;

NOTE: Depending on the change in the scope of responsibility of an employee, the Compliance Officer with the approval of the Chairman cum Managing Director of the Company may exclude or include any employee from the list of Designated Person.

(viii) “Generally Available Information” means information that is accessible to the public on a non-discriminatory basis.

(ix) “**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;

For the matter of clarity, we take the definition of “Relative” as stated in Section 2(7) of Companies Act 2013 which includes Father including step father, Mother including Step Mother, Son including Step Son, Son’s wife, Daughter, Daughter’s husband, Brother including Step Brother, Sister including Step Sister. This is illustrative and not comprehensive.

NOTE: It is intended that the immediate relatives of a —connected person too become connected persons for purposes of SEBI (Prohibition of Insider Trading) Regulations, 2015 (—SEBI regulations). Indeed, this is a rebuttable presumption.

(xiii) “**Informant**” means an individual(s), who voluntarily submits to Securities and Exchange Board of India

Voluntary Information Disclosure Form relating to an alleged violation of insider trading laws that has occurred, is occurring or has reasonable belief that it is about to occur, in a manner provided under the Regulations, regardless of whether such individual(s) satisfies the requirements, procedures and conditions to qualify for a reward.

(xiv) “**Insider**” means any person who is

- (a) a Connected Person; or
- (b) in possession of or having access to Unpublished Price Sensitive Information;

NOTE: it is intended that anyone in possession of or having access to unpublished price sensitive information should be considered an —insider regardless of how one came in possession of or had access to such information. Various circumstances are provided for such a person to demonstrate that he has not indulged in insider trading. Therefore, this definition is intended to bring within its reach any person who is in receipt of or has access to unpublished price sensitive information. The onus of showing that a certain person was in possession of or had access to unpublished price sensitive information at the time of trading would, therefore, be on the person leveling the charge after which the person who has traded when in possession of or having access to unpublished price sensitive information may demonstrate that he was not in such possession or that he has not traded or he could not access or that his trading when in possession of such information was squarely covered by the exonerating circumstances.

(xv) “**Insider Trading Regulations**” means the Securities and Exchange -Board of

India (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time;

- (xvi) “**Key Managerial Personnel**” means person as defined in Section 2(51) of the Companies Act, 2013 and include Key Management Persons as defined under Corporate Governance Guidelines of IRDAI;
- (xvii) “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.
- (xviii) “**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;
- (xix) “**Stock Exchanges**” means the stock exchanges on which the Securities of the Company are listed or proposed to be listed;
- (xx) “**Takeover Regulations**” means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended from time to time;
- (xxi) “**Trading**” means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;
- (xxii) “**Trading Day**” means a day on which the recognized stock exchanges on which Securities of the Company are listed are open for trading and the word “Trade” shall be construed accordingly;
- (xxiii) “**Trading Plan**” shall have the meaning assigned to such term in Clause 5.1;
- (xxiv) “**Trading Window**” means the period determined by the Compliance Officer, within which the Designated Persons are permitted to Trade;
- (xxv) “**Unpublished Price Sensitive Information**” or “**UPSI**” means any information, relating to the Company or its Securities, listed or to be listed, that is not generally available which upon becoming generally available, is likely to materially affect the price of the Securities and shall, ordinarily include without limitation, information relating to the following:

- d) financial results;
- e) dividends;
- f) change in capital structure;
- g) mergers, de-mergers, acquisitions, delisting, disposals, amalgamation, restructuring, arrangement, spin off and expansion of business and similar other transactions;
- h) proposed changes in the general character or nature of its business; and
- i) material events in accordance with the listing agreement.

NOTE: It is intended that information relating to a company or securities, that is not generally available would be unpublished price sensitive information if it is likely to materially affect the price upon coming into the public domain. The types of matters that would ordinarily give rise to unpublished price sensitive information have been listed above to give illustrative guidance of unpublished price sensitive information.

- (xxvi) “**Working Day**” means the working day when the regular trading is permitted on the concerned Stock Exchange.
- (xxvii) **NEED TO KNOW** basis means that unpublished price sensitive information

should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to any conflict of interest or appearance of misuse of information.

NOTE:

Words and expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made there under shall have the meanings respectively assigned to them in those legislation as the context may so require.

PART C

C.1 APPLICABILITY:

This Code shall be applicable to all the Designated Persons and Immediate Relatives of Designated Persons of the Company and to the extent mentioned to Insiders and Connected Persons.

PART D

D.1. Communication or procurement of Unpublished Price Sensitive Information.

- a. Notwithstanding anything contained in this Code, an Unpublished Price Sensitive Information may be communicated, provided, allowed access to or procured, in connection with a transaction that would -
 - i. entail an obligation to make an open offer under the Takeover Regulations where the Board of Directors of the Company is of informed opinion that sharing of such information is in the best interests of the Company;
 - ii. not attract 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 sharing of such information 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 to be adequate and fair to cover all relevant and material facts.

- b. For the purpose of clause D.1.a. above, 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 purpose of D.1.a. above, and shall not otherwise trade in securities of the Company when in possession of Unpublished Price Sensitive Information.

Policy for determination of 'Legitimate Purpose':

In line with clause 2A of Regulation 3 of Regulations and any modification(s) / amendment(s) thereto, Policy for determination of legitimate purposes is as under:

“LEGITIMATE PURPOSE” shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider

- a. with partners, collaborators, lenders, customers, suppliers, bankers, merchant bankers, legal advisors, auditors, registrar and transfer agents, insolvency professionals or other advisors or consultants;
- b. for purposes of furtherance of business of the Company in accordance with the provisions of law;
- c. for the purposes of compliance with provisions of laws including rules, regulations and guidelines and provisions of statutes which are applicable to the Company and judgments, orders and directions of any court or tribunal or any other authority whose judgments, orders and directions are applicable to or binding upon the Company;
- d. for the purposes of compliance with standards, policies, practices, codes lawfully followed by the Company;
- e. for the purposes of performance of agreements and contracts which have been lawfully entered by the Company and
- f. in the course of actions taken in accordance with lawful resolutions, decisions, recommendations and directions of the Company, its Board of Directors, Committees of the Board of Directors, Managing Director & CEO and other Key Managerial Personnel and such other persons to whom the Company, its Board of Directors, Committees of the Board of Directors and Managing Director & CEO or other Key Managerial Personnel may have delegated their powers to, either in an explicit or implicit manner provided that it shall be the responsibility of the delegate to prove that such power has been delegated if the power is delegated in an implicit manner provided that such sharing has not been carried to evade or circumvent the prohibitions of the Regulations. No insider shall communicate, provide, or allow access to any Unpublished Price Sensitive Information, relating to securities of the Company or securities proposed to be listed by the Company, to any person including other insiders except where such communication is in furtherance of Legitimate Purposes, performance of duties or discharge of legal obligations.
- g. A structured digital database shall be maintained internally, containing the names of such persons or entities, as the case may be, with whom information is shared for legitimate purposes along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Adequate and effective system of internal controls will also be laid out to secure such database. Documents containing confidential information shall be kept secured. Computer files must have adequate security login and password, etc. This database shall be preserved for such period as prescribed under the Regulations.
- h. The Structured Digital Database shall be preserved for a period of 8 years after completion of relevant transactions or even longer in case of pending proceedings.

D.2 TRADING PLANS

a. An Insider shall be entitled to formulate a trading plan (“**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. This provision enables an insider who may be perpetually in possession of unpublished price sensitive information, to plan for trades to be executed in future and enable him to trade in securities in a compliant manner. By doing so, the possession of unpublished price sensitive information when a trade under a trading plan is actually executed would not prohibit the execution of such trades that had pre-decided even before the unpublished price sensitive information came into being.

b. Such Trading Plan shall:

- (i) not entail commencement of trading on behalf of the Insider earlier than six months from the public disclosure of the Trading 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 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.

c. The Compliance Officer shall review the Trading Plan to assess whether the Trading Plan would have any potential for violation of 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 Trading Plan.

d. The Trading Plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the Trading Plan, without being entitled to either deviate from it or to execute any Trade in the Securities outside the scope of the Trading Plan.

Provided that the implementation of the Trading Plan shall not be commenced if at the time of formulation of the plan, the insider is in possession of any UPSI and the said information has not become generally available at the time of the commencement of implementation and in such event the Compliance Officer shall confirm that the commencement ought to be deferred until such UPSI becomes Generally Available Information so as to avoid a violation of the SEBI Regulations.

e. Upon approval of the Trading Plan, the Compliance Officer shall notify the Trading Plan to the Stock Exchanges on which the Securities are listed.

PART E

DISCLOSURE OF TRADING BY INSIDERS/DESIGNATED PERSONS

E.1 General Provisions

- a. Every public disclosure shall be made in the Form/s as prescribed under the Regulations from time to time.
- b. The disclosures to be made by any person under this Code and, or, the Regulations shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.
- c. The disclosure of trading in securities shall also include trading in derivatives of securities and traded value of the derivatives shall be taken into account. Provided that trading in derivatives of securities is permitted by any law for the time being in force.
- d. The disclosures made under this Part shall be maintained by the Company, for a minimum period of five years, in such form as may be specified.

E.2 : Disclosure by certain persons:

(i) Initial Disclosure

Every person on appointment as a Director or a Key Managerial Personnel of the Company or upon becoming a Promoter or a member of the Promoter Group shall disclose his holding of securities of the Company as on the date of appointment or becoming a Promoter or a member of the Promoter Group, to the Company, within seven days of such appointment or becoming a Promoter or member of the Promoter Group. Such disclosure shall be made in the format prescribed under the Regulations, as amended from time to time and set out in **Form A**;

(ii) Continual Disclosure

- i. Every employee of the Company, Designated Person and member of the Promoter Group shall disclose to the Company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 10 lacs. Such disclosure shall be made in the format prescribed under the Regulations, as amended from time to time and set out in **Form B**. For avoidance of doubt, it is clarified that acquisition or disposal would include creation, revocation or invocation of pledge of the securities.
- ii. The Compliance Officer of the Company shall notify the particulars of such trading to the Stock Exchange on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.

Explanation - It is clarified for the avoidance of doubts that the disclosure of the incremental transactions after any disclosure under this sub-code, shall be made when the transactions effected after the prior disclosure cross the threshold specified in clause b. i. above.

iii. Disclosures by other Connected Persons

The Company may at its own discretion require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the Company in such form and at such frequency as may be determined by the Company in order to monitor compliance with this Code and the Regulations. Such disclosure shall be made in the format prescribed under the Regulations, as amended from time to time and set out in **Form C**.

PART F

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

- F.1. The Company,
- a. shall make 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.
 - b. shall ensure uniform and universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure.
 - c. appoints “Chief Investor Relation Officer” to deal with dissemination of information and disclosure of Unpublished Price Sensitive Information.
 - d. shall make prompt dissemination of Unpublished Price Sensitive Information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
 - e. shall give appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
 - f. shall ensure that information shared with analysts and research personnel is not Unpublished Price Sensitive Information.
 - g. shall develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the website of the Company, to ensure official confirmation and documentation of disclosures made.
 - h. shall ensure that all the Unpublished Price Sensitive Information are handled on a need- to-know basis i.e. Unpublished Price Sensitive Information shall be disclosed only to those within the Company, who need the information to discharge their duty.

PART G

G.1 Duties of Compliance Officer

- a. He shall maintain a record of Promoter, member of Promoter Group, Designated Persons and any changes made therein.
- b. He may in consultation with the Chairman / Executive Director and shall as directed by the Board, specify the prohibited period from time to time and immediately make an announcement thereof to all concerned.

- c. He shall maintain a record of prohibited period specified from time to time.
- d. He shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of 'Unpublished Price Sensitive Information', 'pre-clearing of Designated Persons' trades, monitoring of trades and the implementation of this Code under the overall supervision of the Board of Directors of the Company.
- e. He shall maintain records of all the declarations submitted in the appropriate form under this Code for a minimum period of five years.
- f. He shall place before the Board, on a quarterly basis all the details of the dealing in the securities by the Designated Persons with relevant documents that such persons had executed under the pre-dealing procedure as envisaged in this Code. He shall also provide the said details, on a quarterly basis, to the Chairman of the Audit Committee of the Board or to the Chairman of the Board.
- g. He shall from time to time inform the Stock Exchanges of any Unpublished Price Sensitive Information on immediate basis.
- h. He shall intimate to all Stock Exchanges on which the securities of the Company are listed the relevant information received.
- i. He shall be responsible for overseeing and co-ordinating disclosure of Unpublished Price Sensitive Information to Stock Exchanges, analysts, shareholders and media and educating staff on disclosure policies and procedure.
- j. He shall inform SEBI of any violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.
- k. He shall review and grant approval of the trading plan in compliance with Regulation 5 of the Regulations for trading in the securities of the Company.

G.2 Duties of Chief Investor Relation Officer

- a. To deal with universal dissemination and disclosure of UPSI (Unpublished Price Sensitive Information).
- b. Determination of questions as to whether any particular information amounts to UPSI.
- c. Determination of response, if any, of the Company to any market rumor in accordance with Code of Fair Disclosure of the Company.
- d. Dealing with any query received by any Insider about any UPSI.
- e. Providing advice to any Insider as to whether any particular information may be treated as UPSI.

G.3 Preservation of "Unpublished Price Sensitive Information"

Insiders including Designated Persons shall maintain the confidentiality of all Unpublished Price Sensitive Information. Insiders including Designated Persons shall not pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sale of securities of the Company. Following practices should be followed in this regard:

3.1 Need to know

Unpublished Price Sensitive Information is to be handled on a "need to know" basis, i.e., Unpublished Price Sensitive Information should be disclosed only to those within the Company, where it is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations, and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of information.

3.2 Limited access to confidential information

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password, etc. Files containing confidential information should be deleted / destroyed after its use. Shredder should be used for the destruction of physical files.

3.3 Chinese Wall

- a. To prevent the misuse of confidential information the Company shall adopt a "Chinese Wall" policy which separates those areas of the Company which routinely have access to confidential information, considered "inside areas" from those areas which deal with sales/marketing or other departments providing support services, considered "public areas".
- b. The employees in the inside area shall not communicate any Price Sensitive Information to anyone in public area.
- c. Where Chinese wall arrangements are in place Designated persons working within an Insider Area are prohibited from communicating any Confidential or Unpublished Price Sensitive Information to Designated Persons or any other person in Public Areas without the prior approval of Compliance Officer.
- d. In exceptional circumstances employees from the public areas may be brought "over the wall" and given confidential information strictly on the basis of "need to know" criteria, under intimation to the Compliance Officer.
- e. The establishment of Chinese Walls does not suggest or imply that Unpublished Sensitive Price Information can circulate freely within Insider Areas. The provision of 'Need to Know' Clause shall be applicable within Insider Areas as well.

G.4 Prohibition on dealing, communicating or counselling on matters relating to Insider Trading

No Insider shall –

- a. either on his own behalf, or on behalf of any other person, trade in securities of the Company when in the possession of any Unpublished Price Sensitive Information; and
- b. communicate, counsel or procure, directly or indirectly any Unpublished Price Sensitive Information to any person. However, these restrictions shall not be applicable to any communication required in furtherance of Legitimate Purposes or performance of duties or discharge of legal obligations.

G.5. Trading Restrictions and Trading Window

All Designated employees and their immediate relatives shall be subject to trading restrictions as detailed in this clause. The period prior to declaration of Unpublished Price Sensitive Information is particularly sensitive for transactions in the Company's securities. This sensitivity is due to the fact that the Designated Persons will, during that period, often possess Unpublished Price Sensitive Information.

During such sensitive times, the Designated Persons will have to forego the opportunity of trading in the Company's securities.

The Designated Persons of the Company shall not deal in the securities of the Company when the trading window is closed. The period during which the trading

window is closed shall be termed as prohibited period/Silent period.

5.1 Trading window

- a. The Company shall specify a Trading period for designated persons to be called “**Trading Window**”, for trading in the Securities of the Company in compliance with the Insider Trading Regulations.
- b. Unless otherwise specified by the Compliance Officer, the Trading Window shall be:
In respect of declaration of financial results (standalone& consolidated), the Trading window can be closed from the end of every quarter till 48 hours after the declaration of financial results. Designated persons shall not trade in securities when trading window is closed.
- c. In addition to the above, the Trading Window shall also be closed for the following purposes:
 - Declaration of Dividends (Interim & Final)
 - Change in Capital Structure. Amalgamation, mergers, de-mergers, takeovers, acquisitions, delisting and buy-back;
 - Any changes in policies, plans or operations of the company that could have a material impact on its financial performance.
 - Material events in accordance with the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015.

5.2The Trading Window for the aforesaid purposes shall be closed for a Designated Person or a class of Designated Persons for which the Compliance Officer determines that such Designated Person, or such class of Designated Persons are reasonably expected to be in possession of Unpublished Price Sensitive Information. The Trading Window shall reopen after closure, not earlier than 48 (forty-eight) hours after the Unpublished Price Sensitive Information in question becomes generally available.

5.3All designated persons (and their immediate relatives) shall conduct all their dealings in the Securities only when the Trading Window is open and no Designated person shall deal in the Securities during the period when the Trading Window is closed or during any other period as may be specified by the Compliance Officer from time to time.

5.4For avoidance of doubt, it is clarified that during the closure of the Trading Window, all trading in Securities are prohibited for designated persons and their immediate relatives, whether the same are within, or in excess of, the threshold limit notified in this Code, i.e. whether requiring pre- clearance or not. Applications for pre-clearance will not be entertained during the period when the Trading Window is closed.

G.6 Pre-clearance of Trades:

Applicability

All insiders who (or whose immediate relatives) intends to Trade in Securities of the Company in a calendar quarter (either in one transaction or in a series of

transactions) exceeding market price of Rs. 10,00,000 (Rupees Ten Lakh) shall obtain prior approval for the transactions as per the procedure prescribed.

Procedure:

- a An application for pre-clearance of trade shall be made in the format set out in **Form D**, as amended from time to time, to the Compliance Officer along with an undertaking in favor of the Company by such Designated Person incorporating, *inter-alia*, the following clauses, as may be applicable:
- b That the Designated Person does not have any access or has not received "Unpublished Price Sensitive Information" up to the time of signing the undertaking.
- c That in case the Designated Person has access to or receives "Unpublished Price Sensitive Information" after signing of the undertaking but before the execution of the transaction he or she shall inform the Compliance Officer of the change in his position and that he or she would completely refrain from dealing in the securities of the Company till the time such information becomes public.
- d That he or she has not contravened the provisions of this Code or Regulations, as amended, from time to time.
- e That he or she has made a full and true disclosure in the matter.
- f The Compliance Officer shall on receiving an application provide the Designated Person with an acknowledgement on the duplicate of the application.
- g The Compliance Officer shall grant approval within 7 trading days from the date of acknowledgement.
- h If the pre-cleared Trade is not executed within seven trading days after the approval is given, the Designated Person must secure pre-clearance for the intended transaction once again.
- i The Compliance Officer shall retain copies of all applications and acknowledgements.
- j In exceptional circumstances consent may not be given if the Compliance Officer is of the opinion that the proposed trade is on the basis of possession of any Unpublished Price Sensitive Information. There shall be no obligation to give reasons for any withholding of consent.
- k If so requested by the Compliance Officer, the Designated Person must ensure that his stockbroker is authorized to disclose to the Company all matters relevant to his share dealings.

Other Restrictions:

The Designated Persons shall hold their investments in securities for a minimum period of six months irrespective of mode of acquisition in order to be considered as being held for investment purposes. The Designated Persons permitted to trade shall not be permitted to execute a contra trade within a period of six months from the date of said trade. The restriction on contra trades shall not be applicable for trades pursuant to exercise of stock options.

In case the sale of securities is necessitated by personal emergency, the Compliance Officer may waive the holding period after recording in writing his or her reasons in this regard. An application for waiver of holding period shall be made to the Compliance Officer in the format set out in **Form E**, as amended from time to time.

G.7 Half - yearly / Annual Disclosures

In addition to disclosures mentioned under Part E of this Code, all Designated Persons of the Company shall be required to forward following details to the Compliance Officer:

- a. All holdings in securities of the Company at the time of joining the Company in the format set out in **Form F**, as amended from time to time;
- b. In respect of existing Designated Persons, all holdings in securities of the Company as on the date specified by the Compliance Officer in the format set out in **Form G**, as amended from time to time;
- c. Statement of any transactions in securities of the Company, whether pre-clearance of trade was obtained or not, in the format set out in **Form H**, as amended from time to time, on a half-yearly basis within 10 days from the end of half year;
- d. Annual statement of all holdings in securities of the Company in the format set out in **Form I**, as amended from time to time, as on March 31 of each year, before April 15 of that year; and
- e. Disclose names and Permanent Account Number or any other identifier authorized by law of the following persons on an annual basis and as and when the information changes:
 - immediate relatives;
 - persons with whom such Designated Person(s) shares a material financial relationship; and
 - Phone and mobile numbers which are used by them.

It is clarified that the term “material financial relationship” shall have the meaning assigned to it under the Regulations.

G.8 Records of disclosures received by the Company

The Compliance Officer shall maintain records of all the declarations in the appropriate Form given by the Designated Persons for a minimum period of five years.

The Compliance Officer shall place before the Board of Directors, on a quarterly basis all the details of the dealing in the securities by the Designated Persons of the Company and the accompanying documents that such persons had executed under the pre-dealing procedure as envisaged in this Code.

G.9 Penalty for Contravention of the Code

Every designated person/employee to whom this Code applies 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).

Designated persons/employee to whom this Code applies and who violate these rules shall be subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligibility for future participation in the Company’s stock option plans or termination.

G.10. Information to SEBI in case of violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015

In case it is observed by the Company and / or Compliance Officer that there has been a violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Compliance Officer shall inform the SEBI promptly on becoming aware of the violations of the Regulations.

The SEBI or any other appropriate regulatory authority would also be informed of the violation of these Rules so that appropriate action may be taken.

G.11. Information to Stock Exchanges in case of violation of the Code of Conduct

In case of violation with regard to non-compliance with respect to presence of an adequate and effective system of internal control will be reported to the Stock Exchanges in the form and manner as may be prescribed by Board from time to time.

G.12. Responsibility of Compliance Officer

Compliance Officer shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information (UPSI), monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board of Directors of the Company.

G.13. Miscellaneous:

All Employees/Designated Persons/ are advised to read this Code and the SEBI Insider Trading Regulations carefully and acquaint themselves with the provisions contained therein ensure that their Immediate Relatives do not violate the Regulations / Code in letter or in spirit.

While a person may cease to be a Designated Person on retirement, resignation, etc. (and consequently would cease to be subject to this Code), he would continue to be a Connected Person for the purpose of the Regulations / Code for a **period of 6 months** from separation and consequently would continue to be subject to the Regulations / Code).

It is further re-iterated that the onus of providing necessary disclosure(s)/ intimation(s) shall be on the Insider, Designated Person, employee concerned and they themselves shall be personally liable to pay penalties/compensate the Company, if levied by Stock Exchanges / SEBI or other regulatory authorities.

The Company reserves all right to modify and/or amend this Code at any time. This Code and subsequent amendment(s) thereto, shall be published on the web-site of the Company.

If there are any queries or difficulties relating to the Regulations or this Code, please approach the Compliance Officer for assistance.

THIS POLICY IS ONLY AN INTERNAL CODE OF CONDUCT AND ONE OF THE MEASURES TO AVOID INSIDER TRADING. IT WILL BE THE RESPONSIBILITY OF EACH EMPLOYEE/DESIGNATED PERSON TO ENSURE COMPLIANCE OF THE INSIDER TRADING REGULATIONS, GUIDELINES AND OTHER RELATED STATUTES FULLY.

**CODE OF CONDUCT FOR BOARD MEMBERS AND SENIOR MANAGEMENT PERSONNEL
CODE OF CORPORATE DISCLOSURE PRACTICES**

Overseeing and co-ordinating disclosure:

The Board of the Company shall designate a senior officer as a Chief Investor Relations Officer who would be responsible to ensure timely, adequate, uniform and universal dissemination of information and disclosure of Unpublished Price Sensitive Information (“UPSI”) pursuant to this Code as required under the Regulations so as to avoid selective disclosure.

The Chief Investor Relations Officer shall report to the CMD and shall also co-ordinate with the Compliance Officer. The Chief Investor Relations Officer shall ensure that information shared with analysts and research personnel is not UPSI. The Chief Investor Relations Officer shall be responsible for over-seeing and co-ordinating disclosure of UPSI to analysts, shareholders and media, and educating Employees on disclosure policies and procedures.

The Chief Investor Relations Officer shall also ensure that when interacting with media and external public, guidelines for disclosure of UPSI are complied with.

All disclosure/dissemination of any UPSI (save and except disclosure required to be made under any law or under this Code) on behalf of the Company shall be first marked to the Chief Investor Relations Officer, for approval. Any such information shall be made public or published on behalf of the Company only if the same is approved by the Chief Investor Relations Officer. In case of doubt, the Chief Investor Relations Officer, shall consult and seek approval of the CMD before dissemination of such information.

Should any dissemination of information on behalf of the Company take place without prior approval referred above, out of accidental omission, selectively, inadvertently or otherwise by any Employee /Director of the Company then such Employee/Director of the Company shall forthwith inform the Chief Investor Relations Officer, about such disclosure. The Chief Investor Relations Officer will then promptly disseminate the information as to make such information generally available.

Responding to market rumours:

The Employee/Director of the Company shall promptly direct any queries on news reports or requests for verification of market rumours received from regulatory authorities to the Chief Investor Relations Officer.

The Chief Investor Relations Officer shall on receipt of requests as aforesaid, consult the CMD as the case may be and send an appropriate and fair response to the same.

The Chief Investor Relations Officer shall be responsible for deciding in consultation with the CMD of the Company as to the necessity of a public announcement for verifying or denying rumours and there after making appropriate disclosures.

All requests/queries received shall be documented and as far as practicable, the Chief Investor Relations Officer shall request for such queries/ requests in writing. No disclosure in response to the queries/request shall be made by the Chief Investor Relations Officer, unless the CMD approves the same.

Medium of disclosure/dissemination:

The Company shall disseminate all credible and concrete UPSI on a continuous and immediate manner to Stock Exchanges where its securities are listed in accordance with the requirements of applicable law.

As a good corporate practice, the UPSI disclosed to the Stock Exchanges may also be supplemented by prompt updates on the Company's website. The Company may also consider other modes of public disclosure of UPSI so as to improve investor access to the same.

The information filed by the Company with the Stock Exchanges under the Stock Exchange Listing Agreement shall also be posted on the Company's website.

The Company will also promptly intimate any amendment to this Code of Corporate

Disclosure Practices to the Stock Exchanges, as required under the Regulations.

FORM A

Form for initial disclosure of holdings of equity shares / other securities of the Company (in terms of Clause E.2 (i) of Code)

Name of the Company: - The New India Assurance Co. Ltd.

ISIN: -

Name: -

87, M.G. Road,
Fort. Mumbai 400 001

PAN: -

Sir/Madam/,

To

The Compliance Officer
The New India Assurance Co. Ltd.

With reference to above, I wish to inform you that I am a Promoter / member of Promoter Group / I have joined the Company with effect from _____ as _____ and have read the “Code of practices and procedures and code of conduct to regulate, monitor and report trading in securities and fair disclosure of unpublished price sensitive information pursuant to the requirements of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015” (Code) of the Company and declare that I along-with my immediate relatives are holding equity shares / other Securities of the Company as follows :-

Date:-

1. Details of securities held by me in the Company:

Name, PAN, CIN / DIN & address with contact nos.	Category of Person (Promoters/ Promoter Group KMP/ Directors / immediate relative to/ others, etc.)	Securities held as on date		% of Shareholding	
		Type of security (For e.g. Shares, Warrants, Convertible Debentures, etc.)	Amount		
Open interest of the future contracts held as on date			Open interest of the option contracts held as on date		
Contract Specifications	Number of Units (Contracts* lot size) units	Notional Value in Rupee terms	Contract Specifications	Number of Units (contracts* lot size)	Notional value in Rupee terms

1. Details of securities held by my immediate relatives in the Company:

Name, PAN, CIN / DIN & address with contact nos.	Category of Person (Promoters / Promoter Group / KMP / Directors / immediate relative to / others, etc.)	Securities held as on date		%of Shareholding
		Type of security (For e.g. Shares, Warrants, Convertible Debentures, etc.)	No.	

Open Interest of the future contracts held as on date			Open interest of the option contracts held as on date		
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

I also confirm that whatever I have declared above is true and I or my immediate relatives are not holding any other Securities of the Company.

Signature:

Designation:

Place:

FORM B**Form for continual disclosure of holdings of equity shares / other securities of the Company (in terms of Clause E.2 b. of the Code)**

Name of the Company:- The New India Assurance Co. Ltd.

ISIN :

Sir/Madam,

Pursuant to Clause E.2 b. of the “Code of practices and procedures and code of conduct to regulate, monitor and report trading in securities and fair disclosure of unpublished price sensitive information pursuant to the requirements of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015” (Code) of the Company, I wish to inform you that I have acquired / disposed of _____equity shares / other securities of the Company. Details of the same are mentioned below:

Name, PAN, CIN / DIN & addresses with contact nos.	Category of Person (Promoters / Promoter Group / KMP / Director / immediate relative to / others, etc.)	Securities held prior to acquisition / disposal		Securities acquired / disposed			
		Type of security (For e.g. Shares, Warrants, Convertible Debentures, etc.)	No. and % of shareholding	Type of security (for e.g. Shares Warrants, Convertible Debentures, etc.)	No.	Value	Transaction Type (Buy/Sale/ Pledge / Revoke / Invoke)

Securities held post acquisition / disposal	Date of allotment / advice acquisition of shares/ sales 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 e.g. Shares, Warrants, Convertible Debentures, etc.)	No. and % of share-holding	From	To

Signature: _____

(Name: _____) Designation

FORM C**Form for continual disclosure of holdings of equity shares / other securities of the Company by Connected Persons (in terms of Clause E.2 c. of the Code)**

Name of the Company :- The New India Assurance Co. Ltd.

ISIN :-

Sir/Madam,

Pursuant to Clause E.2 c. of the “Code of practices and procedures and code of conduct to regulate, monitor and report trading in securities and fair disclosure of unpublished price sensitive information pursuant to the requirements of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015” (Code) of the Company, I wish to inform you that I hold__ equity shares / other securities of the Company. Details of the same are mentioned below:

Name, PAN, CIN / DIN & address with contact nos. of Connected Person	Connection with the Company	Securities held prior to acquisition / disposal		Securities acquired / Disposed			
		Type of security (For e.g. Shares Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (for e.g. Shares Warrants, Convertible Debentures etc.)	No	Value	Transaction Type (Buy / Sale / Pledge / Revoke / Invoke, etc)

Securities held post acquisition / disposal	Date of allotment / advice acquisition of shares/ sales 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 e.g. Shares Warrants, Convertible Debentures etc.)	No and % of Shareholding	From	To		

I confirm that whatever I have declared above is true and correct.

Signature: _____

(Name:_____)

Designation:_____

Place:_____

Date:-_____

FORM D**Application for Pre-Clearance of pledging the securities of the Company (in terms of Clause 4.5(a) of the Code)****From**

Name of the person:- Designation:-

DIN/ Employees Code/Regn. No.:-

PAN :-

Address:-

To

The Compliance Officer

The New India Assurance Co. Ltd.

87, M.G. Road, Fort,

Mumbai 400 001

Sir/Madam,

With reference to above, I/we wish to inform you that I/we want to create pledge of _____ equity shares / other Securities of the Company to comply with conditions of the borrowing, details of the same are as mentioned below :-

Sr. No.	Heading	Particulars
1	Existing holding of the shares / other securities	
2	Folio No./ DP_ID and CL_ID	
3	Nature of new transaction:	Creation of pledge/ Top up
4	Quantity	
5	Price per share	Market Closing price on the date of creation of pledge
6	Name of Pledgee/ Charge holder	
7	Details of Agreement	
8	Purpose	

I/ We declare that I/ we have complied with the requirements of Company's "Code of practices and procedures and code of conduct to regulate, monitor and report trading in securities and fair disclosure of unpublished price sensitive information" based on the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015. You are requested kindly to give your permission to create pledge in the equity shares / other securities of the Company as requested above.

Signature: _____

(Name: _____)

FORM D-1**Application for Pre- clearance of trading in securities of the Company (in terms of Clause 5.1 of G.5 of the Code)****From**

Name:-

Designation:-

DIN/ Employees Code:-

PAN :-

Address:-

To

The Compliance Officer
The New India Assurance Co. Ltd.
87, M.G. Road, Fort,
Mumbai 400 001

Sir/Madam,

With reference to above, I wish to inform you that I want to purchase / sale ___equity shares/ other Securities of the Company from the open market/ private arrangement, details of the same are as mentioned below:-

Sr. No.	Heading	Particulars
1	Existing holding of the shares / other securities	
2	Folio No./ DP_ID and CL_ID	
3	Nature of new transaction: sale / purchase	
4	Quantity want to purchase / sale	
5	Price at which you want to purchase / sale	
6	Estimated consideration	
7	Mode of transaction – private / open market	
8	Purpose of purchase / sale	
9	In whose name (with relation) the transactions will take place	

I/ We declare that I/ we have complied with the requirements of Company's "Code of practices and procedures and code of conduct to regulate, monitor and report trading in securities and fair disclosure of unpublished price sensitive information" based on the Securities and Exchange Board of India (SEBI) (Prohibition of Insider Trading) Regulations, 2015. I am executing an Undertaking as required and enclose herewith.

You are requested kindly to give your permission to trade in the equity shares/ other securities of the Company as requested above.

Signature: _____

(Name : _____)

Undertaking

(in terms of Clause 5.1 of G.5 of the Code)

From

Name:-

Designation:-

DIN/ Employees Code:-

PAN:-

To

The Compliance Officer
The New India Assurance
Co. Ltd.
87, M.G. Road, Fort,
Mumbai 400 001

Date:-

Sir/Madam,

With reference to my application dated ____ for pre-clearance of trade for purchase/ Sale of

_____ equity shares / other Securities of the Company, I confirm, declare and undertake as follows:-

- (a) That I do not have any access or has not received “unpublished price sensitive information” up to the time of signing the Undertaking.
- (b) That in case I have access to or receive “unpublished price sensitive information” after the signing of the Undertaking but before the execution of the transaction, I shall inform you the change in my position and I shall completely refrain from trading in the securities of the Company till such information becomes public.
- (c) That I have not contravened the Code of practices and procedures and code of conduct to regulate, monitor and report trading in securities and fair disclosure of unpublished price sensitive information pursuant to the requirements of the Securities and Exchange Board of India (SEBI) (Prohibition of Insider Trading) Regulations, 2015 (Code) as notified by the Company from time to time.
- (d) That I hereby confirm that I abide by the provisions of Clause 5.2 of G.5 of the Code with regard to time norms for execution and holding of securities.

I hereby solemnly declare that I have made a full and true disclosure in this regard to the best of my knowledge and belief.

Signature:_____

(Name :_____)

FORM E**Application for waiver of holding period (in terms of Clause 5.2 of G.5 of the Code)****From**

Name:-
Designation:-
DIN/ Employees Code:-
PAN:-

To

The Compliance Officer
The New India Assurance Co. Ltd.
87, M.G. Road, Fort,
Mumbai 400 001

Sir/Madam,

With reference to above, I wish to inform you that I had purchased _____ equity shares/ other Securities of the Company on ___ the details are as mentioned below: -

Sr. No.	Heading	Particulars
1	No. of equity shares / other securities purchased	
2	Folio No./ DP_ID and CL_ID	
3	Date of purchase and price of purchase	
4	From whom purchased	
5	Existing total holding	
6	Quantity want to sale	
7	Reason for early selling	
8	Price at which you want to sale	
9	Mode of transaction – private / open market	

I understand that as provisions of the Code of practices and procedures and code of conduct to regulate, monitor and report trading in securities and fair disclosure of unpublished price sensitive information pursuant to the requirements of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (Code), I need to hold this investment for a minimum period of six months, but, due to reason as mentioned above, I need to sell the same before prescribed period.

Kindly to give your permission for sale of the aforesaid Securities as requested.

Signature: _____

(Name : _____)

FORM F**Form for initial disclosure of holdings of equity shares / other securities of the Company (in terms of Clause G.6(a) of Code)****From**

Name:-

Designation:-

DIN/ Employees Code:-

PAN:-

Address:-

To

The Compliance Officer
The New India Assurance Co.
Ltd.
87, M.G. Road, Fort,
Mumbai 400 001

Date:-_

Sir/Madam,

With reference to above, I wish to inform you that I have joined the Company with effect from.

_____as_____and have read the “Code of practices and procedures and code of conduct to regulate, monitor and report trading in securities and fair disclosure of unpublished price sensitive information pursuant to the requirements of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015” (Code) of the Company and declare that I along with my immediate relatives are holding equity shares/ other Securities of the Company as follows:-

I Statement of holdings in my name:

Name	Securities held as on date			Date on which Securities were purchased / sold	
	Type of Security (For e.g. Shares, Warrants, Convertible Debentures, etc.)	Folio No. / DP ID / Client ID	No. of Securities held		
Open interest of the future contracts held as on date			Open interest of the option contracts held as on date		
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

II Details of Securities held by my immediate relatives:

Name of relative and PAN	Relationship	Securities held as on date			Date on which Securities were purchased / sold
		Type of Security (For e.g. Shares, Warrants, Convertible Debentures, etc.)	Folio No./ DP ID/ Client ID	No. of Securities held	

Open Interest of the future contracts held as on date			Open interest of the option contracts held as on date		
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

I also confirm that whatever I have declared above is true and I or my immediate relatives are not holding any other Securities of the Company.

Signature: _____

(Name: _____)

FORM G**Form for disclosure of existing holdings of equity shares / other securities of the Company (in terms of Clause G.6(b) of Code)****From**

Name:- Designation:-

DIN / Employees Code:-

PAN:-

Address:-

To

The Compliance Officer
 The New India Assurance Co. Ltd.
 87, M.G. Road, Fort,
 Mumbai 400 001

Sir/Madam,

With reference to above, I wish to inform you that I am working as _____ and declare that have read the "Code of practices and procedures and code of conduct to regulate, monitor and report trading in securities and fair disclosure of unpublished price sensitive information pursuant to the requirements of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015" (Code) of the Company and declare that I along with my immediate relatives are holding equity shares / other Securities of the Company as follows :-

I Statement of holdings in my name:

Name	Securities held as on date			Date on which Securities were purchased / sold	
	Type of Security (For e.g. Shares, Warrants, Convertible Debentures, etc.)	Folio No./ DP ID/ Client ID	No. of Securities held		
Open interest of the future contracts held as on date			Open interest of the option contracts held as on date		
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

II Details of Securities held by my immediate relatives:

Name of Relative and PAN	Relationship	Securities held as on date			Date on which Securities were purchased / sold
		Type of Security (For e.g. Shares, Warrants, Convertible Debentures, etc.)	Folio No./ DP ID/ Client ID	No. of Securities held	

Open Interest of the future contracts held as on date			Open interest of the option contracts held as on date		
Contract Specifications	Number of Units (contracts * lot size)	Notional value in Rupee terms	Contract Specification	Number of Units (contracts * lot size)	Notional value in Rupee terms

I also confirm that whatever I have declared above is true and I or my immediate relatives are not holding any other Securities of the Company.

Signature: _____

(Name: _____)

FORM H

Form for disclosure of holdings of equity shares / other securities of the Company on half - yearly basis (in terms of Clause G.6(c) of Code)

From

Name :-

Designation / Category:-

DIN / CIN / Employee's Code :-

PAN:-

Address :-

To

The Compliance Officer
The New India Assurance Co. Ltd.
87, M.G. Road, Fort,
Mumbai 400 001

Sir/Madam,

With reference to above, I wish to inform you that I along with my immediate relatives are holding equity shares / other Securities of the Company as follows:

1. Details of holdings in my name:

Date :- _____