



**PAL/I-TRADING/19**

Date: April 27, 2019

The Bombay Stock Exchange Ltd.  
Corporate Relationship Department  
Phiroze Jeejeebhoy Towers,  
Dalal Street, Fort,  
Mumbai - 400001  
Scrip Code: 500456

**Sub: Compliance under Regulation 8(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, read with SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018**

Dear Sir,

Pursuant to the Regulation 8 (2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 read with SEBI (Prohibition of Insider Trading) Amendment Regulations, 2018 as amended, please find enclosed the revised "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)" duly approved by the Board of Directors of the Company through resolution passed by circulation. The said revised code shall be effective from April 1, 2019.

You are requested to take the same on records and notify your constituents accordingly.

Yours faithfully,

**For Pasupati Acrylon Limited**

**(Ankush Kumar Chokhani)**  
**Company Secretary & Compliance Officer**  
**Encls: As above**

**P A S U P A T I A C R Y L O N L T D .**

□ CORPORATE OFFICE : M-14, CONNAUGHT CIRCUS, (MIDDLE CIRCLE), NEW DELHI-110 001 (INDIA) □ PHONE : EPABX- 47627400  
□ Fax : 91-11-47627497, 47627498 □ E-MAIL : delhi@pasupatiacrylon.com □ VISIT OUR SITE : <http://www.pasupatiacrylon.com>  
□ REGD. OFFICE & WORKS : KASHIPUR ROAD, THAKURDWARA-244 601 DISTT. MORADABAD (U.P.)  
□ E-MAIL : works@pasupatiacrylon.com ★ pasupati\_tkd@rediffmail.com  
□ CIN : L50102UP1982PLC015532

**CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI)**

**OF**

**PASUPATI ACRYLON LIMITED**

**EFFECTIVE FROM 01<sup>ST</sup> APRIL, 2019**

**1. Preamble**

Pasupati Acrylon Limited (the "Company" or "PAL") has always stood for a fair and equitable flow of economic benefit to its shareholders and communication with investors, it has always endeavored to provide a healthy level of disclosure, with responsibility and caution in discussion about the future, transparency and equal dissemination of information to all its investors and analysis, current or prospective. The Company welcomes enhanced sensitivity to equality in shareholder communication and has formalized its principles in to a code of Fair Disclosure (as defined below):

**2. Purpose**

The Securities and Exchange Board of India has formulated the SEBI Insider Regulations (as defined below) in prescribe a legal framework for prohibition of insider trading. In terms of the provisions of SEBI Insider Regulations, every listed Company is required in formulate a Code of Fair Disclosure. Accordingly, the Company has formulated this Code of Fair Disclosure to ensure timely and adequate disclosure of Unpublished Price Sensitive Information.

**3. Effectiveness**

Pursuant to Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Company has a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI), as adopted by the Board of Directors in their meeting held on 25<sup>th</sup> May 2015 and shall be deemed to be came into force w.e.f 15<sup>th</sup> May, 2015.

SEBI has vide notification dated 31 December 2018, amended SEBI (Prohibition of Insider Trading) Regulations, 2015 effective from 1 April 2019. As required under the said Regulations, a revised Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI), (hereinafter referred in as the ("Code") has been framed and adopted by the Board of Directors of the Company. The said Code shall supersede the earlier Code and shall be effective from 1 April 2019.

**4. Definitions**

"Legitimate Purpose" shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers,

suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or Consultants, provided that such sharing has not been carried out in evade or circumvent the prohibitions of the said regulations.

"Unpublished Price Sensitive Information" means any information, relating to the 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 in, information relating to the following:

- (i) Financial results;
- (ii) Dividends;
- (iii) Change in capital structure;
- (iv) Mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
- (v) Changes in key managerial personnel; and
- (vi) Capitalized terms and other terms used but not specifically defined herein shall have the same meaning as assigned thereto in the SEBI Insider Regulations, the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, or the Companies Act, 2013 and rules and regulations made thereunder or any other applicable laws or regulations, including the amendments thereon, as the case may be.

#### **5. Prompt Public disclosure of Unpublished Price Sensitive Information**

PAL will comply with all periodic reporting and disclosure requirements contained in the Companies Act, 2013, listing agreement executed with the stock exchanges, SEBI Insider Regulations and other applicable laws, PAL shall make prompt 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. PAL shall disseminate the Unpublished Price Sensitive Information uniformly and universally without any selective disclosure.

#### **6. Chief Investor Relations Officer**

The Company Secretary and Compliance Officer shall be designated as Chief Investor Relations Officer. The CFO and Chief Investor Relations Officer will deal with the dissemination and disclosure of Unpublished Price Sensitive Information. In addition to CFO, the following persons ("Authorised Spokespersons") are also authorized to communicate with the Investors/media in co-ordination with the CFO;

Chairman, if any,  
Managing Director;  
Director (Operations), and,  
Company Secretary & Compliance Officer (Chief Investor Relation Officer)

The Company Secretary & Compliance Officer in coordination with the CFO shall disseminate/disclose the information to the stock exchanges where the Securities of the Company are listed.

#### **7. Prompt disclosure of information that get disclosed inadvertently or selectively**

PAL shall also promptly disseminate the Unpublished Price Sensitive Information that gets disclosed selectively, inadvertently or otherwise to make such information generally available by informing to the Stock Exchanges where the Securities of the Company are listed. If any Unpublished Price Sensitive Information is inadvertently disclosed without the consultation of the CFO, the CFO and the Company Secretary should be informed about the same as soon as possible and they may take such action to ensure that such information is generally available.

#### **8. Designated Persons**

The following shall include designated person(s) who have access to UPSI shall not trade while trading window is closed:

- i) Employees of the Company designated General Manager Level and above
- ii) Promoters of the Company
- iii) Chief Financial Officer (CFO)
- iv) Company Secretary and Compliance Officer
- v) Any concerned employee who is having access to UPSI

#### **9. Pre-Clearance of Trades / Trading in Securities**

9.1. All Designated Persons who intend to Trade in the Securities of the Company either in his/her own name or in the name of his/her Immediate Relatives during a Valid Trading Window require to submit a trading plan (in Form – I) in accordance with clause 9 of this Code, which is to be approved by the CFO/Compliance Officer in Form II. In case of non-submission of trading plan, the designated person shall obtain pre-clearance for the Trade from the CFO/Compliance Officer, if the Trade together with the Trades undertaken during the calendar quarter, aggregates to a traded value of more than `5 lakh (Rupees Five Lakh) in value, or 25,000 shares or 1% of the total shareholding or voting rights or such other value as may be specified by the CFO/Compliance Officer from time to time.

##### **9.2. Applicability**

- 9.2.1. Application for pre-clearance shall be made only during a Valid Trading Window. Applications submitted during a period when the Trading Window is closed shall be invalid and will be deemed to have been automatically rejected.
- 9.2.2. Such Pre-clearance approval will not be necessary if the Trading is not crossing the threshold limit as prescribed above.
- 9.2.3. Notwithstanding of the above provisions, the Compliance Officer may in appropriate case review the holding of Designated Employees and may ask for pre-clearance.

### **9.3. Pre-clearance Procedure**

9.3.1. All Designated Persons required to obtain pre-clearance of the transactions as per the provisions of Clause 9.2 above, shall make a preclearance application to the CFO/Compliance Officer in Form - III. The application should be complete and correct in all respects and should be accompanied by such undertakings (See Form - III), declarations, indemnity bonds and other documents/ papers as may be prescribed by the Compliance Officer from time-to-time.

9.3.2. An undertaking shall be executed in favor of the Company by such Designated Persons incorporating, inter alia, the following clauses, as may be applicable:

- (a) that he/she does not have any access or has not received UPSI up to the time of signing the undertaking;
- (b) that in case he/she has access to or receives UPSI 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/her position and that he/she would completely refrain from Trading till the time such information becomes Generally Available Information;
- (c) that he/she has not contravened the Code as notified by the Company from time to time;
- (d) that he/she shall hold their investments in Securities of the Company for a minimum holding period as specified under Clause 9.6;
- (e) that he/she undertakes to submit the necessary report within two working days of the date of the pre-clearance approval if the transaction is not undertaken;
- (f) that he/she is aware that, he/she shall be liable to face penal consequences as set forth in this Code including disciplinary action under this Code, in case the above declarations are found to be misleading or incorrect at any time;
- (g) that he/she hereby undertakes not to conduct Trading in the sanctioned period in case the Trading Window is declared closed subsequently;
- (h) that he/she has made a full and true disclosure in the matter.

9.3.3. All the Designated Persons shall execute documents as may be prescribed by the Compliance Officer from time-to-time. Such application for pre-Trading approval with enclosures must necessarily be sent through electronic mail followed by hard copies of all the documents. The e-mail for this purpose should be sent to the address [delhi@pasupatiacrylon.com](mailto:delhi@pasupatiacrylon.com) or to such other email-id as may be notified by the Compliance Officer from time to time.

### **9.4. Approval**

9.4.1. The Compliance Officer shall consider the pre-clearance application and shall approve it forthwith, preferably on the same working day but not later than 2 (two) working days from the time of receiving the application unless he is of the opinion that grant of such an approval would result in a breach of the provisions of this Code, or the Regulations. Such approval/rejection would be conveyed in Form – IV through electronic mail and if no such approval/intimation of rejection is received within a period of 2 (two) working days, the applicant can presume that the approval is deemed to be given. Immediately on receipt of a preclearance application, the date and time of the receipt of the same shall be recorded thereon by the Compliance Officer. In case of trading by the Compliance Officer, prior clearance shall be required from the chairman & managing director of the Company.

9.4.2. Every approval letter shall be issued in the format prescribed in Form-IV as annexed to this Code. Every approval shall be dated and shall be valid for a period of 7 (seven) Trading Days from the date of approval; however such approval shall automatically deemed to be withdrawn if such period is superseded by closure of the Trading Window.

9.4.3. If a Trade is not executed by the Designated Persons pursuant to the approval granted by the Compliance Officer within 7 (seven) Trading Days, then such Designated Person shall apply once again to the Compliance Officer for fresh pre-clearance of the transaction.

9.4.4. The competent person or authority to accord pre-clearance shall be as follow:

i) For chairman & managing director:	Board is the approving authority
(ii) For directors, CFO and Compliance Officer:	Chairman & managing director is the approving authority
(iii) For Designated Persons:	Compliance Officer

9.4.5. The Compliance Officer shall duly report to the chairman & managing director the details of pre-clearance(s), if any, accorded during a month within 10 (ten) days of the commencement of the following month and shall submit a consolidated report, if any, to the Board annually.

#### **9.5. Completion of Pre-Cleared Trading**

9.5.1. Every Designated Person who intends to Trade either in his/her own name or in the of his/her Immediate Relatives shall ensure that they complete execution of every pre-cleared Trading as prescribed above within 7 (seven) Trading Days from the date of the approval. Such Designated Persons shall file within 2 (two) working days of the execution of the transaction, the details of such transaction, with the Compliance Officer in Form V. In case the transaction is not undertaken, a report to that effect shall be filed in Form – V.

9.5.2. However, where the Designated Person is an KMP and the said precleared deal results in a change in the holding from the last disclosure by `5 lakh market value or 25,000 Securities or 1% of total shareholding/ voting rights in the Company, whichever is lower, then in addition to filing the form as per above clause, such Designated Person shall file, the details of such deal with the Compliance Officer.

9.5.3. The Compliance Officer shall maintain a register for pre-clearance of Trading in Form – III.

#### **9.6. Holding Period**

9.6.1. The Designated Persons shall not, within six months of buying or selling any number of Securities of the Company in terms the pre-clearance received above, enter into an opposite transaction i.e. sell or buy, as the case may be, any number of the Securities of the Company. The Designated Persons shall hold their investments in Securities of the Company subscribed to by them in terms of the approval received for a minimum period of 6 (six) months in order to be considered as being held for investment purposes.

9.6.2. In case the buy/ sale of Securities of the Company is necessitated due to personal reasons or emergency situations, the holding period referred to above may be waived by the Compliance Officer after recording the reasons in this regard and making application by the Designated Person(s) in Form – VI. It may however, be noted that in terms of the Regulations, no such buy/ sale will be permitted when the Trading Window is closed.

- 9.6.3. The Compliance Officer shall also maintain a register of waiver of restriction on holding period and shall record therein the name of the Designated Person, details of Securities of the Company for which waiver is granted, date of such waiver and the grounds for grant of the waiver.
- 9.6.4. In any case, where a contra trade is executed, inadvertently or otherwise, in violation of the restriction as mentioned at sub-clause 9.6.1 above, the profits made from such a trade shall be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund administered by SEBI.
- 9.7. Advice regarding Pre-Clearance  
In case of doubt, the Designated Persons shall consult the Compliance Officer where the provisions relating to pre-clearance are applicable to any proposed transaction to be made by such Designated Persons in the Securities of the Company.
- 9.8. To provide assistance in preventing inadvertent violations of this Code and the applicable securities laws and to avoid the appearance of impropriety in connection with the Trading of the Company's Securities, all Trading in Company's Securities by Officers, Directors and Designated Employees and their Immediate Relatives and such other Connected Persons must be pre-cleared.

10. Appropriate and fair response to queries on news reports

The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities. The CFO may also decide whether a public announcement is necessary for verifying or denying rumors and in case it is necessary, the Company should make a public announcement for either verifying or denying the rumors.

11. Information shared with analyst and research personnel

PAL shall ensure that the information shared with analyst and research personnel is not Unpublished Price Sensitive Information.

12. Unpublished Price Sensitive Information on need to know basis. Unpublished Price Sensitive Information shall be handled on a need to know basis, i.e unpublished price Sensitive information should be disclosed only to those within the Company who need the information to discharge their duty and shall not be communicated to any person except in furtherance of the legitimate purposes, performance of duties or discharge of legal obligations.

13. Sharing of Unpublished Price Sensitive Information for legitimate purpose.

Any person in receipt of unpublished price sensitive information pursuant to a legitimate purpose shall be considered an insider for the purpose of the said Regulations and due notice shall be given to such person to maintain confidentiality of such unpublished price sensitive information in compliance with the said Regulations

14. Digital Database of recipient of Unpublished Price Sensitive Information.

A Structural Digital database containing the names of such persons or entities as the case may be with whom unpublished Price Sensitive Information is shared along with PAN or other identifier authorized by law where PAN is not available shall be maintained with adequate internal control and checks.

#### 15. Modification and Amendments

PAL reserves all right to modify and/or amend this Code of Fair Disclosure at any time. This Code of Fair Disclosure and subsequent amendment(s) thereto, shall be promptly intimated to the stock exchange where the Securities of the Company are listed.

#### 16. Miscellaneous

##### 16.1. Quarterly Earnings Release Conference Calls

After issuance of each quarterly earnings release, PAL may hold a quarterly conference call. PAL will furnish the quarterly earning press release to the stock exchanges where its Securities are listed before the commencement of quarterly conference call, PAL will also make available the transcript or records of the conference call at its website.

##### 16.2 Other requirements

The Company shall ensure the compliance of other applicable provisions of SEBI Insider Regulations in this regard.

This Code of Fair Disclosure and any amendment thereof shall also be published on the official website of PAL.



**Form - I**

**Application for Approval of Trading Plan to Trade in Securities**

**(Under Clause 9.1 of the Code of Conduct for Prevention of Insider Trading and Fair Disclosure of Unpublished Price Sensitive Information)**

Date:

To,

The Company Secretary and Compliance Officer  
Pasupati Acrylon Ltd.  
M-14, Middle Circle,  
New Delhi – 110 001

Dear Sir,

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended, and the Company's Code of Conduct for Prevention of Insider Trading and Fair Disclosure of Unpublished Price Sensitive Information (the 'Code'), I seek approval for Trading Plan in Pasupati Acrylon Ltd. for the financial year \_\_\_\_\_ as per the details given below.

Name & Designation : :

Department :

PAN No. :

Email Id :

Date of becoming Designated Person :

Sl. No.	No. Shares held (including Immediate Relative) as on date of application	Whether proposed transaction under selfname or by Impeditive Relative	Name of Immediate Relative, if transaction is made by Immediate Relative	Nature of new transaction for which approval is sought (Purchase or Sale)	Estimated No. of Securities to be dealt
1	2	3	4	5	6

Estimated Consideration Value	Name and Contact Details of Broker with A/c No.	Name of Depository Participant	Folio No. / DP & Client ID	Date of transactions / period/ Interval for transaction	Previous approval No. and date of transaction	Remarks
7	8	9	10	11	12	13

### Undertaking

In this connection I solemnly confirm and declare that:

- (a) The Trading Plan once approved shall be irrevocable and I shall mandatorily 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;
- (b) The implementation of the Trading Plan shall not be commenced if any Unpublished Price Sensitive Information in my possession at the time of the formulation of the plan has not become generally available information at the time of the commencement of implementation;
- (c) I have not contravened the provisions contained in the Code and the Regulations;
- (d) I shall not entail commencement of Trading earlier than 6 (six) months from the public disclosure of the Trading Plan;
- (e) The Trading Plan submitted by me does not entail overlap of any period for which another Trading Plan submitted by me is already in existence;
- (f) I shall not use this Trading Plan as a tool for market abuse;
- (g) I am aware that I shall be liable to face penal consequences as set forth in the Code including disciplinary action under the Code in case the above declarations are found to be misleading or incorrect at any time;
- (h) I hereby undertake not to transact in Securities of the Company in the sanctioned period in case Trading Window is declared closed subsequently during such sanctioned period;
- (i) I hereby made a full and true disclosure in the matter.

Name & Signature

Date:

Place:

Designation:

**Form – II**

**Letter of Intimation of Trading Plan**

**(Code of Conduct for Prevention of Insider Trading and Fair Disclosure of Unpublished Price Sensitive Information)**

Date:

Approval No.

To,  
Name  
Designation

Dear Sir,

With reference to your application dated .....seeking approval for your Trading Plan in Securities of the Company detailed therein, please be informed that you are hereby authorised/ not authorised to undertake the transaction(s) as detailed in your said application. Kindly note that in terms of the Company's Code of Conduct for prevention of Insider Trading and Fair Disclosure of Unpublished Price Sensitive Information, the Trading Plan shall be irrevocable and you have to mandatorily implement the plan, without being entitled to either deviate from it or to execute any trade in Securities outside the scope of Trading Plan.

This approval is being issued to you based on the various declarations, representations and warranties made by you in your said application.

For & on behalf of Pasupati Acrylon Ltd.

Company Secretary and Compliance Officer

**Form – III**

**Application for Pre-Clearance of Trading in Securities of the Company**

(Under Clause 9.2.1/9.3.1 of Code of Conduct for Prevention of Insider Trading and Fair Disclosure of Unpublished Price Sensitive Information)

Date:

To,

The Company Secretary and Compliance Officer  
Pasupati Acrylon Ltd.  
M-14, Middle Circle,  
New Delhi – 110 001

Dear Sir,

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended, and the Company's Code of Conduct for Prevention of Insider Trading and Fair Disclosure of Unpublished Price Sensitive Information (the 'Code'), I seek approval for purchase/ sale/ subscription of the Securities of the Company as per the details given below:

Name & Designation : :

Department :

PAN No. :

Email Id :

Date of becoming Designated Person :

Sl. No.	No. Shares held (including Immediate Relative) as on date of application	Whether proposed transaction under selfname or by Impeditive Relative	Name of Immediate Relative, if transaction is made by Immediate Relative	Nature of new transaction for which approval is sought (Purchase or Sale)	Estimated No. of Securities to be dealt	Estimated Consideration Value
1	2	3	4	5	6	7

Name and Contact Details of Broker with A/c No.	Name of Depository Participant	Folio No. / DP & Client ID	Details of Previous Pre-clearance, if any			
			Nature of Transaction (Purchase or Sale)	No. of Shares and Consideration Value	Date of Transaction	Whether the transaction was executed or not? Yes or No.(along with details and reasons of transaction)
8	9	10	11	12	13	14

#### Undertaking

In this connection I solemnly confirm and declare that:

- (a) I do not have access and/or have not received any “Unpublished Price Sensitive Information” up to the time of signing the undertaking;
- (b) In case I have access to or I receive any “Unpublished Price Sensitive Information” after the signing of the undertaking but before the execution of the transaction, I shall completely refrain from trading in the Securities of the Company till the time such information becomes generally available information
- (c) I have not contravened the provisions contained in this Code and the Regulations
- (d) I shall hold the Securities of the Company for a minimum holding period as specified under Clause 9.6 of this Code.
- (e) I undertake to submit the necessary report within 2 (two) working days of execution of the transaction/ a “Nil report”, after the expiry of 1 (one) week from the date of the preclearance approval, if the transaction is not undertaken.
- (f) I am aware that, I shall be liable to face penal consequences as set forth in this Code including disciplinary action under this Code, in case the above declarations are found to be misleading or incorrect at any time.

(g) I hereby undertake not to transact in Securities of the Company in the sanctioned period in case Trading Window is declared closed subsequently during such sanctioned period.

(h) I hereby made a full and true disclosure in the matter. Pre-clearance may kindly be accorded in terms of provisions of this Code.

Date:

Signature:

Place:

**Form – IV**

**Letter of Intimation of Pre-Clearance**

(Under Clause 9.4.1 of Code of Conduct for Prevention of Insider Trading and Fair Disclosure of Unpublished Price Sensitive Information)

Date:

Approval No.

To,

Name

Designation

Dear Sir,

With reference to your application dated ..... seeking approval for undertaking Trading in Securities of the Company detailed therein, please be informed that you are hereby authorised/ not authorised to undertake the transaction(s) as detailed in your said application. Kindly note that in terms of the Code of Conduct for Prevention of Insider Trading and Fair Disclosure of Unpublished Price Sensitive Information of the Company (the 'Code'), the above mentioned transaction is to be completed within 7 (seven) Trading Days from the date of this letter granting the pre-clearance.

This approval is being issued to you based on the various declarations, representations and warranties made by you in your said application. This approval letter is valid till \_\_\_\_\_ (i.e. for 7 Trading Days). If you do not execute the approved Trade on or before this date you would have to seek fresh pre-clearance before executing Trading in the Securities of the Company in terms of the Code. Further, you are required to file the details of the executed transactions in the attached format within 2 (two) working days from the date of execution of such Trading. In case the transaction is not undertaken, you shall submit a "Nil" report after the expiry of 2 (two) days from (date), as mentioned above.

Kindly also note that the Securities of the Company transacted pursuant to this approval shall be held for a minimum holding period as specified under Clause 9.6 of the Code. This approval will automatically stand withdrawn if subsequently the Trading Window is declared closed involving the period for which such approval has been granted by this letter.

For & on behalf of Pasupati Acrylon Ltd.

Company Secretary and Compliance Officer

**Form – V**

**Disclosure of Trading pursuant to Pre-Cleared Transactions**

**(Under Clause 9.5.1 of Code of Conduct for Prevention of Insider Trading and Fair Disclosure of Unpublished Price Sensitive Information)**

**(To be submitted within 2 (two) working days of transaction in the Securities of the Company/ Trading)**

Date:

To,

The Company Secretary and Compliance Officer  
Pasupati Acrylon Ltd.  
M-14, Middle Circle,  
New Delhi – 110 001

Dear Sir,

Details of Pre-Approved Transaction

Ref: Your Approval Letter No. \_\_\_\_\_ dated \_\_\_\_\_

\*I hereby inform you that I

♣ have not bought/sold/subscribed any Securities of the Company post receipt of your pre-clearance vide letter dated ..... due to [reasons to be recorded].

♣ have bought/sold/subscribed to the \_\_\_\_\_ Securities of the Company as mentioned below on \_\_\_\_\_ (insert date)

Name of Holder	First of joint Holder	No. of Securities dealt with	Bought/ sold/ subscribe	DP ID/ Client ID (electronic form) or Folio No. for physical where the Securities will be debited or credited	Price
1	2	3	4	5	6

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 5 (five) 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 Code of Conduct for Prevention of Insider Trading and Fair Disclosure of Unpublished Price Sensitive Information and/or applicable laws/ regulations have been contravened for effecting the above said transaction(s).

I agree to hold the above Securities of the Company for minimum holding period as specified under clause 9.6 of the Code. In case there is any urgent need to sell these Securities of the Company within the said minimum period of holding, I shall approach the Compliance Officer for necessary approval.

Yours faithfully,

Signature:

Name:

Designation:

Date:

Place:

\*Strike out whichever is not applicable.

**Form – VI**

**Application for Waiver of Minimum Holding Period**

**(Under Clause 9.6.2 of Code of Conduct for Prevention of Insider Trading and Fair Disclosure of Unpublished Price Sensitive Information)**

Date

To,

The Company Secretary and Compliance Officer  
Pasupati Acrylon Ltd.  
M-14, Middle Circle,  
New Delhi – 110 001

Dear Sir,

I request you to grant me waiver of the minimum holding period of 30 days as required under the Code of conduct for prevention of Insider Trading and Fair Disclosure of Unpublished Price Sensitive Information with respect to \_\_\_\_\_ shares of the Company held by me/ \_\_\_\_\_ (name of relative) singly/jointly acquired by me on \_\_\_\_\_ (date). I desire to deal in the said shares \_\_\_\_\_ on \_\_\_\_\_ account \_\_\_\_\_ of

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_ (give reasons)

Yours faithfully,

Signature:

Name:

Designation:

Date:

Place:

\*Strike out whichever is not applicable.