

INDIA NIPPON ELECTRICALS LTD

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY ITS EMPLOYEES AND OTHER CONNECTED PERSONS

(FRAMED IN TERMS OF REGULATION 9 AND SCHEDULE B OF THE SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015)

Part A - Definitions

- a. Regulations shall mean the SEBI (Prohibition of Insider Trading) Regulations, 2015 and amendments thereof;
- b. Code of Conduct or Code means this code of conduct as amended from time to time
- c. Company means India Nippon Electricals Ltd
- d. Compliance Officer means the Company Secretary of the Company;
- e. Designated Persons shall mean
 - Directors including Managing Director
 - Chief Executive Officer
 - Chief Financial Officer
 - Company Secretary
 - Heads of key functions viz. Marketing, Manufacturing, Materials, Human Resources, Engineering and Quality and Unit Heads irrespective of their designation
 - All Employees of Finance and Secretarial Departments of the Company
 - Immediate relatives of all the above
 - Any Connected Person specified by the Board of Directors in consultation with the Compliance Officer to be covered by this Code on the basis of his/her role and function in the Company.
- f. Words and expressions not defined in these Regulations shall have the same meaning as contained in SEBI (Prohibition of Insider Trading) Regulations, 2015 and amendments thereof.

Part B

1. Compliance Officer

- 1.1. The Compliance Officer shall report to the Board of Directors of the Company and in particular, shall provide quarterly or half yearly as may be specified by the Board.
- 1.2. The Compliance Officer, under the overall supervision of the Board of Directors of the Company, shall be responsible for implementing the Code of Conduct, monitoring, and pre-clearing trades of Designated Persons and their Immediate Relatives.

1.3. The Compliance Officer shall maintain a record of the Designated Persons and any changes made in the list of Designated Persons.

1.4. The Compliance Officer shall assist the Designated Persons in addressing any clarifications regarding the Regulations and the Code of Conduct.

2. Restricted access to unpublished price sensitive information

2.1. Employees shall maintain the confidentiality of all unpublished price sensitive information. Employees 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 or in any other manner.

2.2. Unpublished price sensitive information is to be handled on a need to know basis i.e. it should be disclosed only to those within the Company who need the information to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 a conflict of interest or appearance of misuse of the information. All non-public information directly received by any Employee should immediately be reported to such Employee's head of the department.

2.3. Files containing unpublished price sensitive information shall be kept secure. Computer files must have adequate security of login and pass word etc.

3. Chinese Walls procedures

3.1 Designated persons shall maintain Chinese Walls to ensure unpublished price sensitive information is not leaked outside their respective departments

3.2 Designated persons shall disclose unpublished price sensitive information to any Employee outside his/her department or to non-employees only for legitimate business purposes, for performance of such Designated persons duties or discharge of such Employee's legal obligations and shall do so only in consultation with the Compliance Officer of the Company

3.3 All Consultants, Internal Auditors and other third parties (including employees of Group Companies) who has or is expected to have access to UPSI as part of their assignment/ engagement/ relationship with the company should execute a specific confidential and non disclosure agreement pertaining to protection of UPSI.

4. Restrictions on trading by Designated Person and Trading window

4.1 The Designated Persons shall not deal/ buy/sell/ pledge etc securities of the Company during Closure of the 'Trading Window', i.e. the period during which trading in the securities of the Company is prohibited. The Designated persons shall conduct all their

dealings in the securities of the Company only during an open trading window. The Compliance Officer shall specify a Trading Window closure period during such time when price sensitive information remains unpublished. No Designated Person shall trade or deal with the Securities of the Company when the trading window is closed.

The Trading Window shall be closed when the Compliance Officer determines that a Designated Person or class of Designated Persons can reasonably be expected to have possession of unpublished price sensitive information. Such closure shall be imposed in relation to such securities to which such unpublished price sensitive information relates.

- 4.2 The timing for re-opening of the trading window shall be determined by the Compliance Officer taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, which in any event shall not be earlier than forty-eight hours after the information becomes generally available.
- 4.3 Notwithstanding the above, the Trading Window shall be closed at the time of
- a) Declaration of Financial results (quarterly, half-yearly and annually)
 - b) Declaration of dividend (Interim and Final)
 - c) Issue of securities by way of public/rights/bonus etc
 - d) Any major expansion plans or execution of new projects
 - e) Amalgamation, mergers, takeovers and buy-back
 - f) Disposal of whole or substantially the whole of the undertaking
 - g) Any changes in policies, plans or operations of the company.
- 4.4 The period of closure of the Trading Window in the above cases shall be 15 days prior to the date of Board meeting convened for deciding the matter specified above or from the date of circulation of agenda papers pertaining to the subjects referred above, whichever is longer. The trading window shall be opened 48 hours after the information referred to in paragraph becomes generally available.
- 4.5 Designated Person shall not trade in the Company's securities when the trading window is closed.
- 4.6 Exercise of options under ESOP schemes is permissible when the trading window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when trading window is closed.
- 4.7 No Designated Person shall trade in the Company's securities if such Designated

Person is in possession of unpublished price sensitive information even if the Trading Window is not closed.

- 4.8 Restrictions on trading when in possession of unpublished price sensitive information or when the Trading Window is closed shall apply to any person having contractual or fiduciary relation with the Company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the Company.

5. Trading Plan

5.1 The designated persons shall be entitled to formulate a Trading Plan for dealing in Shares and present it to the Compliance Officer in the prescribed Form VI

5.2 The Trading Plan shall –

- (i) not entail commencement of trading on behalf of the designated persons earlier than six months from the public disclosure plan;
- (ii) not entail trading for the period between twentieth trading day prior to the last day of any financial period, for which results are required to be announced by the Company and 48 hours after the disclosure of such UPSI becomes the generally available information.
- (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 Equity Shares 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 Equity Shares for market abuse

5.3 The Compliance Officer shall review the Trading Plan to assess whether the Plan would have any potential for violation of the Regulations and this Code and shall be entitled to seek such express undertakings, as may be necessary and enable to approve and monitor the implementation of the Plan.

5.4 The Trading Plan once approved shall be irrevocable and the Designated Person shall mandatorily have to implement the Plan, without being entitled to either deviate from it or to execute any trade in Equity Shares outside the scope of the Trading Plan. However, the implementation of the Trading Plan shall not be commenced, if at the time of execution of the Plan the Designated Person is in possession of any UPSI and the said information has not become 'generally available information'. The commencement of the Trading Plan shall be deferred until such UPSI becomes the generally available information.

Further, the Designated Persons shall also not be allowed to deal in Equity Shares, if the date of trading in Equity Shares as per the approved Trading Plans, coincide with the date of closure of Trading Window announced by the Compliance Officer.

5.5 Upon approval of the Trading Plan, the Compliance Officer shall notify the plan to the

Stock Exchanges.

6. Pre-clearance of trades

- 6.1 When the Trading Window is open, trading by Designated Person shall be subject to preclearance by the Compliance Officer, if the value of the proposed trades is above Rs.5,00,000 or above 2000 equity shares of the Company whichever is less. For this purpose, the value of trades/ number of shares proposed within a block of 7 trading days shall be clubbed together.
- 6.2 No Designated Person shall apply for pre-clearance of any proposed trade if he/she is in possession of unpublished price sensitive information even if the trading window is not closed.
- 6.3 An application may be made in the Form (appended), to the Compliance Officer indicating the estimated number of securities that the Designated Person intends to deal in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by the Company in this behalf.
- 6.4 An undertaking shall be executed by such Designated Person in favour of the Company incorporating, inter alia, the following clauses:
- a. the Designated Person does not have any access or has not received unpublished price sensitive information upto the time of signing the undertaking.
 - b. in case the Designated Person has access to or receives unpublished price sensitive information after the signing of the undertaking but before the execution of the transaction he/she shall inform the Compliance Officer of the change in his position and that he/ she would completely refrain from dealing in the securities of the Company till the time such information becomes generally available.
 - c. he/she has not contravened the Code of Conduct.
 - d. he/she has made a full and true disclosure in the matter
- 6.5 Prior to approving any pre-clearance of trades, the Compliance Officer shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.
- 6.6 The Compliance Officer shall confidentially maintain a list of such securities as a "restricted list" which shall be used as the basis for approving or rejecting applications for preclearance of trades.

6.7 Designated Persons shall execute the trades which have been pre-cleared within seven trading days of the pre-clearance. Failing which, fresh pre-clearance would be needed for the trades to be executed

6.8 A Designated Person who is permitted to trade shall not execute a contra trade within six months of any trade. The Compliance Officer is empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate these regulations. Should a contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the SEBI for credit to the Investor Protection and Education Fund administered by the SEBI under the SEBI Act.

7. Reporting requirements for transactions in securities

7.1 All Designated Persons of the Company shall forward the following details of their Securities transactions including the statement of dependent family members to the Compliance Officer.

- a. All holdings in securities of the Company by newly employed Designated Persons at the time of joining the Company.
- b. In respect of existing Designated Person, all holdings in securities of the Company as on 16th May 2015, i.e the date of the coming into force of the SEBI (Prohibition of Insider Trading) Regulations 2015.
- c. Statement of any transactions in securities of the Company irrespective of whether pre-clearance of trade was obtained or not, on a quarterly basis within 15 days from the end of each quarter and
- d. Annual statement of all holdings in securities of the Company as on 31st March of each year; before 30th April of that year.

7.2 Every Designated Person shall disclose to the Company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of ten lakh rupees or such other value as may be specified by SEBI from time to time.

7.3 The Compliance Officer shall maintain records of all the declarations in the appropriate form given by Designated Person for a minimum period of three years.

- 7.4 The Compliance Officer shall submit a report on dealing in the securities of the Company under the pre-dealing procedure as envisaged in this Code of Conduct, in such a frequency as may be prescribed by the Board.
8. **Penalty for contravention of the Code of Conduct**
- 8.1 Any Designated Person contravening the Code of Conduct shall be subject to disciplinary action, which may include non-payment of remuneration, wage freeze, suspension, ineligibility for future participation in employee stock option plans, etc.
- 8.2 Such action may be taken by the Board of directors of the Company or any committee of the board authorised in this behalf and after giving due opportunity to such Designated Person.
- 8.3 Any action by the Company shall not preclude SEB from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations 2015.
- 8.4 In case it is observed by the Company/Compliance Officer that there has been a violation of SEBI (Prohibition of Insider Trading) Regulations, 2015 SEBI shall be informed accordingly.

FORM I
FORMAT FOR MAKING APPLICATION FOR PRE-CLEARANCE OF TRADE AS PER THE TERMS
OF THE CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS
OF THE COMPANY READ WITH SEBI (PROHIBITION OF INSIDER TRADING) REG, 2015

The Compliance Officer
India Nippon Electricals Ltd
11 & 13, Pattulos Road
Chennai-600002

Dear Sir,

Sub: **Application for pre-dealing approval in equity shares / securities of the company in terms of the code of conduct to regulate, monitor and report trading by insiders of the company read with applicable provisions of the SEBI (Prohibition of Insider Trading Regulations) 2015**

Pursuance to the SEBI (Prohibition of Insider Trading) Regulations 2015 and the Code, I seek your approval for purchase / sale / subscription of the equity shares / securities of the company as per the details given below:

SNo.	Description	Particulars
1.	Name of the applicant and PAN	
2.	Designation	
3.	Number and value of equity shares / securities of the company held as on date	
4.	Nature of equity shares / securities held	<ul style="list-style-type: none">• Equity shares / debentures / securities
5.	Mode in which the equity shares / securities are held	<ul style="list-style-type: none">• Physical / dematerialized
6.	The proposal is for himself / herself through his / her immediate relatives	<ul style="list-style-type: none">• Acquisition in the open market• Subscription to the equity shares / securities• Sale of equity shares / securities
7.	Proposed date of dealing in equity shares / securities	
8.	Nature of proposed dealing	<ul style="list-style-type: none">• Purchase / sale of equity shares / securities
9.	Estimated number of equity shares / securities proposed to be acquired / subscribed / sold	
10.	Price at which the transaction is proposed	
11.	Current market price (as on the date of application)	

12.	Whether the proposed transaction to be through stock exchange or off market deal	
13.	Proposed mode of dealing in equity shares / securities	Physical / dematerialised
14.	If the equity shares / securities are held / proposed to be dealt in dematerialized form	
	Name of the depository	
	Client id number	

I / we hereby declare that I /we shall execute my / our order in respect of equity shares / securities of the company within one week after the approval of pre-clearance is given. If the order is not executed within one week after the approval is given, I undertake to obtain pre-clearance for the transaction again.

I / we attach herewith the Form of undertaking signed by me/ us.

Signature : Date :
Designation : Place :

- Strike whichever is not applicable

FORM II

FORMAT OF UNDERTAKING TO BE EXECUTED BY DESIGNATED PERSONS FOR TRADES AS PER THE TERMS OF THE CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS OF THE COMPANY READ WITH SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015

This undertaking is executed on this _____ day of _____ with reference to my application for the pre-clearance of trade in the Equity Shares / Securities of INDIA NIPPON ELECTRICALS LIMITED, hereinafter called "Company"

I, _____ of the

Company, residing at No. _____ Am desirous of dealing in _____(no. of equity shares) Shares of the Company as mentioned in my / our application dated _____ for pre-clearance of the transactions and do hereby give an undertaking in favour of M/s INDIA NIPPON ELECTRICALS LIMITED situated at 11 & 13, Pattulos Road, Chennai-600002.

I further declare that I am not / my immediate relatives are not in possession of or otherwise privy to any 'Unpublished Price Sensitive Information' or UPSI(as defined in the Code of conduct to regulate, monitor and report trading by insiders of the Company (the Code) read with SEBI(Prohibition Of Insider Trading) Regulations, 2015 upto the timing of this Undertaking.

- (1) THAT I have received and read the Company's Code Of Conduct to regulate, monitor and report trading by Insiders of the Company;
- (2) THAT as on the date I do not possess/own any Equity Shares / Securities of the Company or I have purchased _____ no of Equity Shares / Securities of the Company from Open Market / Off Market.

- (3) THAT I/ my immediate relatives neither have access to nor received any 'UPSI' in respect of the Equity Shares / Securities of the Company upto the time of signing this Undertaking;
- (3) That I / my immediate relatives neither have access to nor received any UPSI in respect of the equity shares / securities of the company upto the time of signing this undertaking;
- (4) That I /my immediate relatives would refrain from dealing in the Company's equity shares / securities if I / my relatives gained access to or receive any UPSI, after the date of signing this undertaking but before the execution of transaction, till such time the information becomes the general available information;
- (5) THAT I / my immediate relatives have never contravened the stipulations laid down in the Code of Conduct to regulate, monitor and report Trading By Insiders notified by the Company for prevention of insider trading, from time to time;
- (6) THAT I / my immediate relatives undertake to submit that necessary report within two trading days of execution of the transaction / a 'nil' report, if the transaction is not undertaken. If approval is granted, I/ my immediate relatives shall execute the deal within 7 days of the receipt of approval failing which I/ my immediate relatives shall seek pre-clearance.

THAT to the best of my knowledge, I / my immediate relatives have made complete and full disclosure of my / my immediate relatives dealing in Equity Shares / Securities of the Company, from time to time;

Date

Place

Signature

This Undertaking is required to be given by any Designated Person when he/she intends to deal in shares of the Company, in excess of the threshold limit, along with the application for pre-clearance.

FORM III

**PRE-DEALING APPROVAL AS PER THE TERMS OF THE CODE OF CONDUCT TO
REGULATE, MONITOR AND REPORT TRADING BY INSIDERS OF THE COMPANY READ
WITH SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015**

To
The Compliance Officer
India Nippon Electricals Ltd
11 & 13 Pattulos Road
Chennai-600002

Date

Application for pre-dealing approval – your application dt.

With reference to your application seeking approval for undertaking certain transactions in the Equity Shares / Securities of the Company detailed therein, please be informed that you are hereby authorized to undertake the transaction(s) as detailed in your said application.

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 days). If you do not execute the approval transaction / deal on or before this date you would have to seek fresh pre-dealing approval before any transaction/deal in the Securities of the Company. Further, you are required to file the details of the executed transactions in the attached format within two trading (2) days from the date of transaction / deal. In case, the transaction is not undertaken a "Nil" report shall be necessary.

Yours faithfully
For India Nippon Electricals Ltd

Compliance Officer

FORM IV

**FORMAT FOR DISCLOSURE OF PRE-APPROVED TRANSACTIONS AS PER THE TERMS OF THE CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS OF THE COMPANY READ WITH SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015
(To be submitted within 2 days of transaction/trading in Equity Shares / Securities of the company)**

Date:

To
The Compliance Officer
India Nippon Electricals Ltd
11 & 13 Pattulos Road
Chennai-600002

Dear Sir

DETAILS OF PRE-APPROVED TRANSACTION

Ref: Your approval letter dated _____ I hereby
inform you that I have –

- * not bought/sold/subscribed any securities of the Company;
- * bought / sold / subscribed to the Equity Shares / Securities of the Company as mentioned below:

Name of holder	First or joint holder	No . of shares dealt with	Bought/ sold/ subscribed / date of transaction	DP id/ Client id/ or folio no.	Price (Rs.) per share

In connection with the aforesaid transactions, I hereby undertake to preserve, for a period of three years and produce to the Compliance Officer/SEBI any one 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 agree I shall not enter into any opposite transactions, i.e. sell or buy any number of shares during the next six months*. In case, there is any urgent need to sell these Securities within the said period, I shall approach the Compliance Officer for necessary approval (applicable in case of purchase / subscription)

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

Yours truly,
Signature :
Name :

Designation :
Emp. No. :
Dep/ Div No. :

FORM V

FORMAT FOR GIVING THE STATEMENT OF HOLDINGS IN EQUITY SHARES / SECURITIES OF THE COMPANY BY ALL DESIGNATED PERSONS - ANNUALLY - AS PER THE TERMS OF THE CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS OF THE COMPANY READ WITH SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015

To The Compliance Officer India Nippon Electricals Ltd 11 & 13, Pattulos Road Chennai-600002	
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Re.:	ANNUAL DISCLOSURE FOR THE FINANCIAL YEAR ENDED - AS PER THE TERMS OF THE CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS OF THE COMPANY READ WITH SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015
I along with my 'immediate relatives' hold the Equity Shares / Securities of the Company, the details whereof are as follows:	

S no.	Description	Particulars
1	Name of the person & designation	:
2	Permanent Account Number (PAN)	:
3	No. of equity shares / securities held as on (end of the year)	:
4.	Folio number and nature of holding	:
5	Source of acquiring the equity shares / securities	:
6	Details of equity shares / securities dealt by the Applicant including their immediate relatives during the year ended	:
	Date of dealing	
	Nature of dealing	
	Number of Equity Shares/ Securities	
	Price paid per Equity Share / Securities	
	Source of Acquiring the Equity shares / Securities	
	Mode of disposal of equity shares / securities	
7	Was pre clearance obtained for the above acquisition?	
8	Date of obtaining pre clearance	

9	Was the order for dealing in shares executed within one week of preclearance of trades?		
10.	If not, whether a fresh preclearance obtained? If so, the date of subsequent preclearance		
11	Details of immediate relatives' shareholding*		
Name of the relatives	Nature of relationship	Folio no.	** no. of shares held as on (end of the quarter)
			Physical

I/We declare that the above details are true, correct and complete in all respects.

Date:

Signature:

Place:

- * "Immediate Relative" shall mean the Directors' / Designated Persons' spouse and includes parent, sibling and children of such Director / Designated Employee, any of whom is either dependent financially or consults such person in taking decisions relating to trading in Equity Shares / Securities;
- ** Equity shares of Rs.5/- each, fully paid-up.

FORM VI

FORMAT FOR MAKING APPLICATION FOR TRADING PLAN AS PER THE TERMS OF THE CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS OF THE COMPANY READ WITH SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015

To
The Compliance Officer
India Nippon Electricals Ltd
11 & 13 Pattulos Road
Chennai-600002

Dear Sir/Madam

Sub: Application for Trading Plan in Equity Shares / Securities of the Company in terms of the Code of conduct to regulate, monitor and report trading by insiders of the Company and of the SEBI (Prohibition of Insider Trading Regulations) 2015 /

Ref.: DP's name :
DP id :
Client id :
Name of the Insider :

I wish to seek your approval in terms of the Code of conduct to regulate, monitor and report trading by insiders of the Company and of the SEBI (Prohibition of Insider Trading Regulations) 2015 for the proposed 'Trading Plan' for purchase and sale of Equity Shares / Securities of the Company in physical / demat form.

Sno.	Nature of trade	No. of equity shares / securities to be traded	Time intervals between the two trades	Date of the proposed trade

I confirm and declare:-

(i)	that I do not have access to the 'Unpublished Price Sensitive information' (UPSI) and also have not received any UPSI till today
(ii)	that, in case, I have access to any 'confidential information' related to UPSI or receive any confidential information to relate to UPSI or after approving the Trading Plan I shall inform the change and refrain from dealing in Equity Shares / Securities till the UPSI becomes public;
(iii)	that I have not contravened the terms of the Code of conduct to regulate, monitor and report trading by insiders of the Company and of the SEBI (Prohibition of Insider Trading Regulations) 2015
(iv)	that whatever is stated above is true and correct to the best of knowledge and nothing has been omitted or concealed.

Signature :

Date:

Name :

Designation :

Emp. No. :

Dep/ Div No. :

Nature of relationship

Place

Date

* Strike whichever is not applicable

APPROVAL OF TRADING PLAN

- (1) I, _____, Compliance Officer of the Company, have reviewed the Trading Plan submitted by the Designated Persons has furnished all the information / undertaking which I have demanded.
- (2) The aforesaid Trading Plan is not violating any of the terms of the Code of Conduct To Regulate, Monitor And Report Trading by Insiders of the Company read with SEBI(Prohibition Of Insider Trading) Regulations, 2015.
- (3) I shall monitor the implementation of the aforesaid Plan.

For India Nippon Electricals Ltd

Compliance Officer

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

Name of the company: **India Nippon Electricals Limited.**

ISIN of the company: **INE092B01025**

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

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relatives/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding	Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option Contracts held as on the date of regulation coming into force		
		Type of security (For eg. – shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms	
1	2	3	4	5	6	7			
		Shares							

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

Please note that none of my immediate relatives including spouse, parents, sibling and child and any other person who is either dependent financially, or consults in taking decisions relating to trading in securities, holds any shares in the company viz., India Nippon Electricals Ltd.

Name & Signature:

Date:

Designation:

Place:

FORM B

FORMAT FOR DISCLOSURE OF EQUITY SHARES / SECURITIES AS PER THE APPLICABLE PROVISIONS OF SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015 ON APPOINTMENT OF KEY MANAGERIAL PERSONNEL (KMP) OR DIRECTOR OR UPON BECOMING A PROMOTER {Regulation 7(1)(b) read with Regulation 6(2)}

Name of the company		India Nippon Electricals Limited		
ISIN of the company		INE092B01025		
Details of Securities held on appointment of Key Managerial Personnel) or Director or upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation 6(2)				
SNo.	Particulars	Details		
1.	Name, PAN, CIN / DIN & address with contact Nos.			
2.	Category of Person (Promoter/ KMP/ Directors / immediate relatives / others)			
3.	Date of appointment of Directors/ KMP / or date of becoming promoter			
4.	Securities held at the time of becoming Promoter / appointment of Director / KMP	Type of security	Folio no.	No. of shares
		Equity		
5.	Percentage of Shareholding			
6.	Open Interest of the Future contracts held at the time of becoming Promoter / appointment of Director / KMP	No. of units (contract lot size)	Notional value in rupee terms	
7.	Open interest of the Option Contracts held at the time of becoming Promoter / appointment of Director / KMP	No. of units (contract lot size)	Notional value in rupee terms	

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

Signature :

Designation :

Date :

Place :

FORM C
FORMAT FOR DISCLOSURE OF EQUITY SHARES / SECURITIES AS PER THE APPLICABLE PROVISIONS OF SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015 ON CHANGE IN HOLDING OF SECURITIES OF PROMOTER, EMPLOYEE OR DIRECTOR
{Regulation 7(2) read with Regulation 6(2)}

Name of the company		India Nippon Electricals Limited				
ISIN of the company		INE092B01025				
Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2)						
SNo.	Particulars	Details				
1.	Name, PAN, CIN / DIN & address with contact Nos. of Promoter / Employee / Director					
2.	Category of Person (Promoters / KMP / Directors / immediate relatives / others)					
3.	Securities held prior to acquisition / disposal	Type of security	Folio no.	No. of shares		
		Equity				
4.	Securities acquired / disposed	Type of security	Folio no.	No. of shares		
		Equity				
5.	Percentage of Shareholding	Pre-transaction	Post transaction			
6.	Date of allotment advice / acquisition of shares / sale of shares specify	From	To			
7.	Date of intimation to company					
8.	Mode of acquisition (Market purchase / public rights / preferential offer / off market / inter-se transfer)					
9.	Trading in derivatives (specify type of contract, futures of options etc)	Buy		Sell		
		Value	No. of units (contracts lot size)	Value	No. of units (contracts lot size)	
10.	Exchange on which the trade was executed					

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

Signature : Date :
Designation : Place :

FORM D

FORMAT FOR DISCLOSURE OF EQUITY SHARES / SECURITIES AS PER THE APPLICABLE PROVISIONS OF SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015 BY OTHER CONNECTED PERSONS (Regulation 7(3)-Transactions by Other Connected persons as identified by the company)

Name of the company		India Nippon Electricals Limited				
ISIN of the company		INE092B01025				
Transactions by Other Connected persons as identified by the company						
SNo.	Particulars	Details				
1.	Name, PAN, CIN / DIN & address with contact Nos. of connected persons as identified by the company					
2.	Connection with company					
3.	Securities held prior to acquisition / disposal	Type of security	Folio no.	No. of shares		
		Equity				
4.	Securities acquired / disposed	Type of security	Folio no.	No. of shares		
		Equity				
5.	Percentage of Shareholding	Pre-transaction	Post transaction			
6.	Date of allotment advice / acquisition of shares / sale of shares specify	From	To			
7.	Date of intimation to company					
8.	Mode of acquisition (Market purchase / public rights / preferential offer / off market / inter-se transfer					
9.	Trading in derivatives (specify type of contract, futures of options etc)	Buy		Sell		
		Value	No. of units (contracts lot size)	Value	No. of units (contracts lot size)	
10.	Exchange on which the trade was executed					

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

Signature : Date :
 Designation : Place :