

**CODE OF CONDUCT FOR REGULATING, MONITORING
AND
REPORTING OF TRADING BY INSIDERS
OF
SHOQUBA REALTY PRIVATE LIMITED**

Date: February 11, 2025

INTRODUCTION

In accordance with the Insider Trading Regulations, the Board, has adopted this code of conduct for regulating, monitoring and reporting of trading by Insiders (the “**Code**”).

1. APPLICABILITY

This Code shall be applicable to Connected Persons, Insiders, the Designated Persons and their Immediate Relatives, and includes any person in the possession of Unpublished Price Sensitive Information.

2. DEFINITIONS

- (i). “**Act**” means the Securities and Exchange Board of India Act, 1992.
- (ii). “**Board**” means the board of directors of the Company.
- (iii). “**Code**” shall mean this code of internal procedures and conduct for regulating, monitoring and reporting of trading by insiders as amended from time to time.
- (iv). “**Company**” means Shoquba Realty Private Limited.
- (v). “**Compliance Officer**” for the purpose of this Code shall mean the Company Secretary of the Company or in his absence, means any senior officer designated so and reporting to the Board, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under the Insider Trading Regulations, and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules of preservation of Unpublished Price Sensitive Information, monitoring of trades and the implementation of the codes specified under the Insider Trading Regulations under the overall supervision of the Board.
- (vi). “**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himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to Unpublished Price Sensitive Information or is reasonably expected to allow such access.
 - b) 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,

- An Immediate Relative of Connected Persons specified in clause (a); or
- A holding company or associate company or subsidiary company, if any; or
- An intermediary as specified in Section 12 of the Securities and Exchange Board of India Act, 1992, as amended or an employee or director thereof; or
- An investment company, trustee company, asset management company or an employee or director thereof; or
- An official of a stock exchange or of clearing house or corporation; or
- 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
- 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, as amended; or
- An official and/or employee of a self-regulatory organization recognized or authorized by the Board;
- A banker of the Company; or
- 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; or.
- a firm or its partner or its employee in which a connected person is also a partner; or
- a person sharing household or residence with a connected person.

(vii). **“Dealing in Securities”** means an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or otherwise deal in the securities of the Company either as a principal or an agent.

(viii). **“Designated Person(s)”** shall include:

- a) Promoters;
- b) Directors;
- c) Key Managerial Personnel
- d) Head of all Functions (HOFs);
- e) Head of all Department (HODs);
- f) All employees up to two levels below Managing Director or person occupying such other equivalent position;
- g) every employee in the Finance, Accounts, Corporate Communication, Corporate Secretarial, Legal, Information Technology, Commercial Department as may be determined and informed by the Compliance Officer;
- h) any other employee as may be determined and informed by the Compliance Officer from time to time, with the approval of Managing Director.

(ix). **“Director”** means a member of the Board of Directors of the Company;

(x). **“Employee”** means every employee of the Company including the directors in the

employment of the Company.

- (xi). **“Generally available Information”** means information that is accessible to the public on a non- discriminatory basis.
- (xii). **“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.
- (xiii). **“Insider”** means any person who is:
 - a) a Connected Person; or
 - b) in possession of or having access to Unpublished Price Sensitive Information.
- (xiv). **“Insider Trading Regulations”** means the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended.
- (xv). **“Securities”** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956, as amended except units of a mutual fund.
- (xvi). **“Trading”** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and “trade” shall be construed accordingly.
- (xvii). **“Trading Day”** means a day on which the recognized stock exchanges are open for trading;
- (xviii). **“Trading Plan”** shall mean a plan for trades to be executed in the future by persons who have perpetual access to the UPSI.
- (xix). **“Trading Window”** shall mean the window available for trading in the securities of the Company.
- (xx). **“Unpublished Price Sensitive Information”** shall have the meaning assigned to it under the Insider Trading Regulations.

3. ROLE OF COMPLIANCE OFFICER

The Company Secretary nominated by the Board of Directors or such other senior officer, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations.

The Compliance Officer shall:

- be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of Unpublished Price Sensitive information; pre-clearing of trades by Designated Employees’ and their dependents; and

monitoring of trades and the implementation of this Code of Conduct under the overall supervision of the Managing Director of the Company. He shall work under the direct control, direction and superintendence of the Managing Director and he shall accordingly report to him.

- report on insider trading to the Board of the Company and in particular, shall provide reports to the Chairman of the Board at least once in a year.
- be entitled to seek declaration to the effect that the applicant for pre-clearance is not in possession of any UPSI prior to approving any trade.
- assist all employees in addressing any queries or seeking clarifications in relation to the PIT Regulations and the Company's Code of Conduct.
- maintain Database of the Designated Persons and any changes made therein, disclosures and such other records, as required under this Code.
- responsible for the implementation of Code Practice and Procedure for Fair Disclosure and this Code of Conduct.
- review and approve trading plan, in consultation with the Managing Director, and seek express undertaking with respect to the trading plan confirming that the Trading Plan does not or would not violate any regulation of the PIT Regulations.
- notify trading plan to the Stock Exchanges where the securities of the Company are listed.
- maintain, disclosures made by the Designated Persons for a period of five years.
- promptly report to the stock exchanges regarding violation of the regulations.

4. PRESERVATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION

- (i). All information shall be handled within the Company on a need-to-know basis and no Insider shall communicate, provide or allow access to any Unpublished Price Sensitive Information, relating to the Company or the Securities proposed to be listed, to any person including other Insiders except where such communication is in furtherance of the legitimate purposes, performance of duties or discharge of his legal obligations.
- (ii). No person shall procure from or cause the communication by any Insider of Unpublished Price Sensitive Information, relating to a Company or Securities listed or proposed to be listed, except in furtherance of the legitimate purposes, performance of duties or discharge of his legal obligations. For purposes of the Code, 'legitimate purposes' 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 shall not be carried out to evade or circumvent the prohibitions of the Insider Trading Regulations in accordance with the determination made under the Code Of Practices And Procedures For Fair Disclosure Of Unpublished Price Sensitive Information.
- (iii). For the purposes of this Code, "need to know" shall mean:
 - a) 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 a conflict of interest or appearance of misuse of the information; or

- b) that all information that is not Generally Available, if directly received by any Employee should immediately be reported to the head of the department.
- (iv). There shall be limited access to confidential information. Files containing confidential information shall be kept secure. Computer files shall have adequate security of login, password and firewall protection.
- (v). Designated Persons in the Company shall be governed by this Code.
- (vi). Chinese Walls:
 - a) *Identification of Inside Areas and Public Areas*: To prevent the misuse of confidential information the Company shall establish procedures and processes which separate/demarcate those areas of the Company which routinely have access to Unpublished Price Sensitive Information, considered “*Inside Areas*” from other departments providing support services, considered “*Public Areas*”.
 - b) The Designated Persons in an Inside Area shall not communicate any Unpublished Price Sensitive Information to any one in Public Area.
 - c) Even on a particular side of the Chinese Wall, Unpublished Price Sensitive Information may not be shared among Designated Persons or any other recipient of such information, except on a need-to-know basis.
 - d) In exceptional circumstances persons from Public Areas may be brought “*over the wall*” and given confidential information strictly on “need-to-know basis”. Upon the transmission of Unpublished Price Sensitive Information in the foregoing manner, the relevant person from the public area, if not already a Designated Person, will be deemed to be a Designated Person and shall become bound by this Code of Conduct.
 - e) *Crossing the Chinese Wall*: To complete or assist in a particular mandate or assignment of an Inside Area of the Chinese Wall, assistance of Designated Persons in the Public Area may be required for discussion on or as a part of a team for such mandate or assignment. In such an instance, the Designated Persons in the Public Area would be considered as having “*Crossed the Chinese Wall*” and have come on the Inside Area of the Chinese Wall, only during the duration of the mandate/assignment. Approval of the Head of the concerned business must be obtained to Cross the Chinese Wall and such precautions taken, as may be stipulated. Such “*crossing of Chinese Wall*” should be reported to the Compliance Officer for his records.
 - f) *Responsibilities post Crossing of the Wall*: While any Designated Persons from the Public Area is in the Inside Area after having crossed the Chinese Wall, he shall

strictly maintain the confidentiality of the transaction or UPSI and will be subject to general principles governing confidentiality and the handling and use of Unpublished Price Sensitive Information.

- g) Persons crossing the Chinese Wall shall be provided with only such information as is reasonably necessary and appropriate for him to accomplish the purpose for which the Chinese Wall is crossed from the Public Area to the Inside Area.

5. TRADING PLANS

- (i). An Insider shall be entitled to formulate a trading plan and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.
- (ii). Trading plans shall:
 - a) not entail commencement of trading on behalf of the Insider earlier than six months from the public disclosure of the plan;
 - b) not entail trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced by the Issuer of the Securities and the second trading day after the disclosure of such financial results;
 - c) entail trading for a period of not less than twelve months;
 - d) not entail overlap of any period for which another trading plan is already in existence;
 - e) set out either the value of trades to be affected 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 affected; and
 - f) not entail trading in securities for market abuse.
- (iii). The Compliance Officer shall review the trading plan made as above and shall assess whether the plan would have any potential for violation of the Insider Trading Regulations. He shall be entitled to take express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per provisions of the Insider Trading Regulations.

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

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

- (iv). The trading plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.

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 Unpublished Price Sensitive Information and the said information has not become generally available at the time of the commencement of implementation. The commencement of a trading plan shall be deferred until such Unpublished Price Sensitive Information becomes generally available information. Further, the Insider shall also not be allowed to deal in securities of the Company, if the date of trading in securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.

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

6. TRADING WINDOW AND WINDOW CLOSURE

- (i). a) Trading window shall mean a notional trading window which shall be used as an instrument of monitoring trading by Designated Persons.
 - b) 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.
 - c) When the trading window is closed, the Designated Persons and their Immediate Relatives shall not Deal in Securities of the Company. Trading restriction period shall be made applicable from the end of every quarter till 48 hours after the declaration of financial results.
 - d) All Designated Persons and their Immediate Relatives shall conduct their dealings in the securities of the Company only in a valid trading window and shall not deal in any transaction involving the purchase or sale of the Company's Securities during the periods when the trading window is closed, as referred to in clause (c) above or during any other period as may be specified by the Company from time to time.
- (ii). The Compliance Officer shall intimate the closure of trading window to all the Designated Persons of the Company.
 - (iii). The Compliance Officer after considering various factors including the Unpublished Price Sensitive Information in question becoming generally available and being capable of assimilation by the market, shall decide the timing for re-opening of the trading window. In any event such re-opening shall not be earlier than forty-eight hours after

the information becomes generally available.

7. PRE-CLEARANCES OF TRADE

When the trading window is open, the trading by designated persons and their relatives shall be subject to pre-clearance by the Compliance Officer, if the value of the proposed trade or cumulative trade, whether in one transaction or a series of transactions, over any calendar quarter, aggregates to a traded value in excess of Rs. 10 Lakhs (market value).

The pre-clearance procedure shall be as hereunder:

- a) An application may be made in the prescribed Form I and Form IA 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 any rule made by the Company in this behalf.
- b) The Compliance Officer may seek declaration from the applicant (s) as per “Annexure II” to the effect that the applicant (s) is/are not in possession of UPSI.
- c) All Designated Persons and their Immediate Relatives shall execute their trade in respect of Securities of the Company within seven Trading Days after the approval of pre-clearance is given. The Designated Person shall file within two Trading Days of the execution of the deal, the details of such deal with the Compliance Officer in the prescribed Form B. In case the transaction is not undertaken, a report to that effect shall be filed in the prescribed Form II.
- d) If the order is not executed within seven Trading Days after the approval is given, the employee/ director must seek fresh pre-clearance of the transaction.
- e) The designated person and their relatives who are permitted to trade by the Compliance Officer by way of written clearance, shall not execute contra trade at least for a period of 6 (six) months from the date of trade(s) executed by the applicant(s) which have been pre-cleared. However, Compliance Officer may grant relaxation from strict application from above restriction provided that reasons for such relaxation granted shall be recorded in writing in the prescribed Form III and such relaxation shall not violate the regulations.
- f) No Designated Persons shall apply for pre-clearance of any proposed Trade by such Designated Person or his/her Immediate Relative, if such Designated Person or his/her Immediate Relative is in possession of Unpublished Price Sensitive Information even if the trading window is not closed.
- g) **Internal Control**
 - i. The Compliance Officer or director or such other analogous person of the Company shall put in place adequate and effective system of internal controls to

ensure compliance with the requirements given in Insider Trading Regulations to prevent insider trading. Further, the Board is to ensure that the requirements are met by such persons under the Insider Trading Regulations.

ii. The internal controls shall include the following:

- Designated Persons;
- all the Unpublished Price Sensitive Information shall be identified and its confidentiality shall be maintained as per the requirements of the Insider Trading Regulations;
- adequate restrictions shall be placed on communication or procurement of Unpublished Price Sensitive Information as required by the Insider Trading Regulations;
- lists of all employees and other persons with whom Unpublished Price Sensitive Information is shared shall be maintained and confidentiality agreements shall be signed or notice shall be served to all such employees and persons;
- all other relevant requirements specified under the Insider Trading Regulations shall be complied with;
- periodic process review to evaluate effectiveness of such internal controls.

8. REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES

Initial Disclosure

- (i). Every person on appointment as a Key Managerial Personnel or a director of the Company or upon becoming a Promoter member of the Promoter Group shall disclose his holding of Securities of the Company as on the date of appointment or becoming a Promoter, to the Company within seven days of such appointment or becoming a promoter in the prescribed Form A.

Continual Disclosure

- (ii). Every Promoter, member of the Promoter Group, Employee and director of the Company shall disclose to the Company the number of such Securities acquired or disposed of within two Trading Days of such transaction if the value of the Securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value more than Rs. 10 lakhs.

The disclosure shall be made within two trading days of:

- a) the receipt of intimation of allotment of Securities; or
- b) the acquisition or sale of Securities or voting rights as the case may be.

- (iii). Every Insider shall disclose to the Company the number of such Securities acquired or disposed through an off-market inter-se transaction within two Trading Days of such transaction.

Disclosure by the Company to the Stock Exchange(s)

- (iv). Within two Trading Days of the receipt of intimation under Clause 10 (iii) or Clause 10 (iv), the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received.
- (v). The Compliance Officer shall maintain records of all the declarations in the appropriate form given by the directors / officers / Designated Persons for a minimum period of five years.

9. REPORTING REQUIREMENTS FOR DESIGNATED PERSONS

a) Annual Disclosure:

The Designated Persons shall disclose on an annual basis, and as and when the information changes, following information of their immediate relatives and the persons with whom such designated person(s) shares a material financial relationship:

- Names
- Permanent Account Number
- Phone, mobile and cell numbers which are used by them

NOTE: The term 'material financial relationship' shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift from a designated person during the immediately preceding 12 months, equivalent to at least 25% of the annual income of such designated person but shall exclude relationships in which the payment is based on arm's length transactions.

b) One-time disclosure:

The Designated Persons shall disclose to the Company the names of the educational institutions from which designated persons graduated and the names of their past employers on a one-time basis.

10. DISSEMINATION OF PRICE SENSITIVE INFORMATION

- (i). No information shall be passed by Designated Persons by way of making a recommendation for the purchase or sale of Securities of the Company.

Where disclosure of Unpublished Price Sensitive Information is required to be made to any person in the course of a transaction, such disclosure shall be made

on a “need to know” basis. Any such disclosure shall be made in accordance with the Insider Trading Regulations.

The following process shall be followed in bringing persons to whom Unpublished Price Sensitive Information is disclosed as ‘insiders’:

- a) All such persons shall be required to enter into agreements to contract confidentiality and non-disclosure obligations, in accordance with regulation 3(4) of the Insider Trading Regulations;
- b) The Compliance Officer shall explain to all such persons the obligations and consequences of breach of obligations set out in the Insider Trading Regulations.
- c) The Compliance Officer shall maintain a list of all persons brought in as ‘insiders’ pursuant to this Code.

11. PENALTY FOR CONTRAVENTION OF THE CODE OF CONDUCT

- (i). Every Designated Person shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her dependents).
- (ii). Any Designated Person who trades in securities or communicates any information for trading in Securities, in contravention of this Code may be penalized and appropriate action may be taken by the Company.
- (iii). Designated Persons who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, recovery, clawback, ineligibility for future participation in employee stock option plans, etc.
- (iv). The action by the Company shall not preclude the Securities and Exchange Board of India from taking any action in case of violation of the Insider Trading Regulations.
- (v). In case of the Board becoming aware of any violation by the Designated Person and immediate relatives of Designated Persons of the Insider Trading Regulation, the Board shall promptly inform the Securities and Exchange Board of India (“SEBI”) of such violation in the format prescribed by SEBI.

12. REVIEW AND AMENDMENTS

The Board reserves the power to review and amend this Code from time to time. All provisions of this Code would be subject to revision or amendment in accordance with the applicable law as may be issued by relevant statutory, governmental or regulatory authorities, from time to time. In case of any amendment(s), clarification(s),

circular(s) etc. issued by the relevant authorities are not consistent with the provisions laid down under this Code, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder.

13. ASSISTANCE

For any assistance, advice or clarification on any questions, doubts or difficulties that may arise in the interpretation of this Code, you may contact the following persons:

Sr. No.	Name & Designation	Email address
1.	Rutvi Kothari Company Secretary & Compliance officer	Rutvi.kothari@serainainvest.ch

SHOQUBA REALTY PRIVATE LIMITED
CODE OF CONDUCT FOR REGULATING, MONITORING AND REPORTING OF TRADING BY
INSIDERS

FORM – I [Refer Clause 7(i)]

APPLICATION TO DEAL IN SECURITIES OF SHOQUBA REALTY PRIVATE LIMITED

To: Compliance Officer

From: Name of the Director/ Employee :

Designation :

Employee Reference No. :

Department / Unit :

Location :

-
I hereby give notice that I propose to carry out the following transaction:

Transaction Sale / Purchase	No. of Debentures proposed to be bought/sold	DP & Client ID No (In case of Demat)

UNDERTAKING

I hereby undertake and confirm:

- a) that I do not have any access or have not received Unpublished Price Sensitive Information up to the time of signing this undertaking.
- b) that in case I obtain access to or receive any Unpublished Price Sensitive Information after the signing of this undertaking but before the execution of the transaction, I shall inform the Compliance Officer of the change in my position and that I would completely refrain from dealing in the Securities of the Company till the time such information becomes public.
- c) that I have not contravened the code of conduct for prevention of insider trading as notified by the Company from time to time.
- d) that I have made a full and true disclosure in this application.

Name
(Signature)

Date:

SHOQUBA REALTY PRIVATE LIMITED

**CODE OF CONDUCT FOR REGULATING, MONITORING AND REPORTING OF TRADING BY
INSIDERS**

FORM – II [Refer Clause 7(i) (d)]

REPORT ON REASON FOR NOT COMPLETING THE APPROVED TRANSACTION

To: Compliance Officer

From: Name of the Director / Employee :

Designation :

Employee Reference No. :

Department / Unit :

Location :

-

I hereby give reasons for not executing the approved transaction as per the following details:

Date of Pre-clearance	No. of Debentures proposed to be bought / sold	DP & Client ID No (In case of Demat)	Reasons

Name
(Signature)

Date:

SHOQUBA REALTY PRIVATE LIMITED

**CODE OF CONDUCT FOR REGULATING, MONITORING AND REPORTING OF TRADING
BY INSIDERS**

FORM – IA [Refer Clause 7(i)]

LIST OF RELATIVES/IMMEDIATE RELATIVES

1. Spouse _____
2. Father (Including step-father) _____
3. Mother (Including step-mother) _____
4. Son's (Including step-son) _____
5. Son's wife _____
6. Daughter _____
7. Daughter's husband _____
8. Brother's (Including step-brother) _____
9. Sister (Including step-sister) _____
10. If you are member of Hindu Undivided _____

Date:

Name
(Signature)

SHOQUBA REALTY PRIVATE LIMITED

**CODE OF CONDUCT FOR REGULATING, MONITORING AND REPORTING OF TRADING
BY INSIDERS**

FORM - III [Refer Clause 7(i)(h)]

APPLICATION FOR WAIVER OF MINIMUM HOLDING PERIOD

To: Compliance Officer :
From: Name of the Director/ Employee :
Designation :
Employee Reference No. :
Department / Unit :
Location :

Through: Department Head

Dear Sir,

I request you to grant me waiver of the minimum holding period as required under the Company's code of conduct for regulating, monitoring and reporting of trading by Insiders, with respect to debentures of the Company held by me/ (name of family dependent)/jointly acquired by me on_____(date). I desire to deal in the said debentures because of the under-mentioned emergency [mention reasons in brief along with supporting documents]

Thanking you

Your faithfully,
Name

(Signature)

Date:

SHOQUBA REALTY PRIVATE LIMITED
CODE OF CONDUCT FOR REGULATING, MONITORING AND REPORTING OF TRADING
BY INSIDERS

FORM - IV [Refer Clause 10(i)]
DISCLOSURE OF HOLDINGS IN SECURITIES OF SHOQUBA REALTY PRIVATE LIMITED BY
DIRECTORS / DESIGNATED PERSONS

Date: _____

To: Compliance Officer :
From: Name of the Director / Employee :
Designation :
Employee Reference No. :
Department / Unit :
Location :

**I. DETAILS OF HOLDINGS BY DIRECTOR/DESIGNATED PERSON IN HIS OWN NAME
(WHETHER SINGLY OR JOINTLY)**

All holdings in Securities of Shoquba Realty Private Limited as on March 31, 20__.

Securities held at March 31, 20__	Value in ₹	Folio No./DP ID / Client ID

**II. DETAILS OF DEALINGS & HOLDINGS BY IMMEDIATE RELATIVE(S) (WHETHER
SINGLY OR JOINTLY)**

Securities held at March 31, 20__	Value in ₹	Folio No./DP ID & /Client ID

I declare that I have complied with the provisions of the Regulations and/or the Code. I declare that above details are true, correct and complete in all respect.

Signature

Name:

Designation:

PAN:

Department:

Employee No.:

Please sign and return even if you have nothing to declare.

FORM A

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (1) (b) read with Regulation 6(2) – Disclosure on becoming a director/KMP/Promoter/member of the promoter group]

Name of the Company: Shoquba Realty Private Limited

ISIN: INE1DOI08011

Details of Securities held on appointment of Key Managerial Personnel (KMP), Senior Management (SMP) or Director or upon becoming a Promoter or member of the Promoter Group of a listed company and immediate relatives of such persons and by other such persons and other such persons as mentioned in Regulation 6(2).

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (KMP/Director or Promoter or member of the promoter group/Immediate relative to/others etc.)	Date of appointment of KMP/Director/ OR Date of becoming Promoter or member of the promoter group	Securities held at the time of becoming Promoter/appointment of Director/KMP or becoming Promoter or member of the promoter group		% of Shareholding
			Type of security (For e.g. – Shares, Warrants, Convertible Debentures, Rights entitlements, etc.)	No.	
1	2	3	4	5	6

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

Details of Open Interest (OI) in derivatives of the company held on appointment of Key Managerial Personnel (KMP), Senior Management (SMP) or Director or upon becoming Promoter or member of the promoter group of a listed company immediate relative of such persons and by and other such persons as mentioned in Regulation 6(2).

Open Interest of the Future contracts held at the time of appointment of Director/KMP or upon becoming Promoter/ member of the promoter group			Open Interest of the Option Contracts held as on the date of regulation coming into force		
Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
7	8	9	10	11	12

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

Name & Signature:

Designation:

Date:

Place:

FORM B**SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015****[REGULATION 7 (2) READ WITH REGULATION 6(2) – CONTINUAL DISCLOSURE]**Name of the Company: Shoquba Realty Private LimitedISIN: INE1DOI08011

Details of change in holding of Securities of Promoter, Member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such person and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/ DIN, & address with contact nos.	Category of Person (Promoter / member of the promoter group/designated person/Directors/ Immediate Relative to/others. etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/ acquisition of shares/ disposal 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.)	Exchange on which the trade was executed
		Type of security For e.g. - Shares, Warrants, Convertible Debentures, Rights entitlements, etc.)	No. and % of share holding	Type of security (For e.g. - Shares, Warrants, Convertible Debentures, Rights entitlements, Etc.)	No.	Value	Transaction Type (Purchase/ Sale/ Pledge / Revocation/ Invocation/ Other - Please specify)	Type of security (For e.g. - Shares, Warrants, Convertible Debentures, Rights entitlements, Etc.)	No. and % of Shareholding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

Note:

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

(ii) Value of transaction excludes taxes/brokerage/any other charges.

Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or Director of a listed company and immediate relative of such persons and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc.)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
16	17	18	19	20	21	22

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

Name:

Signature:

Designation:

Date:

Place:

FORM C (INDICATIVE FORMAT)

**SEBI (Prohibition of Insider Trading) Regulations, 2015
Regulation 7(3) – Transactions by Other Connected Persons as identified by the Company**

Details of trading in securities by other connected persons as identified by the company

Name, PAN, CIN/DIN, & addresses with contact nos. of other connected persons as identified by the Company	Connection with Company	Securities held prior to acquisition / disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/ acquisition of shares/ disposal 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.)	Exchange on which the trade was executed
		Type of security For e.g. – Shares, Warrants, Convertible Debentures, Rights entitlements, etc.)	No. and % of shareholding	Type of security (For e.g. – Shares, Warrants, Convertible Debentures, Rights entitlements, etc.)	No	Value	Transaction Type (Purchase / Sale/ Pledge / Revocation/ Invocation/Others- Please Specify)	Type of security (For e.g. – Shares, Warrants, Convertible Debentures, Rights entitlements, etc.)	No. and % of Share holding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

Note:

(i) “Securities” shall have the meaning as defined under regulation 2(1)(I) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

(ii) Value of transaction excludes taxes/brokerage/any other charges.

Details of trading in derivatives on the securities of the company by other connected persons as identified by the company

Trading in derivatives (Specify type of contract, Futures or Options etc.)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
16	17	18	19	20	21	22

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

Name:

Signature:

Date:

Place: