

GARWARE POLYESTER LIMITED

I **Code of Fair Disclosures and Conduct:**

This Code of Conduct is adopted by the Board of Directors at its meeting held on 29th May, 2015 pursuant to SEBI [Prohibition of Insider Trading] Regulations, 2015 and will be known as **Garware Polyester Limited** - "Code of Fair Disclosure and Conduct" and "Code for Prevention of Insider Trading".

This Code provides a framework for practices and procedures for fair disclosure of events and occurrences which may impact the price discovery in the market for the Securities of the Company listed on the Stock Exchange. The Code will govern the trading by the employees of the Company and other connected persons.

II **Definitions:**

- 1.1 **"Act"** means the Securities and Exchange Board of India Act, 1992.
- 1.2 **"Board"** means the Board of Directors of the Company.
- 1.3 **"Chief Investor Relations Officer"** means the Company Secretary or any other officer of the Company appointed by the Board of Directors from time to time for the purposes of this Code in pursuance of the Regulations.
- 1.4 **"Code"** Or **"Code of Fair Disclosure and Conduct"** shall mean the Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of trading by insiders of **Garware Polyester Limited** as amended from time to time.
- 1.5 **"Company"** means Garware Polyester Limited.
- 1.6 **"Compliance Officer"** means Company Secretary or compliance officer of the Company for the purpose of administration of Insider Trading policy.
- 1.7 **"Connected Person"** means:
 - i. any person who is or has during the six' months prior to the concerned act has 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himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.

- ii Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established,
 - a. an immediate relative of connected persons specified in clause [i]; or
 - b. a holding company or associate company or subsidiary company; or
 - c. an intermediary as specified in section 12 of the SEBI Act or an employee or Director thereof; or
 - d. an investment company, trustee company, asset management company or an employee or director thereof; or
 - e. an official of a Stock Exchange or of clearing house or corporation; or
 - f. a member of the Board of Trustees of a mutual fund or a member of the Board of Directors of the asset management company of a mutual fund or is an employee thereof; or
 - g. a member of the Board of Directors or an employee, of a public financial institution as defined in section 2 [72] of the Companies Act, 2013; or
 - h. an official or an employee of a self-regulatory organization recognised or authorized by the Board; or
 - i. a Banker of the Company; or
 - j. a concern, firm, trust, Hindu undivided family, company or association of persons wherein a Director of a Company or his immediate relative or banker of the Company, has more than ten per cent (10%), of the holding or interest.

1.8 **"Dealing in Securities"** means an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in the securities of the Company either as principal or agent.

1.9 **" Designated Employee[s]"** shall include:

- a. every employee in the grade of General Manager and above;
- b. every employee in the finance, accounts, secretarial and legal department as may be determined and informed by the Compliance Officer; and
- c. any other employee as may be determined and informed by the Compliance Officer from time to time.

- 1.10 "**Director**" means a member of the Board of Directors of the Company from time to time.
- 1.11 "**Employee**" means every employee of the Company including the Directors in the whole time employment of the Company.
- 1.12 "**Generally available Information**" means information that is accessible to the public on a non-discriminatory basis.
- 1.13 "**Immediate Relative**" means a spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities.
- 1.14 "**Insider**" means any person, who is,
- i. a connected person; or
 - ii. in possession of or having access to unpublished price sensitive information.
- 1.15 "**Key Managerial Person**" means person as defined in section 2[51] of the Companies Act, 2013.
- 1.16 "**Promoter**" shall have the meaning assigned to it under the SEBI [Issue of Capital and Disclosure Requirements] Regulations, 2009 or any modification thereof:
- 1.17 "**Securities**" shall have the meaning assigned to it under the Securities Contracts (Regulations) Act, 1956 or any modification thereof except units of a mutual fund;
- 1.18 "**Takeover Regulations**" means the SEBI [Substantial Acquisition of Shares and Takeovers] Regulations, 2011 and any amendments thereto;
- 1.19 "**Trading**" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly.
- 1.20 "**Trading Day**" means a day on which the recognized Stock Exchange are open for trading;
- 1.21 "**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 to, 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. material events in accordance with the listing agreement.

1.22 **"Regulations"** shall mean the SEBI [Prohibition of Insider Trading] Regulations, 2015 and any amendments thereto.

1.23 **"Specified Persons"** means the Directors, connected persons; the insiders, the Designated Employees and the promoters and immediate relatives' are collectively referred to as Specified Persons.

Words and expressions used and not defined in these regulations but defined in the SEBI Act, 1992, the Securities Contracts [Regulation] Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation.

Role of Compliance Officer:

III

- i. The Compliance Officer shall be responsible under the overall supervision of the Board of Directors for the following :
- ii. report on insider trading to the Board of Directors of the Company and in particular, shall provide reports to the Chairman of the Audit Committee, if any, or to the Chairman of the Board of Directors at the end of every quarter at the immediately held meeting of Audit Committee and Board of Directors in respect of Trading in Securities of the company by the Designated Persons and or Employees , the trading plans and pre-clearances as approved by the Compliance Officer;
- iii. compliance of policies and procedures and maintenance of records;
- iv. Monitoring adherence to the Rules for the preservation of Unpublished price Sensitive Information;
- v. Maintaining records of the Designated Persons and any change made in the list of Designated Persons;
- vi. The Compliance Officer shall provide guidance and clarifications sought by the Designated Employees and Designated Persons assist all employees in addressing any clarifications regarding the SEBI [Prohibition of Insider Trading] Regulations, 2015 and this Code.

- vii. The Compliance Officer shall discharge other functions and duties as prescribed in the Code.

IV ***Preservation of "Price Sensitive Information":***

- 4.1 All information shall be handled within the Company on a need-to-know basis and no unpublished price sensitive information shall be communicated to any person except in furtherance of the insider's legitimate purposes, performance of duties or discharge of his legal obligations.

Unpublished price sensitive information may be Communicated, provided, allowed access to or procured, in connection with a transaction which entails:

an obligation to make an open offer under the takeover regulations where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the Company; or

not attracting the obligation to make an open offer under the takeover regulations but where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the Company and the information that constitute unpublished price sensitive information is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the Board of Directors may determine.

However, the Board of Directors shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the limited purpose and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information

4.2 **Need to Know:**

- i. "Need to Know" basis Means that Unpublished Price Sensitive Information should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.
- ii. All non-public information directly received by any employee should immediately be reported to the head of the department.

4.3 **Limited access to confidential information:**

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password, etc.

Prevention of misuse of "Unpublished Price Sensitive information":

Employees and connected persons designated on the basis of their functional role [**"designated persons"**] in the Company shall be governed by an internal code of conduct governing dealing in securities.

5.1 Trading Plan:

An insider or a Designated Person who may be perpetually in possession of Unpublished Price Sensitive Information shall have an option to formulate a trading plan for dealing in securities of the Company 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.

5.2 Such trading Plan shall:

- i** not entail commencement of trading on behalf of the insider or Designated Person or their Immediate Relatives earlier than six months from the public disclosure of the trading plan;
- ii** not entail trading in Securities of the Company 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 Company and the second trading day after the disclosure of such financial results;
- iii.** entail trading for a period of not less than twelve months;
- iv.** not entail overlap of any period for which another trading plan is already in existence;
- v.** set out either the value of trades to be effected in the Securities or the number of Securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
- vi.** not entail trading in securities for market abuse.

5.3 The Compliance Officer shall review the Trading Plan to assess whether the plan would have the potential for violation of the Code or the Regulations and shall be entitled to take express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the trading plan as per provisions of the Regulations.

- 5.4 The Trading Plan once approved shall be irrevocable and the Insider or the Designated Person or their Immediate Relatives shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.

However, the implementation of the trading plan shall not be commenced, if at the time of formulation of the plan, the Insider is in possession of any unpublished price sensitive information and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Plan shall be deferred until such unpublished price sensitive information becomes generally available at the time of commencement of implementation and in such event, the Compliance Officer shall confirm that the commencement ought to be deferred until such Unpublished Price Sensitive Information becomes generally available.

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

VI Trading Window and Window Closure:

- 6.1.1 The trading window shall be, inter alia, closed 7 trading days prior to and during the time the unpublished price sensitive information is published.
- 6.1.2 When the trading window is closed, the Specified Persons shall not trade in the Company's securities during such period.
- 6.1.3 All Specified Persons shall conduct all their dealings in the securities of the Company only in a valid trading window and shall not deal in any transaction involving the purchase or sale of the Company's securities during the periods when the trading window is closed, as referred to in Point No.'6.1.1 above or during any other period as may be specified by the Company from time to time.
- 6.2 The Compliance Officer shall intimate the closure of trading window to all the designated employees of the Company when he 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.
- 6.3 The Compliance Officer after taking into account 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 reopening of the trading window, however in any event it shall not be earlier than forty-eight hours after the information becomes generally available.
- 6.4 The trading window shall also be applicable to any person having contractual

or fiduciary relation with the Company such as Auditors, Accountancy Firms, Law firms, Analysts, Consultants, etc., assisting or advising the Company.

VII

Pre-clearance of trades:

All Specified Persons, who intend to deal in the securities of the Company when the trading window is opened and if the value of the **proposed trades is Rs. 10/- Lakhs [market value] or more** should pre-clear the transaction. However, no designated person shall be entitled to apply for pre-clearance of any proposed trade, if such designated person is in possession of unpublished price sensitive information even if the trading window is not closed and hence he shall not be allowed to trade. The pre-dealing procedure shall be hereunder:

- i An application may be made in the prescribed Forms [**Annexure-1 & Undertaking**] to the Compliance officer indicating the estimated number of securities that the Specified Employee 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.

The application is to be filed along with Statement of Holding in Securities of the Company at the time of pre-clearance as per [**Annexure -2**]

- ii. An undertaking [**Annexure-3**] shall be executed in favour of the Company by such Specified Employee incorporating, *inter alia*, the following clauses, as may be applicable:
 - a. That the employee/Director/Officer does not have any access or has not received "Unpublished Price Sensitive Information" up to the time of signing the undertaking,
 - b. That in case the Specified Employee 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 public,
 - c. That he/she has not contravened the code of conduct for prevention of insider trading as notified by the Company from time to time and
 - d. That he/she has made a full and true disclosure in the matter.
- iii. All Specified Persons shall execute their order in respect of securities of the Company_ within 7 (seven) trading days after the approval of pre-clearance is given. Thereafter a fresh pre-clearance will be needed for the trades executed in excess of Rs. 10 lakhs as per the requirements of Clause 9.2 hereof. The Specified Person shall file within 2 [two] trading days of the execution of the deal, the details of such deal with the Compliance Officer in the prescribed

form — A prescribed by SEBI [**copy attached as Annexure — 4**]. In case the transaction is not undertaken, a report to that effect shall be filed.

- iv. If the order is not executed after obtaining pre-clearance from the Compliance Officer , the concerned Designated Person shall intimate the same alongwith reasons thereof to the Compliance Officer within 2 (two) trading days after the expiry of 7 (seven) trading days from the date of pre-clearance by the Compliance Officer.
- v. All Specified Persons who buy or sell any number of shares of the Company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction. **For example:** If 'X' or any of his Immediate Relatives buy Securities of the Company on January 1, 2015, then 'X' and his Immediate Relatives shall not sell any Securities of the Company until July 1, 2015 and *vice versa*.

The Compliance Officer may grant relaxation from strict application of such restriction on an application made in this behalf by the concerned Designated Person and after recording in writing the reasons in this regard; provided that such relaxation does not violate the Regulations.

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 pre-clearances of trades.

All Specified Persons shall also not take positions in derivative transactions in the shares of the Company at any time. In case of any contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act. In case of Subscription in the primary market [initial public offers], the above mentioned entities shall hold their investments for a minimum period of 30 days. The holding period would commence when the securities are actually allotted.

- vi. The Compliance Officer may waive off the holding period in case of sale of securities in personal emergency after recording reasons for the same. However, no such sale will be permitted when the Trading window is closed.

VIII Other Restrictions

- 8.1 The disclosures to be made by any person under this Code shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.
- 8.2 The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be

taken into account for purposes of this Code.

- 8.3 The disclosures made under this Code shall be maintained for a period of five years.

IX Reporting Requirements for transactions in securities:

9.1 Initial Disclosure:

- i Every promoter/ Key Managerial Personnel / Director / Officers / Designated Employees of the Company, within thirty days from May 15 2015 (the date on which the Regulations come into force) shall forward to the Company the details of all holdings in securities of the Company presently held by them including the statement of holdings of dependent family members in the Form — B prescribed by **SEBI. [Copy enclosed as Annexure - 5].**
- ii Every person shall within 7 (seven) days of his or her appointment as a key managerial personnel or a Director of the Company or upon becoming a promoter shall disclose the details of Securities held by him or her in the Form — C prescribed by SEBI. **[copy enclosed as Annexure — 6]**

9.2 Continual Disclosure:

- i. Every Designated Person , promoter, employee and director of the Company shall disclose to the Company the number of such securities acquired or disposed of within 2 (two) trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. Ten lakhs in form — D prescribed by **SEBI [copy enclosed as Annexure — 7].**
- ii. The disclosure shall be made within 2 working days of:
 - a. the receipt of intimation of allotment of shares, or
 - b. the acquisition or sale of shares or voting rights, as the case may be.

X Disclosure by the Company to the Stock Exchange[s]:

- i Within 2 days of the receipt of intimation under clause 9.2, the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received in the same Form — C prescribed by SEBI.
- ii The Compliance officer shall maintain records of all the declarations in the appropriate form given by the Directors / Officers / designated employees for a minimum period of five years.

XI *Dissemination of Price Sensitive Information:*

- i No information shall be passed by Specified Persons by way of making a recommendation for the purchase or sale of securities of the Company.
- ii. Disclosure/dissemination of Price Sensitive Information with special reference to analysts, media persons and institutional investors.

XII *Penalty for contravention of the code of conduct:*

- 12.1 Every Specified 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].
- 12.2 Any Specified Person who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalised and appropriate action may be taken by the Company.
- 12.3 Specified Persons who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, in eligibility for future participation in ESOPs etc.
- 12.4 The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI [Prohibition of Insider Trading] Regulations, 2015.

XIII *Code of Fair Disclosure:*

The Company shall adhere to the following are the principles of Fair Disclosure for the purposes of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information.

- i) Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available. The company shall also upload such Unpublished Public Information on the Company's official website i.e. [www. garwarepoly .com](http://www.garwarepoly.com) after the disclosure is made to the stock exchanges.
- ii) The Company shall make uniform and universal dissemination of Unpublished price sensitive in the manner described above and shall not disclose unpublished Price Sensitive Information on a selective basis.
- iii) The Board of Directors of the Company has designated the Company Secretary as Chief Relations Officer who shall deal with dissemination of information and disclosure of Unpublished price sensitive information.
- iv) In the event of any Unpublished Price Sensitive Information getting disclosed selectively, inadvertently or otherwise , the Company shall promptly disseminate such Unpublished Price Sensitive Information to

the Stock Exchanges and on its official website into make it Generally Available Information. In the event of any query or request for verification about news reports or market rumours by regulatory authorities, the Chief Investor Relations Officer shall fairly and appropriately respond to such queries and requests.

- v) The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
- vi) In order to avoid misrepresentation or misquoting, endeavour shall be made that at least two Company representatives are present in the meetings or conference calls with analysts, brokers or institutional investors. The transcripts of aforesaid conference calls or record of the proceedings of the meetings shall be made available on the official website of the Company in order to make the information shared with analysts, brokers or institutional investors Generally Public Information.
- vii) There shall be limited access to Unpublished Price Sensitive Information. Unpublished Price Sensitive Information will be disclosed on need to know basis only to those persons who need the information for legitimate purposes to discharge their duty or legal obligations.

Specimen application for Pre-dealing approval

Date:

To ,
The Compliance Officer,
Garware Polyester Limited,
Mumbai – 400 057.

Dear Sir/Madam,

Application for Pre-dealing approval in securities of the Company

Pursuant to the SEBI [prohibition of Insider Trading] Regulations, 2015 and the Company's Code of Conduct for Prevention of Insider Trading, I seek approval to purchase / sale / subscription of equity shares of the Company as per details given below:

Sr. No.	Particulars	Particulars
1	Name of the applicant	
2	Designation	
3	Number of Securities held as on date	
4	Folio No./DP. ID/Client ID No.	
5	The proposal is for	a)Purchase of securities b)Subscription to securities c)Sale of securities
6	Proposed date of dealing in securities	
7	Estimated number of securities proposed to be	
8	Price at which the transactions is proposed	
9	Current market price (as on date of application)	
10	Whether the proposed transaction will be	
11	Folio No./ DP ID/Client ID No. where the	

I enclose herewith the form of Undertaking signed by me.

Yours faithfully,

[Signature of Employee]

UNDERTAKING TO BE ACCOMPANIED WITH THE
APPLICATION FOR PRE-CLEARANCE

To,

The Compliance Officer,
Garware Polyester Limited(ISIN: _____)
Garware House, 50 – A Swami Nilayanand Marg
Vile Parle (E), Mumbai 400 057.

I, _____, _____ of the
Company residing at _____, am
desirous of trading in _____ shares of the Company as mentioned in my
application dated _____ for pre-clearance of the transaction.

I further declare that I am not in possession of any unpublished price sensitive information
up to the time of signing this Undertaking.

In the event that I have access to or receive any unpublished price sensitive information
after the signing of this undertaking but before executing the transaction for which
approval is sought, I shall inform the Compliance Officer of the same and shall
completely refrain from trading in the securities of the Company until such information
becomes public.

I declare that I have not contravened the provisions of the Rules as notified by the
Company from time to time.

In the event of this transaction being in violation of the Rules or the applicable laws, (a) I
will, unconditionally, release, hold harmless and indemnify to the fullest extent, the
Company and its directors and officers, (the 'indemnified persons') for all losses, damages,
fines, expenses, suffered by the indemnified persons, (b) I will compensate the
indemnified persons for all expenses incurred in any investigation, defense, crisis
management or public relations activity in relation to this transaction and (c) I authorize the
Company to recover from me, the profits arising from this transaction and remit the
same to the SEBI for credit of the Investor Protection and Education Fund
administered by the SEBI.

I undertake to submit the necessary report within two days of execution of the transaction /
a 'Nil' report if the transaction is not undertaken.

If approval is granted, I shall execute the trade within seven days of the receipt of
approval failing which I shall seek pre-clearance afresh.

I declare that I have made full and true disclosure in the matter.

Signature : _____

Name:

Date :

STATEMENT OF HOLDING DISCLOSURE FORM

Date: _____

1. DETAILS OF HOLDING OF "DESIGNATED PERSON HELD IN "HIS/HER NAME

Nature and No. of Securities held	*Folio No./Client ID & DP ID No.	Nature of Transaction for which approval is sought	Nature and No. of Securities to be dealt	Approximate market Value (Rs.)

2. DETAILS OF SECURITIES HELD BY IMMEDIATE RELATIVES(S)

Name, PAN No. & address of relative	Relationship	Nature & No. of Securities held	*Folio No./ Client ID & DP ID No.	Nature of Transaction for which approval is sought	Nature and No. of Securities to be dealt	Approximate market value (Rs.)

* I/We declare that I/We shall not enter into a contra trade** in the Securities of the Company during the next 6 months following the last trade.

* I/ We further declare that the above disclosure is true and correct.

Signature:

Name:

Designation:

Department:

* Strike out whatever is not applicable

** Contra trade means if you buy share on particular date, you can't sell any share of the Company for next 6 months from the last purchase. Similarly, you can't purchase shares for next 6 months from last sale.

DISCLOSURE OF TRANSACTIONS

(To be submitted within 2 days of transaction / trading in securities of the Company)

To,

The Compliance Officer,
 Garware Polyester Limited (ISIN: _____)
 Garware House, 50 – A Swami Nilayanand Marg
 Vile Parle (E), Mumbai 400 057.

I hereby inform that I

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

(strike out whichever is not applicable)

Name of holder	No. of securities traded	Bought / sold / subscribed	DP ID/Client IID/Folio No.	Price (Rs.)

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

Signature : _____

Name:

Date :

Annexure 4
Form A

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

To,

The Compliance Officer,
Garware Polyester Limited (ISIN: _____)
Garware House, 50 – A Swami Nityanand Marg
Vile Parle (E), Mumbai 400 057.

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

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.)			Number of Units (contracts * lot size)	Notional value in Rupee terms	Number of Units (contracts * lot size)	Notional value in Rupee terms

Signature:

Designation:

Date:

Place:

Annexure 5
Form B

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

To,

The Compliance Officer,
Garware Polyester Limited (ISIN: _____)
Garware House, 50 – A Swami Nityanand Marg
Vile Parle (E), Mumbai 400 057.

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) of SEBI Regulations.

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relatives/others etc)	Date of appointment of Director /KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP		% of Shareholding	Open Interest of the future contracts held at the time of becoming Promoter/appointment of Director/KMP		Open Interest of the option contracts held at the time of becoming Promoter/appointment of Director/KMP	
			Type of security	No		Number of units (contracts* lot size)	Notional value in Rupee terms	Number of units (contracts* lot size)	Notional value in Rupee terms

Signature:

Designation:

Date:

Place:

Annexure 6
FORM C

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

To,

The Compliance Officer,
Garware Polyester Limited (ISIN: _____)
Garware House, 50 – A Swami Nityanand Marg
Vile Parle (E), Mumbai 400 057.

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) of the SEBI Regulations.

Name PAN No. CIN/DI N & address s of Promo ter/Em ployee /Direct or with Contrq act nos..	Categor y of Person (Promo ters/ KMP / Director s/immed iate relatives /others etc)	Securities held prior to acquisition/ disposal at		Securities acquired/Di sposed		% of Shareholding		Date of allotment advice/ac quisition of shares/sal e of shares specify		Date of Intimatio n to the Company	Mode of acquisition(market purchase/p ublic rights/prefe rential offer/off market/Inte r-se transfer etc.	Trading in derivatives (specify type of contract, futures or Options etc.)				Exchange on which the trade was executed
		Type of securi ty	No.	Type of securi ty	No.	Pre Transac tion	Post Transac tion	Fro m	To			Buy		Sell		
										Val ue	No. of Units (Contracts *lot size)	Val ue	No. of Units (Contra cts*lot size)			

Signature:

Designation:

Date:
Place

Annexure 7
FORM D

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
Regulation 7(3) - Transactions by other connected persons as identified by the company

Name PAN No. CIN/DI N & address s of Promo ter/Em ployee /Direct or with Contrac t nos..	Connect ion with the Compan y	Securities held prior to acquisition/dis posal at		Securities acquired/Dispo sed		% of Shareholding		Date of allotment advice/acq uisition of shares/sale of shares specify		Date of Intimatio n to the Company		Mode of acquisition(market purchase/p ublic rights/prefe rential offer/off market/Inte r-se transfer etc.		Trading in derivatives (specify type of contract, futures or Options etc.)				Exchange on which the trade was executed
														Buy		Sell		
														Val ue	No. of Units (Contracts *lot size)	Val ue	No. of Units (Contrac ts*lot size)	
Type of securi ty	No.	Type of securi ty	No.	Pre Transac tion	Post Transac tion	From	To											

Name

Signature:

Designation:

Date:
Place