



CIN No.: L45400MH2012PLC234941

CODE OF CONDUCT

TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSONS

**[Under Regulation 9(1) of the Securities and Exchange Board of India
(Prohibition of Insider Trading) Regulations, 2015]**

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1. INTRODUCTION:

Insider trading means dealing in securities of a company listed on any Stock Exchange in India based on, or when in possession of, Unpublished Price Sensitive Information (“UPSI”).

With a view to govern the conduct of insiders on matters relating to Insider Trading, the Securities and Exchange Board of India (“SEBI”) had formulated SEBI (Insider Trading) Regulations 1992, which came into force on December 19, 1992 and has been amended subsequently from time to time. The amended regulations are now titled as “Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015” (hereinafter referred to as the (“**Regulations**”). These Regulations were notified by the SEBI on January 15, 2015, which became effective from May 15, 2015.

In terms of the Regulations every Company whose securities are listed on the Stock Exchange(s) and every market intermediary registered with SEBI handling UPSI, shall mandatorily formulate a Code of Conduct to regulate, monitor and report trading by designated persons. In addition to the above every Company whose securities are listed on the Stock Exchange, is also required to formulate a Code of Practices and Procedure for Fair Disclosure of UPSI.

ATAL REALTECH LIMITED is a listed public Company registered under the Companies Act, 2013 and having its Registered Office at **Unit No. 301 and 302, ABH Developers Town Square, S No. 744, Nashik MH 422002 IN.**

The Shares of the Company are listed on NSE Limited. Thus, as per **Regulation 8** and **Regulation 9** of the Regulations, **ATAL REALTECH LIMITED** shall be considered as the Company whose shares are listed on the Stock Exchanges and shall formulate a Code of Conduct to regulate, monitor and report trading by designated persons and Code of Practices and Procedure for Fair Disclosure of UPSI.

The document comprises of the Code of Conduct to regulate, monitor and report trading by designated persons, for Prevention of Insider Trading (hereinafter referred to as the “**Code**”) adopted by the Company to be followed by the Director, Promoter, Key Managerial Personnel and other Connected Persons. Further, the provisions of this Code shall be read with the Regulations and if there is any inconsistency/contradiction between the two, the provisions of the Regulations shall prevail.

2. DEFINITIONS:

In this Code, unless the context otherwise requires,

- a) “**Act**” means the Securities and Exchange Board of India Act, 1992.
- b) “**Company**” means **ATAL REALTECH LIMITED**.
- c) “**Board**” shall mean the Board of Directors of **ATAL REALTECH LIMITED**.
- d) “**Code**” means this Code of Conduct for Prevention of Insider Trading, as modified from time to time.



- e) **“Compliance officer”** means any senior officer, designated so and reporting to the Board or head of the organization in case Board is not there, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board of the Listed Company or the head of an organization, as the case may be.
- f) **"Connected Person"** means –
- i. A Director of the Company;
 - ii. A Key Managerial Personnel of the Company;
 - iii. An Officer of the Company;
 - iv. Any person who is or has during the six months prior to the concerned act been associated with a 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
 - v. 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.
 - vi. An employee of the Company who has access to UPSI or is reasonably expected to have access to UPSI;
 - vii. Any person who has a professional or business relationship and that relationship, directly or indirectly, (x) allows access to UPSI or (y) is reasonably expected to allow access to UPSI;

Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established, -

- i. an immediate relative of connected persons specified in clause (i); or
- ii. a holding company or associate company or subsidiary company; or
- iii. an intermediary as specified in section 12 of the Act or an employee or director thereof; or
- iv. an investment company, trustee company, asset management company or an employee or director thereof; or
- v. an official of a stock exchange or of clearing house or corporation; or
- vi. a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or



- vii. a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
 - viii. an official or an employee of a self-regulatory organization recognized or authorized by the Board; or
 - ix. a banker of the company; or
 - x. a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten per cent of the holding or interest.
- g) **“Designated Person”** means –
- i. Promoters;
 - ii. Directors;
 - iii. Key Managerial Personnel of the Company;
 - iv. All Department Heads and who may have access to UPSI; and
 - v. Employees and other connected persons as identified by the Compliance officer in consultation with the Board from time to time.
- h) **“Dealing in Securities”** means an act of subscribing, buying, selling or agreeing to subscribe, buy, sell or deal in the Securities by any person, either as a principal or as an agent.
- i) **“Employee”** means all employees of the Company (whether in probation or not) including Directors in employment of the Company.
- j) **“Generally available information”** means information that is accessible to the public on a non-discriminatory basis.
- k) **“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.
- l) **“Insider”** means any person who is:
- i) A connected person; or
 - ii) In possession of or having access to Unpublished Price Sensitive Information.
- m) **“Promoter”** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.
- n) **“Regulations”** means the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time.
- o) **“SEBI”** means Securities and Exchange Board of India.



- p) **“Securities”** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund.
- q) **“Securities of the Company”** shall include Equity Shares of the Company, or any other marketable securities of the Company.
- r) **“Stock Exchange”** shall mean a Stock Exchange on which the shares of **ATAL REALTECH LIMITED** are listed.
- s) **“Trading”** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly
- t) **“Trading Window”** shall have the meaning as mentioned thereto in clause 6 of the Code.
- u) **“Trading Day”** means a day on which the recognized Stock Exchange are open for trading.
- v) **“Unpublished Price Sensitive Information” or “UPSI”** means any information, relating to a 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 including 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
- w) **“Working day”** shall mean the working day when the regular trading is permitted on the concerned Stock Exchange where the Securities of **ATAL REALTECH LIMITED** are listed.

Words and expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made there under shall have the meanings respectively assigned to them in those legislations.

3. COMPLIANCE OFFICER:

The Company Secretary of ATAL REALTECH LIMITED shall be the Compliance Officer for the purposes of this Code and will report to the Board of Directors. In the absence of the Company Secretary, any other person as may be designated by the Board shall be the Compliance Officer till such time as it deems fit, and in case of vacancy till the time a successor is appointed. The Compliance Officer shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of Price Sensitive Information, pre-clearing of all proposed trades, addressing any clarifications/difficulties regarding the Regulations and/or the Code and the implementation of the Code, under the overall supervision of the Board of Directors.



The Compliance officer shall maintain a record of all Designated Persons and their Immediate Relatives (**See Annexure – 1**) and changes thereto from time to time.

The Compliance Officer shall place a report before the Audit Committee, detailing the Trading of the Securities of the Company by the Designated Persons along with the documents such persons had executed in accordance with the pre-trading procedures at least once in a year.

Unless the context otherwise requires, the term “Compliance Officer” wherever used in the Code in connection with ATAL REALTECH LIMITED shall mean “Compliance Officer for ATAL REALTECH LIMITED”.

The Compliance Officer shall assist all the employees in addressing any clarifications regarding the regulations of this Code.

4. PRESERVATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION:

All Designated Persons shall maintain confidentiality of all UPSI in their possession.

To maintain this obligation, Designated Persons shall not:

- a. communicate, provide, or allow access to any UPSI, relating to the Company or its securities, to any person including other insiders, leading to purchase or sale of securities of the Company except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations;
- b. discuss UPSI in public areas; or
- c. recommend to anyone that they may undertake trading in Securities of the Company while in possession, control or knowledge of UPSI.
- d. All UPSI shall be handled on a “need-to-know” basis, i.e., UPSI should be disclosed only to those within ATAL REALTECH LIMITED, who need the information to discharge their duty and/or functions.
- e. Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password etc.

5. CHINESE WALL POLICY:

To prevent misuse of UPSI, Company shall maintain Chinese Walls or Information Barriers by secluding certain group of persons identified by the Compliance Officer, which routinely have access to UPSI from the rest of the Company for a particular purpose or for a specified period of time.

Except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations, and are subjected to, among other conditions, additional confidentiality obligations, information barriers designed to prevent exchanges of UPSI outside the “Chinese Wall”, and the execution of an undertaking by such persons to abstain and / or forego trading during such seclusion or till the UPSI no longer constitutes UPSI.



6. TRADING WINDOW:

The trading window shall remain open for trading in Securities of the Company, unless prescribed otherwise.

Designated Persons and their immediate relatives shall not trade in the Company's Securities when the Trading Window is closed.

The Trading Window shall be closed during the time the information mentioned hereunder is unpublished:

- a. Declaration of Financial Results (quarterly, half yearly and annual);
- b. Declaration of dividends (interim or 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 whole of the undertaking;
- g. Any changes in policies, plans or operations of the Company;
- h. such other information as may be specified by the Compliance Officer for this purpose.

In respect of declaration of financial results of each quarter, the trading window shall remain closed from end of each quarter till 48 hours after the declaration of the financial result.

As regards, declaration of interim dividend and other matters referred to in (b) to (h) above, the Managing Director/Compliance officer shall, well before initiation of such activity/project, form a core team of Designated Employees and/or Designated Persons who would work on such assignment. The Managing Director/ Compliance officer shall also designate a senior Employee who would be in-charge of the project. Such team members will execute an undertaking not to deal in the Securities of the Company till the Price Sensitive Information regarding the activity/project is made public or the activity/project is abandoned and the Trading Window would be regarded as closed for them.

Additionally, the Trading Window shall be closed in particular for any Designated Person or class of Designated Persons when the Compliance Officer determines that such Designated Person or class of Designated Persons can reasonably be expected to have possession of UPSI, for such periods as determined by the Compliance Officer from time to time.

Exercising of ESOPs of **ATAL REALTECH LIMITED**, if any, by its employees may be made at any time irrespective of trading window restrictions.

Pre-clearance should be obtained by Designated Persons for sale of such shares

There would be no minimum holding period requirement applicable for sale of equity shares allotted pursuant to the ESOP, if any.

The Trading Window may be re-opened after closure, not earlier than 48 hours after the UPSI in question becomes generally available.

When the trading window is open, trading by Designated Persons shall be subject to pre-clearance by the Compliance Officer, if the value of the proposed trades is above such thresholds as the Board of Directors of the Company may stipulate.



In case of ESOPs, if any, exercise of options may be allowed in the period when the Trading Window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when the Trading Window is closed.

7. PRE-CLEARANCE OF TRADING:

Every Designated Person shall obtain a pre-trading approval as per the procedure prescribed hereunder for trading in securities of the Company proposed to be undertaken by such Designated Person and/or his/her Immediate Relatives.

Designated Persons may trade in the Securities of the Company when the Trading Window is open, after obtaining approval of the Compliance Officer by submitting an application in the prescribed format (**See Part A of Annexure 2**) accompanied with a declaration and undertaking (**See Part B of Annexure 2**). The Compliance officer shall send his/her application to the Managing Director/Whole-time Director/Chief Financial Officer. Designated Persons shall send their application along with the declarations and undertaking in the format prescribed either physically or through email at compliance@vrmlife.com.

The Compliance Officer shall not approve any proposed Trade by Designated Person if the Compliance Officer determines that such Designated Person is in possession of UPSI even though the trading window is open.

The Compliance Officer may, after being satisfied that the application and undertaking are true and accurate, approve trading by a Designated Person preferably by the next Trading Day. Such approval/intimation of rejection shall be given through email latest within 2 Trading Days from the date of receipt of application otherwise the applicant shall presume that the approval is deemed to be given. The letter for approval shall be issued in a prescribed format (**See Annexure 3**) subject to such changes as the Company may suggest from time to time. Every approval shall be dated and valid for a period of 7 Trading Days from the date of approval.

The Designated Person shall, within two days of the execution of the Trade, submit the details of such Trade to the Compliance Officer (**See Annexure 4**). In case the transaction is not undertaken, a report to that effect shall be filed in the said form.

If the pre-cleared Trade is not executed within seven trading days after the approval is given, the Designated Person must secure pre-clearance of the transaction again.

Such pre-trading approval shall apply only if the cumulative trading in one transaction or series of transaction in any financial year **exceeds Rs. 10,00,000/- (Rupees Ten Lakhs)** or such other amount as may be specified by the Board of Directors from time to time (a “de minimis Trade”). Provided that the Designated Person is not in possession of UPSI while executing the de minimis Trade.

In case of absence of the Compliance Officer, any employee as designated by him/her, being a part of the Compliance Department or Managing Director or Whole-time Director shall carry out the duties for pre-clearance of trades.

Additional trading restrictions on Designated Persons: -

- i. No Director or Key Managerial Personnel shall enter into derivative transactions in respect of the securities of the Company;



- ii. All Designated Persons who trade in the securities of the Company shall not enter into an opposite transaction during the next six months following the prior transaction. 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.

8. TRADING PLAN:

The Regulations recognize the concept of Trading Plan. Any Designated Person intending to formulate the trading plan shall consult the Compliance Officer to discuss the applicable rules and procedures. The Compliance Officer shall only approve the trading plan in accordance with the applicable provisions of the Regulations.

9. DISCLOSURES BY DESIGNATED PERSONS:

Every Designated Person shall disclose the name and Permanent Account Number or any other identifier authorized by the law of the following persons to the Company on an annual basis and as and when the information changes:

- a. Immediate relatives
- b. Person with whom such designated persons share a material financial relationship
- c. Phone, mobile and cell numbers which are used by them.

The names of the educational institutions from which the designated persons have graduated and names of their past employers shall also be disclosed on a one-time basis.

10. REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES:

Initial Disclosure:

- a) Every Promoter, Key Managerial Personnel, Director shall disclose their holding and the holdings of his / her Immediate Relatives' and of any other person for whom such person takes trading decisions, of the Securities of the Company (including derivative, if any) to the Compliance Officer within thirty days of these Regulations taking effect (i.e. by June 13, 2015) **(See Annexure 5)**.
- b) Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter shall disclose their holding and the holdings of his / her Immediate Relatives' and of any other person for whom such person takes trading decisions, of the Securities of the Company (including derivative, if any) as on the date of appointment or becoming a promoter, to the Compliance Officer within seven days of such appointment or becoming a promoter in the format prescribed. **(See Annexure 5)**.
- c) Every Promoter, Key Managerial Personnel, Director or Designated Person shall disclose annual statements of their holding and the holdings of his / her Immediate Relatives' and of any other person for whom such person takes trading decisions, of the Securities of the Company (including derivative, if any) to the Compliance Officer within as on 31st March every year in the format as prescribed **(See Annexure 6)**. Such statement shall be submitted by 15th April every year.



Continual Disclosure:

- d) Every Promoter, Director and Employee shall disclose their holding and the holdings of his/her Immediate Relatives' and of any other person for whom such person takes trading decisions, the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of **Rs. 10,00,000/- (Rupees Ten lakhs)** in such format as may be prescribed. (See Annexure 7)
- e) The disclosure shall be made within two working days of the receipt of intimation of allotment of shares or the acquisition or sale of shares or voting rights, as the case may be.
- f) The Compliance Officer shall notify the Stock Exchanges, particulars of the Trades, within two trading days of the receipt of the Continual Disclosure or from becoming aware of such information.
- g) The Compliance Officer shall maintain the records of all the above declaration in an appropriate form for a minimum period of 5 years from the date of filling thereof.
- h) The Compliance Officer may, require any other Connected Person to disclose the holdings and trading in securities of the Company at such frequency as he may determine.

11. PENALTY FOR CONTRAVENTION OF THE CODE:

Every Employee, Director, Key Managerial Personnel, Promoter or Designated Person shall be individually responsible for complying with the provisions of the Regulations and the Code to the extent applicable.

Every person who violates this code, in addition to the other penal actions shall be subject to disciplinary action by the Company, which in respect of an Employee may include wage freeze, suspension, termination of employment or ineligibility for future participation in the Company's stock option plans.

The action by **ATAL REALTECH LIMITED** shall not preclude SEBI from taking any action for violation of the Regulations.

Under Section 15G of the SEBI Act, any insider who indulges in Insider Trading in contravention to the provisions of this Regulations shall be liable to a penalty which shall not be less than Rs. 10,00,000/- (Rupees Ten Lakh) but which may extend to Rs. 25,00,00,000 (Rupees Twenty-Five Crore) or three times the profits made out of Insider Trading, whichever is higher. Under Section 24 of the SEBI Act, anyone who contravenes the provisions of the Act or of any rules or regulations made thereunder, shall be punishable with imprisonment for a term which may extend to ten years, or with fine, which may extend to Rs. 25,00,00,000 (Rupees Twenty-Five Crore) or with both. Further, if any person fails to pay the penalty imposed by the adjudicating officer or fails to comply with any of his directions or orders, he shall be punishable with imprisonment for a term which shall not be less than one month but which may extend to ten years, or with fine, which may extend to Rs. 25,00,00,000 (Rupees Twenty-Five Crore) or with both.



In case any violation of the Regulation or the Code is observed, the Compliance Officer shall immediately inform SEBI of the same.

12. MISCELLANEOUS:

The Board of Directors shall be empowered to amend, modify, interpret these Regulations and such Regulations shall be effective from such date that the Board may notify in this behalf.

The Compliance Officer shall provide the Audit Committee and the Board, on an annual basis, all the details of Trading in securities by the Designated Persons including any violations of the Regulations.

For all queries concerning the Code/Regulations, please contact the Compliance Officer.

The Compliance Officer shall maintain

(a) updated list of Designated Persons;

(b) records of disclosures and pre-clearance applications and undertakings for a period of five years; and

(c) a confidential list of any 'restricted securities' to which the Compliance Officer may require Designated Persons to seek pre-clearance before Trading in such 'restricted securities.'

Annexure 2
PART A
FORMAT FOR APPLICATION FOR PRE-TRADING APPROVAL
(Pursuant to Clause 7.2 of the Code)

Date:

To,
The Compliance Officer,
ATAL REALTECH LIMITED

Dear Sir,

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 / sell / subscribe _____ nos. of Securities (including derivative, if any) of the Company as per details given below.

Name: _____

State whether: - Director Designated Person

Immediate Relative Name: _____

<input type="checkbox"/> #Employee Code	
#Designation	
#Department	
#Location	
Number of securities held as on date	
Folio No. / DP ID / Client ID No.	
Nature of transaction (Buy/Sell/Subscribe)	
Proposed date of trading in securities	
Estimated number of securities proposed to be purchased/subscribed/sold	
Current market price (as on date of application)	
Whether the proposed transaction will be through Stock Exchange or off-market trade	
Previous approval no. and date for purchase/allotment (only if applicable)	

to be filled only by employees

I enclose herewith the form of undertaking signed by me Yours faithfully,

(Signature of the Applicant)

Annexure 2
PART B
FORMAT FOR DECLARATION/UNDERTAKING TO BE ACCOMPANIED WITH THE
APPLICATION FOR PRE- CLEARANCE

(Pursuant to Clause 7.2 of the Code)

Date:

To,
The Compliance Officer,
ATAL REALTECH LIMITED

I, _____, resident of _____ residing at

_____ hereby declare that I am a designated person of **ATAL REALTECH LIMITED** and I 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, 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 Code as notified by the Company from time to time.

I undertake to submit the necessary report within two days of execution of the transaction ('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 am aware that, I shall be liable to face penal consequences as set forth in the Code including disciplinary actions under the Code of the Company, in case the above declaration are found to be misleading or incorrect at any time.

I agree to comply with the provisions of the Code and provide any information relating to the trade as may be required by the Compliance Officer and permit the Company to declare such details to be disclosed to SEBI, if required by SEBI.

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

(Signature of the Applicant)

ANNEXURE 3

FORMAT FOR PRE-TRADING APPROVAL LETTER

(Pursuant to Clause 7.4 of the Code)

Date:

Approval No.: _____ of _____

To,

Mr./Mrs. _____ Employee Code No.: _____ Designation : _

Pre-Trading Approval / Disapproval - Your Application date: _____

With reference to your above application seeking approval for undertaking certain transactions in securities (including derivatives, if any) detailed therein, please be informed that you are / your immediate Relative _____ is hereby authorized / not 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 seven trading days from the date hereof). If you / your immediate Relative _____ do (es) not execute the approved transaction / trade on or before this date you would have to seek fresh pre-trading approval before executing any transaction / deal in the securities (including derivatives, if any) of __ (Name of the Company). Further, you are required to file the details of the executed transactions in the attached format within Two Trading days from the date of transaction / deal. In case the transaction is not undertaken a "NIL" report shall be necessary.

Yours truly,

Compliance Officer

Encl.: Format for submission of details of transaction (Annexure 4)

ANNEXURE 4

FORMAT FOR DISCLOSURE OF PRE-APPROVED TRANSACTIONS

(Pursuant to Clause 7.5 of the Code)

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

To,
The Compliance Officer,
ATAL REALTECH LIMITED

Dear Sir,

Details of pre-approved transactions

Ref: Your approval letter no. _____ dated _____

I hereby inform that, I –

- have not bought/sold /subscribed any Securities (including derivatives) of ATAL REALTECH LIMITED.
- have bought/sold/subscribed to the__Securities (including derivatives, if any) (GIVE DESCRIPTION) as mentioned below on _____(DATE).

Name of the Holder	First/Joint Holder	No. of Securities (including derivatives, in any)	Bought /Sold/ Subscribed	DP ID/Client ID/ Folio No.	Price (Rs.)

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

I agree not to buy/sell the above Securities (including derivatives, if any) for a period of six months from the date of the aforesaid transaction (applicable in case of sale/purchase by Designated Persons only).

In case there is any urgent need to undertake opposite transaction in these Securities (including derivatives, if any) within the said period I shall approach the Company (Compliance Officer) for necessary approval.

Yours faithfully,

Name & Signature: Employee Code: Dept./Location:

ANNEXURE 5

FORMAT FOR DISCLOSURE OF PARTICULARS BY PROMOTER / KEY MANAGERIAL PERSONNEL

/ DIRECTOR / DESIGNATED PERSON

(Pursuant to Clause 9.1 a) of the Code)

PART - A

DETAILS REQUIRED FOR MAKING ENTRY IN TO THE REGISTER OF DESIGNATED PERSONS

Date:

To,
The Compliance Officer,
ATAL REALTECH LIMITED

Dear Sir,

My Personal details are as under:

Name of the Promoter / Key Managerial Personnel (KMP) / Director / Designated Person	
# Employee No.	
# Grade	
# Department	
# Folio No. / DP ID & Client ID	
# Location	
Date of Appointment	

Pursuant to the provision of SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct for Prevention of Insider Trading, I hereby declare that I have the following immediate Relative (s):

Sr. No.	Name of the Immediate Relatives	Relationship with Director / KMP/ Designated Person	Folio No./ DP Id & Client ID

To be filled by the Employees

I hereby undertake to inform the changes in the above details from time to time. I hereby declare that the above details are true, correct and complete in all respects.

Name & Signature:

PART - B

INITIAL DISCLOSURE UNDER REGULATION 7 (1) (A) READ WITH REGULATION 6 (2)

(Pursuant to Clause 9.1 a) of the Code)

ATAL REALTECH LIMITED

ISIN of the Company: _____

Details of Securities Held by Promoter, Key Managerial Personnel (KMP) / Director / Designated Person and Other Than 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)	Securities held as on the date of regulation coming into force		%	Open interest of the Future Contracts held as on the date of regulation coming into force		Open interest of the option contacts held as on the date of regulation coming into force	
		Type of Securities (for e.g. – Shares, Warrants, Convertible Debentures, etc.)	No.		No. of units (Contracts * lot size)	Notional value in Rupee terms	No. of units (Contracts * lot size)	Notional value in Rupee terms

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

Signature	:	
Designation	:	
Date	:	
Place	:	

PART - C

INITIAL DISCLOSURE UNDER REGULATION 7 (1) (B) READ WITH REGULATION 6 (2)

(Pursuant to Clause 9.1 b) of the Code)

ATAL REALTECH LIMITED

ISIN of the Company: _____

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a Listed Company or upon being identified as a Designated Person 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.,)	Date of appointment of Director/ KMP or Date of becoming promoter	Securities held as on the date of regulation coming into force		% of Share holding	Open interest of the Future Contracts held as on the date of regulation coming into force		Open interest of the option contacts held as on the date of regulation coming into force	
			Type of Securities (for e.g. – Shares, Warrants Convertible Debentures, etc.,)	No.		No. of units (Contracts * lot size)	Notional value in Rupee term	No. of units (Contracts * lot size)	Notional value in Rupee terms

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

Signature	:	
Designation	:	
Date	:	
Place	:	

ANNEXURE 6

FORMAT FOR ANNUAL STATEMENT OF HOLDINGS
BY PROMOTER/ KEY MANAGERIAL PERSONNEL / DIRECTOR / DESIGNATED PERSONS
AND THEIR IMMEDIATE RELATIVES
(Pursuant to Clause 9.1 (c) of the Code)

Date:
To,
The Compliance Officer
ATAL REALTECH LIMITED

Dear Sir,

Statement of Security Holdings in the Company

As on _____, I along with my Immediate Relative hold the Securities (including derivatives, if any) of the Company, details whereof are as under:

Description of Security

Name of Holder	Name of Security	Physical holdings		Electronic holdings		
		Folio No.	Total holdings	DP ID	Client ID	Total holdings

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

Signature	:	
Name	:	
Employee Code	:	
Dept./Location	:	

ANNEXURE 7

**FORMAT FOR DISCLOSURE OF TRANSACTIONS CROSSING THRESHOLD
BY THE PROMOTER/ DIRECTORS/ EMPLOYEES PURSUANT TO REGULATIONS 7**

(2) READ WITH REGULATION 6 (2)

(Pursuant to Clause 9.2 a) of the Code)

(To be submitted within 2 Trading Days of transactions/ Dealing in Securities (including derivatives, if any) of the Company)

Name of the Company: _____

ISIN of the Company: _____

Details of change in holdings of Securities of Promoter, Employee or Director of a Listed Company and other such persons as mentioned in Regulation 6(2)

1	2	3	4	5	6	7	8	9	10		13	14
									No. and % of share holding	Date of allotment advice/ acquisition of shares/ sale of shares specify Company		
Name, PAN, CIN/ DIN & address with contact nos.	Category of Person (Promoters /KMP / Directors/ immediate relative to/others etc.)	Type of security held prior to acquisition /Disposal (For eg. – Shares Warrants, Convertible)	No. and % of share holding	Type of security (For eg. – Shares, Warrants,	No. of Equity Shares	Value	Transaction Type (Buy/ Sale/ Pledge/ Revoke/Invoke)	Type of security (For eg. Shares Warrants, Convertible Debentures etc.)	Securities held post acquisition /disposal	Date of allotment advice/ acquisition of shares/ sale of shares specify Company	Date of intimation to Company	Mode of acquisition /disposal (on

Details of trading in derivatives of the Company by Promoter, Employee or Director of a Listed Company 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)	
15	16	17	18	19	20	21

Signature	:	
Designation	:	
Place	:	
Date	:	
