KRANTI INDUSTRIES LIMITED

CODE OF CONDUCT FOR PROHIBITION OF INSIDER TRADING

VERSIONS OF POLICY

Sr. No.	Description of Change	Approved by	Approval Date	Effective Date
1	Original Policy	Board of Directors	December 21, 2015	December 21, 2015
2	Updated & Reviewed	Audit Committee & Board of Directors	August 13, 2025	August 13, 2025

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(Effective from August 13, 2025)

1. Introduction:

The Securities and Exchange Board of India ('SEBI') (Prohibition of Insider Trading) Regulations, 2015, as may be amended from time to time ("PIT Regulations") stipulate that listed companies must formulate a Code of Conduct, approved by their board of directors, to monitor, regulate, and report trading activities carried out by designated persons and the immediate relatives of designated persons.

Accordingly, Kranti Industries Limited ("Company or KIL") has formulated this Code of Conduct for Prohibition of Insider Trading ("Code") which is applicable to its Designated Persons ("DPs") and Connected Persons of the Company, as defined herein.

The Code is framed in line with the existing provisions of PIT Regulations in effect as on the date of approval of this Code and in case there is any conflict between the Code and the PIT Regulations, the PIT Regulations shall prevail.

2. Objective:

This code embodies the Code of Conduct to regulate, monitor and report trading by Designated Persons and their immediate relatives, as adopted by the Company for Prevention of Insider Trading. The Code is prescribed to ensure that the Designated Persons and/or their immediate relatives do not trade in the Securities of the Company when in possession of UPSI, and to prevent any speculative dealings, knowingly or unknowingly, by the Designated Persons or their immediate relatives.

The Company has no tolerance for any form of Insider Trading or similar unlawful security related trade practices.

3. Definition(s):

a. "**Act**" shall mean the SEBI Act, 1992 (15 of 1992);

b. "**Board**" means the Securities and Exchange Board of India;

c. "**Code**" means this Code of Conduct for Prevention of Insider Trading and the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information, as applicable, including modifications made thereto from time-to-time;

d. "**Company**" means Kranti Industries Limited;

e. **"Compliance Officer"** means any senior officer, designated so and reporting to the Board of Directors 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 directors of the listed company or the head of an organization, as the case may be.

Explanation – For the purpose of this definition, "financially literate" shall mean a person who has the ability to read and understand basic financial statements i.e. balance sheet, profit and loss account, and statement of cash flows;

f. "**Connected Person**" means: -

i. any person who is or has been, during the six months prior to the concerned act, associated with a company, in any capacity, directly or indirectly, 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, whether temporary or permanent, with the company, that allows such a 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. a 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 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 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 relative or banker of the Company, has more than 10% of the holding or interest;

k. a firm or its partner or its employee in which a connected person specified in sub-clause (i) of clause (d) is also a partner; or

l. a person sharing household or residence with a connected person specified in sub-clause (i) of clause (d);

m. such other person as may be notified by SEBI under the Regulations;

g. "**Designated Person(s)"** means the following persons:

a. Directors and Key Managerial Personnel i.e. CFO, CS and COO of the Company;

b. All Promoter(s), members of Promoter group of Company;

c. All employees of the Company at the grade Head of the Department "HODs" and above i.e. two levels below the Chairman and Managing Director;

d. Members of the Core Management Team

e. Any other Employees of KIL working in Finance, Accounts, Corporate Secretarial, Legal, Information Technology, Business Development functions as may be determined by the Compliance Officer from time to time, in consultation with the respective Head of Department.

f. Employees of Material Subsidiary(ies) of KIL identified as per clauses (a) to (e) above.

g. For the purpose of this clause, "Material Subsidiary" shall have the same meaning as defined in the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time and reported in Annexure A to this Code;

h. "**Generally Available Information**" means information relating to the Company and its securities, which is accessible to the public on a non-discriminatory basis and shall not include unverified event or information reported in print or electronic media;

i. **"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;

j. "**Insider**" means any person who is:

i. a connected person; or

ii. in possession of or having access to Unpublished Price Sensitive Information;

k. "**Informant**" means an individual(s), who voluntarily submits to the SEBI a Voluntary Information Disclosure Form relating to an alleged violation of insider trading laws that has occurred, is occurring or has a reasonable belief that it is about to occur, in a manner provided under SEBI (Prohibition of Insider Trading) (Third Amendment) Regulations, 2019, regardless of whether such individual(s) satisfies the requirements, procedures and conditions to qualify for a reward.

l. "**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;

m. "**Promoter Group**" 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. "**relative**" shall mean the following:

i. spouse of the person;
ii. parent of the person and parent of its spouse;
iii. sibling of the person and sibling of its spouse;
iv. child of the person and child of its spouse;
v. spouse of the person listed at sub-clause (iii); and
vi. spouse of the person listed at sub-clause (iv);

o. **"Relevent Person"** include designated person, immediate relatives and persons with whom such designated person(s) share(s) material financial relationship i.e.; receipt of at least 25% of DP annual income during the immediately preceding twelve months but shall exclude relationships in which the payment is based on arm's length transactions.

p. "**Regulation**" Securities Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015;

q. "**Securities**" shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof;

r. "**Trading**" means and includes subscribing, redeeming, switching, buying, selling, dealing, or agreeing to subscribe, redeem, switch, buy, sell, deal in any securities, and "trade" shall be construed accordingly;

s. "**Trading Day**" means a day on which the recognized stock exchanges are open for trading.

t. "**Unpublished Price Sensitive Information (UPSI)**" means any information relating to the Company and its securities, directly or indirectly, that is not generally available to the public which 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. changes in the capital structure;

iv. mergers, de-mergers, acquisitions, delisting, disposals, expansion of business and such other transactions;

v. changes in Key Managerial Personnel.

vi. However, the code is not restricted to the information of events mentioned above, and it shall include any, direct or indirect information relating to the Company or its securities.

Words and expressions used and not defined in this code but defined in this code, 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 thereunder shall have the meanings respectively assigned to them in those legislation.

This Code is intended to govern the "Regulating", "Monitoring" and "Reporting" of trading by insiders in shares of the Company by the Company.

4. Applicability:

The code shall be applicable to the employees and connected persons dealing in securities hereinafter called as the designated persons specified by the Board of Directors of the Company.

The designated persons shall include the following:

i. All Directors of the Company;

ii. Promoters and members of Promoter Group of the Company

iii. Heads of all divisions/ Departments of the Company by whatever designation they may be called

iv. Employees up to two levels below Board of Directors of the Company

v. Employees in Finance, Accounting, Taxation and, Corporate Communications and Secretarial & Legal department who have access to UPSI

vi. Auditors of the Company

vii. Employees of subsidiaries of Company designated on the basis of their functional role or access to UPSI in the organization by their Board of Directors;

viii. Employees of IT function of the Company who are in possession or likely to be in possession of Unpublished Price Sensitive Information;

ix. Any other employees as may be designated/ notified by the Compliance Officer in consultation with the Board from time to time, who may be considered to be in possession of Unpublished Price Sensitive Information; and

x. Immediate Relatives of persons specified in (i) to (viii) above.

5. Restrictions on Communication and Preservation of UPSI:

- The insider shall not communicate, provide, or allow access to any UPSI regarding Company and its securities listed or proposed to be listed by Company to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- Any communication by the insider of UPSI relating the Company in the furtherance of legitimate purposes, performance of duties or discharge of legal obligations and in the situations as provided in the Regulations shall not be violation of this code.
- Any person in receipt of UPSI in furtherance of a legitimate purpose shall be considered as an insider for the purpose of this Code and the SEBI Regulations.
- Any communication in the organisation by and/or among the insiders shall be strictly on need to know basis. This means the UPSI shall be disclosed only to those persons who need to know the same in furtherance of a legitimate purpose, the course of performance or discharge of their duty and whose possession of UPSI will not in any manner give rise to a conflict of interest or likelihood of misuse of the information.
- The Company's Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information stipulates the policy on determination of legitimate purpose.
- The Designated Persons and Employees, sharing UPSI in furtherance of legitimate purposes, shall issue a due notice or enter into a confidentiality / non-disclosure agreement with such insider to maintain confidentiality of the UPSI in compliance with these Rules and the SEBI Regulations.
- No insider shall trade in securities of the Company when in possession of UPSI.

6. Limited access to confidential information:

Designated Persons privy to confidential information shall, in preserving the confidentiality of information, and to prevent its wrongful dissemination, adopt among others, the following safeguards:

a) files containing confidential information shall be kept secure;

b) computer files must have adequate security of login through a password; and

c) follow the guidelines for maintenance of electronic records and systems as may be prescribed by the Compliance Officer from time-to-time in consultation with the person in charge of the information technology function.

7. Chinese Wall Procedures:

- To prevent the misuse of UPSI, the Company shall separate those areas of the Company which routinely have access to UPSI, considered "inside areas" from other areas including operations or other departments providing support services, considered "public areas".
- In exceptional circumstances employees from the public areas may be brought "over the wall" and given UPSI on the basis of "need to know" criteria. In such an event, such employees will be bound by the same restrictions and obligations as the employees in the "inside areas" till the UPSI becomes generally available.

8. Trading Plans:

- The Regulations give an option to persons who may be perpetually in possession of UPSI and enabling them to trade in securities in a compliant manner. This enables to formulate a Trading Plan by an Insider to enable him/her to plan for trades to be executed in future.
- An insider may carry out trade in the securities of the Company (either in own name or in any immediate relative's name) i.e. to buy or sell or deal in securities pursuant to a trading plan approved by the Compliance Officer and after making disclosure to the public.
- The trading plan shall be approved after seeking declaration of non-possession of any UPSI from such insider-applicant.
- The Trading plan shall clearly set out following parameters:

  i. either the value of trades to be effected or the number of securities to be traded;

  ii. nature of the trade;

  iii. either specific date or time period not exceeding five consecutive trading days;

  iv. price limit, that is an upper price limit for a buy trade and a lower price limit for a sell trade, subject to the range as specified below:

- for a buy trade: the upper price limit shall be between the closing price on the day before submission of the trading plan and up to twenty per cent higher than such closing price;

- for a sell trade: the lower price limit shall be between the closing price on the day before submission of the trading plan and up to twenty per cent lower than such closing price.

Explanation:

i. While the parameters in sub-clauses (i), (ii) and (iii) shall be mandatorily mentioned for each trade, the parameter in sub-clause (iv) shall be optional.

ii. The price limit in sub-clause (iv) shall be rounded off to the nearest numeral.

iii. Insider may make adjustments, with the approval of the compliance officer, in the number of securities and price limit in the event of corporate actions related to bonus issue and stock split occurring after the approval of trading plan and the same shall be notified on the stock exchanges on which securities are listed.

- The insider shall make an application to the Compliance officer of the Company in the form annexed hereto as Annexure A.

- The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of these Regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.

- The Compliance Officer shall approve or reject the trading plan within two (2) trading days of receipt of the trading plan and notify the approved plan to the stock exchanges on which the securities are listed, on the day of approval.

- The trading plan once approved shall be irrevocable and mandatorily implemented by the insider;

Provided that the implementation of trading plan shall not be commenced if any unpublished price sensitive information in possession of the insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation.

Provided further that if the insider has set a price limit for a trade under (iv) above, the insider shall execute the trade only if the execution price of the security is within such limit. If price of the security is outside the price limit set by the insider, the trade shall not be executed.

- The trading under the approved trading plan shall not be commenced earlier than One Hundred and Twenty (120) calendar days from the date of public disclosure of plan and there shall be a gap of 12 months in two (2) trading plans.

- There shall not be overlapping of trading plans and such trading plans are not the immunity from any market abuse.

9. Trading Window:

- The Designated persons and their immediate relatives may execute trades subject to compliance with these regulations and a national trading window shall be used as an instrument of monitoring trading by the designated persons.
- The Designated persons and their immediate relatives shall not trade in securities when the trading window is closed. The exact dates of each closure of the Trading Window shall be intimated to each Insider, who is an employee of the Company, and it is the responsibility of each Insider to ensure compliance with this Code and by each of Insiders' Immediate Relatives.
- Trading Window shall be closed, inter alia, at the time of:

  i. Declaration of financial results (quarterly, half-yearly and annually);
  ii. Declaration of dividend (interim or final);
  iii. Issue of Securities by way of rights/ bonus/etc.;
  iv. Any major expansion plan or execution of new projects;
  v. Amalgamation, merger, takeover, buy-back, etc.;
  vi. Disposal of whole or substantially whole of the undertaking.

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 UPSI. Such closure shall be imposed in relation to such securities to which such unpublished price sensitive information relates.

- Trading restriction period shall be made applicable from the end of every quarter till 48 hours after the declaration of financial results. The gap between clearance of accounts by audit committee and board meeting should be as narrow as possible and preferably on the same day to avoid leakage of material information.
- Designated person shall not execute a contra trade within not be less than six (6) months' subject to the grant of relaxation by the Compliance Officer in accordance with the regulations. Provided that this shall not be applicable for trades pursuant to exercise of stock options.
- The timing for re-opening of the trading window shall be determined by the compliance officer taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, which in any event shall not be earlier than forty-eight hours after the information becomes generally available.

- Prior to approving any trades, the Compliance Officer shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any UPSI. He shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.
- Where the volume of shares to be traded/ dealt are 1,00,000 or above shares, then such trade shall be subject to pre-clearance by the Compliance Officer.
- The pre-cleared trades need to be executed within seven (7) trading days failing which fresh pre-clearance would be needed for the trades to be executed.
- Trading window shall be closed by the Compliance Officer when notice to the Board is issued for quarterly meetings till second day when the price sensitive information, if any, is made generally available by the Company.

10. Disclosures and Reporting:

A. Initial Disclosure of Holdings:

Any person appointed as Key Managerial Personnel or a director of the Company or upon becoming a promoter or 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 (7) days of such appointment or becoming a promoter in Form A. (as Annexed)

B. Continual Disclosures:

If the value of the securities traded by promoter, member of promoter group, designated person and directors of the Company, whether in one transaction or series of transaction over any calendar quarter, aggregates to the traded value in excess of ₹10 Lakhs (Rupees Ten Lakhs only) then a disclosure shall be made to the Company within two(2) trading days of the transaction, about the number of securities acquired or disposed and the Company shall further notify the particulars of such trading to the stock exchange within two (2) trading days of receipt of the disclosure or from becoming aware of such information in Form B. (as Annexed)

The Company shall within a period of two (2) working days from the date of receipt of such disclosures, inform the Stock Exchanges particulars of such trading.

C. The disclosures by any person under this code shall also include trading by such person's immediate relatives and by any other person for whom such person takes trading decisions. Other formats / disclosures, to monitor compliance with these Regulations would be as under:

i. Application-cum-undertaking for pre-clearance in Annexure A (as annexed);
ii. Reporting of holdings and trading in securities of the Company by other Connected Person(s) in Form C (as Annexed) within two working days;
iii. Every off-market trade shall be reported by the insiders to the Company within two working days.

The aforesaid 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.

The disclosures of trading in securities shall also include trading in derivatives of securities in value.

The aforesaid disclosures shall be maintained by the company, for a minimum period of five years, in such form as may be specified.

11. Penalty:

- Every designated employee shall be individually responsible for compliance with the provisions of this Code (including to the extent the provisions hereof are applicable to his / her Immediate Relatives).
- Any Director / Designated Person who trades in Securities or communicates any information for trading in Securities in contravention of the Code may be penalised and appropriate action may be taken by the Company.
- Directors / Designated Person of the Company who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, recovery, claw back, etc. Any penalty amount collected under this clause shall be remitted to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the SEBI Act.
- The Managing Director shall upon receipt of the report or based on the finding contained therein be entitled to take action against the person found guilty for violation of this Code as he may in his absolute discretion deem fit including but not restricted to:
    a. Issue letter of warning stating that consequence of contravention / non-adherence would result in dismissal from services.
    b. Any other suitable action, to facilitate the implementation of the spirit of the Code.
- The Board of Directors of the Company shall inform the Stock Exchange promptly in case of violation of the code and the regulations.
- Under Section 15G of the Securities Exchange Board of India Act 1992, If any Insider, who-
    i. either on his own behalf or on behalf of any other person, deals in securities of a body corporate listed on any stock exchange on the basis of any unpublished price-sensitive information; or
    ii. communicates any unpublished price-sensitive information to any person, with or without his request for such information except as required in the ordinary course of business or under any law; or

iii. counsels, or procures for any other person to deal in any securities of anybody corporate on the basis of unpublished price-sensitive information,

shall be liable to a penalty which shall not be Less than ₹10Cr (Rupees Ten Lakh only) but which may extend to ₹25Cr (Rupees Twenty-Five Crore only) or Three (3) times the amount of profits made out of insider trading, whichever is higher.

12. Protection against reporting of suspected or alleged violations:

The Company will protect any employee, who is an Informant, against retaliation and victimisation under the Code.

Employee who reports to SEBI about an alleged violation of insider trading laws in accordance with the mechanism introduced by SEBI (Prohibition of Insider Trading) (Third Amendment) Regulations, 2019 will be protected against any discharge, termination, demotion, suspension, threats, harassment, directly or indirectly or discrimination.

13. Information to SEBI in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015 including any amendments thereof:

In case it is observed by the Company/Compliance Officer that there has been a violation of the Regulations, SEBI shall be informed by the Company.

14. Amendment:

The Code would be subject to revision/ amendment in accordance with the applicable laws, regulations, circulars, notifications, guideline issued by SEBI. The Company reserves its rights to alter, modify, add, delete or amend any of the provisions of the Rules.

The Board of Directors (including Audit Committee / Management Committee of the Board of Directors) is authorised to change/amend this Code from time to time at its sole discretion and/or in pursuance of any amendments made in the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Any subsequent amendment/modification in the SEBI (Prohibition of Insider Trading) Regulations, 2015, or amendment/modification by way of issue of circular/clarification by the Securities and Exchange Board of India and/or any other applicable law(s) for time being in force, in this regard shall prevail upon the provisions hereunder and the Code shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

The formats for making applications for pre-clearance, reporting of trades executed, reporting level of holdings in securities at such intervals as may be determined as being necessary to monitor compliance with these regulations shall be specified by the Board of Directors as deems necessary.

FORM A

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7(1)(b) read with Regulation 6(2)–Disclosure on becoming a Key Managerial Personnel / Director / Promoter / Promoter Group]

Name of the Company: KRANTI INDUSTRIES LIMITED

ISIN of the Company: INE911T01010

Details of Securities held on appointment of Key Managerial Personnel (KMP) 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 as mentioned in Regulation 6(2).

Name, PAN, 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/ member of the promoter group	Securities held at the time of appointment of KMP/Director or upon becoming Promoter or member of the promoter group		% of Shareholding
			Type of securities (For eg. – 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 on the securities of the company held on appointment of KMP 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 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 at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group		
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.

Signature:
Name:
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: KRANTI INDUSTRIES LIMITED
ISIN of the Company: INE911T01010

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

Name, PAN, CIN / DIN & addresswith contactnos.	Category of Person (Promoter/ Promoter Group/ designated person KMP/ 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	No. and % of shareholding	Type of security	No.	Value	Transaction Type (Buy/ Sale/ Pledge/ Revoke / Invoke)	Type of security	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. 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 relatives of such persons and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc.)						
Type of contract	Contract specifications	Buy		Sell		Exchange on which the trade was executed
		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.

Signature:
Name:
Designation:
Date:
Place:

FORM C

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 & address with contact nos.	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	No. and % of shareholding	Type of security	No.	Value	Transaction Type (Buy / Sale / Pledge / Revoke / Invoke)	Type of security	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. 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.)						
Type of contract	Contract specifications	Buy		Sell		Exchange on which the trade was executed
		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

Signature:
Name:
Designation:

Date:
Place:

ANNEXURE A

To,
The Compliance Officer
Kranti Industries Limited
Gat No.267/B/1, At Post Pirangut,
Tal. Mulshi, Pune, Maharashtra,
India, 412115

Details of person filing the form (To be filled mandatorily)	
Name	
Address	
Designation/Association with the Company (For employees / contractors / consultant - state department and current role). For third parties- state nature of work, department dealing with)	
Whether employee or third party (Tick the applicable box)	Employee ☐ Director ☐ Contractor/ Consultant/ Third Party ☐
PAN (Mandatory whether shares held or not)	
Folio No. or DP ID & Client ID (Mandatory whether shareholder not)	
No. of Shares held in the Company, if any	
Whether Form being filed for self, relative or Others*	Self ☐ Relative ☐ Others ☐
In case, Form is being filed for relative/ Others*, name and relation to be mentioned	Name: Relation:

** 'Others' refer to any such person for whom the KMP / Director / Promoter, takes trading decisions.*

Sr. no.	Purpose of filing the Form	Tick against purpose for which Form is being filed
1.	Application for Pre-Clearance	☐
2.	Reporting of trades executed as per pre-clearance or decisions not to trade after securing pre-clearance	☐
3.	Application for waiver of holding Shares of the Company for period of six months	☐

1. Application for Pre-Clearance

Application to trade in the shares of the Company as per details hereunder:

Number of Shares held in the Company (A)	
Number of Shares of the Company proposed to be Sold (B)	
Number of Shares of the Company proposed to be acquired (C)	
Balance holding (A) - (B) + (C)	
Name of Depository participant & DP ID No. through whom Shares are proposed to be Debited / Credited	
DP ID / Client ID No	

Declaration:

I confirm on my own behalf and on behalf of my relative that:

i. I do not have access to any unpublished price sensitive information and have complied with the Code of Conduct for Inside Trading as specified by the Company from time to time;

ii. I shall execute the trade of shares within 7 days of your approval failing which I shall apply again to you for your approval.

iii. I shall hold shares of the Company for a minimum period of six months from the date of acquisition. (In case of application for purchase of shares)

iv. I have not entered into any opposite transaction in the previous six months and I shall not execute a contra trade within six months from execution of the proposed transaction.

I further confirm that the aforesaid facts are true and correct and shall be fully responsible for any wrongful acts of my Dependents including such penalties as may be imposed by the Company.

Signature:
Name:
Designation:
Department:

Place:
Date:

Approval / Rejection of Pre-Clearance

I _____, Compliance officer of the Company hereby_____ (Approve / Reject) the above application.

Reasons for rejection, if any:

Place:
Date:

Signature:
Compliance Officer

2. Reporting of trades executed as per pre-clearance or decisions not to trade after securing pre-clearance

Date of receipt of pre-clearance approval	
Whether trade executed	Yes ☐ No ☐
In case, 'Yes', please fill in details below	
Date of purchase/ sale as per pre-clearance	
No. of shares purchased	
No. of shares sold	
Balance shares held	
In case, 'Yes', please fill in details below	
Reasons for not trading as per pre-clearance	

Signature:
Name:
Designation:
Department:

Place:
Date:

3. Application for relaxation from holding Shares of the Company for period of six months

Application for waiver of holding Shares of the Company for period of six months as per details hereunder:

Number of Shares held in the Company	
Number of Shares of the Company proposed to be sold	
Date of last purchase	
Balance shareholding	
Name of Depository participant & DP ID No. through whom Shares are proposed to be sold	
DP ID / Client ID No	
Reasons in details for waiver	

Declaration:

I confirm on my own behalf and on behalf of my_____ (mention relation) or _____ (any other person) that I do not have access to any unpublished price sensitive information and have complied with the Code of Conduct for Insider Trading as specified by the Company from time to time.

I further confirm that the aforesaid facts are true and correct and shall be fully responsible for any wrongful acts of my Dependents including such penalties as may be imposed by the Company.

Signature:
Name:
Place: Designation:
Date: Department:

Approval / Rejection of application for relaxation from holding Shares of the Company for period of six months

I, _____ Compliance officer of the Company hereby _____ (Approve/Reject) the above application.

Reasons for rejection:

Place: Signature:
Date: Compliance Officer