

PIRAMAL CAPITAL & HOUSING FINANCE LIMITED

CODE FOR PREVENTION OF INSIDER TRADING

I. INTRODUCTION

As a market intermediary, Piramal Capital & Housing Finance Limited (“**the Company**”) endeavours to maintain the highest ethical standards of compliance in respect of dealing in securities by persons associated with the Company. In this regard, the Company has formulated this Code pursuant to Regulation 9 (1) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

II. APPLICABILITY

The Code framed hereunder and any amendments thereto from time to time shall be applicable to all Designated Persons of the Company.

Each employee joining the Company must receive, read, sign and submit this document, confirming that she/ he understands and will follow the corporate standards and comply with the policies and procedures contained herein to the extent applicable to them.

III. DEFINITIONS

Unless the context requires otherwise, the definitions and abbreviations used in this Code shall have the meanings as set out below:

1. **“Applicable Laws”** mean any applicable law, statute, bye-law, rule, regulation, guideline, circular, order, notification, regulatory policy (including any requirement or notice of any regulatory body), compulsory guidance, rule, order or decree of any court or any arbitral authority, or directive, delegated or subordinate legislation in any applicable jurisdiction, inside or outside India, including any applicable securities law in any relevant jurisdiction, including the Securities and Exchange Board of India Act, 1992, the Companies Act, 2013, the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the guidelines, instructions, rules, communications, circulars and regulations issued by any regulatory or governmental authority.
2. **“Chinese Walls”** refer to arrangements that restrict access to Unpublished Price Sensitive Information as set out in further detail under the Chinese Wall Policy of the Company.
3. **“Code”** means this Code for Prevention of Insider Trading adopted by the Company with effect from [●].
4. **“Compliance Officer”** means such senior officer, designated so and reporting to the Board of Directors of the Company (at a frequency stipulated by the Board of Directors of Company) who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under the SEBI 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, implementation of this Code, and pre-clearance of trades by Designated Persons and their immediate relatives.

5. **“Connected Person”** in terms of the SEBI Regulations shall mean 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 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.

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) Immediate Relative of Connected Persons; or
- (ii) Holding company or associate company or subsidiary company; or
- (iii) Intermediary or an employee or a director thereof; or
- (iv) Investment company, trustee company, asset management company or an employee or a 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; or
- (viii) An official or an employee of a self-regulatory organization recognized or authorized by SEBI; or
- (ix) a banker of the Company; or
- (x) A concern, firm, trust, HUF, company or association of persons wherein a director of a company or his Immediate Relative or banker of the company has more than 10% of the holding or interest

6. **“Designated Persons”** means:

- (a) Members of the Board of Directors and Key Managerial Personnel;
- (b) all concerned employees (irrespective of their grades or designation) in Investor Coverage team, Corporate Coverage team, Finance and Accounts, Secretarial, Compliance and Legal Departments who have access to UPSI,

- the Restricted List maintained by the Company or have information about the mandates received/ proposed to be received by the Company;
- (c) Such other person, as may be designated by the Compliance Officer, in consultation with the Board of Directors, on the basis of their functional role, relationship / association with the Company; and
 - (d) Immediate Relative of persons mentioned in clause (a) to (c) above.
7. **“Generally Available Information”** means information that is accessible to the public on a non-discriminatory basis, such as information published on websites of stock exchanges.
 8. **“Immediate Relative”** shall mean 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.
 9. **“Insider”** shall mean any person who is:
 - (i) a Connected Person; or
 - (ii) in possession of or having access to Unpublished Price Sensitive Information;
 10. **“SEBI”** means the Securities and Exchange Board of India.
 11. **“SEBI Regulations”** means the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time.
 12. **“Securities”** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (as amended from time to time), but shall not include units of mutual funds.
 13. **“Trading”** shall mean and include subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell or deal in any Securities.
 14. **“Unpublished Price Sensitive Information” / “UPSI”** shall mean 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 include but not be restricted to information relating to:
 - (i) financial results;
 - (ii) dividends;
 - (iii) changes in capital structure;
 - (iv) mergers, de-mergers, acquisitions, delistings, 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, or any other applicable laws.

IV. INTERPRETATION

- (i) In case of any inconsistency between the definitions set out above and those provided under the Applicable Laws, the definitions provided under the Applicable Laws shall prevail.
- (ii) The words and expressions used, but not defined in this Code shall have the meaning ascribed to them under the Applicable Laws.
- (iii) References to any legislation, act, regulation, rules, guidelines or policies shall be to such legislation, act, regulation, rules, guidelines or policies as amended, supplemented, or re-enacted from time to time and any reference to a statutory provision shall include any subordinate legislation made from time to time under that provision.

V. ROLE OF COMPLIANCE OFFICER

The Compliance Officer shall perform all the duties as enumerated under the SEBI Regulations including, without limitation, the following duties:

- (i) He/ she shall be responsible for monitoring implementation of the Code under the overall supervision of the Board of Directors;
- (ii) He/ she shall provide reports regarding compliance with this Code to the Board of Directors of the Company, and specifically to the Chairman of the Audit Committee at such frequency as may be stipulated by the Board of Directors;
- (iii) He/ she shall maintain a record of Designated Persons and any changes made to the list of Designated Persons. The Compliance Officer shall in consultation with the Board of Directors, specify the Designated Persons to be covered by this Code on the basis of their role and function in the organisation;
- (iv) He/ she shall be responsible for granting or declining pre-clearances of all Trades by the Insiders;
- (v) He/ she shall assist all the employees in addressing any clarification regarding the Code and SEBI Regulations;
- (vi) He/ she shall maintain records of all the declarations submitted in the appropriate form given by the Designated Persons;
- (vii) He/ she shall maintain a Restricted List of Securities, and use such list as the basis for granting or declining pre-clearance of Trades;
- (viii) He/ she shall implement the punitive measures or disciplinary action prescribed for any violation or contravention of this Code;
- (ix) He/ she shall promptly inform and report any violation of the SEBI Regulations that may come to his/ her notice ; and

- (x) He/ she shall do all such things as provided in the SEBI Regulations and as may be prescribed by SEBI from time to time in relation to prevention of insider trading.

VI. RESPONSIBILITY OF INSIDERS AND DESIGNATED PERSONS

- (i) The Designated Persons and all Insiders shall maintain the confidentiality of all Unpublished Price Sensitive Information obtained by them during the course of their activities.
- (ii) The Designated Persons and all Insiders are prohibited from:
 - (a) trading in the Securities of listed or proposed to be listed companies, either on their own behalf or on behalf of any other person, while in possession of UPSI; or
 - (b) communicating, providing, or allowing access to any UPSI relating to any listed or proposed to be listed company or its Securities to any person including other insiders like employees, clients or other persons, with or without his request for such information, except as required on a need to know basis where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations; or
 - (c) to procure from or cause the communication by any Insider of UPSI, relating to any listed or proposed to be listed company or its Securities except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations, or
 - (d) to counsel or recommend to any person to Trade in any Security of a listed or proposed to be listed company in respect of which the Insider has UPSI.
- (iii) Unpublished Price Sensitive Information is to be handled on a “need to know basis”, i.e., UPSI should be disclosed only to those persons in the Company who need such information to discharge their duties and/ or legal obligations whose possession of such information will not give rise to a conflict of interest or misuse of the information.
- (iv) The employees shall not encourage or circulate rumours or unverified information obtained from client, industry or any other source without verification (usually through contact with the subject company or an authentic source) and in accordance with the Applicable Laws.
- (v) All Designated Persons and Insiders are required to ensure compliance with this Code and not participate in, assist or abet any violation of SEBI Regulations or this Code.
- (vi) All files, whether electronic or manual, containing Unpublished Price Sensitive Information shall be kept secure. Records containing such information should be kept under appropriate security.

VII. EMPLOYEE DEALINGS

- (i) All Insiders, and Designated Persons are required to observe the following requirements and procedures for dealing in Securities set out in this Code.

- (ii) No Insider, or Designated Persons shall trade, subscribe, buy, sell, pledge or deal in, or agree to trade, subscribe, buy, sell, pledge or deal in Securities that are listed or proposed to be listed on a stock exchange, when in possession of UPSI.
- (iii) All Insiders, and Designated Persons shall be individually responsible for complying with the provisions of the SEBI Regulations and the Code to the extent applicable.
- (iv) To prevent misuse of UPSI, the Company shall maintain Chinese Walls in accordance with the Chinese Wall Policy of the Company and all employees and Designated Persons shall ensure compliance with the same.

(v) **Procedures for Trading in the Securities**

1. No Insider shall, when in possession of UPSI, apply for pre-clearance of a proposed Trade in Securities, whether for his own account or on account of any other person.

2. *Pre-Clearance for Trading in Securities*

In all other cases, all Designated Persons who intend to undertake Trading in Securities in their own name or in the name of their Immediate Relatives (above the Threshold Limit set out below), shall obtain pre-clearance of each of the transactions as per the pre-clearance procedure as described hereunder.

3. *Procedure for Pre-clearance of Trade in the Securities*

- (a) An application for pre-clearance of Trade in the Securities shall be made in to the Compliance Officer in the format specified in **Form 'A'** annexed to this Code. The pre-clearance may be sought either by hard copy or via e-mail addressed to the Compliance Officer, enclosing the Form A duly completed and signed.

- (b) An undertaking in the format specified in **Form 'B'** annexed to this Code shall be executed by such Designated Person incorporating, amongst others, the following clauses:

- (i) that the Designated Person does not have any access to, or has not received, Unpublished Price Sensitive Information in relation to the Securities proposed to be traded up to the time of signing the undertaking;

- (ii) If he/ she has access to, or has received, Unpublished Price Sensitive Information after the signing of the undertaking, but before the execution of the Trade, he/ she shall inform the Compliance Officer of the change in position, and he/ she shall not undertake and refrain from Trading in the Securities till the time that he/ she ceases to have access to Unpublished Price Sensitive Information, and the relevant Unpublished Price Sensitive Information becomes Generally Available Information;

- (iii) He/ she has not placed a contra-trade in last six months;

- (iv) He/ she has not contravened this Code or the SEBI Regulations; and
- (v) He/ she has made a full and true disclosure in the matter.
- (c) Granting pre-clearance shall be at the discretion of the Compliance Officer and he/ she shall record the reason for his/ her decision. In case of a positive clearance, the Compliance Officer shall issue the order in the format specified under Form A annexed to this Code. Thereafter, the Designated Person shall be required to submit the confirmation prescribed under Form A annexed to this Code stating that the Trade for which the pre-clearance was granted has been undertaken.
- (d) Please note that the Compliance Officer has the right to ask the Designated Persons to furnish such additional information including its statement of holdings held by himself and the Immediate Relatives, or any other document as the Compliance Officer may consider appropriate, to verify and ensure that due procedures are being adhered to.
- (e) If a Security approved for Trading is subsequently placed on the Restricted List, prior to execution of the approved Trade, the pre-clearance shall be treated as withdrawn and the Trade shall not be allowed to be executed.
- (f) In case of the Trades to be executed by the Compliance Officer or his/ her Immediate Relatives, the Compliance Officer shall obtain clearance from the Managing Director in the manner set out above.
- (g) The pre-clearance shall not be necessary, if the aggregate value of Securities to be Traded in a quarter in one or more transactions does not exceed Rs. 10,00,000/- (Rupees Ten Lakhs Only) (the “**Threshold Limit**”).
- (h) Designated Person shall execute the Trade in Securities within seven (7) days after the pre-clearance is given. If the Trade is not executed within the time specified under this clause, the pre-clearance granted shall lapse and he/she shall be required to provide reasons for not effecting the transactions under “**Form C**” as annexed to this Code, along with a fresh request for pre-clearance, if desired.
- (i) All Designated Persons who buy or sell Securities shall not enter into an opposite transaction (i.e. sell or buy, respectively) during a period of six months following the prior transaction (“**Contra Trade**”). In case sale of Securities before the expiry of six months is necessitated by personal emergency, the Compliance Officer may at his/ her discretion waive the requirement for the minimum holding period, as per “**Form D**” as annexed in this Code.
- (j) In case of any Contra Trade being executed, inadvertently or otherwise, the profits from such Trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and

Education Fund administered by SEBI under the Securities and Exchange Board of India Act, 1992.

VIII. MAINTENANCE OF RESTRICTED LIST

- (i) In order to prevent Trading in Securities while in possession of UPSI, the Company shall restrict Trading in Securities of any listed or proposed to be listed company in respect of which any one or more Designated Persons are in possession of UPSI.
- (ii) Towards this, the Compliance Officer shall maintain a list of such Securities which shall be designated as the Restricted List.
- (iii) In order to ensure that the subject companies or Securities of these companies are placed on the Restricted List at an appropriate time, it is the responsibility of all employees in the respective areas to keep the Compliance Officer apprised of business, strategic or relationship related developments which might indicate that placing of such companies or their Securities on the Restricted List has become necessary.
- (iv) **Restricted List**
 - (a) A subject company and its Securities may be brought on the Restricted List in case of the following circumstances:
 - i. Any investment has been made by the Company;
 - ii. When the Company executes a confidentiality agreement; or signs a mandate with the subject company, where such details are not made public or enters into negotiations or is pitching for a mandate, the details of which are not made public;
 - iii. Any Designated Person has obtained any UPSI (outside the deal process), because of a potential assignment, relationship or otherwise;
 - iv. When the Company has UPSI relating to Securities of any subject company because of a potential assignment, relationship or otherwise.
 - (b) The Restricted List will be updated on an on-going basis by the Compliance Officer.
 - (c) The following types of subject companies and its Securities may be considered for removal from the Restricted List by the Compliance Officer:
 - i. where due diligence was undertaken more than 6 months ago, however no investment was not made or transaction undertaken and there is no proposal to make such investments or participate in any transaction;
 - ii. where the transaction has been completed and 6 months have elapsed since then;
 - iii. which were incorporated in the Restricted List outside the deal process, and the unpublished price sensitive information in connection with the subject company becomes public.

IX. DISCLOSURES

(i) **Initial Disclosure**

- (a) Every Designated Person shall disclose in the prescribed format at **Annexure 1**, the number of Securities held by him/ her, his/ her Immediate Relatives and any other person for whom he takes Trading decisions, to the Company within seven (7) days of the Company adopting the Code and/ or as on the date of joining the Company.
- (b) Every person on appointment as a Designated Person shall disclose in the prescribed format, the number of Securities held (as on the date of his/ her appointment) by him/ her, his/ her Immediate Relatives and any other person for whom he takes Trading decisions, to the Company within seven (7) days of such appointment.

(ii) **Continual Disclosures**

- (a) All Designated Persons shall disclose to the Company the number of such Securities acquired or disposed of within two (2) trading days of such transaction only 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 INR 10 lakh, in the prescribed format set out at **Annexure – 2**.
 - (b) All Designated Persons shall, within thirty (30) days from the end of each calendar year, disclose to the Company the details of Securities transacted by him/ her, his/ her spouse and his/ her Immediate Relatives and by any other person for whom he/ she takes Trading decisions, in the prescribed format set out at **Annexure - 3**.
 - (c) The Compliance Officer may require any Connected Person to make disclosure of its holdings and Trading in Securities in such form and frequency as may be determined.
- (iii) All disclosures obtained in terms of this Code shall be maintained for a minimum period of five (5) years, or as may be prescribed under the Applicable Laws.

X. DISCIPLINARY ACTION

- (i) Every Insider, employee and Designated Person shall be individually responsible for complying with the applicable provisions of this Code (including to the extent the provisions hereof are applicable to their Immediate Relatives and the persons for whom such employee or Designated Person takes Trading decision).
- (ii) Any person who contravenes this Code is liable to be penalised and appropriate disciplinary action shall be taken by the Company after giving the person a reasonable opportunity to them to explain his/ her stand in the matter. The disciplinary action may include warnings, wage freeze, dismissal, suspension, ineligibility for future participation in ESOP, forfeiture of benefits, monetary fines, etc.
- (iii) Action taken by the Company for violation of the Code against any person will not preclude SEBI from taking any action for violation of the SEBI Regulations or any other Applicable Laws.

- (iv) The Compliance Officer shall also promptly report any violation of the SEBI Regulations that may come to his/ her notice.

XI. OTHERS

- (i) The Compliance Officer in consultation with the Board of Directors may impose additional limitations/ conditions as may be necessary to effectively implement the Code.
- (ii) The Board of Directors and Compliance Officer will jointly have the power to suitably modify / revise the above mentioned Code as and when required.

FORM A

Application for Pre-clearance for dealing in Securities above threshold limit

Date : _____

From:

Name : _____

Designation : _____

To:

Compliance Officer

Piramal Capital & Housing Finance Limited

With reference to the Code for Prevention of Insider Trading (“**the Code**”) of the Company, I seek your approval to trade/subscribe to / agree to subscribe to / purchase* / sell* / deal as an agent / principal in _____ (nos) of _____ (description of security).

My Undertaking in the prescribed format is enclosed for your perusal in this connection.

*I declare that I have not entered into an opposite transaction of sale / purchase in respect of the security for which pre – clearance is sought, during the 6 months preceding this application.

I further declare that the minimum holding period stipulated in the Code with respect to the securities proposed to be sold has been complied with.

Signature: _____

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PRE-CLEARANCE ORDER ISSUED BY COMPLIANCE OFFICER

Date : _____

This is to inform you that your request for trading in _____ (nos) of _____ (description of security) as mentioned in your above mentioned application is approved. Please note that the said transaction must be completed within 7 days from today. Further, please ensure that disclosures as are required to be made by you under this Code, are duly made.

For Piramal Capital & Housing Finance Limited

Compliance Officer

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CONFIRMATION OF DEAL

Date : _____

From:

Name : _____

Designation : _____

To:
Compliance Officer
Piramal Capital & Housing Finance Limited

I confirm that the Security dealing for which approval was granted on _____ was completed on _____ by purchasing / selling _____(nos) of _____ (description of security).

Signature : _____

FORM B

UNDERTAKING TO BE SUBMITTED ALONG WITH APPLICATION FOR PRE-CLEARANCE

To,
Compliance Officer,
Piramal Capital & Housing Finance Limited

I, _____ (name and designation), am desirous of dealing in _____ (nos.) of _____ (description of security) as mentioned my application dated _____ for pre-clearance of the transaction.

As required by the Code of Piramal Capital & Housing Finance Limited for Prevention of Insider Trading (“**the Code**”), I hereby state as follows:

- a) I do not have any access to, nor have I received any information that could be construed as “Unpublished Price Sensitive Information” as defined in the Code or the SEBI Regulations, in connection with the securities proposed to be traded, up to the time of signing this undertaking;
- b) In the event that I have access to or receive any information that could be construed as “Unpublished Price Sensitive Information” as defined in the Code or the SEBI Regulations, after the signing of this Undertaking, but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the change in position in writing and shall completely refrain from dealing in the securities until such information becomes public;
- c) I have not placed a contra-trade of the same security in the last six months;
- d) I have not contravened the provisions of the Code and the SEBI Regulations in force as of date;
- e) I shall make requisite disclosures of trading in securities to the extent required under the SEBI Regulations and the Code;
- f) I have made full and true disclosure in the above matter.

Date:

Signature:

FORM C

**SUBMISSION OF DECISION FOR NOT EFFECTING TRANSACTION AFTER
OBTAINING PRE-CLEARANCE**

Date : _____

To,
Compliance Officer
Piramal Capital & Housing Finance Limited

Dear Sir,

This is to inform you that I had sought pre-clearance for trading in _____ (nos) of _____ (description of security) by way of application dated _____. The pre-clearance was granted to be by way of order dated _____.

However, subsequent to obtaining the pre-clearance I have not effected this transaction. The reasons for not effecting the transaction are given below:

[mention reasons here]

Thanking you,

Yours faithfully,

(Name)

(Designation)

(Department)

FORM D
APPLICATION FOR WAIVER

Date : _____

To,
 Compliance Officer
 Piramal Capital & Housing Finance Limited

Dear Sir,

I request you to grant me waiver from:

- a) the restriction of undertaking an ‘opposite transaction’ of sale / purchase of securities;
- b) the minimum holding period of 6 months;

as required under the Code with respect to the following securities held by me:

Name	Relation	Folio No, / DP ID / Client ID No.	Type of Security	No. of Securities	Date of Acquisition

The reasons for seeking this waiver are given below:

[mention reasons here]

I hereby state that I do not have any information that could be construed as “Unpublished Price Sensitive Information” as defined in the Code or the SEBI Regulations up to the time of signing this form on the basis of which, the proposed transaction is to be executed.

Thanking you,

Yours faithfully,

(Name)

(Designation)

(Department)

ANNEXURE – 1
Initial Disclosure

To,
 Compliance Officer
 Piramal Capital & Housing Finance Limited

With reference to above subject, I hereby declare that the following constitutes full and true disclosure of all Securities held by me and my Immediate Relatives as on date of implementation of the Code/ joining the Company:

(a) Holdings of Employee (held singly or jointly):

Sr. No.	Type of Security	Name of the Company	Number of Securities

(b) Holding(s) of Spouse – Mr./Ms. _____:

Sr. No.	Type of Security	Name of the Company	Number of Securities

(c) Holding(s) of other Immediate Relatives:

Sr. No.	Name of Immediate Relatives	Relation with the employee	Type of Security	Name of the Company	Number of Securities

I hereby confirm that:

- I have read the Code for Prevention of Insider Trading and have understood the provisions thereto. I agree to comply with the Code and I acknowledge that my Immediate Relatives and I shall be bound by the Code to the extent applicable to us.
- I declare that except the above accounts, the details of which are mentioned above, my Immediate Relatives and I do not hold any other account.
- I hereby state that the above details are correct, true and complete in all respect. Further, I confirm that I will inform immediately on change of any information.

Name & Signature of the Employee:

Designation:

Place:

Date:

ANNEXURE – 2
Continual Disclosure
DISCLOSURE OF DEALINGS & HOLDINGS IN SECURITIES

Date: _____

To,
 Compliance Officer
 Piramal Capital & Housing Finance Limited

Name of Person	Designation	Securities held prior to acquisition/ disposal		Securities acquired/ disposed				Securities held post acquisition/ disposal		Date of allotment advice/ acquisition of shares/ sale of shares	Date of intimation to Company	Mode of acquisition/ disposal
		Type of Security	No. and % of shareholding	Type	No.	Value	Transaction Type	Type	No. and % of shareholding			

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

I declare that I have complied with the requirement of pre-clearance of Trades, wherever applicable, and the minimum holding period in respect of the Securities sold or purchased made or disposed off.

I declare that I have not violated the provisions of the SEBI Regulations and/or the Code.

I declare that above details are true, correct and complete in all respect.

Name & Signature of the Employee:

Designation:

Place:

Date:

ANNEXURE - 3
Continual Disclosure
ANNUAL DISCLOSURE OF DEALINGS & HOLDINGS IN SECURITIES

Date: _____

To,
 Compliance Officer
 Piramal Capital & Housing Finance Limited

DEALINGS & HOLDINGS BY EMPLOYEE IN HIS/HER OWN NAME (WHETHER SINGLY OR JOINTLY)

Name of the entity	No. & Description of Securities Transacted			Date of Transaction	Date of Approval (where applicable)	Securities held as on the date of this form
	Purchase	Sale	Others (specify)			

DEALINGS & HOLDINGS BY SPOUSE (WHETHER SINGLY OR JOINTLY)

Name of Person	Relation	Name of the entity	No. & Description of Securities Transacted			Date of Transaction	Date of Approval (where applicable)	Securities held as on the date of this form
			Purchase	Sale	Others (specify)			

DEALINGS & HOLDINGS BY OTHER IMMEDIATE RELATIVES (WHETHER SINGLY OR JOINTLY)

Name of Person	Relation	Name of the entity	No. & Description of Securities Transacted			Date of Transaction	Date of Approval (where applicable)	Securities held as on the date of this form
			Purchase	Sale	Others (specify)			

I declare that I have complied with the requirement of pre-clearance of Trades, wherever applicable, and the minimum holding period in respect of the Securities sold or purchased made or disposed off.

I declare that I have not violated the provisions of the SEBI Regulations and/or the Code.

I declare that above details are true, correct and complete in all respect.

Name & Signature of the Employee:

Designation:

Place:

Date: