

# **ASTRAL LIMITED**

**Code of Conduct for regulating, monitoring and reporting of trading in  
securities of the Company by Insiders**

**(Pursuant to SEBI (Prohibition of Insider Trading) Regulations 2015)**

## 1 PREAMBLE:

- 1.1 Astral Limited (**"The Company"**) endeavors to preserve the confidentiality of un-published price sensitive information and to prevent misuse of such information. The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations in force.
- 1.2 Securities and Exchange Board of India (SEBI), as part of its continuing efforts to protect the interests of investors in general, revised regulations for prohibition of Insider Trading and has issued new regulations viz. the SEBI (Prohibition of Insider Trading) Regulations, 2015, applicable to all listed companies. These Regulations shall come into force with effect from 15th May, 2015 amended from time to time and latest vide notification dated 6<sup>th</sup> December 2024.
- 1.3 To achieve these objectives under the new regulations, the Company hereby adopts this Code of conduct for regulating, monitoring and reporting trading in securities of the Company by Designated Persons ("hereinafter referred to as **"Code of Conduct"**). This Code of Conduct once approved by the Board of Directors shall supersede earlier of Code of Conduct approved for prevention of Insider Trading.

## 2 DEFINITIONS:

- (a) **"Act"** means the Securities and Exchange Board of India Act 1992.
- (b) **"Board"** means Board of Directors of the Company.
- (c) **"Company"** means Astral Limited.
- (d) **"Compliance Officer"** means the Company Secretary or such other senior officer designated so and reporting to the Board of Directors, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under the 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board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 Company.

"Explanation – For the purpose of this clause, "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."

- (e) **“Connected Person”** means persons as defined in the Regulations i.e.
- (i) any person who is or has 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) 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 the Company or his relative or banker of the Company, has more than ten per cent, of the holding or interest, or
    - (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);]
- (f) **“Trading in Securities”** means an act of subscribing to, buying, selling, dealing or agreeing to subscribe, buy, sell or deal in the securities of the Company either as principal or agent.

- (g) **“Designated Persons”** means following persons:
- i. Promoters and Promoter Group of the Company
  - ii. All Directors of the Company and its Material Subsidiary
  - iii. Key Managerial Persons of the Company and its Material Subsidiary of the Company.
  - iv. Functional Heads by whatever designation they may be called of the Company and Material Subsidiary.
  - v. All employees at or above the level of Officer in Finance and Accounts Departments of the Company and Material Subsidiary.
  - vi. All employees of Secretarial and IT Department of the Company and Material Subsidiary, who have access to unpublished price sensitive information.
  - vii. All employees at or above level of Assistant General Manager in other departments of the Company and Material Subsidiary (not covered above).
  - viii. Employees upto two levels below of Chief Executive Officer of the Company and its Material Subsidiaries irrespective of their functional role in the company or ability to have access to unpublished price sensitive information;
  - ix. Such other employees as may be identified by the Compliance Officer.
- (h) **"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.
- (i) **“Insider”** means any person who is,
- (i) Connected Person or,
  - (ii) in possession of or having access to Price Sensitive Information.
- (j) **“Key Managerial Person”** means person as defined in Section 2(51) of the Companies Act, 2013 or any modification thereof.
- (k) **“Material Subsidiaries”** means Material Subsidiaries as per the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- (l) **"Promoter" and "Promoter Group"** shall have the meanings assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof;

- (m) **“SEBI”** shall mean Securities and Exchange Board of India
- (n) **“SEBI PIT Regulations”** shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.
- (o) **“Securities”** shall have the meaning assigned to it under the Securities Contracts (Regulations) Act 1956 or any modification thereof except units of a mutual fund.
- (p) **“Unpublished Price Sensitive Information” or “UPSI”** means information as defined in the SEBI PIT Regulations i.e.

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, delistings, disposals and expansion of business, award or termination of order/contracts not in the normal course of business;
- (v) changes in key managerial personnel, other than due to superannuation or end of term, and resignation of a Statutory Auditor or Secretarial Auditor;
- (vi) change in rating(s), other than ESG rating(s);
- (vii) fund raising proposed to be undertaken;
- (viii) agreements, by whatever name called, which may impact the management or control of the company;
- (ix) fraud or defaults by the company, its promoter, director, key managerial personnel, or subsidiary or arrest of key managerial personnel, promoter or director of the company, whether occurred within India or abroad;
- (x) resolution plan/ restructuring or one-time settlement in relation to loans/borrowings from banks/financial institutions;
- (xi) admission of winding-up petition filed by any party /creditors and admission of application by the Tribunal filed by the corporate applicant or financial creditors for initiation of corporate insolvency resolution process against the company as a corporate debtor, approval of resolution plan or rejection thereof under the Insolvency and Bankruptcy Code, 2016;
- (xii) initiation of forensic audit, by whatever name called, by the company or any other entity for detecting mis-statement in financials, misappropriation/ siphoning or diversion of funds and receipt of final forensic audit report;

- (xiii) action(s) initiated or orders passed within India or abroad, by any regulatory, statutory, enforcement authority or judicial body against the company or its directors, key managerial personnel, promoter or subsidiary, in relation to the company;
  - (xiv) outcome of any litigation(s) or dispute(s) which may have an impact on the company;
  - (xv) giving of guarantees or indemnity or becoming a surety, by whatever named called, for any third party, by the company not in the normal course of business;
  - (xvi) granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.
- (q) **“Trading Window”** means a time period when the Company’s securities can be freely bought or sold.

### **3 COMPLIANCE OFFICER:**

- 3.1 The Compliance Officer shall be responsible for setting out policies and procedures for effective compliance of the SEBI PIT Regulations and the Code of Conduct. He shall report to the Board and in particular, shall provide reports to the Chairman of the Audit Committee and the Board once in a year.
- 3.2 The Compliance Officer shall maintain a record of Designated Persons and any changes, if any, in the list from time to time.
- 3.3 The Compliance Officer shall assist all concerned in complying with the Code of Conduct.
- 3.4 The Compliance Officer shall maintain records of all declarations in the appropriate form(s) given by the Designated Persons.

### **4 PRESERVATION OF PRICE SENSITIVE INFORMATION:**

- 4.1 All information shall be handled within the Company on a need-to-know basis and no Unpublished Price Sensitive Information shall be communicated to any person except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- 4.2 The Company in consultation with the Chief Financial Officer or Managing Director shall determine, about the inclusion of people ‘inside’ on the sensitive transaction & shall make them aware of the duties and responsibilities attached to the receipt of Inside Information, and the liability that attaches to misuse or unwarranted use of such information.
- 4.3 Designated Persons must maintain confidentiality of all Price Sensitive Information. Designated Persons shall not pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sale of securities.

- 4.4 To deal with or handling of UPSI within the Company, the Company shall establish policies, procedures and physical arrangements (collectively “Chinese Walls”) designed to manage confidential information and prevent the inadvertent spread and misuse of UPSI, or the appearance thereof.
- 4.5 Chinese Walls shall be used to separate areas that have access to UPSI (“Insider Areas”) from those who do not have such access (“Public Areas”) within the Company.
- 4.6 Where Chinese Walls arrangements are in place Insiders working within an Insider area are prohibited from communicating any Confidential Information or UPSI to Insiders in public areas without the prior approval of the concerned Head of Department or Compliance Officer.
- 4.7 Demarcation of the various departments as inside area may be implemented by the Compliance Officer in consultation with the Managing Director or Chief Financial Officer.
- 4.8 Insiders within a Chinese Wall have a responsibility to ensure the Chinese Wall is not breached deliberately or inadvertently. Known or suspected breaches of the Chinese Wall must be referred to the Compliance Officer immediately.
- 4.9 An Insider may cross the Chinese Wall to enter the Insider areas only with the prior approval of the concerned Head of Department or Compliance Officer, and would be subject to all restrictions that apply to such areas.
- 4.10 The establishment of Chinese Walls does not suggest or imply that UPSI can circulate freely within Insider areas. The provisions of need to know basis as mentioned under Clause
- 4.11 above shall be applicable within Insider areas as well.
- 4.12 In exceptional circumstances, Designated Persons from the public areas may be brought "over the wall" and given confidential information on the basis of "need to know" criteria, under intimation to the concerned Head of Department or Compliance Officer.
- 4.13 Unpublished Price Sensitive Information may be communicated, provided, allowed access to or procured, in connection with a transaction which entails:
- an obligation to make an open offer under the takeover regulations where the Board is of informed opinion that the sharing of such information is in the best interests of the Company; or
  - not attracting the obligation to make an open offer under the takeover regulations but where the Board is of informed opinion that sharing of such information is in the best interests of the Company and the information that constitute unpublished price sensitive information is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the Board may determine to be adequate and



fair to cover all relevant and material facts.

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

- 4.14 The Board shall ensure that a structured digital database is maintained containing the names of such persons or entities as the case may be with whom information is shared under SEBI PIT Regulations along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such databases shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non- tampering of the database.

Provided that entry of information, not emanating from within the organisation, in structured digital database may be done not later than 2 calendar days from the receipt of such information.

## **5 TRADING PLAN:**

An Insider can enter into a trading plan formulated as per the Regulation 5 of the Regulations and as pre-approved by the Compliance Officer.

Trading Window norms shall not be applicable for trades carried out in accordance with an approved trading plan

## **6 TRADING WINDOW:**

- 6.1 Designated persons may execute trades subject to compliance with these regulations. Towards this end, a national trading window shall be used as an instrument of monitoring trading by the designated persons. The Compliance Officer shall notify the Trading Window Close Period for different types of UPSI. When the Trading Window is closed, the Designated Persons shall not trade in the Company's securities in such period.

Provided that, for unpublished price sensitive information not emanating from within the Listed Company, trading window may not be closed.

- 6.2 In case of financial results, the Compliance Officer shall close Trading Window from the first day of every quarter and shall remain closed till 48 hours after the communication of the financial results by the Company to the Stock Exchanges.
- 6.3 In case of other types of UPSIs, the Compliance Officer shall intimate the closure of Trading Window to all the Designated Persons of the Company when he determines that Designated Persons or class of Designated Persons can reasonably be expected to have possession of Unpublished Price Sensitive Information.



The trading window restrictions mentioned in sub-clause (1)

6.4 shall not apply in respect of –

- a) transactions specified in clauses (i) to (iv) and (vi) of the proviso to sub-regulation (1) of regulation 4 and in respect of a pledge of shares for a bonafide purpose such as raising of funds, subject to pre-clearance by the compliance officer and compliance with the respective regulations made by the Board
  - b) transactions which are undertaken in accordance with respective regulations made by the Board such as acquisition by conversion of warrants or debentures, subscribing to rights issue, further public issue, preferential
- 6.5 allotment or tendering of shares in a buy-back offer, open offer, delisting offer] [or transactions which are undertaken through such other mechanism as may be specified by the Board from time to time.

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.

## **7 PRE-CLEARANCE OF TRADE:**

All Designated Persons, who intend to deal in the securities of the Company when the trading window is open and if the value of the proposed trades, whether in one transaction or a series of transactions over any calendar quarter is above Rs.10/- Lakhs shall pre-clear the transaction. However, no Designated Person shall be entitled to apply for pre-clearance of any proposed trade if such Designated Person is in possession of Unpublished Price Sensitive Information even if the trading window is not closed and hence he shall not be allowed to trade. The pre-dealing procedure shall be hereunder;

- (i) An application (including an undertaking) may be made in the prescribed Form **(Annexure - 1)** to the Compliance Officer indicating the estimated number of securities that the Designated Person intends to deal in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the Company in this behalf.
- (ii) All Designated Persons and their relatives shall execute their order in respect of Securities of the Company within one week after the approval of pre-clearance is given. The Designated Person shall file within 2 trading days of the execution of the deal, the details of such deal with the Compliance Officer in the prescribed form. **(Annexure – 2)**.

- (iii) If the order is not executed within seven trading days after the approval is given, the Designated Person must pre-clear the transaction again.
- (iv) All Designated Persons who buy or sell any number of Securities of the Company shall not enter into an opposite transaction i.e. sell or buy any number of securities during the next six months following the prior transaction. All Designated Persons shall also not take positions in derivative transactions in the securities of the Company at any time. In case of any contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act. However, provision of contra trade shall not be applicable for trades pursuant to exercise of stock options.
- (v) The Compliance Officer may waive off the holding period in case of sale of Securities in personal emergency after recording reasons for the same. However, no such sale will be permitted when the Trading window is closed.

## **8 OTHER RESTRICTIONS:**

- 8.1 The disclosures to be made by any person under the Code of Conduct shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.
- 8.2 The disclosures of trading in Securities shall also include trading in derivatives of securities, if any and the traded value of the derivatives shall be taken into account for purposes of the Code of Conduct.
- 8.3 The disclosures made under this Code of Conduct shall be maintained for a period of five years.

## **9 DISCLOSURES:**

### **Initial Disclosure**

- 9.1 Every person on appointment as a Key Managerial Person or a Director of the Company or upon becoming promoter shall disclose his holding of securities of the Company as on the date of appointment/joining or becoming a promoter, to the Company within seven days of such appointment/joining or becoming a Promoter. Disclosure to be made in **Annexure-3** and **Form B** as prescribed in the SEBI PIT Regulations within two days of joining. Every person upon joining as employee and covered under "Designated Person" shall give one time disclosure within two days of joining as per Annexure-3.

## Continual Disclosure

9.2 Every Promoter, member of Promoter group, Designated Person and Director of the Company shall disclose to the Company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 10 Lakhs. Disclosure to be made in **Form C** as prescribed in the SEBI PIT Regulations.

The disclosure shall be made within 2 working days of:

- (a) the receipt of intimation of allotment of securities, or
- (b) the acquisition or sale of securities or voting rights, as the case may be.

9.3 Within 2 days of the receipt of intimation under Clause 9.3, the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received.

9.4 The Compliance Officer shall maintain records of all the declarations in the appropriate form given by the Directors / Designated persons for a minimum period of five years.

9.5 The Compliance Officer shall maintain records of all the declarations in the appropriate form given by the Directors / Designated persons for a minimum period of five years.

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

- a) Immediate Relatives
- b) Persons with whom such designated person(s) shares a material financial relationship; and Phone, mobile and cell numbers which are used by them

Designated persons shall also disclose on a one time basis the names of educational institutions from which designated persons have graduated and names of their past employers.

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

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.

Annual Disclosure to be made in **Annexure 3** as prescribed in the SEBI PIT Regulations and annexed hereto.

## **10 PENALTY FOR CONTRAVENTION OF THE CODE OF CONDUCT:**

- 10.1 Every Designated Person shall be individually responsible for complying with the provisions of the Code of Conduct (including to the extent the provisions hereof are applicable to his/her dependents).
- 10.2 Any Designated Person who trades in securities or communicates any information for trading in securities, in contravention of this Code of Conduct may be penalized and appropriate action may be taken by the Company.
- 10.3 Designated Persons who violate the Code of Conduct shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, recovery, clawback ineligibility for future participation in employee stock option plans, etc.
- 10.4 In case it is observed by the Company/ Compliance Officer that there has been a violation of the SEBI PIT Regulations, the Compliance Officer shall promptly inform the Stock Exchanges of the same, in accordance with the procedure and format prescribed by SEBI/Stock Exchanges from time to time.
- 10.5 The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI PIT Regulations.
- 10.6 Under Section 15G of the Securities and Exchange Board of India Act, 1992, any person violating the SEBI PIT Regulations is liable for a penalty up to Twenty-five crore rupees or three times the amount of profits made out of insider trading, whichever is higher

## **11 PROTECTION AGAINST RETALIATION AND VICTIMISATION:**

- 11.1 The employees of the Company can raise concerns against any leak / suspected leak of UPSI or unethical use of UPSI in accordance with the Policy for Inquiry in case of leak of Unpublished Price Sensitive Information as adopted by the Company.
- 11.2 Retaliation for reporting suspected violations is strictly prohibited under this Code. Employee who reports alleged violations of this code or SEBI Insider Trading Regulations will be protected against any discharge, termination, demotion, suspension, threats, harassment, directly or indirectly or discrimination to such employee.

**This Code was reviewed by the Board of Directors of the Company at its Meeting held on 21<sup>st</sup> May 2025.**

**Amendment pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) (Amendment) Regulations, 2025.**

**ANNEXURE -1****APPLICATION FOR PRE-DEALING APPROVAL  
(Pursuant to 7.1 of the Code of Conduct)**

To  
The Compliance Officer  
Astral Limited  
Ahmedabad

1. Name of Applicant: .....
2. (a) Designation: .....  
(b) Department. : .....  
(c) Location: .....
3. (a) No. of Equity shares held as on date of Application: .....  
(b) Folio No. (if held in physical mode): .....  
(c) Client ID (if held in demat form): .....  
(d) Name of Depository: .....  
(e) Name & Address of Depository Participant: .....
4. I, the applicant, propose to enter into transactions in the securities of the Company as per details given hereunder:

Name of Transaction	Estimated No. of Security & value	DPID/Client ID/Folio No. in which credit/debit will be given
(a) Intended purchase		
(b) Intended sale		

I request you to pre-clear the aforesaid transactions to enable me to execute the same.

5. I hereby undertake:
  - (a) That I do not have any access to or has not received “Price Sensitive Information” up to the time of signing this undertaking.
  - (b) That in case I shall have access to or receive “ Price Sensitive Information” after signing of this undertaking but before execution of this transaction I shall inform the Compliance Officer of the change in my position and that I would completely refrain from dealing in the securities of the Company till the time such information becomes public.

**ASTRAL LIMITED**

- (c) That I have not contravened the Code of Conduct for Prevention of Insider Trading as notified by the Company from time to time.
- (d) That I have made a full and true disclosure in the matter.
- 6. I agree to execute the intended purchase/sale of the securities detailed above within one week of receipt of the approval of pre-clearance.
- 7. I shall hold the above shares if purchased, for a minimum period as required under the Act.
- 8. I shall also abide by and comply with any conditions that may be imposed while according the approval of pre-clearance by you.

**Place:**

**Signature.....**

**Date:**

**Name .....**

**ANNEXURE – 2****DISCLOSURE OF EXECUTION OF PRE-CLEARED TRANSACTIONS**  
**(Pursuant to Clause 7.1 of Code of Conduct)**

Date: .....

To  
**The Compliance Officer**  
Astral Limited  
Ahmedabad

**DETAILS OF PRE-CLEARED TRANSACTION**

1. On the subject, I hereby inform you that:

- I have not bought/sold any Equity Shares of the Company
- I have bought/sold Equity shares as detailed hereunder on  
(Strike out whichever is not applicable)

* Name of Holder	No. of Equity Shares bought/sold	Date of purchase /Sale of Shares	DPID/Client ID or Folio No.	Price (Rs.)

\*(Indicate sole/1st/2nd/3rd Joint holder)

2. In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of three years and produce to the Compliance Officer/ SEBI any of the following documents:

- (1) Broker's Contract note:
- (2) Proof of payment to/from brokers:
- (3) In case of Demat transactions:
  - (a) Extract of Bank Passbook/ Statement of Transaction
  - (b) Copy of Delivery Instruction Slip (Applicable in case of sale transaction)

3. I declare that the above information is correct and no provisions of the Company's Code of Conduct for Prevention of Insider Trading and/or applicable laws/regulations have been contravened for effecting the above said transaction(s).

4. I agree not to buy/sell the Securities for a period of six months from the date of the aforesaid transaction (applicable in case of purchase / sale transaction by Specified Persons only). In case there is any urgent need to sell these shares within the said period, I shall approach the Company (Compliance Officer) for necessary approval.

Signature: .....

Department: .....

Name: .....

**ASTRAL LIMITED**



**ANNEXURE -3****ONE TIME/ANNUAL DISCLOURE BY DESIGNATED PERSON**  
**(Pursuant to clause 9.2/9.6 of Code of Conduct)****Astral Limited**

**Information Form from Designated Partners pursuant to Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading by Insiders:**

**(Kindly read instructions given below before filling the form)**

- *Please fill details asked for in the form correctly.*
- *Please fill the form in BLOCK LETTERS.*
- *Add additional rows/ columns if required.*
- *Wherever a point is not applicable, state the same.*
- *Check the information details carefully before final submission.*
- *For clarification on any point, contact the Company Secretary.*

**(A) Details of Employee:**

1. Name	
2. Employee ID	
3. Mobile No.	
4. Phone No. (Resident)	
5. E-mail ID	
6. Permanent Account Number (PAN)	
7. No. of Shares held	
8. Details of Educational Institutions from which graduated (Pls. specify with Degree):	
9. Names of past employer	

**(B) Details of Spouse:**

1. Name	
2. PAN	
3. No. of Shares held	
4. Mobile No.	
5. Phone No. (Resident)	

(C) **Details of Immediate Relatives**

*(To be provided only if any of whom is either dependent financially on employee, or consults employee in taking decisions relating to trading in securities otherwise write Not Applicable):*

1. Father of Employee*	Name	
	PAN	
	Mobile No.	
	Phone No.	
2. Mother of Employee*	Name	
	PAN	
	No. of shares	
	Mobile No.	
3. Brother of Employee* (in case more than one brother, pls. provide details of all.)	Name	
	PAN	
	No. of shares held	
	Mobile No.	
4. Sister of Employee* (in case more than one sister, pls. provide details of all.)	Name	
	PAN	
	No. of shares held	
	Mobile No.	
5. Child (including step-child* (in case more than one child, pls. provide details of all.)	Name	
	PAN	
	No. of shares held	
	Mobile No.	
6. Father of Employee's Spouse	Name	
	PAN	
	No. of shares held	
	Mobile No.	
7. Mother of Employee's Spouse	Name	
	PAN	
	No. of shares held	
	Mobile No.	
8. Brother of Employee's Spouse* (in case more than one brother, pls. provide details of all.)	Name	
	PAN	
	No. of shares held	
	Mobile No.	
9. Sister of Employee's Spouse* (in case more than one sister, pls. provide details of all.)	Name	
	PAN	
	No. of shares held	
	Mobile No.	
	Phone No.	

*\* To be provided only if any of whom is either dependent financially on employee, or consults employee in taking decisions relating to trading in securities otherwise write Not Applicable.*

(D) Person with whom Employee Shares a material financial relationship:

*(The term “material financial relationship” shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding twelve months, equivalent to at least 25% of such payer’s annual income but shall exclude relationships in which the payment is based on arm’s length transactions.)*

1.Name	
2.PAN	
3.No. of shares held	
4.Mobile No.	
5.Phone No. (Resident)	

**Declaration cum Undertaking:**

I hereby declare that the details furnished above are true and correct to the best of my knowledge and belief and I undertake to inform the Company of any changes therein, immediately. In case any of the above information is found to be false or untrue or misleading or misrepresenting, I am aware that I may be held liable for it. Further, I undertake not to deal in securities of the Company when I am in possession of unpublished price sensitive information and shall always abide by the Company’s code of conduct for prevention of insider trading in letter and spirit.

**Signature:**

**Date:**