

INDIAN BANK CODE OF CONDUCT FOR PROHIBITION OF INSIDER TRADING IN LISTED SECURITIES OF THE BANK

2025-26

CO: Investor Services Cell

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Policy Certification

Title

**Indian Bank Code of Conduct for
Prohibition of Insider Trading in Listed
Securities of the Bank**

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INTRODUCTION

Necessity for the Code:

Insider trading is the buying or selling or dealing in the securities of a listed Company by a Director, member of management, an employee of the firm or by any other person such as internal and statutory auditor, agent, advisor, analyst, consultant etc., who has knowledge of material 'inside' information not available to the general public. The dealing in securities by an 'insider' is illegal when it is predicated upon the utilization of 'inside' information to profit at the expense of other investors who do not have access to the same information. The prices of most securities generally reflect the available public information about these companies. Hence, any investor who acts on non-public information does so at the cost of public confidence in the securities market and in the process he distorts the level playing field.

The Securities and Exchange Board of India (SEBI) notified the SEBI (Prohibition of Insider Trading) Regulations, 2015 {SEBI (PIT) Regulations} on January 15, 2015, which was effective from May 15, 2015 and repealed SEBI (Prohibition of Insider Trading) Regulations, 1992 effective from that date. The Regulations seek to govern the conduct of the Insiders, Connected Persons and Persons who are deemed to be connected persons on matters relating to insider trading.

The Regulations require all listed companies and other specified entities to set up appropriate mechanism and to frame and enforce a Code of Conduct for Prohibition of Insider Trading and internal procedures prescribing various disclosures of interest or holding to be made by its Directors and Designated Employees.

In conformity with the Regulations, the Bank formulated a Code which came into force with effect from May 15, 2015, which is now being amended in line with the recent amendments made in the SEBI Regulations. The Code would be applicable to the Promoter, Directors, Designated Persons, their immediate relatives and connected persons as defined in the Regulations.

Objective

The objective of the Code is to prevent Insider Trading by prohibiting dealing, communicating or counselling on matters relating to Insider Trading.

1. CODE

The Code is called as **Indian Bank Code of Conduct for Prohibition of Insider Trading in listed Securities of the Bank**, of which the code of Fair Disclosure and the Policy for determination of 'legitimate purposes' form part.

- 1.1 The Code has been made pursuant to Regulation 9(1) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (hereinafter called as "the Regulations) to regulate, monitor and report trading by the Directors, Designated Persons of the Bank and their immediate relatives with a view to comply with the provisions of the Regulations.

2. Applicability

The Code will be applicable to Government of India, officials working in Department of Financial Services, Ministry of Finance, Government of India, Directors / Designated Persons, their Immediate Relatives and Connected Persons.

3. Confidentiality Agreement:

All Directors/Designated Persons on becoming a Director or a Designated person as the case may be, would need to sign a confidentiality agreement, agreeing to protect the confidentiality of information obtained by him / her while working with the Bank (**Annexure – XI**).

4. Definitions:

For the purpose of this Code:

- (a) **“Act”** means Securities and Exchange Board of India Act, 1992.
- (b) **“Bank”** means Indian Bank.
- (c) **“Board”** means Board of Directors of the Bank.
- (d) **“Code”** means **Indian Bank Code of Conduct for Prohibition of Insider Trading in listed Securities of the Bank**” as applicable, including modifications made there to from time-to-time.
- (e) **“Compliance Officer”** means the Compliance Officer appointed by the Bank 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 this Code under the overall supervision of the Board of Directors of the Bank.
- (f) **“Connected Person”** means, -
 - i. any person who is or has been, during the six months prior to the concerned act, associated with the Bank, 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 Bank or holds any position including a professional or business relationship, whether temporary or permanent, with the Bank that allows such person, directly or indirectly, access to Unpublished Price Sensitive Information (UPSI) 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; or
 - (b) the holding, associate 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 employee or director thereof; or
 - (e) an official of a stock exchange or a 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 recognized or authorized by the Board; or
 - (i) a banker of the Bank; 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 ten percent of the holding or interest; or
- (k) a firm or its partner or its employee in which a connected person is also a partner; or
- (l) a person sharing household or residence with a connected person.

(g) **‘Designated Persons’ means:**

- i) All the Directors including Executive Directors and Managing Director & CEO of the Bank.
 - ii) All Officers of the Bank in the management cadre, viz. Scale V, VI, VII and VIII.
 - iii) All the employees of Chairman Secretariat, MD & CEO Secretariat, ED(s) Secretariat, CGM Secretariat, GMs Secretariat, Board Department, Accounts Department, Investor Services Cell, Department of Planning and Business Intelligence, Risk Management Department, Recovery Department, Treasury Department and IT Department at Head Office/ Corporate Office and such other employees designated by Chairman / MD & CEO of the Bank from time to time.
 - iv) Connected persons identified by the Compliance Officer in consultation with the MD & CEO, who in their opinion can come in possession of Unpublished Price Sensitive Information based on their functional area and the propensity to generate such information.
- (h) **“Director”** means a member of the Board of Directors of the Bank.
- (i) **“Generally available information”** means - information that is accessible to the public on a non-discriminatory basis and shall not include unverified event or information reported in print or electronic media.
- (j) **“Immediate relative”** means - 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.
- (k) **“Insider”** means any person who is
- a. a connected person; or
 - b. in possession of or having access to Unpublished Price Sensitive Information.
- (l) **“Key Managerial Persons or Personnel”** means those persons who have the authority and responsibility for planning, directing and controlling the activities of the Bank as prescribed by RBI (only Chairman, Managing Director & CEO, Executive Directors are considered as key managerial persons).
- (m) **“Legitimate Purpose:** This shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.
- (n) **“Promoter”** and **“Promoter Group”** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issued of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof;
- (o) **“SEBI”** means the Securities and Exchange Board of India;
- (p) **“Securities”** shall have the meaning assigned to it under the Securities Contracts (Regulations) Act, 1956 or any modification thereof.

- (q) **"Specified"** means specified by SEBI in writing.
- (r) **"Trading" / "Trading in securities"** 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) **"Trading plan"** means the term 'Trading Plan' as described in Regulation 5 of the SEBI (Prohibition of Insider Trading) Regulations;
- (u) **"Takeover regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;
- (v) **"Unpublished Price Sensitive Information"** (UPSI) means any information, relating to a Bank 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, demergers, acquisitions, delistings, disposals and expansion of business, award or termination of order/contracts not in the normal course of business and such other transactions;
 - (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.

Explanation 1- For the purpose of sub-clause (ix):

- a. 'Fraud' shall have the same meaning as referred to in Regulation 2(1)(c) of Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003.
- b. 'Default' shall have the same meaning as referred to in Clause 6 of paragraph A of Part A of Schedule III of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Explanation 2- For identification of events enumerated in this clause as unpublished price sensitive information, the guidelines for materiality referred at paragraph A of Part A of Schedule III of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as may be specified by the Board from time to time and materiality as referred at paragraph B of Part A of Schedule III of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 shall be applicable.

Words and phrases not specifically defined herein but defined in Securities and Exchange Board of India Act, 1992, Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or Companies Act, 2013 shall have the meanings respectively assigned to them in those legislation.

5. COMPLIANCE OFFICER:

- 5.1 The Bank is required to appoint an Executive of the Bank as the Compliance Officer, under this Code. The Chief Financial Officer of the Bank is designated as the Compliance Officer who shall provide reports on insider trading to the Managing Director and CEO of the Bank Periodically.
- 5.2 The Compliance Officer shall be responsible for setting forth policies, procedures, monitoring and adherence to the rules for the preservation of "Unpublished Price Sensitive Information", pre-clearance of trades of designated employees and their dependents (directly or through respective department heads as decided by the Bank), monitoring of trades and Implementation of the Code of Conduct under the overall supervision of the Board of Directors of the Bank.
- 5.3 The Compliance Officer shall maintain a record of the designated employees and changes, if any, from time to time.
- 5.4 The Compliance Officer shall assist all the Designated Employees in addressing any clarifications regarding the Regulations and the Bank's Code.

6. PRESERVATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI):

- 6.1 The Directors and Designated Persons shall maintain confidentiality of all 'UPSI'. The Directors and Designated Persons shall not communicate, provide, counsel, procure, pass on, or allow access to, directly or indirectly, any UPSI relating to the Bank or its securities or by way of making a recommendation for the purchase or sale of securities to any person. The Directors and Designated Persons shall not trade in securities of the Bank when in possession of such UPSI.
- 6.2 'UPSI' shall be handled on a 'need to know' basis. Such information should be disclosed only to those within the Bank who need the information to discharge their duty and disclosure of such information will not give rise to a conflict of interest or appearance of misuse of the information.

- 6.3 All non-public information directly received by any Designated Person should be reported to the head of his/her department/Compliance Officer immediately.
- 6.4 All files containing confidential information shall be kept secure under lock and key. Computer files shall have adequate security of login and passwords. Files containing confidential information should be deleted / destroyed after its use. Shredders should be used wherever necessary for the destruction of physical files.
- 6.5 An Insider will not on his own accord reveal any information to any person unless authorized to do so by the Compliance Officer to further his / her legitimate purposes, performance of duties or discharge of legal obligations.
- 6.6 If an Insider commits a breach or accidentally crosses the Wall, it shall be reported to the Compliance Officer and immediate action shall be initiated to stop the information from being further misused.
- 6.7 An UPSI may be communicated, provided, allowed access to or procured, in connection with a transaction that would:
- (a) entail an obligation to make an open offer under the takeover regulations where the Board of Directors of the Bank is of informed opinion that sharing of such information is in the best interests of the Bank;
 - (b) not attract the obligation to make an open offer under the takeover regulations but where the Board of Directors of the Bank is of informed opinion that sharing of such information is in the best interests of the Bank and the information that constitute UPSI is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the Board of Directors may determine to be adequate and fair to cover all relevant material facts.
 - (c) The Board of Directors shall for the purposes of transaction mentioned aforesaid require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties except for the purpose mentioned in 6.5.
- 6.8 The Bank shall ensure that a structured digital database is maintained containing the nature of unpublished price sensitive information and the names of such persons or entities as the case may be who have shared the information and also the name of such person with whom information is shared under the regulations along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such database 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.
- 6.9 The Bank shall ensure that the structured digital database is preserved for a period of not less than 8 years after completion of the relevant transactions.

7. DISCLOSURES:

7.1 Initial:

Every person on appointment as a Key Managerial Personnel or as a Director of the Bank or upon becoming a Promoter or a member of the promoter group or a Designated Person, shall disclose their (including the holding of immediate relatives) holding of securities (including derivatives) of

the Bank as on the date of appointment or becoming a Promoter or a Designated Person to the Bank within **seven working days** of such appointment or becoming a promoter or a Designated Person to the Compliance Officer in **Form 1 (Annexure I)**.

7.2 Continuous:

- (a) Government of India/Promoter, all Director of the Bank and all other Designated Persons shall disclose to the Compliance Officer the number of such securities (including derivatives) acquired or disposed of within **two trading days** of such transaction, if the value of the securities (including derivatives) 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** in **Form B (Annexure – IX)**.
- (b) The Compliance Officer shall notify the particulars of such trading to the Stock Exchange (National Stock Exchange of India Limited and BSE Limited) on which the securities (including derivatives) are listed within two trading days of receipt of the disclosure or from becoming aware of such information.
- (c) Designated Persons shall be required to disclose, name and Permanent Account Number or any other identifier authorized by law of his / her spouse, immediate relatives and persons with whom such designated person(s) shares a material financial relationship, on annual basis and changes in such information in **Form 2(Annexure – II)**.

Explanation- 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 from a designated person during the immediately preceding twelve months, equivalent to at least 25% of the annual income of such designated person but shall exclude relationships in which the payment is based on arm’s length transactions

Note: The disclosure of the incremental transactions after any disclosure made aforesaid, shall be made when the transactions effected after the prior disclosure cross the threshold specified in Clause 7.2 (a) above.

7.3 Disclosures by other connected persons.

The Bank may, at its discretion require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the company in such form and at such frequency as may be determined by the company in order to monitor compliance with SEBI (PIT) Regulations. The format of disclosure is as per Form C in **Annexure – X**.

8 PREVENTION OF MISUSE OF UNPUBLISHED PRICE SENSITIVE INFORMATION:

A. Trading Plan:

- (1) An insider shall be entitled to formulate a trading plan and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.
- (2) The trading plan shall comply with the following requirements:
 - (a) Trading can commence only after 120 days from public disclosure of plan.
 - (b) Trading plan shall not entail overlap of any period for which another trading plan is already in existence.

- (c) It shall set out following parameters for each trade to be executed:
- (i) either the value of trade 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, i.e. an upper price limit for a buy trade and a lower price limit for a sell trade. For buy trade, the upper price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent higher than such closing price. For sell trade, the lower price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent lower than such closing price.

Explanation:

- while the parameters in sub-clauses (i), (ii) and (iii) are mandatorily to be mentioned for each trade, the parameter in sub-clause (iv) is optional.
- The price limit in sub-clause (iv) shall be rounded off to the nearest numeral.
- 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.

(d) not entail trading in securities for market abuse.

- (3) 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.
- (4) Pre-clearance of trades shall not be required for a trade executed as per an approved trading plan. Further the trading window norms shall not be applicable for trades carried out in accordance with an approved trading plan.
- (5) The trading plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to either execute any trade in the securities outside the scope of the trading plan or to deviate from it except due to permanent incapacity or bankruptcy or operation of law.
- (6) Implementation of the 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.
- (7) In case of non-implementation (full/partial) of trading plan due to permanent incapacity or bankruptcy or operation of law or failure of execution of trade due to inadequate liquidity in the scrip, the following procedure shall be adopted:
- (i) The insider shall intimate non-implementation (full/partial) of trading plan to the compliance officer within two trading days of end of tenure of the trading plan with reasons thereof and supporting documents, if any.
 - (ii) Upon receipt of information from the insider, the compliance officer, shall place such information along with his recommendation to accept or reject the submissions of the insider, before the Audit Committee in the immediate next meeting. The Audit Committee shall decide whether such non-implementation (full/partial) was bona fide or not.
 - (iii) The decision of the Audit Committee shall be notified by the compliance officer on the same day to the stock exchanges on which the securities are listed.

- (iv) In case the Audit Committee does not accept the submissions made by the insider, then the compliance officer shall take action as per the Code of Conduct.
- (8) If the insider has set a price limit for a trade, 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. However, if the insider wishes to trade irrespective of the fluctuation in market price, he may not set any price limit at the time of formulation of the trading plan.
- (9) The Compliance Officer shall approve or reject the trading plan within two 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.

B. Closure of Trading Window:

- (1) Promoters, Directors, Insiders or Designated Persons or persons who can reasonably be expected to have possession of UPSI and the immediate relatives of the aforesaid persons shall not trade when Trading Window is closed.
- (2) Compliance Officer shall announce closure of Trading Window for securities of the Bank when any of the following events occur:-
- Financial Results;
 - Declaration of Dividends;
 - Change in capital structure;
 - Mergers/amalgamation, demergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
 - When any material event is likely to occur.

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

- (3) Trading restriction period shall be made applicable from the end of every quarter till 48 hours after the declaration of financial results.
- (4) 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 unpublished price sensitive information. 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.

9. PRE-CLEARANCE OF TRADES:

9.1. The persons mentioned in 8 B (1) shall:

- execute trades subject to the Compliance with the Code
- trade only when “**Trading Window**” is open.
- trade in the securities of the Bank from and above 5000 number of securities only on seeking pre-clearance in **Form 3(Annexure - III)** from the Compliance Officer along with declaration as per **Form 4 (Annexure – IV)** and undertaking as per **Form 5 (Annexure – V)**.

9.2. The Compliance Officer may after

- seeking such information as may be necessary from the applicant (**Annexure IV & V**);
- ensuring that the applicant is not in the possession of UPSI;
- confirming that the request for trade is in accordance with the Trading Plan submitted by the applicant earlier;
- applicant has not done any prior contra trade within the previous period of six months,
- ensuring that declaration, if any, made at the time of seeking pre-clearance is correct,

grant the pre-clearance as per **Form 6 (Annexure – VI)**. The pre-clearance shall be valid for a period of days as may be granted by the Compliance Officer and in no event more than 7 trading days. In case of failure to execute trade within the stipulated period fresh application for obtaining pre-clearance has to be sought.

9.3. Pre-clearance shall be required even if the transaction is only in the nature of transfer of beneficiary rights to any of the immediate relatives of the applicant.

9.4. The applicant shall be required to disclose the details of the trade within two days of such trade in **Form 7 (Annexure – VII)**. In the event the applicant does not trade during the period, the applicant shall report to the Compliance Officer the reasons for the same.

9.5. The applicants shall not execute a contra trade (opposite trade) for a period of 6 months within which a trade has been performed.

9.6. The Compliance Officer may grant relaxation to a contra trade for reasons recorded in writing provided that such relaxation does not violate the Code or the Regulations and the request for waiver is made as per **Form 8 (Annexure VIII)**.

9.7. In case a contra trade is 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 it.

9.8. In case any Director or employee has to be allotted securities in terms of the ESOP/ESPS Scheme of the Bank, there shall be no restriction on allotment of securities even during the Trading Window Closure period. However, the employee shall not be permitted to dispose off the securities during the Trading Window Closure period.

10. FORMATS AND REPORTING REQUIREMENTS:

The formats of various forms / applications referred to in the Code are annexed.

- (a) All Directors and Designated Persons shall forward to the Compliance Officer in **Form No.1 (Annexure - I)** the number of shares or voting rights held and positions taken in derivatives by such person and their immediate relatives and by any other person for whom such person takes trading decisions, within **seven working days** from the date of his appointment or his becoming the Designated Employee as the case may be.
- (b) Any person who is a Promoter or part of Promoter Group of the Bank shall disclose to the Compliance Officer in **Form No.1 (Annexure - I)** the number of shares or voting rights held by such person, within seven working days of becoming such promoter or persons belonging to promoter group.
- (c) All Designated Persons shall within thirty days from the end of the Financial Year and as and when the information changes, disclose the names and Permanent Account Number or any other identifier authorized by law of his / her spouse, immediate relatives and persons with whom such designated person(s) shares a material financial relationship in **Form 2 (Annexure – II)**.

- (d) All Directors and Designated Persons shall forward in **Form No. B (Annexure - IX)** to the Compliance Officer the number of such securities acquired and disposed of within two trading days of such transaction if the value of securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregating to a traded value in excess of ten lakh rupees or such other value as may be specified.
- (e) The Compliance Officer shall maintain records of all the declarations in the appropriate forms given by the Directors/Designated Employees for a minimum period of five years.
- (f) The Compliance Officer shall furnish to the Managing Director and CEO of the Bank, on a quarterly basis, all the details of the dealings in the securities of the Bank by Directors / Designated Persons of the Bank and the details of pre-clearance given and trade executed under the pre-clearance procedure envisaged in this Code.
- (g) The Compliance Officer shall submit compliance reports to the Audit Committee of the Board and Board of Directors at the end of every half year.
- (h) The Compliance Officer shall within seven days of coming to know of any contravention of the Code or the Regulations, immediately bring the same to the notice of the Chairman of the Audit Committee and also notify SEBI of the contravention. The format for notifying SEBI regarding any violation is as per **Annexure- XII**.

11. PENALTY AND PUNISHMENT FOR CONTRAVENTION OF CODE OF CONDUCT:

- 11.1 Any Director/Designated Person of the Bank and any other person considered as an Insider who deals in securities or communicates any Unpublished Price Sensitive information, in violation/contravention of a Bank's Code may be penalized by the Bank. The Bank may take appropriate action against such person and such action may include disciplinary action viz., wage freeze, suspension, ineligibility for future participation in employee stock option plans etc.
- 11.2 Such a person shall also be subject to any action that may be taken by SEBI for violation of the Code in accordance with the provisions of the Act.

12. PROTECTION AGAINST RETALIATION AND VICTIMIZATION:

Employee who reports any alleged violations of insider trading laws in accordance with the Informant mechanism introduced vide SEBI (Prohibition of Insider Trading) (Third Amendment) Regulations, 2019 dated September 17, 2019, will be protected against any discharge, termination, demotion, suspension, threats, harassment, directly or indirectly or discrimination.

13. CODE OF FAIR DISCLOSURE:

A code of practices and procedures for fair disclosure of Unpublished Price Sensitive Information that would be followed by the Bank is set out below;

- (a) The Bank ensures prompt disclosure of price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being.
- (b) Bank discloses UPSI in conformity with the Listing Agreement and SEBI guidelines and thus ensures uniform and universal dissemination of UPSI and avoids selective disclosure.
- (c) The Bank shall designate a senior officer as chief investor relations officer to deal with dissemination of information and disclosure of UPSI.
- (d) The Bank appropriately responds to queries on news reports and requests for verification of market rumours by regulatory authorities.

- (e) The Bank develops best practices with regard to sharing of UPSI with analysts, research personnel.
- (f) The Bank handles all UPSI on a need-to-know basis.

14. POLICY ON DETERMINATION OF LEGITIMATE PURPOSES

This policy is part of the “Indian Bank Code of Conduct for Prohibition of Insider Trading in listed Securities of the Bank” and is formulated in compliance to Regulation 3(2A) of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

The Code restricts the communication of UPSI relating to the Bank or securities listed or proposed to be listed to any other person including other insider except where such communication is made in furtherance of legitimate purposes.

The term “legitimate purpose” is explained in the Code. However, the following principles shall be considered in determining if the disclosure is for legitimate purposes;

- (a) The UPSI shall be shared with other employees / departments of the Bank only when such disclosure is made in furtherance of duties entrusted to the Designated Person.
- (b) The UPSI can be shared with Government of India, Reserve Bank of India, Regulators, Statutory Bodies etc. when statutorily mandated and with merchant bankers, legal advisers, auditors, insolvency professionals or other advisors or consultants in ordinary course of business for specific performance of their duties or discharge of their legal obligations. The employee/ insider who intends to share information as given hereinabove (except when statutorily mandated) shall, as and when applicable, ensure that a notice of confidentiality is provided to the recipient or Confidentiality Agreement / Non Disclosure Agreement is signed with the recipient before sharing such information.
- (c) The sharing of UPSI shall not be carried out to evade or circumvent the prohibition of these regulations.
- (d) The sharing of UPSI is in furtherance of the Bank's interests.

15. FREEZING OF PAN OF DESIGNATED PERSONS:

- (a) In line with SEBI guidelines regarding automation of Continual Disclosures under Regulation 7(2) of SEBI (PIT) Regulations, 2015, the Bank has appointed / designated NSDL as the Designated Depository for the purpose.
- (b) The Bank shall confirm/update with NSDL, the details with respect to the ISIN of equity shares of the Bank, Name, PAN, demat account number viz. DP ID and Client ID (in case of PAN exempted cases) of the Designated Persons.
- (c) The aforesaid details shall be submitted by the Bank to the NSDL atleast 2 trading days prior to the commencement of trading window closure date (T-2 days).
- (d) NSDL shall provide the details received from the Bank (i.e., Commencement Date and End Date of the trading window closure period, Name and PAN of DPs, ISIN, etc.) to the Stock Exchanges and the other Depository atleast 1 trading day prior to the commencement of trading window closure commencement date (T-1 day).
- (e) The demat accounts shall be identified by the Depositories based on the PAN of the Designated Person. Based on the demat accounts, the off-market transactions and creation of pledge shall be restricted by the Depositories for such Designated Persons while the Stock Exchanges shall restrict the on-market transactions of such Designated Persons in equity

shares and equity derivatives contracts of the Bank from the Commencement Date of trading window closure period (i.e., T day).

- (f) The Bank shall update / modify list of Designated Persons on the portal of NSDL on continuous basis on the basis of information received from CO: HRM Dept.
- (g) If the Designated Person(s) are required to be exempted by the Bank from Trading Window restrictions, the details of such Designated Person(s) to be exempted shall be furnished by the Bank to the Designated Depository.
- (h) The freezing/de-freezing of PAN at the security level on account of changes due to addition or deletion will be effected post market hours.

Further regulatory guidelines / directives issued from time to time will form part of the policy and will become effective from the date indicated in the concerned circular / guidelines / directives.

ANNEXURE – I

FORM 1

INDIAN BANK CODE OF CONDUCT FOR PROHIBITION OF INSIDER TRADING IN LISTED SECURITIES OF THE BANK

STATEMENT OF INITIAL DISCLOSURE OF SHARES HELD IN THE BANK

Name, PAN, CIN/DIN & Address with contact phone and mobile nos.	Category of Person (KMP / Director or Promoter or member of the promoter group/Designated Person/ Immediate relative to/others, etc.)	Date of appointment of KMP/Director / or Date of becoming Promoter/ member of the promoter group/ Designated Person	Securities held at the time of appointment of KMP/Director or upon becoming Promoter or member of the promoter group/ Designated Person		% of Share holding	Open Interest of the Future contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group/Designated Person			Open Interest of the Option Contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group/Designated Person		
			Type of security	No.		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

Note: In case of Options, notional value shall be calculated based on premium plus strike price of options.

Name of Spouse :

PAN of Spouse:

Name of immediate relative:

PAN of immediate relative:

Signature :

Name:

Designation:

Branch/Office:

Date:

Place :

ANNEXURE – II

FORM 2

INDIAN BANK CODE OF CONDUCT FOR PROHIBITION OF INSIDER TRADING IN LISTED SECURITIES OF THE BANK

STATEMENT OF ANNUAL DISCLOSURE OF SHARE HELD IN THE BANK BY DIRECTORS/ DESIGNATED PERSONS AND THEIR RELATIVES

Name of Director / Designated Person	
Department	

PARTICULARS		PAN	PARTICULARS OF SHAREHOLDING				
Name	Relation (Self/relative*)		Folio No./ DP ID-Client ID	No. of shares held on 1 st April 20__	No. of shares acquired during the year	No of shares sold during the year	No of shares held on year ended 31 st March 20__

I/we declare that I/we have complied with the requirement of not entering into an opposite transaction i.e., sell or buy any number of shares during the next six months following the prior transaction.

*Immediate relative means 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.

Place:

Date:

(Signature)

ANNEXURE – III

Form 3

INDIAN BANK CODE OF CONDUCT FOR PROHIBITION OF INSIDER TRADING IN LISTED SECURITIES OF THE BANK

APPLICATION FORM FOR PRE-CLEARANCE OF TRADES IN BANK'S SECURITIES

Date:

From:

Name:

Designation:

Department:

To:

The Compliance Officer

CO: Investor Services Cell

Corporate Office, Chennai – 600014.

Dear Sir,

(Through Head of the Department / Branch Manager)

With reference to INDIAN BANK Code of conduct for Prohibition of Insider Trading in Listed Securities of the Bank, I seek your approval to subscribe to/ agree to subscribe to / purchase / sell deal as an agent / principal in _____ equity shares of the Bank.

The statement of shareholding in Form No. 4, as on _____ and Undertaking in the prescribed format are enclosed for your perusal.

Details of transaction to be entered into

Name of the person for whom the transaction is to be executed	
Relationship with the applicant	
No. of shares covered by the transaction	
Allotment/Purchase/Sale	
Depository I. D. No.	
Client I. D. No.	
Particulars of the broker through whom the transaction is to be executed	Name : Address : Phone No. :

I request you to kindly pre-clear the above transaction at the earliest.

Thanking you,

Yours faithfully,

Signature of the Applicant

ANNEXURE – IV

Form 4

INDIAN BANK CODE OF CONDUCT FOR PROHIBITION OF INSIDER TRADING IN LISTED SECURITIES OF THE BANK

Statement of shares held in the Bank at the time of pre clearance

Name of Director /Designated Person	
Employee Code No.	
Department	
Location	
As on	

PARTICULARS		PARTICULARS OF SHAREHOLDING	
Name	Relation	Folio /Client ID. No.	No. of shares held

Add more rows if required

I/we declare that I/we have complied with the requirement of not entering into an opposite transaction i.e., sell or buy any number of shares during the next six months following the prior transaction.

Place:

Date:

(Signature)

ANNEXURE – V

INDIAN BANK CODE OF CONDUCT FOR PROHIBITION OF INSIDER TRADING IN LISTED SECURITIES OF THE BANK

Form 5

(Draft undertaking to be accompanied with every pre-clearance application)

The Compliance Officer
Investor Services Cell
Corporate Office
Chennai

Dear Sir,

I, _____, a Director/Designated Person of the Bank, am desirous of dealing in _____ (#) Securities of the Bank as mentioned in my application dated _____ for pre-clearance of the transactions.

As required by the Indian Bank Code of Conduct for Prevention of Insider Trading in Listed Securities of the Bank, I hereby state / confirm:

- to maintain confidentiality of all 'Unpublished Price Sensitive Information' that may come into my possession in the discharge of my duties with the Bank;
- not to pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sale of securities of the Bank based on the same;
- to report to the Compliance Officer, any non-public information that may be directly received by me;
- that I did not have any access or receive 'Unpublished Price Sensitive Information' upto the date of signing this undertaking ;
- that in case I have access to or receive 'Unpublished Price Sensitive Information' after the signing of this undertaking but before the execution of the transaction, I shall inform the Compliance Officer of the change in my position and that I shall completely refrain from dealing in the securities of the Bank till such time such information becomes public ;
- that I have not contravened the Code of Conduct for Prohibition of Insider Trading as notified by the Bank from time to time; and
- that I have made full and true disclosure in the matter.

Name of Director / Designated Employee:

Employee Code No:

Department:

Location:

Place :

Date :

(#) indicate number of Securities

ANNEXURE – VI

INDIAN BANK CODE OF CONDUCT FOR PROHIBITION OF INSIDER TRADING IN LISTED SECURITIES OF THE BANK

Form 6

(Draft letter of approval from Compliance Officer)

Date:

To:

Dear Sir,

Sub: **Pre-clearance of trade in Bank's Securities**

Ref: Your application dated _____, for pre-clearance of transaction for _____ shares of the Bank in your name / in the name of _____.

With reference to your above application pursuant to Clause 9.1 of INDIAN BANK Code of Conduct for Prohibition of Insider Trading in Listed Securities of the Bank, seeking pre-clearance of your transaction in _____ Securities of the Bank, we hereby accord our approval to the proposed transaction.

You may kindly note that pursuant to provisions of Clause 9.2 of the said Code of Conduct, the aforesaid transaction shall be executed within seven days from the date of receipt of this approval letter, failing which, an application seeking pre-clearance to the proposed transaction together with undertaking in the prescribed format, shall be made afresh within four days from the conclusion of the seven days period stated hereinabove. As stipulated in Clause _____ of the Code of Conduct, the shares so purchased shall be held for _____ from the date of acquisition thereof in order to be considered as being held for investment purposes.

Thanking you,

Yours faithfully,

For INDIAN BANK

Compliance Officer

ANNEXURE - VII

INDIAN BANK CODE OF CONDUCT FOR PROHIBITION OF INSIDER TRADING IN LISTED SECURITIES OF THE BANK

Form 7

STATEMENT OF TRANSACTIONS IN THE SECURITIES OF THE BANK

Name of Director /Designated Person	
Employee Code No.	
Department	
Location	

Sl. No.	Date of application for pre-clearance	Date of receipt of pre-clearance	Date of Execution of transaction / allotment	No. of shares transacted

(Signature of Director / Designated Person)

Place :

Date :

ANNEXURE - VIII

Form 8

INDIAN BANK CODE OF CONDUCT FOR PROHIBITION OF INSIDER TRADING IN LISTED SECURITIES OF THE BANK

(Draft application for waiver of Minimum period)

The Compliance Officer
Investor Services Cell
Corporate Office
Chennai

From

Name	
Employee Code	
Department	
Location	

Dear Sir,

I request you to grant me waiver of the minimum period of six months for not entering into contra trade as required under the Code for Prohibition of Insider Trading with respect to _____ shares of the Bank held by me / _____ (name of the dependent) acquired on _____. I desire to deal in the said shares on account of _____. (give reasons)

Thanking you,

(Name of the Applicant)

ANNEXURE – IX
FORM – B
INDIAN BANK CODE OF CONDUCT FOR PROHIBITION OF INSIDER TRADING IN LISTED SECURITIES OF THE BANK
**FORM FOR DISCLOSURE OF DETAILS OF ACQUISITION/DISPOSAL OF SECURITIES OF THE BANK OF VALUE MORE THAN Rs.10.00 LAKH
IN ONE TRANSACTION OR A SERIES OF TRANSACTIONS OVER ANY CALENDAR QUARTER
(Refer Clause 7.2 (a) of the Code)**

Name, PAN, CIN/ DIN & address of Promoter /member of Promoter Group Designated Person/ Director/immediate relative to/others etc. with contact nos.	Category of Person (Promoter/ member of the promoter group/ designated person/ Director s/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/ sale of shares/disposal of shares specify		Date of intimation to Bank	Mode of acquisition /disposal (market / public rights/ preferential offer/ off market / Inter-se transfer, ESOPs etc.	Trading in derivatives (Specify type of contract, Futures or options etc)						Exchange on which the trade was executed
		Type of security	No and % of share holding	Type of security	No.	Value	Transaction type (Purchase/sale/Pledge/Revocation/invocation/others	Type of security	No and % of share holding	From	To			Type of contract	Contract specifications	Buy		Sell		
																Notional Value	No. of units	Notional Value	No. of units	

Note: In case of Options, notional value shall be calculated based on premium plus strike price of options.

Signature:

Name:

Designation:

Branch / Office:

Date:

Place:

ANNEXURE – X
FORM - C

INDIAN BANK CODE OF CONDUCT FOR PROHIBITION OF INSIDER TRADING IN LISTED SECURITIES OF THE BANK
TRANSACTIONS BY OTHER CONNECTED PERSONS AS IDENTIFIED BY THE BANK
(Refer clause 7.3 of the code)

Name, PAN, CIN/ DIN & address with contact nos. of other connected persons as identified by the Bank	Conne ction with Bank	Securities held prior to acquisition / Disposal		Securities acquired / Disposed				Securities held post acquisition / disposal		Date of allotment advice/acq uisation of shares/ sale of shares specify		Date of intimation to Bank		Mode of acquisition/ disposal (on market/ public/ rights/ preferential offer/off market / Inter-se transfer, ESOPs etc.		Trading in derivatives (Specify type of contract, Futures or options etc)				Exchange on which the trade was executed
		Type of security	No. and % of share holding	Type of security	No	Valu e	Tran sacti on type	Type of secu rity	No. and % of share holding	From	To			Type of contract	Contract specifications	Buy		Sell		
																Notional value	No. of units	Notional value	No. of units	

Note: In case of Options, notional value shall be calculated based on premium plus strike price of options.

Signature:
 Name:
 Designation:
 Branch / Office:
 Date:
 Place :

Annexure XI

CONFIDENTIALITY AGREEMENT

This **Agreement** is made on this _____ day of _____, _____ between _____ with **INDIAN BANK** having its Head Office at 66, Rajaji Salai, Chennai – 600 001 and Corporate Office at 254-260, Avvai Shanmugam Salai, Royapettah, Chennai – 600 014 (hereinafter referred to as the Bank) on the second part.

WHEREAS the Bank has formed a Code of Conduct known as the “Indian Bank Code of Conduct for Prohibition of Insider Trading in Listed Securities of the Bank” in pursuance of Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

In Compliance of which I agree to the following covenants that

I shall not:

1. at any time without the consent of the Bank disclose, divulge make public or pass on such Unpublished Price Sensitive Information to any person directly or indirectly by way of making a recommendation for the purchase or sale of securities of the Bank based on the same.
2. Disclose Unpublished Price Sensitive Information to family members, friends, business associates or any other individual.
3. Discuss Unpublished Price Sensitive Information in public places.
4. Disclose Unpublished Price Sensitive Information to any employee who does not need to know the information for discharging his or her duties.
5. recommend to anyone that they may undertake dealing in securities of the company while being in possession, control or knowledge of Unpublished Price Sensitive Information.
6. be seen or perceived to be dealing in securities of the company on the basis of Unpublished Price Sensitive Information.

Signed and delivered by	
In presence of the within named witness	
For Indian Bank - Compliance Officer	
In presence of the within named Witness	

Report by Indian Bank for violations related to Code of Conduct for Prohibition of Insider Trading in Listed Securities of the Bank

Sr. No	Particulars	Details												
1.	Name of the listed entity/ Intermediary/Fiduciary													
2.	Please tick appropriate checkbox Reporting in capacity of : <ul style="list-style-type: none"> ▪ Listed entity • Intermediary • Fiduciary 													
3.	A. Details of Designated Person (DP)													
	i. Name of the DP													
	ii. PAN of the DP													
	iii. Designation of DP													
	iv. Functional Role of DP													
	v. Whether DP is Promoter or belongs to Promoter Group													
	B. If Reporting is for immediate Relative of DP													
	i. Name of the immediate relative of DP													
	ii. PAN of the immediate relative of DP													
	C. Details of transaction(s)													
	i. Name of the scrip													
	ii. No of shares traded and value (Rs.) (Date- wise)													
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter													
	(i) Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015													
	(ii) Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015													
4.	Details of violations observed under Code of Conduct													
5.	Action taken by Listed entity/ Intermediary/ Fiduciary													
6.	Reasons recorded in writing for taking action stated above													
7.	Details of the previous instances of violations, if any, since last financial year													
8.	If any amount collected for Code of Conduct violation (s)													
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)													
	ii. Details of transfer / payment													
	in case of Online:													
	<table border="1"> <thead> <tr> <th>Particulars</th><th>Details</th></tr> </thead> <tbody> <tr> <td>Name of the transferor</td><td></td></tr> <tr> <td>Bank Name, branch and Account number</td><td></td></tr> <tr> <td>UTR/Transaction reference Number</td><td></td></tr> <tr> <td>Transaction date</td><td></td></tr> <tr> <td>Transaction Amount (Rs.)</td><td></td></tr> </tbody> </table>	Particulars	Details	Name of the transferor		Bank Name, branch and Account number		UTR/Transaction reference Number		Transaction date		Transaction Amount (Rs.)		
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Name of the transferor														
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	<p>In case of Demand Draft (DD):</p> <table border="1" data-bbox="327 293 1096 465"> <tr> <td data-bbox="327 293 711 336">Bank Name and branch</td> <td data-bbox="711 293 1096 336"></td> </tr> <tr> <td data-bbox="327 336 711 378">DD Number</td> <td data-bbox="711 336 1096 378"></td> </tr> <tr> <td data-bbox="327 378 711 421">DD date</td> <td data-bbox="711 378 1096 421"></td> </tr> <tr> <td data-bbox="327 421 711 465">DD amount (in Rs.)</td> <td data-bbox="711 421 1096 465"></td> </tr> </table>	Bank Name and branch		DD Number		DD date		DD amount (in Rs.)	
Bank Name and branch									
DD Number									
DD date									
DD amount (in Rs.)									
9	Any other relevant information								

Yours faithfully,

Name and signature of the Compliance Officer

PAN:

Date and Place

Email id:

Mobile Number: