



Rodium Realty Ltd.

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RODIUM REALTY LIMITED
CIN: L85110MH1993PLC206012

Regd. Office: Plot No.636, 501, X'Cube, Off. New Link Road, Andheri (West), Mumbai – 400053

• **Tel:** 022- 4231 0800 • **Fax no:** 022 4231 0855 • **Email id:** info@rodium.net • **Website:** www.rodium.net

CODE OF CONDUCT FOR REGULATE, MONITOR AND REPORT TRADING BY INSIDERS
[As per SEBI (Prohibition of Insider Trading) Regulations, 2015 including any amendment or re-enactment thereof]

This Code of Conduct to Regulate, Monitor and Report trading by Insiders of the Company (“**Rodium**” or “**the Company**”) has been framed pursuant to Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Definitions and Interpretation:

“**Act**” means the Securities and Exchange Board of India Act, 1992

“**Board**” means the Board of Directors of Rodium;

“**Code**” shall mean this Code of Conduct to Regulate, Monitor and Report trading by Insiders as adopted by Rodium;

“**Compliance Officer**” shall be the person holding the position of Company Secretary of the Company, from time to time or such other officer of Rodium who is Financially Literate as may be designated by the Board;

“**Connected Person**” means –

- (i) any person who is or has during the six months prior to the concerned act been associated with the 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/ itself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.
- (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) an Immediate 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



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- (h) an official or an employee of a self-regulatory organization recognized or authorized by the Board; or
- (i) a banker of the Company; or
- (j) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a Company or his Immediate Relative or banker of the Company, has more than ten percent of the holding or interest;

“Director” means a member of the Board;

“Designated Persons” shall mean and include the following:

- (i) All Directors of the Company and its subsidiaries
- (ii) All the Key Managerial Personnel of the Company and its Subsidiaries
- (iii) All the Nominee Directors appointed by bank(s) or financial institution(s) on the Board of the Company, if any.
- (iv) All employees in the Finance and Accounts department, Secretarial and Legal department, Board Secretariat and Design and Architectural department of the Company.
- (v) Such other employees as may be determined as such by the Compliance Officer or the Board from time to time.
- (vi) Intermediary or fiduciary designated on the basis of their functional role or access to unpublished price sensitive information in the organization by their board of directors;
- (vii) All Promoters of the Company.
- (viii) Personal Assistant/Secretary to all the above persons.

“Employee” means all employees of Rodium

“Fiduciary/Fiduciaries” means professional firms such as auditors, accountancy firms, law firms, analysts, insolvency professional entities, consultants, banks etc., assisting or advising the Company.

“Generally available information” means information that is accessible to the public on a non-discriminatory basis.

“Insider” means any person who is:

- i) a Connected Person; or
- ii) in possession of or having access to Unpublished Price Sensitive Information;

“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;

“Legitimate purpose” 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 in order to perform duty or discharge of legal obligation i.e. on need to know basis, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the Regulation.14.

“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.



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“Key Managerial Personnel” in relation to a Company, means –

- (i) the Chief Executive Officer and/ or the Managing Director;
- (ii) the Company Secretary;
- (iii) the Whole-time Director;
- (iv) the Chief Financial Officer; and
- (v) such other officer as may be prescribed under Companies Act, 2013;

“Promoter” shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification(s) thereof;

“Promoter Group” shall have the meaning assigned to it under the Securities and Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof;

“Securities” shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 or any modification(s) thereof except units of a mutual fund;

“SEBI Insider Trading Regulations” shall mean the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time;

“Trading” means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly.

“Trading Day” means a day on which the recognized stock exchanges are open for trading;

“Unpublished Price Sensitive Information” or “UPSI” means any information, relating to the 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 and such other transactions;
- (v) changes in key managerial personnel; and

“Trading Window” shall mean the time period during which Dealing in Securities of the Company shall be permitted and which shall be as specified in paragraph 4.2 herein;

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

1. Application and Scope:

This Code shall apply to the Designated Persons and their Immediate Relatives. The provisions of this Code shall be applicable irrespective of whether the Securities are held by Designated Persons solely or jointly along with any other persons or by their Immediate Relative.

2. Compliance Officer:

- 2.1 In accordance with the requirement of the SEBI Insider Trading Regulations, the Company shall always have a Compliance Officer, who shall report to the Board of Directors and in particular, shall provide reports to the Chairman of the Audit Committee, if any, or to the Chairman of the Board of Directors at such frequency as may be stipulated by the Board of Directors. The Compliance Officer shall be responsible for:
- Compliance of policies, procedures, maintenance of records
 - Monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information as set forth in this Code and applicable laws
 - Pre-clearing of the proposed trading in Securities of the Company by the Designated Persons and their Immediate Relatives
 - Monitoring of Trading in Securities of the Company and the implementation of this Code under the overall supervision of the Board
 - Determining of closing and reopening of Trading Window
 - Approving and monitoring of Trading Plan
- 2.2 The Compliance Officer shall assist the Designated Persons in addressing any clarification and/or issues relating to or arising out of the SEBI Insider Trading Regulations and the Code.

3. Confidentiality of Price Sensitive Information and Chinese Walls:

Confidentiality of Price Sensitive Information.

- 3.1.1 The Designated Persons and their Immediate Relatives shall maintain the confidentiality of all Unpublished Price Sensitive Information. The Designated Persons shall not pass on such information to any person, directly or indirectly.
- 3.1.2 The Unpublished Price Sensitive Information is to be handled on a “need-to-know” basis, i.e., Unpublished Price Sensitive Information should be communicated only to those Designated Persons and/or to such other persons who need the information in furtherance of their legitimate purpose, performance of duties or discharge of their legal obligation and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.

Chinese Walls

- 3.2.1 To prevent the misuse of Unpublished Price Sensitive Information, the Company shall adopt a “Chinese Wall” concept which separates those areas of the Company which routinely have access to UPSI and considered to be “inside areas”, from other departments providing support services, considered to be ‘public areas’.
- 3.2.2 The Designated Persons in the inside areas shall not communicate any Unpublished Price Sensitive Information to anyone in the public areas.
- 3.2.3 In exceptional circumstances, the Designated Persons from the public areas may be brought to ‘cross the wall’ in furtherance of legitimate purpose, performance of duties or discharge of legal obligations and given the Unpublished Price Sensitive Information on a ‘need-to-know’ basis upon intimation to the Compliance Officer.

4. Restrictions on Trading in Securities of the Company

- 4.1 The Designated Persons shall be subject to the restrictions on Trading in Securities of the Company as enumerated below.

4.2 Trading Window

- 4.2.1 The Trading period or the Trading Window for Trading in the Securities of the Company shall be the period excluding the period as specified in paragraph 4.2.3. Subject to paragraph 4.2.4, the Designated Persons and their Immediate Relatives shall Trade in Securities of the Company only during the time period when the Trading Window is open.
- 4.2.2 The Designated Persons and their Immediate Relatives shall not Trade in Securities of the Company during the period when the Trading Window is closed.
- 4.2.3 The Trading Window shall, inter alia remain closed from the end of every quarter for which financial results are required to be announced by the company and during the time the UPSI in question is published and the Trading Window shall re-open not earlier than 48 hours after the UPSI in question becomes generally available.
- 4.2.4 The Trading window restriction shall not apply for below cases:
- i. off-market inter-se transfer between insiders who were in possession of the same UPSI without violating the policy and both parties had made a conscious and informed trade decision.
 - ii. transaction carried out through the block deal window mechanism between person who were in possession of the UPSI without violating the policy and both parties had made a conscious and informed trade decision.
 - iii. transaction carried out pursuant to a statutory or regulatory obligation to carry out a bonafide transaction.
 - iv. Transaction undertaken pursuant to the exercise of stock options in respect of which the exercise price was pre-determine in compliance with applicable regulations.
 - v. Trades executed ads per the trading plan set up in accordance with the policy.
 - vi. Pledge of shares for a bonafide purpose such as raising of funds, subject to pre-clearance by the Compliance Officer.
 - vii. Transaction which are undertaken in accordance to respective regulations made by SEBI, such as acquisitions by conversion of warrants or debentures, subscribing to rights issue, further public issue, preferential allotment or tendering of shares in buy-back offer, open offer, delisting offer.

5. Pre clearance of Trading in Securities:

- 5.1 All Designated Persons who intends to trade in securities of the company, for themselves and also for their Immediate Relatives, aggregating to trade value of Rupees Ten Lakhs or more, during calendar quarter, should obtain a pre-clearance of the transactions.
- 5.2 An application for pre-clearance of the proposed transaction shall be, made in attached format as Annexure A (Application for Pre-Clearance of Trade) in this regard, to the Compliance Officer along with an undertaking attached as Annexure B.

- 5.3 The Designated Persons shall, within two days of the execution of the Trade, submit the details of such trade to the Compliance Officer as per Annexure C.
- 5.3 In case, any Designated Person and their Immediate Relative fails to execute the trade within 7(seven) trading days after the pre-clearance, he/she shall report such decision to compliance Officer along with reason of not executing the trade.
- 5.4 If the pre-cleared trade is not executed within the seven trading days after the approval is given, the designated person must secure pre-clearance of the transaction again.

6. Additional trading restrictions on Designated Persons:

- 6.2 The Designated Persons and their immediate relatives who have traded in accordance with the provisions of this Code shall not execute a contra trade within 6 (six) months of such trade.

For the sake of clarity, if any Designated Person and their imitative Relative has bought any securities of the Company, he/she cannot sell any securities of the Company, within a period of six months, from the date of such purchase.

Similarly, in case any Designated Person and their impeditive relative has sold any securities, he/she cannot acquire any securities, within a period of six months, from the dated of such sale.

- 6.3 In case the sale of Securities of the Company is necessitated for reasons to be recorded in writing provided that such a reasons does not violate this Code, the minimum holding period as prescribed under paragraph 6.2 may be waived by the Compliance Officer.
- 6.4 Trading in Securities of the Company by the Designated Persons shall be exclusively on delivery basis and no short selling shall be undertaken by them.

Provided that the aforesaid restrictions on contra trade shall not be applicable in case of exercise of ESOP's

7. Trading Plans:

- 7.1 An insider shall have an option 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.
- 7.2 Such Trading plan shall:–
- i. not entail commencement of Trading on behalf of the Insider earlier than six months from the public disclosure of the plan;
 - ii. not entail Trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced by the issuer of the securities and the second trading day after the disclosure of such financial results;
 - iii. entail trading for a period of not less than twelve months;
 - iv. not entail overlap of any period for which another trading plan is already in existence;

- v. set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
 - vi. not entail trading in securities for market abuse.
- 7.3 The Compliance Officer shall consider the Trading plan made as above and shall approve it forthwith. However, he shall be entitled to take express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per provisions of the SEBI Insider Trading Regulations.
- 7.4 The Trading plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the Securities outside the scope of the Trading plan. However, the implementation of the Trading plan shall not be commenced if at the time of formulation of the plan, the Insider is in possession of any Unpublished Price Sensitive Information and the said information has not become generally available at the time of the commencement of implementation. The commencement of the plan shall be deferred until such Unpublished Price Sensitive Information becomes generally available information. Further the Insider shall also not be allowed to deal in Securities of the Company, if the date of Trading in securities of the Company, as per the approved Trading plan, coincides with the date of closure of trading window announced by the Compliance Officer.
- 7.5 Upon approval of the trading plan, the Compliance Officer shall notify the plan to the stock exchange on which the securities are listed.

8. Reporting Requirements for Transactions in Securities:

8.1 Initial Disclosure:

- a. Every Promoter and the member of the promoter group Key Managerial Personnel and Director of the Company shall disclose his holding of securities of the Company within Thirty days of these Rules taking effect as per Form A set out in Annexure D;
- b. Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter or member of promoter group, shall disclose his/her holding of Securities of the Company as on the date of appointment or becoming a Promoter, to the Company within seven days of such appointment or becoming a Promoter in Form B set out in Annexure E.

8.2 Continual Disclosures:

- a. Every Promoter, member of promoter group, designated person, employee and Director 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 Ten Lakh rupees or such other value as may be specified by SEBI Insider Trading Regulations in Form C as set out in Annexure F.
- b. Every Designated person shall 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 in Annexure G.

- Name of Immediate Relatives
- persons with whom such designated person(s) shares a Material Financial Relationship
- Permanent Account Number or any other identifier authorized by law of (a) & (b)
- Phone, mobile and cell numbers of (a) & (b)
- Educational institutions from where the designated person graduated
- Name of past employer(s)

The information required above may be disclosed on one-time basis only.

8.3 **Disclosure to the Stock Exchange:**

The Compliance Officer shall notify the stock exchanges, particulars of the Trades, within two trading days of the receipt of the Continual Disclosure or from becoming aware of such information.

8.4 **Disclosures by other Connected Persons:** The Company 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 Form D as set out in Annexure H and at such frequency as may be determined by the Company in order to monitor compliance with this regulation.

8.5 The Compliance Officer shall maintain records of all the declarations given by the Designated Persons for a minimum period of 5 (five) years.

8.6 The Compliance Officer shall place before the Chairman of the Board on quarterly basis all the details of the trading in the Securities of the Company received from the Designated Persons and their Immediate Relatives and details of such persons who have submitted trading plans as envisaged in this Code.

8.7 Every Promoter, employee and Director and their Immediate Relatives shall within 30 (thirty) days of the end of every financial year submit a statement of Annual Disclosure in Form E-1 and Form E-2 with the Compliance Officer

9. **Penalty for Contravention of Code of Conduct:**

9.1 In the event a Designated Person or his/her Immediate Relatives, trade in Securities or communicates any information for trading in Securities in contravention of this Code or otherwise violates the provisions of this Code, such Person shall be referred to the Audit Committee of Directors. The Board may, on the recommendations of the Audit Committee, decide on the appropriate disciplinary action (which may include salary freeze, suspension, recovery, clawback and ineligibility for future participation in employee stock option plans etc.)

9.2 The action by the Company shall not preclude SEBI from taking any action under SEBI (Prohibition of Insider Trading) Regulations, 2015.

10. **Information to SEBI in case of violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015:**

In case it is observed by Compliance Officer that there has been a violation of SEBI Insider Trading Regulations, the Company shall inform SEBI of such violation

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(Approved and effective by the Board of Directors at its meeting held on November 13, 2019)



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Annexure A

APPLICATION FOR PRE-CLEARANCE OF TRADE

Date : _____

The Compliance Officer
Rodium Realty Limited
501 X'Cube, Plot no 636,
Opp. Fun Republic Theater,
Off. Link Road, Andheri (W),
Mumbai – 400053.

Dear Sir

**Sub. : Application for Pre-Clearance of Trade to be executed by Designated
Persons or the Immediate Relatives** (strike out what is not applicable)

I, _____ S/o Mr. _____
, Director / Employee of Rodium Realty Limited (Rodium) intend to sell /purchase _____
(_____ only) Shares of Rodium through myself/----- (my-----)

Details of Depository Account in which such Shares will be debited / credited, are as under:

Name of the first Holder of the DP Account	
Name of the DP	
DP ID	
Client ID	
Nos. of Rodium Shares in the said account	

Kindly provide pre-clearance for the above trade. Necessary undertaking is enclosed.

Thanking you,
Yours truly,

Signature _____ Name : _____

I confirm the above facts stated by me in respect of myself/ my -----

Signature of the Designated employee : _____
Name of the Designated Employee : _____
Date : _____



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Annexure B

UNDERTAKING

I, _____ S/o Mr. _____
aged _____ years, residing at _____ do
hereby undertake that the following information submitted by me to Rodium Realty Limited,
having its registered office at 501 X'Cube, Plot no 636, Opp. Fun Republic Theater, Off. Link
Road, Andheri (W), Mumbai – 400053. is true and correct:

1. That I do not have any access to or have not received any “price sensitive information” upto the time of signing this undertaking.
2. That in case I receive or have access to any “price sensitive information” after signing the undertaking but before the execution of the transaction which I intend to do, as disclosed in my Application for Pre-Clearance of Trade (“the Application”), I shall refrain from dealing in Shares of the Company either personally or through any Immediate Relative of mine, till such information becomes public and shall necessarily inform the Compliance Officer of the Company, of the same.
3. That I have not contravened the Code of Conduct for Prevention of Insider Trading as notified by the Company.
4. I undertake that the transaction stated in the application shall be executed within seven trading days from the date of pre-clearance by the Company, and if the same is not executed within such time, I shall seek a fresh pre-clearance of the transaction.
5. I undertake that in case of purchase of Shares of the Company, the same shall be held by me/ my Immediate Relative, for investment purposes.
6. I undertake that I myself or through any Immediate Relative of mine, shall not enter into an opposite transaction i.e. sell or buy any number of Shares during the next six months following this transaction.
7. I confirm that I myself or through any Immediate Relative of mine, have not entered into an opposite transaction of buy/sell in the past six months, in relation to the Shares of the Company.
8. That the disclosure made by me in this regard, is full and true.

Signature : _____ Name : _____
Date : _____

DISCLOSURE OF TRANSACTIONS

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

To,
 The Compliance Officer,
 Rodium Realty Limited.

I hereby inform that I

- have not bought / sold/ subscribed any securities of the Company
- have bought/sold/subscribed to _____ securities as mentioned below on _____ (date)

(strike out whichever is not applicable)

Name of holder	No. of securities traded	Bought / sold / subscribed	DP ID/Client ID/Folio No.	Price (Rs.)

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

Signature : _____ Name:

Date :



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Annexure D

FORM A
SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (a) read with Regulation 6 (2) – Initial disclosure to the company]

Name of the company: _____

ISIN of the company: _____

Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

Name, CIN/DIN & address contact nos.	PAN, with	Category of Person (Promoters/ KMP / Directors/immediate relative to/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	

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

Details of Open Interest (OI) in derivatives of the company held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

Open Interest of the Future contracts held as on the date of regulation coming into force			Open Interest of the Option Contracts held as on the date of regulation coming into force		
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 &
Signature:
Designation:
Date:
Place:

FORM B
SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (b) read with Regulation 6(2) – Disclosure on becoming a
director/KMP/Promoter]

Name of the company: _____

ISIN of the company: _____

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN & Address with contact nos.	Category of Person (Promoters/ KMP / Directors/ immediate relative to/others etc.)	Date of appointment of Director /KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP		% of Shareholding
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	

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

Details of Open Interest (OI) in derivatives of the company held on appointment of Key Managerial personnel (KMP) or Director or upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation 6(2).

Open Interest of the Future contracts held at the time of becoming Promoter/appointment of Director/KMP			Open Interest of the Option Contracts held at the time of becoming Promoter/appointment of Director/KMP		
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 &
Signature:
Designation:
Date:
Place:



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Annexure F

FORM C

SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]

Name of the company: _____

ISIN of the company: _____

Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoters/ KMP 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 specify		Date of intimation to company	Mode of acquisition/ disposal (on market/public/ rights/ preferential offer/off market/ Inter- se transfer, ESOPs etc.)
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge /– Revoke/ Invoke)	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To		

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



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Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	

Name & Signature:

Designation:

Date: Place:

[Name of the Designated Person]

[Residential
Address] MOBILE:
[•] | EMAIL:

**Disclosure under SEBI (Prohibition of Insider Trading) Regulations, 2015
([Regulation 9 (1) read with Clause 14 of Schedule B])**

Date

To,
Compliance Officer,
Rodium Realty Limited

Subject: Disclosure as on date of joining / as on April 1, 2019.

Dear Sir,

I, [Name of Designated Person] d/o or s/o [Name of Father] R/o [Address], [Designation]
of [Name of Company], do hereby submit the following details:

A. Details of Spouse:

Sr. No.	Relation	Name	PAN	Contact Details
1	Spouse			

B. Details of other Immediate Relatives, who are either financially dependent or consult in taking decisions relating to trading in Securities of the Company:

Sr. No.	Relation	(A) Financially dependent on me	(B) Consult with me in taking decisions relating to trading in Securities of the Company	Name	PAN	Contact Details
2	Mother	Yes/No	Yes/No			
3	Father	Yes/No	Yes/No			
4	Brother	Yes/No	Yes/No			



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5	Sister	Yes/No	Yes/No			
6	Child	Yes/No	Yes/No			
7	Spouse's Mother	Yes/No	Yes/No			
8	Spouse's Father	Yes/No	Yes/No			
9	Spouse's Brother	Yes/No	Yes/No			
10	Spouse's Sister	Yes/No	Yes/No			

C. Details of Educational Institutions :

Sr. No.	Name of Educational Institution	Affiliated To	Educational Course	Passing Year
1				

D. Details of Past Employer :

Sr. No.	Name of Employer	Address	Contact Details
1			

E. Details of Persons with whom Material Financial Relationship* is shared:

Sr. No.	Relation	Name	PAN	Contact Details
1				

I hereby declare that the information provided by me above is true and complete in all respects. I undertake to immediately intimate the Compliance Officer in case of any change in the above information. I understand that non-disclosure / untrue disclosure shall entail penal consequences and I shall be solely liable in case subsequently it is found out that information provided by me is untrue or incomplete.

Yours Sincerely,

[Name of Designated Person]

Designation

Email:

Phone No:

** 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 transaction.*



Rodium Realty Ltd.

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Annexure H

FORM D (Indicative format)

**SEBI (Prohibition of Insider Trading) Regulations, 2015
Regulation 7(3) – Transactions by Other connected persons as identified by the company**

Details of trading in securities by other connected persons as identified by the company

Name, PAN, CIN/DIN, & address with contact nos. of other connected persons as identified by the company	Connection with company	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition/disposal (on market/public/ rights/ Preferential offer / off market/Inter-se transfer, ESOPs etc.)
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge / Revoke / Invoke)	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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



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Details of trading in derivatives by other connected persons as identified by the company

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of Contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
15	16	17	18	19	20	21

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

Name:

Signature:

Place:
