



BARAK VALLEY CEMENTS LTD.

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CIN : L01403AS1999PLC005741



Ref: 1408/BVCL/2024-25

August 14, 2024

To
The General Manager
Department of Corporate Services,
BSE Limited
Phiroze Jee Jee Bhoy Tower
Dalal Street, Fort
Mumbai-400001
Fax: 022-22722061/41/39
Phone No. 91-22-22721233/4

To
The General Manager
Department of Corporate Services,
National Stock Exchange of India Limited
Exchange Plaza,
Bandra Kurla Complex,
Bandra (East), Mumbai-400051
Fax: 022-26598237/38/47
Phone No. 022-2659-8235/36

Scrip Code- 532916

Scrip Code- BVCL

Sub: Intimation about revised Code of Conduct on Prohibition of Insider Trading.

Dear Sir/Madam,

This is to inform you that pursuant to **Regulation 8(2) of Securities and Exchange Board of India ("SEBI") (Prohibition of Insider Trading) Regulations, 2015 (as amended)**, the Board of Directors of the Company at its meeting held today i.e. on August 14, 2024 has amended the codes and procedures relating to prevention of insider trading and has adopted a revised and comprehensive "**Code of Conduct on Prohibition of Insider Trading.**" as required under the provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015 which shall be effective from August 14, 2024. The said Code of Conduct is available on the website of the company.

This is for your kind information and record.

Thanking you,

For BARAK VALLEY CEMENTS LIMITED

Digitally signed
by RACHNA
GAMBHIR
Date: 2024.08.14
19:05:10 +05'30'

Rachna Gambhir
(Company Secretary & Compliance Officer)



BARAK VALLEY CEMENTS LIMITED

CODE OF CONDUCT ON PROHIBITION OF
INSIDER TRADING



General Information

Sr No	Particulars	Approval / Modification Date
1	Approval	07 th May,2008
2	First Modification	30 th May,2015
3	Second Modification	13 th February, 2019
4	Third Modification	14 th August, 2024



Rachna

PART-A

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING IN
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1. PREAMBLE

With a view to strengthen the conduct of insiders on matters relating to insider trading, Securities and Exchange Board of India (“SEBI”) has notified the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“SEBI PIT Regulations, 2015”) which came into force on May 15, 2015 and as amended till date governs the law relating to insider trading in India. . The SEBI PIT Regulations, 2015 replaced the erstwhile Securities and Exchange Board (Prohibition of Insider Trading) Regulations, 1992.

As per Regulation 9 of SEBI PIT Regulations, 2015 The Board of Directors of every listed Company shall ensure that the Chief Executive Officer or Managing Director shall formulate the Code of Conduct with their approval to regulate, monitor and report trading by the Designated Persons and immediate relatives of the Designated Persons towards compliance with these regulations, adopting the minimum standards set out in Schedule B.

2. OBJECTIVE

Barak Valley Cements Limited (“the Company”) endeavors to preserve the confidentiality of Unpublished Price Sensitive Information, to prevent misuse of such information and to disseminate accurate, timely and consistent non-proprietary information about its products, services and activities to all its stakeholders including its members and in ensuring adherence to all laws and regulations.

This Code has been formulated to regulate, monitor and report trading by the Designated Persons and immediate relatives of the Designated Persons to comply with the SEBI PIT Regulations, 2015, as may be amended from time to time. The Code is prescribed to ensure that the Designated Persons and immediate relatives of the Designated Persons do not trade in the Securities of the Company when in possession of unpublished price sensitive information (“UPSI”), and to prevent any speculative dealings, knowingly or unknowingly, by the Designated Persons. It also provides guidance to the Designated Persons on the policy, pre-clearance/disclosure procedures to be followed at the time of trading in the securities of the Company.

The Code is subject to the applicable prevailing law in relation to prevention of Insider Trading and if there is any inconsistency between any of the provisions of the Code and applicable law, the applicable law shall prevail.

3. DEFINITIONS

3.1 “Code” or “Code of Conduct” shall mean the Code of Conduct to Regulate, Monitor and Report Trading by Insiders of Barak Valley Cement Limited as amended from time to time;

3.2 **Insider** means any person who is a connected person or in possession of or having access to unpublished price sensitive information.

3.3 **Connected person** means

(i) any person who is or has during the six months prior to the concerned act been associated with a company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the company or holds any position including a professional or business relationship between himself and the company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.



(ii) **Deemed to be connected persons:** Following categories shall be deemed to be connected persons unless the contrary is established:

- (a) an immediate relative of connected person; or
- (b) a holding company or associate company or subsidiary company; or
- (c) an intermediary as specified in section 12 of the SEBI Act, 1992 or an employee or director thereof; or
- (d) an investment company, trustee company, asset management company or an employee or director thereof; or
- (e) an official of a stock exchange or of clearing house or corporation; or
- (f) a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
- (g) a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act 2013; or
- (h) an official or an employee of a self-regulatory organization recognised or authorized by the Board; or
- (i) a banker of the company; or
- (j) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten percent of the holding or interest.

3.4 **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.

Information which is available on the website of the company, advertised by the company in the newspaper and disclosed to the stock exchanges are regarded as generally available information.

3.5 **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;

3.6 **Unpublished price sensitive information (UPSI)** means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: –

- (i) financial results;
- (ii) dividends;
- (iii) change in capital structure;



(iv) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;

(v) changes in key managerial personnel

(vi) any other event as may be determined by the Company/ the Compliance Officer which is likely to materially affect the price of the securities of the Company upon coming into the public domain.

3.7 Designated Person shall be identified by the Compliance Officer in consultation with the Board on the basis of their role and function and shall include: -

(a) Directors, Key Managerial Personnel and Senior Management Personnel of Company, and its Material Subsidiaries;

(b) Executive Assistants/Personal Assistants/Secretaries of each of the persons set out above at point (a).

(c) Employees of the listed company designated on the basis of their functional role or access to unpublished price sensitive information in the organization by their board of directors;

(c) Employees of material subsidiaries of the company designated on the basis of their functional role or access to unpublished price sensitive information in the organization by their board of directors;

(d) All Promoters and Members of the Promoter Group of the Company.

(e) Employees upto two levels below Chief Executive Officer of such listed company, intermediary, fiduciary and its material subsidiaries irrespective of their functional role in the company or ability to have access to unpublished price sensitive information;

(f) Any support staff of the company such as IT staff or secretarial staff who have access to unpublished price sensitive information.

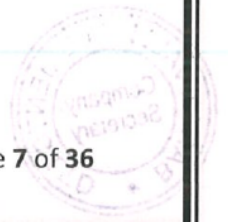
(g) Immediate Relatives of the Designated Persons as defined above.

(h) Such other person who in the opinion of the Compliance Officer is in possession of UPSI.

3.8 "Material Financial Relationship" shall mean a relationship in which one person is recipient of any kind of payment such as by way of loan or gift from a designated person during the immediately preceding 12 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 basis

3.9 "Legitimate Purpose" shall include sharing of UPSI 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 the regulations.

3.10 Need to Know" shall mean that the Insiders who are privy to UPSI, shall handle the same strictly on a "Need to Know" basis. This means the UPSI shall be disclosed only to those persons who need to know the same pursuant to a legitimate purpose and whose possession of UPSI will not in any manner give rise to any conflict of interest or likelihood of misuse of the information.



4 SCOPE

This Code is applicable to Designated Persons and the Immediate Relatives of the Designated Persons. Each one of them must review this code and adhere to the same.

Questions regarding this Code should be directed to the Compliance Officer at Email ID cs@barakcement.com.

5. RESPONSIBILITY OF BOARD OF DIRECTORS

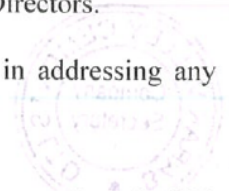
As per Regulation 9 of the SEBI PIT Regulations, 2015, the Board shall ensure that the company at all times has in place this Code to regulate, monitor and report trading by Designated Persons and Immediate Relatives of such Designated Persons. The Board shall be responsible for monitoring the overall compliance to the Insider Trading Regulations. In accordance with the SEBI PIT Regulations, 2015, the Board shall interalia ensure the following;

- a) In consultation with the Compliance Officer, specify the Designated Persons to be covered under this Code based on their functional role or access to Unpublished Price Sensitive Information in addition to seniority and professional designation;
- b) That the Company maintains the Structural Digital Database in conformity with the Insider Trading Regulation and shall preserved it for a period of not less than 8 years after completion of the relevant transaction;
- c) Formulate and review periodically and Publish on the website, the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information including the Policy for determination of "legitimate purpose" and
- d) Formulate and review periodically, the Policy and Procedure for Inquiry in the Event of Leak or Suspected Leak of Unpublished Price Sensitive Information.
- e) The Board of Director shall require the parties to execute the agreements to contract confidentiality and non-disclosure obligations.

6. RESPONSIBILITY OF COMPLIANCE OFFICER

The Company Secretary shall be the Compliance Officer for the purpose of this Code.

- a) The Compliance Officer shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of UPSI, monitoring of trades and the implementation of the Code of Conduct under the overall supervision of the Board of Directors. In case of absence of the Compliance Officer, the Managing Director shall act as the Compliance Officer or shall appoint such other senior officer as the Compliance Officer as he may deem fit.
- b) The Compliance Officer shall report on insider trading to the Board of Directors of the Company and shall provide reports to the Chairman of the Audit Committee, or to the Chairman of the Board every quarter or at such frequency as may be stipulated by the Board of Directors.
- c) Compliance Officer maintains the list of designated persons and assist them, in addressing any clarifications regarding the regulations and the Company's Code of Conduct.



d) The Compliance Officer shall ensure that prohibited period/ trading window closure period is intimated to all concerned at least 24 hours before the commencement of the said period.

e) The Compliance Officer shall in consultation with the Board inform the Stock Exchange(s) of any violation of the SEBI PIT Regulations, 2015 or the Code of Conduct in such form and such manner as may be specified by SEBI from time to time.

f) The Compliance Officer in consultation with the Chairman of the Audit Committee shall have the power to set forth any additional guidelines or procedures required for maintaining adequate and effective internal controls under this Code and ensuring compliance with the SEBI PIT Regulations, 2015.

g) The Compliance Officer shall assist the Chief Executive Officer to put in place adequate and effective system of internal controls to ensure compliance with the requirements of the Regulation 9A of the SEBI PIT Regulations, 2015.

7 RESPONSIBILITY OF DESIGNATED PERSONS

Designated Persons shall disclose their Name and PAN, or any other identifier authorized under law of the following persons to the company on an annual basis and as and when the information changes:

- a) Immediate Relatives;
- b) Persons with whom such Designated Person(s) shares a Material Financial Relationship; and
- c) Phone and mobile numbers which are used by them.

In addition, the names of educational institutions from which designated persons have graduated and names of their past employers shall also be disclosed on a one time basis.

8 PROHIBITION ON COMMUNICATION AND PROCUREMENT AND PRESERVATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION.

In reference of Regulation 3 and Schedule B of SEBI PIT Regulations, 2015

1. No insider shall communicate, provide, or allow access to any UPSI, relating to a Company or securities, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

2. No person shall procure from or cause the communication by any insider of UPSI, relating to the Company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

3. The Board of Directors shall make a policy for determination of "legitimate purposes" as a part of "Codes of Practice and Procedure for Fair Disclosure of Unpublished Price Sensitive Information" as formulated by the Company pursuant to Regulation 8 of SEBI (Prohibition of Insider Trading) Regulation, 2015. The Board of Directors shall ensure that the Company shall comply with the Codes of Practice and Procedure for Fair Disclosure of UPSI.

4. Any person in receipt of UPSI pursuant to a "legitimate purpose" shall be considered as an "insider" for purposes of these regulations and due notice shall be given to such persons to maintain confidentiality of such UPSI in compliance with the regulations.

5. All UPSI directly or indirectly received by any Designated Person should be reported to the Compliance Officer immediately.



6. All information shall be handled on a "need to know" basis. It should be disclosed only to those within the Company who need the information to discharge their duty.

7. Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password etc.

9. **RESTRICTION ON TRADING IN SECURITIES DURING RESTRICTIVE PERIOD.**

Designated Persons and their Immediate relatives shall not trade in the securities of the Company during the Restrictive Period/ trading window closure period except in the cases mentioned below;

Transaction undertaken where the Designated Person is in possession of UPSI may be defensible if the Designated Person demonstrates that the transaction was:

- i. Off-market inter-se transfer between insiders who are in possession of the same unpublished price sensitive information without being in breach of these Rules or SEBI PIT Regulations, 2015 and both the parties have made a conscious and informed trade decision.

Provided that such unpublished price sensitive information is not obtained under sub regulation (3) of Regulation 3 of SEBI PIT Regulations, 2015.

Provided further that such off-market trades shall be reported by the insiders to the Company within two working days. The Company shall notify the particulars of such trades to the stock exchanges within two trading days from receipt of the disclosure or from becoming aware of such information

- ii Transaction carried out through the block deal window mechanism between persons who are in possession of the UPSI without being in breach of this Code and the SEBI PIT Regulations, 2015 and both the parties have made a conscious and informed trade decision.

Provided that such unpublished price sensitive information is not obtained under sub regulation (3) of Regulation 3 of SEBI PIT Regulations, 2015.

iii. Transaction is carried out pursuant to a statutory or regulatory obligation to carry out a bona fide transaction;

iv. Transaction undertaken pursuant to the exercise of stock options issued by the Company.

v. The trades are pursuant to a trading plan set up as per the SEBI PIT Regulations, 2015.

vi. Transactions undertaken in accordance with the respective regulations made by SEBI such as acquisition by conversion of warrants or debentures, subscribing to rights issue, further public issue, preferential allotment or tendering of shares in a buyback offer, open offer, delisting offer.

a. The Compliance Officer shall communicate the prohibited period/ trading window closure to all Designated Persons through email or any other prescribed mode. Irrespective of whether such communication has been received or not, Designated Persons governed by this Code shall mandatorily verify with the Compliance Officer on the status of the Trading Window before undertaking any trades in the securities of the Company. Ignorance of the closure of the trading window or nonreceipt of communication of closure of trading window shall not justify any trades undertaken by Designated Persons during prohibited period/trading window closure.



b. Every Designated Person should inform his/ her Immediate Relatives of the prohibited period/ trading window closure period during which trading in the securities of the Company is prohibited.

c. Designated Persons shall not Trade in Securities of the Company while in possession of Unpublished Price Sensitive Information. If such persons have traded in Securities of the Company when in possession of Unpublished Price Sensitive Information, their Trades would be presumed to have been motivated by the knowledge and awareness of such information in their possession. However, a Designated Person may prove his innocence by demonstrating the circumstances including as provided in Regulation 4 of the SEBI PIT Regulations, 2015.

d. In case, the Designated Persons and their immediate relative deal in any Securities of the Company through his/her portfolio manager/investment manager, the same shall be disclosed to the Compliance Officer and restrictions relating to Trading in Securities of the Company under this Code will also apply to the trading in securities of the company through his/her portfolio manager/ investment manager.

e. Trading restriction period shall be made applicable from the end of every quarter till 48 hours after the declaration of financial results. The gap between clearance of accounts by audit committee and board meeting should be as narrow as possible.

f. Subject to the provisions of this Code and SEBI PIT Regulations, 2015, the Trading window restrictions shall not apply in respect of :

Trades specified in clause (i) to (iv) and (vi) of the proviso to sub-regulation (1) of regulations 4 of the SEBI PIT Regulations, 2015 and in respect of a pledge of shares for a bona fide purpose such as raising of funds, subject to pre-clearance by the Compliance Officer;

i. Trades which are undertaken in accordance with respective Regulations made by SEBI such as acquisition by conversion of warrants or debentures, subscribing to rights issue, further public issue, preferential allotment or tendering of shares in a buy-back offer, open offer, delisting offer or transactions which are undertaken through such other mechanism as may be specified by the Board from time to time.

10. TRADING WINDOW CLOSURE

- The Trading window shall be closed when the compliance officer determines the designated persons or class of designated persons can reasonably be expected to have possession of Unpublished Price Sensitive Information.
- Trading window closure shall be imposed in relation to such securities to which such Unpublished Price sensitive information relates.
- Designated Persons and their immediate relatives shall not trade in securities when the trading window is closed.

Trading window shall be closed in the following manner:

(i) In respect of announcement of Quarterly/Half Yearly/ Yearly Financial Results by the Company- The period commencing on the first day of the month from the end of the quarter and ending 2 trading days after the announcement of Financial Results, for the respective quarter/half year/year, as the case may be, is made generally available by the Company.



(ii) In respect of UPSI other than (i) above - Such period as the Compliance Officer or the Board of Directors, declares as a prohibited period, when the Compliance Officer determines that a designated person or class of designated persons can reasonably be expected to have possession of UPSI. Such prohibited period shall end 2 trading days after the UPSI is made generally available by the Company.

- The Trading window restrictions shall not apply in respect transactions specified in clause 8(i) to (iv) and (vi) and in respect of and in respect of a pledge of shares for a bonafide purpose such as raising of funds, subject to pre-clearance by the compliance officer and transactions which are undertaken in accordance with respective regulations made by the SEBI such as acquisition by conversion of warrants or debentures, subscribing to rights issue, further public issue, preferential allotment or tendering of shares in a buy-back offer, open offer, delisting offer or transactions which are undertaken through such other mechanism as may be specified by the SEBI from time to time.

- When the Trading Window is open the trading by Designated Persons shall be subject to pre-clearance by Compliance Officer if the value of the proposed trades is above such threshold as specified below.

10 PRECLEARANCE OF TRADES :

Designated Persons and their immediate relatives cannot trade when the trading window is closed. Further when the trading window is open, trades to be executed shall subject to the Preclearance by the Compliance Officer if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 50 Lacs.

An Application for pre clearance shall be made to the Compliance Officer or in case the applicant is Compliance Officer himself, to the Chairman/Managing Director in the prescribed format (*refer Annexure-1*).

11 CONTRA TRADE:

The Designated Persons shall not undertake contra trade i.e. enter into an opposite transaction of sell or buy any number of securities during the next 6 (six) months ("holding period") following the prior transaction. Provided that the restriction of contra trade shall not be applicable for trades executed pursuant to exercise of stock options.

Further, the restriction of contra trade will not apply in respect of subscription to shares/convertibles in Follow-on Public Offer (FPO); Offer for Sale (OFS); Rights Issue or tendering of Shares in open offer; share buy-back or delisting offer, exit offers etc.

In case a contra-trade be executed inadvertently or otherwise, in violation of the aforesaid 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 ("IPEF") administered by SEBI under the Act.

12 TRADING PLAN:

An Insider shall be entitled to formulate a trading plan for trade in securities of the Company in a compliant manner and enable him to plan for trades to be executed in future. Trading plan shall be presented 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.

Trading Plan shall:



(i) Not entail commencement of trading on behalf of the Insider earlier than one hundred and twenty (120) days from the public disclosure of the plan;

(ii) Not entail overlap of any period for which another trading plan is already in existence; 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, either specific date or time period not exceeding five consecutive trading days, price limit, that is an upper price limit for a buy trade and a lower price limit for a sell trade, subject to the range as specified below:

a. for a 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;

b. for a 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.

(iii) Not entail trading in securities for market abuse.

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.

Provide that pre- clearance of trades shall not be required for a trade executed as per an approved trading plan.

Provided further that trading window norms shall not be applicable for trades carried out in accordance with an approval trading plan.

The Trading Plan submitted by the Insider shall be approved/ rejected by the Compliance Officer within 2 trading days of its receipt and if approved the same shall be disclose to Stock Exchange on the same day of approval. Once approved the same 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.

In case of non-implementation (full/partial) of the plan, the Insider shall intimate the Compliance officer within 2 trading days from the end of tenure of trading plan along with reasons. Compliance officer along with its recommendation will further inform to Audit committee in its ensuing meeting. Audit committee will decide whether the non-implementation of plan is bonafide or not on basis the recommendation of Compliance Officer and take action (if any) in accordance with the Code of Conduct. Decision of committee shall be intimated to stock exchange on the date of meeting Audit committee.

Provided that deviation from the approved trading plan is allowed in case of permanent incapacity or bankruptcy or operation of law.

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 UPSI 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 UPSI becomes generally available information.

13. DISCLOSURE AND REPORTING REQUIREMENTS



a) INITIAL DISCLOSURES

Every person on appointment as a key managerial personnel or a director of the company or upon becoming a promoter or member of the promoter group shall disclose his holding of securities of the company as on the date of appointment or becoming a promoter, to the company within seven days of such appointment or becoming a promoter.

b) CONTINUAL DISCLOSURES

Every promoter, member of the promoter group, designated person and director of every company shall disclose to the company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of ten lakh rupees or such other value as may be specified;

c) DISCLOSURE BY CONNECTED PERSONS

The Compliance Officer, in addition to the above, may at his discretion require any other Connected Person or class of Connected Persons to make disclosures of holdings and Trading in securities of the Company at such frequency as he may deem fit in order to monitor compliance with this Code and the Insider Trading Regulations.

For the purpose of all the above prescribed disclosures, whether initial, continual or annual, the disclosures of trading in securities shall also include trading in derivatives of securities (if any) and the traded value of the derivatives (if any) shall be taken into account accordingly.

14. CHINESE WALL PROCEDURES (“CHINESE WALLS”)

Chinese wall procedures (“Chinese Walls”) to be used to manage confidential information and prevent the inadvertent spread and misuse of price sensitive information. Areas of the Company which routinely have access to confidential information including UPSI, shall be considered as ‘inside areas’, and steps shall be taken to ensure these inside area separated from those areas or departments providing support services, who do not have access to such information, considered as ‘public areas’. The Chinese Walls established by the Company shall operate as a barrier to the passing of confidential information, including Unpublished Price Sensitive Information and other confidential information. As per the said procedures:

- the Promoters, Directors and Employees of the Company in the ‘insider areas’ shall not communicate any UPSI to anyone in the ‘public areas’;
- the demarcation of various departments as ‘insider areas’ shall be determined by the Compliance Officer in consultation with the Board or with Managing Director(s);
- the establishment of Chinese Walls shall not be intended to suggest that UPSI n can circulate freely within ‘inside areas’. The ‘need-to-know’ principle shall be fully in effect within ‘insider areas’. In exceptional circumstances, employees from the ‘public areas’ may be allowed to ‘cross the wall’ and given UPSI by following the ‘need-to-know’ principle, under intimation to the Compliance Officer. The Compliance Officer would duly record reasons for crossing the wall in writing.

Chinese Walls shall be set up and implemented in the manner set out by Compliance Officer/ Board from time to time.



15 DISCIPLINARY ACTION

Consequence of Non-Compliance with the Code

Failure to comply with this Code is a disciplinary issue and may also constitute a criminal offence in certain cases. Any Designated Person including their immediate relative who violates the provisions of this Code shall be liable for such penal/disciplinary/remedial action as may be considered appropriate by the Compliance Officer or Managing Director as per the sanction framework decided and approved by the Audit Committee and the Board.

All Breaches of this Code with actions taken by Compliance Officer or Managing Director shall be reported to the Audit Committee & Board of Directors of the Company on a quarterly basis. The above actions of the Company will be without prejudice to any civil or criminal action that the regulatory authorities may initiate against such an employee.

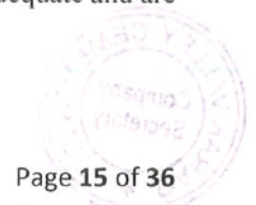
In addition to the above penalties Designated Persons/ Specified Persons/ Insiders who violate the Code shall also be subject to disciplinary action by the Board of Directors of the Company, which may include wage freeze, suspension, ineligibility for future participation in employee stock option plans (if any), etc.

Penalties by the Statutory Authorities

If any Insider contravenes any of the provisions of the Insider Trading Code / SEBI PIT Regulations, such Insider will be liable for appropriate penal actions in accordance with the provisions of the SEBI Act, 1992. The minimum penalty under the SEBI Act, 1992 is Rs. 10 Lakh, which can go up to Rs. 25 crores or 3 times the profits made from trading, whichever is higher.

16 INSTITUTIONAL MECHANISM FOR PREVENTION OF INSIDER TRADING

- a) The Managing Director(s), Chief Executive Officer or such other analogous person of the Company, Intermediary or Fiduciary shall put in place adequate and effective system of internal controls to ensure compliance with the requirements given in these regulations to prevent insider trading.
- b) The internal controls shall include the following:
 - i. all employees who have access to UPSI are identified as designated persons;
 - ii. all the UPSI shall be identified and its confidentiality shall be maintained as per the requirements of the SEBI Regulations;
 - iii. adequate restrictions shall be placed on communication or procurement of UPSI as required by the SEBI Regulations;
 - iv. lists of all employees and other persons with whom UPSI is shared shall be maintained and confidentiality agreements shall be signed or notice shall be served to all such employees and persons;
 - v. all other relevant requirements specified under the SEBI Regulations shall be complied with; and
 - vi. Periodic process review shall be undertaken to evaluate effectiveness of such internal controls.
- c) The Audit Committee shall review compliance with the provisions of the SEBI Regulation at least once in a financial year and shall verify that the systems for internal control are adequate and are operating effectively.



d) The board of directors shall ensure compliance with regulation 9 and sub-regulations (1) and (2) of the SEBI Regulations.

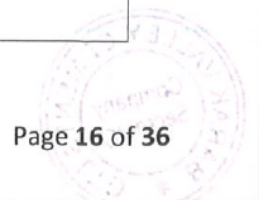
17 AMENDMENTS/REVISIONS

Any subsequent amendment/modification in the SEBI (PIT) Regulations, Companies Act, 2013, the SEBI Listing Regulations and/or other applicable laws in this regard shall automatically apply to this Policy.

The Board of Directors shall be empowered to amend, modify, interpret this Code and shall be effective from such date that the Board may notify in this behalf.

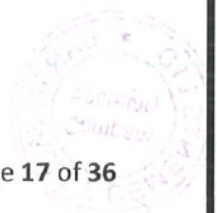
18 SUMMARY OF OBLIGATIONS OF DESIGNATED PERSONS AND FORMAT OF DISCLOSURES.

S. NO.	OBLIGATION	ANNEXURE
1.	Application for Pre-Clearance of Trades.	Annexure-1
2.	Undertaking to be executed at the time of applying for pre-clearance.	Annexure-2
3.	Disclosure on becoming a Key Managerial Personnel/Director/Promoter/Member of the Promoter Group.	Annexure-3
4.	Details of change in holding of Securities of Promoter, Member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).	Annexure-4
5.	Statement of Holdings of Promoter, Member of Promoter Group, KMP, Director and Designated Person(s) and His/her Immediate Relative(s)	Annexure-5
6.	Details of trading in securities by other connected persons as identified by the company	Annexure-6
7.	Reporting of decision of not trading or failure to complete the trade within approved timelines after securing pre-clearance with reasons.	Annexure-7



19. DISCLAIMER

THIS POLICY IS ONLY INTERNAL CODE OF CONDUCT AND ONE OF THE MEASURES TO AVOID INSIDER TRADING. EVERY INSIDER IS REQUIRED TO FAMILIARISE HIMSELF/HERSELF WITH SEBI REGULATIONS AS IT WILL BE THE RESPONSIBILITY OF EACH INSIDER (AND HIS/HER RELATIVES) TO ENSURE COMPLIANCE OF THIS POLICY, SEBI REGULATIONS AND OTHER RELATED STATUTES FULLY.



PART-B

CODE OF PRACTICES & PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION (“UPSI”).

1. PREFACE

Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (the "SEBI PIT Regulations") requires a listed company to formulate and publish on its official website a Code of Practices and Procedure for fair disclosure of Unpublished Price Sensitive Information (“UPSI”) in adherence to the principles set out in Schedule A to the said Regulations, which was further amended by the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 (herein-after called as "regulations").

2. PURPOSE

Company shall ensure timely and adequate disclosure of UPSI which would impact the price of the Company's securities and to maintain the uniformity, transparency and fairness in dealing with all stakeholders and in ensuring adherence to applicable laws and regulations. Further, the Company endeavours to preserve the confidentiality of UPSI and to prevent misuse of such information.

The Board of Directors of company always thrives to conduct its business in a fair and transparent manner with a view to protect the interest of all the stakeholders in the Company. Towards achieving this objective, the Company will adhere to the following principles of fair disclosure of UPSI.

3. PRINCIPLES TO BE ADHERED FOR FAIR DISCLOSURE OF UPSI

a. Prompt public disclosure of UPSI

The company will make prompt public disclosure of UPSI to the stock exchange that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.

b. Uniform and Universal dissemination of UPSI

The Company will make disclosure of UPSI on a continuous, immediate, uniform basis and will be universally dissemination to avoid selective disclosure.

c. Chief Investor Relations Officer (“CIRO”)

The Managing Director / Chief Financial Officer of the Company shall be designated as Chief Investor Relations Officer or any other person as identified by the Board from time to time. The Chief Investor Relations Officer shall oversee the corporate disclosure and deal with dissemination of information and disclosure of UPSI.

Prompt dissemination of UPSI that get disclosed inadvertently or selectively:



The Company will make prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

e. **Responding to any Queries on news reports and/or requests for verification of market rumors by regulatory authorities:**

The Chief Investor Relations Officer shall promptly respond or authorise any Office of the Company to any queries or requests for verification of market rumours by Stock Exchanges. The Company shall ensure an appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.

f. **Information sharing with analysts and research personnel**

The Company will ensure that information shared with analysts and research personnel is not UPSI. The Company will make available the recording of proceedings & discussion of meetings with analysts and other investor relations conferences and post relevant information on the official website www.barakcement.com to ensure official confirmation and documentation of disclosures made. A detailed mechanism with respect to the dealing with Analysts/ Institutional Investors is given below;

g. **Sharing of UPSI on Need-to-Know basis for legitimate purposes:**

The Company will handle all UPSI on a need-to-know basis i.e. UPSI shall be disclosed only to those where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

Sharing of information with partners, collaborators, lenders, customers, suppliers, merchant bankers, advisors, auditors, insolvency professionals, other advisors or consultants, shall be considered as legitimate purposes as per its "Policy for determination of Legitimate Purpose" (PART-C), for the purpose of sharing UPSI in the ordinary course of business by an insider, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the regulations and the relevant codes formulated in pursuance of the SEBI (PIT), Regulations.

Any person in receipt of UPSI pursuant to a "legitimate purpose" shall be considered an "insider" for purposes of these regulations and due notice shall be given to such persons to maintain confidentiality of such UPSI in compliance with the regulations.

4. CRITERIA FOR DETERMINATION OF LEGITIMATE PURPOSE FOR SHARING OF UPSI

In terms of the SEBI PIT Regulations, the term "legitimate purpose" is clarified to include sharing of UPSI in the ordinary course of business by an insider with Company's partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing of UPSI has not been carried out to evade or circumvent the prohibitions of the SEBI PIT Regulations.

The SEBI PIT Regulations require the Board to formulate a policy for determination of 'legitimate purpose' as a part of Code of Fair Disclosure. The assessment of whether sharing of UPSI for a particular instance would tantamount to 'legitimate purpose' would entirely depend on the specific facts and circumstances of each case. Accordingly, this Policy only sets out the principles that should be considered while assessing if the purpose for which UPSI is proposed to be shared is "legitimate".



- Whether sharing of such information is in the ordinary course of business of the Company.
- Whether information is sought to be shared to evade or circumvent the prohibitions of the Regulations.
- Whether sharing the information is in the best interests of the Company or in furtherance of a genuine commercial purpose.
- Whether the information is required to be shared for enabling the Company to discharge its legal obligations.
- Whether the nature of information being shared is commensurate to the purpose for which access is sought to be provided to the recipient.

It is clarified that in the event there exist multiple purposes for sharing UPSI, each purpose will be evaluated on its own merits, in line with the aforementioned principles.



PART-C

POLICY & PROCEDURES FOR INQUIRY IN CASE OF LEAK OF UNPUBLISHED PRICE SENSITIVE INFORMATION.

1. PREFACE

In terms of Regulation 9A(5) of the Securities and Exchange Board of India (“SEBI”) (Prohibition of Insider Trading) (‘PIT’) Regulations (“SEBI PIT REGULATIONS”), 2015 requires the Board to formulate policies and procedures for inquiry in case of leak/ suspected leak of UPSI and accordingly, initiate appropriate inquiries on becoming aware of leak/suspected leak of UPSI.

Any inquiry into any actual or suspected leak of UPSI needs to be tailored to the facts and circumstances of each such instance. Given that it is not possible to provide a standard operating procedure applicable while inquiring into each such instance of leak/ suspected leak of Unpublished Price Sensitive Information (“UPSI”), this policy sets out the broad principles that the Board of Directors will follow while inquiring into cases of actual or suspected leak of UPSI.

2. PURPOSE

The purpose of this policy is;

- To strengthen the internal control system to prevent leak of UPSI.
- To restrict and prohibit the practice of sharing of UPSI, with the un- CIRO, which originates from within the Company and which affects the market price of the Company as well as results into loss of reputation and investors’ / financiers’ confidence in the Company;
- To have a uniform code to curb the un-ethical practices of sharing UPSI by Insiders, Employees & Designated Persons with any other person, firm, Company or Body Corporate.
- Promptly initiate inquiries into instances of actual or suspected UPSI leaks and promptly informing SEBI thereof.
- To take disciplinary actions, if deemed fit against any Insider, Employee & Designated Persons who appears to be found guilty of violating this policy, apart from any action that SEBI may initiate/take against the Insider, Employees & Designated Persons.

3. AUTHORITY

The Audit Committee shall be the Inquiry Committee which shall be authorized to:

- Conduct a preliminary inquiry to ascertain if there exist prima facie violation w.r.t the information or complaint pertaining to actual or suspected leak of UPSI, if any
- Authorize any person, if required, to collect necessary evidence(s)
- Consider the facts and circumstances and decide/ direct on the matter
- Decide disciplinary action thereon.

4. PROCEDURE FOR INQUIRY IN CASE OF ACTUAL/SUSPECTED LEAK OF UPSI



Upon leak of UPSI, becoming aware of actual or suspected leak, the Committee shall evaluate and determine if the matter merits any inquiry including by way of:

- Suo-moto, including through its internal monitoring; or
- A written complaint and/ or email received through the whistle blower mechanism of the Company; or
- Communication received from regulatory authorities.

It is clarified that market rumours, inferences based on media reports, or observations made by analysts, etc. will not be the only determining factors for initiating a preliminary inquiry, and the Committee, will have the discretion to decide if a preliminary inquiry is required to be undertaken, in each such case.

In the event the Committee decides, a preliminary inquiry shall be undertaken in case of actual/suspected leak of UPSI, the rationale for the same would be required to be recorded, to enable the Committee to establish and take cognizance of actual facts and to decide if prima facie there appears to be any violation of the SEBI Regulations. Based on the findings of the preliminary inquiry, the Committee may decide if a detailed inquiry is required to be undertaken.

a. Based on the decision of the Committee, a detailed inquiry may be conducted in order to assess the veracity of the allegations regarding actual/ suspected leak of UPSI, including through review of the relevant documentation in this regard, as well as conducting interviews, where deemed necessary.

b. While conducting any inquiry into cases of actual/ suspected leak of UPSI, the Committee shall regard to the principles of natural justice. Accordingly, it will accord due opportunity of being heard to the relevant Designated Person/ Insider against whom the allegations have been levelled, during the course of inquiry. Further, such persons shall be entitled to make submissions and to lead evidence and depose witnesses etc., in their defense, before the Committee and the Committee will be required to assess and consider the same before concluding on the matter.

5. OUTCOME OF INQUIRY

Upon the conclusion of the inquiry and on the basis of the outcome thereof, the Committee shall decide the disciplinary action/penalty, if any, to be awarded to the Designated Person/Insider. The decision of the Committee shall be final and binding.

6. DISCLOSURE OF ACTUAL/ SUSPECTED LEAK OF UPSI

The Compliance Officer shall inform SEBI promptly of such leaks, inquiries and the results of such inquiries as per the format provided in **Annexure 6**.



APPLICATION FOR PRE-CLEARANCE OF TRADES

To,
The Compliance Officer,
Barak Valley Cements Limited,
ISIN: INE139I01011

Date:

Dear Sir/Madam,

Sub: Application for Pre –Dealing approval in Securities of the company

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 read with including any statutory modification(s) or amendments thereof for the time being in force and the Company's Code of Conduct to Regulate, Monitor and Report Trading by Insiders, I seek approval to purchase/sale/subscription of securities of the company as per details below:

1.	Name of the applicant	:	
2.	Designation	:	
3.	PAN No.	:	
4.	Number of securities held as on date	:	
5.	Folio No. / DP ID / Client ID No.	:	
6.	The proposal is for	:	a) Purchase of securities b) Subscription to securities c) Sale of Securities
7.	Proposed date of dealing in securities	:	
8.	Estimated number of securities proposed to be acquired/subscribed/ sold	:	
9.	Price at which the transaction is proposed	:	
10.	Current market price (as on date of application)	:	
11.	Whether the proposed transaction will be through stock exchange or off-market deal	:	
12.	Folio No. / DP ID / Client ID No. where the securities will be credited / debited	:	

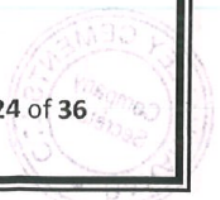
I enclose herewith the form of Undertaking signed by me.

(.....)
 Signature



Footnotes:

1. No application for pre-clearance can be made during closure of trading window; neither any pre-cleared transaction can be carried out during closure of trading window.
2. Pre-clearance required whenever any designated persons, intend dealing in its securities aggregates to a traded value exceeds ₹50,00,000/- in value or 50,000 in no. of shares whichever is lower.
3. Pre-cleared order must necessarily be executed within 7 days of approval.
4. A statement of holdings to be furnished in **Annexure 4** after dealing in pre-cleared transaction.



UNDERTAKING TO BE EXECUTED AT THE TIME OF APPLYING FOR PRE-CLEARANCE

To,
**The Compliance Officer,
Barak Valley Cements Limited,
ISIN: INE139I01011**

Date:

Dear Sir/Madam,

I, _____, S/o., _____ R/o. _____
_____, hereby declare that I am a Promoter / Director / KMP /
Designated Persons (state designation) of the Company. I am desirous of dealing in * shares of the
Company as mentioned in my application dated ____ for pre-clearance of the transaction.

I further declare that I am not in possession of or otherwise privy to any UPSI {as defined in the
Company's Code of Conduct to Regulate, Monitor and Report Trading by Insiders (the Code)} up to
the time of signing this Undertaking.

In the event that I have access to or received any information that could be construed as "Price
Sensitive Information" as defined in the Code, after the signing of this undertaking but before
executing the transaction for which approval is sought, I shall inform the Compliance Officer of the
same and shall completely refrain from dealing in the securities of the Company until such
information becomes public.

I declare that I have not contravened the provisions of the Company's Code of Conduct to Regulate,
Monitor and Report Trading by Insiders as notified by the Company from time to time.

I undertake to submit the necessary report within (4) four days of execution of the transaction / a 'Nil'
report if the transaction is not undertaken.

If approval is granted, I shall execute the deal within (7) seven days of the receipt of approval failing
which I shall seek pre-clearance.

I declare that I have made full and true disclosure in the matter.

(.....)
Signature

* Indicate number of shares



FORM A

SEBI (Prohibition of Insider Trading) Regulation, 2015
[Regulation 7 (1) (b) read with Regulation, 6(2) - Disclosure on becoming a Key Managerial Personnel/Director/Promoter/Member of the Promoter Group]

To,
 The Compliance Officer,
 Barak Valley Cements Limited,
 ISIN: INE139I01011

Date:

Details of Securities held on appointment of Key Managerial Personnel (KMP), Director or upon becoming a Promoter or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2):

Name, PAN, CIN/DIN & Address with contact nos.	Category of person (KMP/ Director or Promoter or member of the promoter group / Immediate relatives/others, etc.)	Date of appointment of KMP/Directors or Promoter/ member of the promoter group	Securities held at the time of appointment of KMP/Director or upon becoming Promoter or member of the promoter group		% of shareholding
			Type of security (For eg: shares, warrants, Convertible Debentures, Rights entitlements, etc.)	No.	
1	2	3	4	5	6

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



Details of Open Interest (OI) in derivatives on the securities of the company held on appointment of KMP or Director or upon becoming a Promoter or member of promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2)

Open Interest of the Future contracts held at the time of appointment of Director/KMP or upon becoming Promoter /member of the promoter group		Open Interest of the Option contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group	
Contracts Specifications	Number of units (contracts *lot size)	Notional value in Rupee terms	Contracts Specifications
7	8	9	10
			11
			12

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

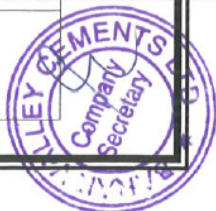
SEBI (Prohibition of Insider Trading) Regulation, 2015
[Regulation 7 (2) read with Regulation, 6(2) - Continual Disclosure

To,
The Compliance Officer,
Barak Valley Cements Limited,
ISIN: INE139101011

Date:

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

Name, PAN, CIN/ DIN,& addresses with contact nos.	Category of Person (Promoter/ member of the promoter group/desi- gnated person /Directors/i- mmediate relative to/others	Securities held prior to acquisition/disposal		Securities held to acquisition/disposal		Securities held post acquisition/disposal	Date of allotment advice/acquisition of shares/disposal of shares specify		Date of intimation to company	Mode of acquisition/disposal (on market/public/rights/preferential offer/off market/inter-se transfer, ESOP's	Exchange on which the trade was executed
		Type of securities (For e.g. - Shares Warrants, Convertible Debentures,	No. and % of share	Type of securities (Purchase/sale Pledge / Revoc	No. and % of shareholding		From	To			



etc.)	Convertible Debentures, Rights entitlements etc.)	Hold ing	Rights entitlements etc.)					ation / Invocation/ Other s- please specify)	Convertible Debentures, Rights entitlements etc.)					etc.)
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

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

(i) Value of transaction excludes taxes/brokerage/any other charges.

Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or Director of a listed company and and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2):

Trading in derivatives (Specify type of contract, Futures or Options etc.)		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)
16	18	19	20	21
17				
				22

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

Name & Signature:
 Designation:
 Date:
 Place:



ANNUAL DISCLOSURE

OF

STATEMENT OF HOLDINGS OF SECURITIES / DERIVATIVES OF PROMOTER, MEMBER OF PROMOTER GROUP, KMP, DIRECTOR AND DESIGNATED PERSONS AND HIS/ HER IMMEDIATE RELATIVES

To

The Compliance Officer

Barak Valley Cements Limited,

ISIN: INE139I01011

I. Statement of Holdings of Promoter, Member of Promoter Group, KMP, Director and Designated Person(s) and his/her Immediate Relative(s)

Name	Designation	Department	No. of shares held as on 1st April, 20....	No. of shares bought/(sold) during the financial year	Date of purchase (sale) during the financial year	No. of shares held as on 31st March, 20....	Folio No./ DP ID/ Client ID



II. Statement of Holdings of Immediate Relatives of Promoter, Member of Promoter Group, KMP, Director and Designated Persons

Name	Designation	Department	No. of shares held as on 1st April, 20....	No. of shares bought/(sold) during the financial year	Date of purchase (sale) during the financial year	No. of shares held as on 31st March, 20....	Folio No./ DP ID/ Client ID

Signature

Date



FORM C

SEBI (Prohibition of Insider Trading) Regulation, 2015
 [Regulation 7(3) – Transaction 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/ disposal of shares specify	Date of intimation to company	Mode of acquisition/ disposal (on market/ public/ rights/ Preferential offer/ Off market/ Inter - se transfer, ESOP's etc.)	Exchange on which the trade was executed
		Type of security (For e.g. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of share Holding	Type of securities (For e.g. – Shares, Warrants, Convertible Debentures, Rights entitlement etc.)	No.	Value	Transaction Type (Purchase/Sale/ Pledge/ Revocation / Invocation/ Other's- please specify)	Type of security (For e.g. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)				



1	2	3	4	5	6	7	8	9	10	11	1	13	14	15
											2			

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

(ii) Value of transaction excludes taxes/brokerage/any other charges

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

Trading in derivatives (Specify type of contract, Futures or Options etc.)						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)	
16	17	18	19	20	21	22

Name & Signature:
 Designation:
 Date:
 Place:





Annexure-7
Format for Reporting Actual or Suspected leak of UPSI to SEBI

To,
Securities and Exchange Board of India
Plot No. C 4-A, G Block,
Near Bank of India, Bandra Kurla Complex,
Bandra East, Mumbai, Maharashtra- 400 051

Dear Sir/ Madam,

Sub: Report of actual or suspected leak of UPSI pursuant to Regulation 9A (5) of SEBI (Prohibition of Insider Trading) Regulation, 2015.

Pursuant to Regulation 9A (5) of SEBI (Prohibition of Insider Trading) Regulation, 2015, we are reporting actual or suspected leak of Unpublished Price Sensitive Information (UPSI) of the Company, as follows:

Name of Offender, if known.	
Name of Organization	
Designation (Employee, Insider, Designated Person or any other)	
Nature of Information	

Whether any action initiated by the Company. If yes, narration of the same	Yes/ No
Any other information.	

Request you to take the aforementioned on your records.

Thanking you,
Yours faithfully,
For Barak Valley Cements Limited

Company Secretary & Compliance Officer



[Handwritten signature in blue ink]

