GALLANTT ISPAT LIMITED

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS

As revised and approved by the Board of Directors on May 14, 2015

CHAPTER -I

INTRODUCTION

Insider trading means dealing in securities of a company listed/traded on any stock exchange in India based on, or when in possession of, unpublished price sensitive information.

With a view to govern the conduct of insiders on matters relating to insider trading, the Securities and Exchange Board of India (SEBI) had formulated Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as 'The Regulations').

Sub-regulation (1) of Regulation 9 inter alia, requires all listed companies to frame a Code of Conduct for Regulating, Monitoring and Reporting of trading by insiders by adopting the minimum standards as set out in Schedule B to the Regulations.

Sub-regulation (1) of Regulation 8 requires all listed companies to formulate and publish on its website, Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information by adopting the minimum standards as set out in Schedule A to the Regulations. Gallantt Ispat Limited ("GIL") has formulated this Code of Conduct called 'GIL's Code of Conduct for Regulating, Monitoring and Reporting of trading by Insiders' ("Code"). All the Directors, Designated Persons, officers and other connected persons of GIL are governed by the Code.

The Code has been amended with the approval of the Board on **14th May, 2015 and shall be effective from 15th May 2015**.

All the Directors, Designated Persons, officers and connected persons of GIL are advised to carefully go through and familiarize themselves with and adhere to the Regulations and the Code.

1. THE POLICY AND OBLIGATIONS

The Company endeavors to preserve the confidentiality of Unpublished Price Sensitive Information ("UPSI") and to prevent misuse of such information. The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations.

Every Director, Officer, Designated Person and connected person of the Company has a duty to safeguard the confidentiality of all such UPSI obtained in the course of his or her work at the Company. No Director, Officer, Designated Officer and connected persons may use his or her position or knowledge of the Company to gain personal benefit or to provide benefit to any third party.

To achieve these objectives, GIL (hereinafter referred to as "the Company") hereby notifies that this code of conduct is to be followed by all directors, officers, Designated Persons and connected persons.

2. APPLICABILITY

This Code shall apply to all Directors, Designated Persons, officers and connected persons of GIL.

3. DEFINITIONS

(i) "**Act**" means the Securities and Exchange Board of India Act, 1992 (15 of 1992) (including any amendment or re-enactment thereof);

(ii) "**Body corporate**" means a body corporate as defined under the Companies Act, 2013;

(iii) "Company" or "the Company" means GALLANTT ISPAT LIMITED

(iv) "Compliance Officer" means the Company Secretary of the Company

(v) "**Connected Person**" means any person who—

(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) 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

(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 per cent of the holding or interest.

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

vii) Designated Person' shall mean:

Employees and connected persons designated on the basis of their functional role. The board of directors shall in consultation with the compliance officer specify the designated persons to be covered by such code on the basis of their role and function in the organisation. Due regard shall be had to the access that such role and function would provide to unpublished price sensitive information in addition to seniority and professional designation.

(viii) "**immediate relative**" shall means a spouse of a person and includes parents, sibling, child of such person or of the spouse, any one of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities.

(ix) '**Free Period**' means any Period other than the Prohibited Period.

(x) "**insider trading"** means—

(*i*) an act of subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell or deal in any securities by any director or key managerial personnel or any other officer of a company either as principal or agent if such director or key managerial personnel or any other officer of the company is reasonably expected to have access to any non-public price sensitive information in respect of securities of company; or

(*ii*) an act of counselling about procuring or communicating directly or indirectly any nonpublic price-sensitive information to any person;

(xi) "**Insider**" means any person who is,

(i) a connected person , or

(ii) in possession of or having access to such unpublished price sensitive information.

(xii) "**Unpublished Price Sensitive Information**" 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, de-listings, disposals and expansion of business and such other transactions.

(v) changes in key managerial personnel;

(vi) material events in accordance with the listing agreement;

(xiii) 'Prohibited Period' means;

1. Period as defined in clause 7.3 of this code

2. Such other period as may be specified by the Compliance Officer from time to time in consultation with the Chairman & Managing Director

(xiv) 'Trading Window' shall have the meaning ascribed thereto in clause 7 of the Code.

(xv) "**Trading day**"" means a day on which the recognized stock exchanges are open for Trading.

(xvi) "**generally available information"** means information that is accessible to the public on a non-discriminatory basis.

(xvii) "**promoter"** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof.

(xviii) "**securities**" shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund;

Words and expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation.

CHAPTER -II

4 COMPLIANCE OFFICER

The Company has appointed the Company Secretary as Compliance Officer who shall report to the Board of Directors of the Company and in particular, shall provide reports to the Chairman of the Audit Committee or to the Chairman of the Board of Directors at such frequency as may be stipulated by the Board. In the absence of the designated/appointed Compliance Officer, the Chairman shall be authorised to appoint a person to act as the Compliance Officer in the period of absence.

4.1 Duties of Compliance Officer:

1. He shall maintain a record of Designated Persons and any changes made to the list of Designated Persons.

2. He may in consultation with the Chairman & Managing Director and shall as directed by the Board, specify Prohibited Period from time to time and immediately make an announcement thereof.

3. He shall maintain a record of Prohibited Period specified from time to time.

4. He shall maintain records of all the declarations submitted in the appropriate form given by the Directors, Officers and Designated Persons for a minimum period of three years. The declarations may be taken and preserved in either physical form or electronic form.

5. He shall place before the Chairman / Managing Director, at regular intervals, all the details of the dealing in the securities by Designated Persons, Directors and Officers of the company and the accompanying documents that such persons had executed under the pre-dealing procedure as envisaged in these rules.

6. He shall assist all the employees/directors in addressing any clarifications regarding SEBI (Prohibition of Insider Trading) Regulation, 2015 and the Company's code of conduct.

7. He shall be responsible for overseeing and co-ordinating disclosure of price sensitive information to Stock Exchanges, analysts, shareholders and media and educating staff on disclosure policies and procedure and report to the Chairman/ Managing Director.

8. He shall ensure that prohibited period is intimated to all concerned at least 48 hours before the commencement of the said period.

9. If the Company /compliance officer observes that there has been a violation of the Regulations, SEBI must be informed by the Compliance Officer.

5 PRESERVATION OF "UNPUBLISHED PRICE SENSITIVE INFORMATION" Directors, Designated Persons, Officers and connected persons shall maintain the confidentiality of all Price Sensitive Information. Employees/ directors shall not pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sale of securities. Following practices should be followed in this regard-

5.1 **Need to Know**

Unpublished Price Sensitive Information is to be handled on a "need to know" basis, i.e., Price Sensitive Information should be disclosed only to those within the company who need the information for legitimate purposes, performance of duties or discharge of his legal obligations and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of information.

5.2 **Limited access to confidential information**

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and pass word, etc. Files containing confidential information should be deleted / destroyed after its use.

6. Prohibition on Dealing, Communicating or Counseling on Matters Relating to Insider Trading:

No insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to the company or its 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.

No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to the Company or its securities, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

Unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction which entails:

- an obligation to make an open offer under the takeover regulations where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the Company; or

- not attracting the obligation to make an open offer under the takeover regulations but where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the Company and the information that constitute unpublished price sensitive information is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the Board of Directors may determine.

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

CHAPTER –III

TRADING RESTRICTION & PREVENTION OF MISUSE OF "UNPUBLISHED PRICE SENSITIVE INFORMATION"

All Directors, Officers and Designated Persons of the Company including their immediate relatives shall be subject to trading restriction as enumerated below:

7. Trading Plan

An insider shall be entitled to formulate a trading plan for dealing in securities of the Company 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.

7.1 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.

7.2 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 Regulations.

7.3 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.

7.4 Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

8 **Trading Window**

8.1 The period prior to declaration of Unpublished price sensitive information is particularly sensitive for transaction in the Company's securities. This sensitivity is due to the fact that the Directors, Designated Persons and officers will, during that period, often possess unpublished price sensitive information.

The Directors and Designated Persons and their immediate relatives of the Company shall not trade in the company's securities when the trading window is closed. The period during which the trading window is closed shall be termed as Prohibited Period.

The intimation of closure shall be made through email and/ or through the website of the Company. The trading window shall be closed when the compliance officer determines that a designated person or class of designated persons can reasonably be expected to have possession of unpublished price sensitive information.

8.2 Unless otherwise specified by the Compliance Officer, the Trading Window for Dealing in Securities of the Company shall be closed for the following purposes

a. Financial results
b. dividends
c. change in capital structure
d. mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions
e. changes in Key Managerial Personnel
f. material events in accordance with the listing agreement.

8.3 In respect of declaration of financial results, the Trading Window shall be closed at least 7 days prior to the date of Board Meeting wherein the quarterly or annual standalone / consolidated financial results, as the case may be, are declared.

The closure of Trading Window for purposes other than declaration of financial results and for which a specific notice/intimation is required to be given to stock exchange shall commence from the date on which intimation of the date of Board meeting for consideration of any such Price Sensitive Information is given to Stock Exchange.

However, if the circumstances so warrant, the time for closing the Trading Window may be increased or decreased by the Compliance Officer with the approval of Chairman /Managing Director.

8.4 The timing for re-opening of the trading window for the information referred in 7.2 shall be determined by the compliance officer taking into account various factors including the

unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, which in any event shall not be earlier than forty-eight hours after the information becomes generally available.

8.5 All Directors, Officers, Designated Persons of the company shall conduct all their dealings in the securities of the Company only during the valid trading window and shall not deal in any transaction involving the purchase or sale of the Company's securities during the prohibited periods or during any other period as may be specified by the Company from time to time.

8.6 The trading window shall also be applicable to any person having contractual or fiduciary relation with the company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the company.

8.7 In case of ESOPs, exercise of option may be allowed in the period when the trading window is closed. However sale of shares allotted on exercise of ESOPs shall not be allowed when trading window is closed.

9 **Pre-clearance of trades**

9.1 All Directors, Officers, Designated Persons of the Company and their immediate relatives who intend to deal in the securities of the company in excess of Rupees 10,00,000 whether in one or a series of transactions over any calendar quarter shall require prior clearance from the Compliance Officer.

No Director, Officer and designated person shall apply for pre-clearance of any proposed trade if such designated person is in possession of unpublished price sensitive information even if the trading window is not closed.

9.2 The Clearance shall be obtained as per the procedure prescribed below:

9.2.1 An application is to be made to the compliance officer as per the enclosed format **(Form -I)** indicating the estimate number of securities that the director/ designated person/ Officer intends

to deal in, the details of securities held in physical form as to folio no., the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the Company in this regard.

9.2.2 Each Director/ Designated person/ Officer shall execute in favour of the Company an undertaking in the enclosed pro-forma **(Form -I)** for getting the trades cleared.

The Compliance Officer shall on receiving an application provide the Director/Designated Person/ Officer with an acknowledgement on the duplicate of the application.

The Compliance Officer shall grant approval within 2 working days from the date of acknowledgement.

The Compliance Officer shall retain copies of all applications and acknowledgements. In exceptional circumstances consent may not be given if the Compliance officer is of the opinion that the proposed deal is on the basis of possession of any unpublished Price Sensitive Information. There shall be no obligation to give reasons for any withholding of consent.

If so requested by the Compliance Officer, Director, Officer, Designated Employee must ensure that his stockbroker is authorised to disclose to the Company all matters relevant to his share dealings.

9.3 The directors/Designated Persons/officers and their dependents shall execute their transactions within one week after the pre-clearance failing which they have to preclear the transactions again.

10. **Minimum Period for holding of Securities**

i. All Directors/officer/Designated Persons or their dependents who buy or sell any number of shares of the Company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction. All

Directors/officer/Designated Persons shall also not take positions in derivative transactions in the shares of the Company at any time.

ii. The compliance officer may be empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate these regulations.

iii. If a contra trade is executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Board for credit to the Investor Protection and Education Fund administered by the Board under the Act.

iv. In the case of subscription under ESOP Scheme(s) of the Company, the above mentioned entities shall hold their investments for a minimum period of 30 days. The holding period would commence when the securities are actually allotted. However, in case the sale of securities is necessitated by personal emergency, the holding period may be waived by Compliance Officer after recording in writing reasons in this regard. The application for this approval should be made to the Compliance Officer in Form 'I' (as attached to this code).

The aforesaid restrictions on entering into opposite transaction shall not apply to acquisition of securities in the primary market or pursuant to exercise of options vested under any ESOP Scheme(s) of the Company.

CHAPTER –IV

REPORTING AND DISCLOSURE REQUIREMENTS FOR TRANSACTIONS IN SECURITIES

11. Reporting Requirements for transaction in securities

11.i All Directors/Designated Persons/ Officers shall forward to the Compliance Officer following details of their securities transactions including the statement of their immediate relatives:

(a) All holdings in securities of the company, at the time of joining the company in **Form -II**;

(b) Annual statement of all holdings in securities of the Company in **Form –III** within 15 days.

11.ii. Every promoter, key managerial personnel and director of every company whose securities are listed on any recognised stock exchange shall disclose his holding of securities of the company as on the date of these regulations taking effect, to the company within thirty days of SEBI (Prohibition of Insider Trading) Regulations 2015 taking effect.

11.iii. Every person on appointment as a key managerial personnel or a director of the Company 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.

11.iv Every promoter, employee 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.

11.v The Compliance Officer shall maintain records of all the declarations/ undertakings/ forms as mentioned in this Code, as received from time to time, for a period of five years.

11.vi The Compliance Officer shall place before Chairman/ Managing Director/ Committee specified by the Company, on a monthly basis, all the details of the dealing in the securities by Designated Persons/director/Officer of the company and the accompanying documents that such persons had executed under the pre-dealing procedure as envisaged in this Code.

12. Disclosure by Company to Stock Exchange

Pursuant to Regulation 7(2)(b) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, within 2 working days of the receipt of the information under Clause 10.ii, 10.iii and 10.iv above, the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received.

The Company is required to frame a Code of Fair Disclosure for prevention of Insider Trading and the same is appended hereto.

CHAPTER –V

MISCELLANEOUS

13. Penalty for breach of code of conduct

a) The directors /Designated Persons who violate the code of conduct shall be subject to disciplinary action by the Company that may include wage freeze, suspension etc. and shall be ineligible for future participation in Employees Stock Option Plan (ESOP).

b) The persons required to formulate a code of conduct under sub-regulation (1) and subregulation (2) of regulation 9, that there has been a violation of these regulations, they shall inform the Board promptly.

c) The action by the Company shall not preclude SEBI or other Regulatory authorities from taking any action against those who are found guilty of Insider trading.

d) If any person enters into Insider Trading, he shall be punishable with imprisonment for a term which may extend to five years or with fine which shall not be less than five lakh rupees but which may extend to twenty-five crore rupees or three times the amount of profits made out of insider trading, whichever is higher, or with both.

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

In case it is observed by the Company and / or Compliance Officer that there has been a violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015, SEBI must be informed by the Company.

THIS POLICY IS ONLY INTERNAL CODE OF CONDUCT AND ONE OF THE MEASURES TO AVOID INSIDER TRADING. IT WILL BE THE RESPONSIBILITY OF EACH EMPLOYEE TO ENSURE COMPLIANCE OF SEBI GUIDELINES AND OTHER RELATED STATUTES FULLY.

FORM I

GALLANTT ISPAT LIMITED

(Under GIL's Code of Conduct for Regulating, Monitoring and Reporting of trading by Insiders)

The Compliance Officer **GALLANTT ISPAT LIMITED** 1, Crooked Lane, Second Floor, Room Nos. 222 & 223, Kolkata – 700069.	**Internal Use** Record Date and Time Sign:

SUB: APPLICATION FOR TRADING IN SHARES OF THE COMPANY AND UNDERTAKING

Dear Sir,

I,_____, a Designated Employee/ Director/ Officer of _____ (Name of the Company), propose to trade in the Shares of Gallantt ISPAT Limited as per details hereunder:

Name of person proposing to trade in shares of the Company and relationship with Designated employee/Director/ Officer	

No. of Shares of the Company held by the person as on date of the application: _____

Sr. No.	**Physical Form**	**Demat Form**		**No. of Shares presently held**
	Folio No.	**DP ID**	**Client ID**	

Particulars of proposed transaction in shares of the Company:

Number of Shares held in the Company (A)	**Number of Shares of the Company proposed to be Sold (B)**	**Number of Shares of the Company proposed to be acquired (C)**	**Balance holding (A) +(C)/ (A) -(B)**
Name of Depository Participant:			
DP Id No.:		**Client Id No.:**	
No. of Shares of the Company that would be held by the person after this application (if approval granted)			

Reason for sale of shares held for less than 30 days (if applicable)#	

I confirm that:

i) I shall execute the trade of Shares within 7 days of your approval failing which we shall apply again to you for your approval. I shall submit a 'NIL' report if the transactions not undertaken.

ii) I shall hold Shares of the Company for a minimum period of 30 days from the date of acquisition.

I hereby undertake and confirm that,

1) I do not have any access or have not received "Price Sensitive Information" up to the time of signing this undertaking

2) In case I have access to or have received "Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction I will inform the Compliance officer of the change in my position and that I would completely refrain from dealing in the securities of the Company till the time such information becomes public.

3) I have not contravened the prevailing Code of Conduct for Prevention of Insider Trading.

4) I have made a full and true disclosure in this matter.

I further confirm that the aforesaid facts are true and correct and shall be fully responsible for any wrongful acts done by me or my relatives including such penalties as may be imposed by the Company.

You are requested to provide the pre-clearance of trade for the above transaction.

Thanking you,

Yours sincerely,

Place: Date:	Signature: Name : Designation & Department:

E-Mail ID for Communication of Approval :

Note: *This application has to be necessarily submitted through electronic mail at the dedicated email
id nitesh@gallantt.com and followed by a hard copy.
Sale of securities held for less than 30 days shall be considered only if necessitated by personal emergency.

FORM – II

Statement of holding of Securities at the time of joining the company by Director/ Designated Employee/Officer

(Under GIL's Code of Conduct for Regulating, Monitoring and Reporting of trading by Insiders)

The Compliance Officer
GALLANTT ISPAT LIMITED
1, Crooked Lane, Second Floor,
Room Nos. 222 & 223, Kolkata – 700069.

Reg. : Initial Disclosure of Shareholding

Following are the details of shares held by me …….. or ……. (dependent family member as on ……...)

Name	**Relationship**	**No. of Shares held in the Company**	**Other Details such as Folio / DP Id / Client Id**
	Self:		
Dependent			
1.			
2.			
3.			
4.			

I undertake to furnish the Annual Statement regarding the complete details of all shares held by us within 15 days from the end of each year.

Signature :

Name :

Designation :

Department :

Date :

E-Mail ID for Communication:

Note: You may also submit through electronic mail at the dedicated e-mail id: nitesh@gallantt.com followed by a hard copy.

FORM III
ANNUAL DISCLOSURE OF SHAREHOLDING

(Under GIL's Code of Conduct for Regulating, Monitoring and Reporting of trading by Insiders)

The Compliance Officer
GALLANTT ISPAT LIMITED
1, Crooked Lane, Second Floor,
Room Nos. 222 & 223, Kolkata – 700069.

Reg. : Annual Disclosure of Shareholding

Following are the details of shares held by me and my dependent family members a s on 31st March, 20……

Name	**Relationship**	**No. of Shares held in the Company as on 31st March____**	**Other Details such as Folio / DP Id / Client Id**
	Self:		
Dependent			
1.			
2.			
3.			
4.			

I/ We declare that the shares sold have been held by me / us for 30 days.
I/ We further declare that the above disclosure is true and correct and is in accordance with the previous disclosures given to the Company.

Signature :

Name :

Designation :

Department :

Date :

E-Mail ID for Communication: