

SECRETARIAL DEPARTMENT

29.03.2025

HO/SEC/293/2024-25

The Manager
Listing Department
National Stock Exchange of India Limited
Exchange Plaza, C-1, Block G
Bandra-Kurla Complex, Bandra (E)
Mumbai-400 051
Scrip Code: **KTKBANK**

The Manager
Listing Department
BSE Limited
Phiroze Jeejeebhoy Towers
Dalal Street
Mumbai-400 001
Scrip Code: **532652**

Madam / Dear Sir,

Sub: Disclosure under Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 - Amendments to the Code of Conduct for Prohibition of Insider Trading and Handling of Unpublished Price Sensitive Information

Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 and Regulation 30 and other applicable provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, we inform that the Board of Directors of the Bank at its Meeting held on Saturday, March 29, 2025 (continuation meeting of the meeting held on Thursday, March 27, 2025), have considered and approved the following (copy enclosed):

1. Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information
2. Code of Conduct for Prohibition of Insider Trading and Handling of Unpublished Price Sensitive Information

The copy of the amended codes can also be accessed from the below mentioned web-link of the Bank: <https://karnatakabank.com/investors/policies-codes>

This is for your information and dissemination.

Yours faithfully,

Sham K
**Company Secretary &
Compliance Officer**

Karnataka Bank Ltd.

Your Family Bank, Across India

Regd. & Head Office
P. B. No.599, Mahaveera Circle
Kankanady
Mangaluru – 575 002

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SECRETARIAL DEPARTMENT

CODE OF PRACTICES & PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

CODE OF CONDUCT FOR PROHIBITION OF INSIDER TRADING AND HANDLING OF UNPUBLISHED PRICE SENSITIVE INFORMATION

VERSION CONTROL

Version	Date of Review	Approved by
V1.0	28.03.2015	Board
V2.0	23.04.2016	Board
V3.0	30.04.2019	Board
V4.0	24.04.2020	Board
V5.0	29.06.2021	Board
V6.0	14.03.2022	Board
V7.0	28.03.2024	Board
V8.0	13.08.2024	Board

Issue Date: 27.03.2025

Version: V9.0

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SECRETARIAL DEPARTMENT

CODE OF PRACTICES & PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

PREAMBLE

The Securities and Exchange Board of India (SEBI) has notified SEBI (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as 'Regulations') repealing the Regulations issued earlier. These Regulations contain comprehensive Code for regulating the disclosure, monitor & report trading by insiders within the Bank for directors and designated persons and their immediate relatives which needs to be followed while dealing in the securities of the Company.

In accordance with the Regulation 8(1) read with Schedule A of the Regulations stated above, the Bank has put in place this "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" (hereinafter referred as "Code of Practices"), which elaborates the principles and practices of the Bank in dealing with fair disclosure of unpublished price sensitive information and timing etc.

1. TIMING OF DISCLOSURE:

- a) The Bank shall ensure to disclose unpublished price sensitive information (UPSI) that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available to the public promptly.
- b) The Bank, being a listed entity, shall adhere to the timelines prescribed in the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, while making disclosure of unpublished price sensitive information to the public.
- c) In order to avoid selective disclosure, Bank shall, while disclosing the unpublished price sensitive information, ensure that such information is uniform nature and it will be disseminated to the public at the same time.
- d) In case of any information disclosed selectively, inadvertently or otherwise, the Bank shall ensure prompt dissemination of the unpublished price sensitive information as soon as practically possible to make such information generally available.

2. DESIGNATION OF CHIEF INVESTOR RELATIONS OFFICER:

The Company Secretary of the Bank is designated as the Chief Investor Relations' Officer to deal with dissemination of information and disclosure of unpublished price sensitive information and the details of the present incumbent are as under:

Name of the Officer : Mr. Sham K
Designation : Company Secretary
Office Address : The Karnataka Bank Ltd., Regd & Head Office, Mahaveera
Circle, Kankanady, Mangaluru - 575002
Contact Details : 0824-2228222 Email: investor.greivance@ktkbank.com

3. RESPONSE TO THE QUERIES:

Bank's Compliance Officer shall ensure to provide appropriate and fair response to the queries on news reports and requests for verification of market rumors by regulatory authorities.

4. DISCUSSION WITH ANALYSTS/INVESTORS:

a) Bank shall, while conducting audio/video conference with analysts/research personnel, ensure to discuss and/or disseminate such information which are not unpublished price sensitive information.

b) To ensure confirmation of fair and transparent sharing of information, Bank will post on its website the transcripts and records of proceedings of group meetings with analysts / other investor relations conferences as stated in Guidance Note dated 29.06.2021 on Analyst/Institutional Investors meet issued by NSE and BSE.

5. SHARING OF INFORMATION FOR LEGITIMATE PURPOSE:

Bank may from time to time be required to share unpublished price sensitive information for legitimate purposes, including in the ordinary course of business, with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, legitimacy of which will be evaluated on case to case basis provided that such sharing has not been carried out to evade or circumvent the prohibitions of SEBI (Prohibition of Insider Trading) Regulations, 2015. Where such information has been shared with any person as mentioned above such persons shall be considered as "insider" for the purpose of this Regulation and due notice shall be given to such persons to maintain the confidentiality of such unpublished price sensitive information.

6. OTHER MATTERS:

Bank has put in place a "Code of Conduct for Prohibition of Insider Trading and Handling of Unpublished Price Sensitive Information" inter-alia permitting the sharing of unpublished price sensitive information on a "need-to-know" basis also.

SECRETARIAL DEPARTMENT
CODE OF CONDUCT FOR PROHIBITION OF INSIDER TRADING AND HANDLING OF UNPUBLISHED PRICE SENSITIVE INFORMATION
1.0 OBJECTIVES AND SCOPE OF THE CODE:

The Code is formulated in compliance with the SEBI (Prohibition of Insider Trading) Regulations, 2015 (PIT Regulations) as amended, and will govern the framework for the following:

1. Trading in Bank's securities and also the manner of reporting of trading in securities of the Bank by insiders.
2. Restriction on trading by insiders with respect to securities of other companies for which Bank is acting as Intermediary or Fiduciary and
3. Manner of handling of and responsibilities associated with UPSI.

Adherence to the Code by the Insiders referred to in this Code is mandatory.

2.0 DEFINITIONS: unless the context otherwise requires:

i.	Bank	means The Karnataka Bank Limited
ii.	Compliance Officer	The Company Secretary of the Bank is designated as the Compliance Officer for ensuring compliance and implementation of Code under the overall supervision of the Board of Directors of the Bank or Managing Director & CEO.
iii.	Connected Person	<p>a. any person who is or has been, during the six months prior to the concerned act, associated with a company, in any capacity, directly or indirectly, including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the company or holds any position including a professional or business relationship, whether temporary or permanent, with the company, that allows such a person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access."</p> <p>b. 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, -</p> <ol style="list-style-type: none"> i. a relative of connected persons specified in clause (a); or ii. a holding company or associate company or subsidiary company; or

		<ul style="list-style-type: none"> iii. an intermediary as specified in section 12 of the SEBI Act, 1992 or an employee or director thereof; or iv. an investment company, trustee company, asset management company or an employee or director thereof; or v. an official of a stock exchange or of clearing house or corporation; or vi. 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 vii. 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 viii. an official or an employee of a self-regulatory organization recognized or authorized by the Board; or ix. a banker of the company; or x. a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his relative or banker of the company, has more than ten per cent of the holding or interest; or xi. a firm or its partner or its employee in which a connected person specified in sub-clause (a) of clause (iii) is also a partner; or xii. a person sharing household or residence with a connected person specified in sub-clause (a) of clause (iii) <p><i>NOTE: It is intended that a connected person is one who has a connection with the Bank that is expected to put him in possession of unpublished price sensitive information. Relatives and other categories of persons specified above are also presumed to be connected persons but such a presumption is a deeming legal fiction and is rebuttable. This definition is also intended to bring into its ambit persons who may seemingly not occupy any position in a company but are in regular touch with the company and its officers and are involved in the know of the company's operations. It is intended to bring within its ambit those who would have access to or could access unpublished price sensitive information about any company or class of companies by virtue of any connection that would put them in possession of unpublished price sensitive information.</i></p>
iv.	Contra Trade	<p>Any buy/sell trade, undertaken by a Designated Person (DP) and their immediate relatives, within 6 months of an earlier sell/buy trade, respectively, where both the trades have been done in open market.</p> <p>Explanation: Any acquisition/disposal of shares undertaken through any corporate action i.e. Rights Issue, FPO, OFS, Bonus, Split, Ex-it offers, Buyback offer, Open offer, Merger/ Amalgamation, Demerger, ESOP etc. shall be considered as Non-open mar-</p>

		ket trade, rest all kinds of transactions will be considered as Open Market trade.
v.	Designated Person *	<p>Designated Person includes:</p> <ol style="list-style-type: none"> i. Directors of the Bank including the Chairman, Managing Director & CEO and Executive Director/s of the Bank. ii. All the Executives working in the Head office and Bull Temple Road office of the Bank in Scale IV (Chief Manager) and above or its equivalent in CTC cadre and such employees as identified by their Department Head / General Managers. <p>who could be reasonably expected to have access to UPSI relating to the Bank or its securities or such employees as maybe decided by the Compliance Officer on case to case basis.</p> <p>The Heads of the offices of the Bank may, without having regard to the seniority and professional designation of the employees, review any role and/or function which is reasonably expected to provide access to UPSI and shall specify the names and details of such persons, if any, to the Compliance Officer for inclusion of such names within this definition on case to case basis.</p> <p>For the purpose of Para 9A of the Code where the Bank is acting in the capacity of an intermediary or fiduciary, Chairperson/members of the Committee according sanction, Executives working in Credit Marketing, Credit Sanctions, and Credit Monitoring departments who could be reasonably expected to have access to UPSI pertaining to a Listed Company or its securities or securities proposed to be listed in case of Unlisted Company, shall also be considered as Designated Persons.</p>
vi.	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.
vii.	Relative	<p>shall mean the following:</p> <ol style="list-style-type: none"> (i) spouse of the person; (ii) parent of the person and parent of its spouse; (iii) sibling of the person and sibling of its spouse; (iv) child of the person and child of its spouse; (v) spouse of the person listed at sub-clause (iii); and (vi) spouse of the person listed at sub-clause (iv)
viii.	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 decision relating to trading in securities.
ix.	Insider	<p>means any person who is</p> <ol style="list-style-type: none"> (i) a connected person or

		(ii) is in receipt of or in possession of or having access to UPSI including for a legitimate purpose.
x.	Legitimate Purpose	legitimate purpose shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.
xi.	Securities	Shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 or any modification thereof.
xii.	Securities Proposed to be listed	shall include securities of an unlisted company: <ul style="list-style-type: none"> ➤ if such unlisted company has filed offer documents or other documents, as the case may be, with SEBI, stock exchange(s) or Registrar of Companies in connection with the listing; OR ➤ if such unlisted company is getting listed pursuant to any merger or amalgamation and has filed a copy of such scheme of merger or amalgamation under the Companies Act, 2013.
xiii.	Fiduciaries	includes Professional firms such as auditors, accountancy firms, law firms, analysts, consultants, banks, valuation agencies, fund accountants, assisting or advising Asset Management Companies, Trustees, Registrars and share transfer agents, Custodians and Credit Rating Agencies.
xiv.	Trade/Trading	trading means and includes subscribing, redeeming, switching, buying, selling, dealing, or agreeing to subscribe, redeem, switch, buy, sell, deal in any securities, and trade shall be construed accordingly
xv.	Trading Day	means day on which the recognized stock exchanges are open for trading.
xvi.	Unpublished price sensitive information (UPSI)	means any information, relating to the Bank or its securities, directly or indirectly, that is not generally available which upon becoming publicly available, is likely to materially affect the price of the securities and shall ordinarily include but not restricted to information relating to the following: <ul style="list-style-type: none"> (i) financial results; (ii) dividends; (iii) change in capital structure; (iv) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business, award or termination of order/contracts not in the normal course of business* and such other transactions; (v) Changes in key managerial personnel other than due to superannuation or end of term, including resignations of statutory or secretarial auditors* (vi) change in rating(s), other than ESG rating(s); (vii) fund raising proposed to be undertaken;

		<ul style="list-style-type: none"> (viii) agreements, by whatever name called, which may impact the management or control of the Bank (ix) fraud or defaults by the Bank, its promoter, director, key managerial personnel, or subsidiary or arrest of key managerial personnel, promoter or director of the Bank, whether occurred within India or abroad; (x) resolution plan/ restructuring or one time settlement in relation to loans/borrowings from banks/financial institutions; (xi) admission of winding-up petition filed by any party /creditors and admission of application by the Tribunal filed by the corporate applicant or financial creditors for initiation of corporate insolvency resolution process against the Bank as a corporate debtor, approval of resolution plan or rejection thereof under the Insolvency and Bankruptcy Code, 2016; (xii) initiation of forensic audit, by whatever name called, by the Bank or any other entity for detecting mis-statement in financials, misappropriation/ siphoning or diversion of funds and receipt of final forensic audit report; (xiii) action(s) initiated or orders passed within India or abroad, by any regulatory, statutory, enforcement authority or judicial body against the Bank or its directors, key managerial personnel, promoter or subsidiary, in relation to the Bank ; (xiv) outcome of any litigation(s) or dispute(s) which may have an impact on the Bank (xv) giving of guarantees or indemnity or becoming a surety, by whatever named called, for any third party, by the Bank not in the normal course of business; (xvi) granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals. <p>Explanation 1- For the purpose of sub-clause (ix):</p> <ul style="list-style-type: none"> a. Fraud' shall have the same meaning as referred to in Regulation 2(1)(c) of Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003. a. 'Default' shall have the same meaning as referred to in Clause 6 of paragraph A of Part A b. of Schedule III of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015. <p>Explanation 2- For identification of events enumerated in this clause as unpublished price sensitive information, the guidelines for materiality referred at paragraph A of Part A of</p>
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		Schedule III of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as may be specified by the Board from time to time and materiality as referred at paragraph B of Part A of Schedule III of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 shall be applicable.” (hereinafter referred to as ‘UPSI’) <i>* Applicability of provisions in the policy from 90th day from the publication of SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2025 Dated March 11, 2025.</i>
xvii.	Employees for the purpose of System-driven Disclosures as prescribed under SEBI/ HO/CFD/DCR1/ CIR/P/2018/85	means the CEO & upto two levels below CEO of the Bank for the purpose of system-driven disclosures in respect of Clause No.8 of this code.
xviii.	Material Financial Relationship	means a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift from a designated person during the immediately preceding twelve months, equivalent to at least 25% of the annual income of such designated person but shall exclude relationships in which the payment is based on arm’s length transactions.

Terms expressed under this Code but not defined shall have the same meaning assigned to them in the Companies Act, 2013 and or/any SEBI Regulations.

3.0 RESTRICTION ON COMMUNICATION OF UPSI:

- i) No insider shall communicate, provide or allow access to any UPSI, relating to the Bank or its securities listed or proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- ii) No person shall procure from or cause the communication by any insider of UPSI relating to the Bank or securities listed or proposed to be listed except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- iii) Any person in receipt of UPSI pursuant to a legitimate purpose shall be considered an insider for the purposes of this Code and due intimation shall be given to such persons to maintain confidentiality of such UPSI in compliance with the Code.
- iv) No insider shall trade in securities of the Bank either on behalf of himself/herself or others when in possession of UPSI except as provided in the Code.

Explanation –When a person who has traded in securities has been in possession of unpublished price sensitive information, his trades would be presumed to have been motivated by the knowledge and awareness of such information in his possession.

Provided that the insider may prove his innocence by demonstrating the circumstances including the following:

- i. the transaction is an off-market inter-se transfer between insiders who were in possession of the same unpublished price sensitive information without being in breach of clause 3 (i) and (ii) and both parties had made a conscious and informed trade decision.

Provided that such unpublished price sensitive information was not obtained under of clause 4 (ii) of the code.

Provided further that such off-market trades shall be reported by the insiders to the Bank within two working days. The Bank shall notify the particulars of such trades to the stock exchange on which the securities are listed within two trading days from receipt of the disclosure or from becoming aware of such information.

- ii. the transaction was carried out through the block deal window mechanism between persons who were in possession of the unpublished price sensitive information without being in breach of regulation 3 and both parties had made a conscious and informed trade decision;

Provided that such unpublished price sensitive information was not obtained under of clause 4 (ii) of the code.

- iii. the transaction in question was carried out pursuant to a statutory or regulatory obligation to carry out a bona fide transaction.

- iv. in the case of non-individual insiders –

(a) the individuals who were in possession of such unpublished price sensitive information were different from the individuals taking trading decisions and such decision-making individuals were not in possession of such unpublished price sensitive information when they took the decision to trade; and

(b) appropriate and adequate arrangements were in place to ensure that these regulations are not violated and no unpublished price sensitive information was communicated by the individuals possessing the information to the individuals taking trading decisions and there is no evidence of such arrangements having been breached;

- v. the trades were pursuant to a trading plan.

4.0 NEED TO KNOW AND 'CHINESE WALL' PROCEDURE:

Without prejudice to the clause 3 supra, the UPSI may be communicated, provided, allowed access to or procured, in connection with transactions that would:

- i) entail an obligation to make an open offer under SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, where the Board of Directors of the Bank is of the informed opinion that the [sharing of such information] * is in the best interest of the Bank;
- ii) not attract the obligation to make an open offer under the takeover regulations but where the Board of Directors of the Bank is of the informed opinion that the sharing of such information is in the best interest of the Bank and UPSI is disseminated to be made available to the public atleast two trading days prior to the proposed transaction being effect in such

form as the Board of Directors may determine [to be adequate and fair to cover all relevant and material facts]*.

- ii a) For the purposes of 4(i) and (ii) above, the concerned parties shall 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 purpose of the para no. 4(i) and (ii) and shall not otherwise trade in securities of the Bank when in possession of UPSI.
- iii) UPSI shall not be communicated in a situation in which there would be an uncertainty as regards conflict of interest or the possibility of misuse of the information.
- iv) All employees are required to take adequate measures to ensure that all confidential information in paper or electronic form is kept secure through adequate security mechanisms. Further, the Designated Persons and also the employees working in departments/offices of the Bank handling UPSI, should not share such information with the employees of other departments of the Bank or with outsiders except on a need-to-know basis and while sharing UPSI on need-to-know basis, appropriate wall-crossing procedure as prescribed in this Code shall be followed.
- v) Any counter party/ies, who by virtue of an agreement with the Bank or by existing association with the Bank in connection with any assignment/contract/service/supply or any such services, which requires sharing of UPSI for execution of such contracts in the ordinary course of business, shall execute agreements to maintain confidentiality and non-disclosure obligations which shall include a covenant that they shall not trade in the securities of the Bank when in possession of UPSI or during the currency of the agreement and for a period of at least 6 months thereafter.
- vi) While dealing with intermediaries or fiduciaries including but not limited to auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the Bank, a confirmation shall be obtained from such entities/firms for having put in place the “Code conduct for Intermediaries and Fiduciaries to Regulate, Monitor and Report Trading by Designated Persons” in terms of Regulation 9(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015.
- vii) Before sharing UPSI with any person, the person sharing the UPSI shall record such sharing in the structured digital database maintained for the purpose with the following details:
 - a. nature of UPSI and
 - b. names of persons who have shared the information
 - c. names of such persons with whom information is shared under this Regulation along with the Permanent Account Number (PAN) or any other identifier authorized by law where PAN is not available.

Explanation: Information not originating from within the organization must be entered into the SDD within two calendar days of receipt. Additionally, trading windows may not need to be closed for such information. *

* *Applicability of provisions in the policy from 90th day from the publication of SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2025 Dated March 11, 2025.*

viii) The Compliance officer shall provide necessary user credentials to the users for the aforesaid purpose.

5.0 TRADING RESTRICTIONS:

i) Insiders shall not trade in the securities of the Bank that are listed on Stock Exchange/s when in possession of UPSI.

If the Connected Person trades in the security/ies of the Bank then the onus of establishing that they were not in possession of the UPSI, shall be on such connected persons.*

For the purpose of the above clause, when a person has traded in securities of Bank when in possession of the UPSI, the trade would presumed to have been motivated by the knowledge and awareness of such information in his/her possession. *

ii) All Directors, Officers and Designated Persons and their immediate relatives as referred in Clause 2 of the Code may execute trades in the securities of the Bank, subject to compliance with this code, in a valid trading window and shall not enter into any transactions in the securities of the Bank during period when the trading window is closed.

iii) Trading window shall remain closed when the Compliance Officer determines that a designated person or class of designated persons can reasonably be expected to have possession of UPSI. Such closure shall be imposed in relation to such securities to which such UPSI relates and during the period of happening of certain events such as announcement of financial results, declaration of dividends, any other important event, any decision taken by the Bank or by the Board of Directors of the Bank which may have an effect on the price of the securities. The illustrative list of such events and the closing period for the window is furnished below.

	EVENT	WINDOW TO REMAIN CLOSED	
		FROM	TO
a)	Declaration of financial results	From the end of every quarter (June/Sept/Dec/Mar)	48 hours after the results are submitted to Stock Exchanges where the securities of the Bank are listed.
b)	Declaration of dividends (interim and final)	Date of notice of Board Meeting to directors or stock exchanges whichever is earlier.	48 hours after the outcome of the Board meeting is submitted to Stock Exchanges where the securities of the Bank are listed.
c)	Change in the capital structure	--do--	--do--
d)	Mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions	--do--	--do--
e)	Changes in Key Managerial Persons;	--do--	--do--

	EVENT	WINDOW TO REMAIN CLOSED	
		FROM	TO
f)	Material events in accordance with the listing regulations;	--do--	--do--

- iv) If the acquisition/purchase/sale of number of shares or value exceeds the limits provided in Clause 6 below, the concerned Directors/Officers/Designated Persons and their immediate relative shall follow the procedure for the Pre-Clearance trade detailed hereinafter.
- v) Exercise of stock options vested under the Employee Stock Option Scheme or any such share based benefit scheme introduced by the Bank from time to time will be permitted when the trading window is closed under this Code. However, sale of shares allotted on exercise of ESOP shares shall not be allowed when the trading window is closed.
- vi) The insider who has obtained an approval for “Trade Plan” shall follow the procedure outlined under Para 7 of the Code for the purpose of trading in the securities of the Bank.
- vi a) All Directors, Executives working in Head office and Bull Temple Road office of the Bank in Scale IV (Chief Manager) and above or its equivalent in CTC cadre and such employees as identified by their department head / General Manager and their respective immediate relatives are deemed to be perpetually in possession of UPSI. Therefore, dealing in the securities of the Bank by these categories of insiders shall be only under a Trade Plan formulated by such insider which is approved by the Compliance Officer and disclosed to the Stock Exchanges, duly adhering to Clause No. 7.0 of this Code. Duly Any dealing in the securities without such Trade Plan is strictly prohibited and will be subject to penal action under the Code.
- vii) The trading window closure shall also be applicable to any person having contractual or fiduciaries relation with the Bank, such as auditors, accountancy firms, law firms, analysts, consultants etc. assisting or advising the Bank.
- viii) The trading window restrictions mentioned in sub-clause (ii) & (iii) above shall not apply in respect of -
- i. transactions specified in clauses (i) to (vi) of the proviso to sub-regulation (1) of Regulation 4 of SEBI PIT Regulations and in respect of a pledge of shares for a bonafide purpose such as raising of funds, subject to pre-clearance by the compliance officer and compliance with the respective regulations made by SEBI;
 - ii. transactions 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 SEBI from time to time.

6.0 PRE-CLEARANCE OF TRADES

- i. All Officers/Designated Persons and their immediate relatives other than those included in Clause 5.0 (vi-a) may trade in Securities during the “trading window” without pre-clearance where the trade is not exceeding 10,000 shares or Rs.10,00,000/- in value

whichever is lower, without indulging in contra trade, with prior written and signed information to the Compliance Officer through the respective Department Head / General Manager, specifying the number of shares and the date by which the trade would be executed not being more than seven working days from the date of intimation. Such intimation shall be submitted to comsec@ktkbank.com.

However, irrespective of the number of securities or the value of the trade, aforesaid persons shall not apply for pre-clearance or trade in securities of the Bank while in possession of UPSI whether the Trading Window is closed or not.

- ii. All /Officers/Designated Persons and their immediate relative other than those included in Clause 5.0 (vi-a) shall obtain prior approval of the Compliance Officer in the prescribed form for every trade exceeding threshold limit as specified in 6(i) above.
- iii. The application for trade shall be accompanied by an undertaking in the prescribed form including a declaration to the effect that the applicant is not in possession of UPSI.
- iv. The trade order shall be executed within a period of seven trading days of the approval, if trade is not completed within such period, they shall seek fresh approval for the trade.
- v. All/Officers/Designated Persons and their immediate relatives who buy or sell any number of securities of the Bank shall not enter into a contra-trade i.e., sell or buy any number of securities during the next six months following the prior transaction. All Officers/Designated Persons and their immediate relatives shall also not take position in derivatives transaction in the securities of the Bank at any time.
- vi. Compliance Officer shall maintain a record of applications made by/Officers/Designated Persons and their immediate relatives seeking pre-clearance for dealing in Securities.

7.0 TRADE PLANS

1. An insider shall be entitled to formulate a 'Trading Plan' and present it to the Compliance Officer for approval and public disclosure before carrying out the trade.
2. The trades shall be carried out as per the trading plan and it:
 - a. **shall not entail** any trading in the securities of the Bank prior to one hundred and twenty calendar days of public disclosure of the trading plan by the Compliance Officer
 - b. **shall not entail** overlaps of any period for which another trading plan is already in existence.
 - c. set out following parameters for each trade to be executed:
 - (i) either the value of trade to be effected or the number of securities to be traded
 - (ii) nature of the trade;
 - (iii) either specific date or time period not exceeding five consecutive trading days;
 - (iv) price limit, 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.

Explanation:

- i. While the parameters in sub-clauses (i), (ii) and (iii) shall be mandatorily mentioned for each trade, the parameter in sub-clause (iv) shall be optional.
 - ii. The price limit in sub-clause (iv) shall be rounded off to the nearest numeral.
 - iii. Insider may make adjustments, with the approval of the compliance officer, in the number of securities and price limit in the event of corporate actions related to bonus issue and stock split occurring after the approval of trading plan and the same shall be notified on the stock exchanges on which securities are listed.”
 - iv. the insider shall execute the trade only if the execution price of the security is within such limit. If price of the security is outside the price limit set by the insider, the trade shall not be executed.
 - v. In case of non-implementation (full/partial) of trading plan due to either reasons enumerated in para (iv) above, or failure of execution of trade due to inadequate liquidity in the scrip, the following procedure shall be adopted:
 1. The insider shall intimate non-implementation (full/partial) of trading plan to the compliance officer within two trading days of end of tenure of the trading plan with reasons thereof and supporting documents, if any.
 2. Upon receipt of information from the insider, the compliance officer, shall place such information along with his recommendation to accept or reject the submissions of the insider, before the Audit Committee in the immediate next meeting. The Audit Committee shall decide whether such non-implementation (full/partial) was bona fide or not.
 3. The decision of the Audit Committee shall be notified by the compliance officer on the same day to the stock exchanges on which the securities are listed.
 4. In case the Audit Committee does not accept the submissions made by the insider, then compliance officer shall act as per the Code of Conduct.
- d. **shall not entail** any trading in the securities of the Bank for market abuse.
3. The Compliance Officer shall review the trading plans to assess whether the plan would have any potential violation of these regulations and shall be entitled to seek express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the trading plan [but the pre-clearance of the trades shall not be required for a trade executed as per an approved trading plan] *. The trading window norms and restrictions shall not be applicable for trades carried out in accordance with an approved trading plan.
 4. The trading plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to execute any trade in the securities outside the scope of the trading plan or to deviate from it except due to permanent incapacity or bankruptcy or operation of law.
 5. However, the implementation of the trading plan shall not be commenced if any UPSI in possession of the insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation.

6. The compliance officer shall approve or reject the trading plan within two trading days of receipt of the trading plan and notify the approved plan to the stock exchanges on which the securities are listed, on the day of approval.

8.0 DISCLOSURE OF TRADING BY INSIDERS:

The following disclosures shall be made to the Compliance Officer:

The disclosures to be made by any person shall include those relating to trading by such person's immediate relative, and by any other person whom such person takes trading decision.

The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account.

Initial disclosure:

- (i) Every person on appointment as a Key Managerial Person or a Director of the Bank or upon becoming a promoter (or member of promoter group) shall disclose his holding of securities of the Bank as on the date of appointment or becoming promoter, to the Bank within seven days of such appointment or becoming promoter. **(in Form No. A)**

Continual disclosure:

- (i) Every promoter (or member of promoter group) *designated person and director of the Bank shall disclose to the Bank the total number of securities acquired or disposed of within **two trading days** of such transaction if the value of securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs.10 lakh or such other value as may be specified. **(in Form No. B)**
- (ii) The Bank shall notify the particulars of such trading to the stock exchanges on which the securities of the Bank are listed within **two trading days** of receipt of the disclosure or becoming aware of such information.
- (iii) The disclosure of the incremental transactions after any disclosure under above provisions shall be made when the transactions effected after the prior disclosure cross the threshold specified in (i) above.
- (iv) The Compliance Officer may decide the frequency (not longer than a year) of submission of holding & trading of securities of the Bank from time to time.
- (v) All Directors/Officers/Designated Persons shall forward a statement annually of loans taken by them on the security of securities of the Bank. **(in Form No. B)**

8(a) DISCLOSURE BY OTHER CONNECTED PERSONS: *

(I) Every Designated Person/s shall disclose details of their holdings in securities of the Bank together with those held by the immediate relatives as under:

A. Initial Disclosure:

Within seven working days of taking charge in the respective scale/position. **(in Form No. A)**

B. Continual Disclosure:

Within seven working days from the end of each Financial Year for the transactions undertaken in the securities of the Bank during the immediate preceding Financial Year. **(in Form No. B)**

Further, the disclosures for para 8(a) (I) above, the disclosures may also be furnished electronically through email or weblink providing the details as per the said formats.

Designated persons shall be required to disclose Names and Permanent Account Number of the following persons to the Bank on an annual basis and also as and when the information changes:

- a. immediate relatives
- b. persons with whom such designated person(s) shares a material financial relationship
- c. Phone, mobile and cell numbers which are used by them

C. One time Disclosure (as part of Form No. A): The designated persons shall provide the following details on a one time basis:

- Names of educational institutions from which designated persons have graduated and
- Names of their past employers

(II) Compliance Officer may at its discretion require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the Bank in such form and at such frequency as may be determined by the Bank as may be decided on case to case basis in order to monitor compliance with the Code. **(in FORM No. C)**

Bank shall also adhere to the formats of declaration and changes there to as may be specified by SEBI from time to time.

(III) The disclosures made under Clause 8 shall be maintained by the Bank, for a minimum period of five years.

9.0 DUTIES OF THE COMPLIANCE OFFICER:

The Compliance Officer shall be responsible for establishing policies, procedures and monitoring adherence to this Code under the overall supervision of the Board of Directors and shall submit a quarterly report on compliance to the Code to the Audit Committee. The Compliance officer is responsible for the following

- i) Pre-clearance of trades of Directors, Officers and Designated Persons and their immediate relatives and approval of trading plans.
- ii) Maintain a list of securities as a 'restricted list' confidentially which shall be used as basis for approving or rejecting applications for pre-clearance of trades.
- iii) Clarification and improvements in policies and procedures with respect to this Code and ensure effective implementation of the Code.
- iv) Intimation to any individual or class of Designated Persons and their immediate relative referred to in this Code.
- v) Maintenance of records of all Directors, Officers, Designated Persons and their immediate relatives as required by this Code and any changes therein.
- vi) Establishment of mechanisms necessary for monitoring of trades and implementation of the Code.
- vii) Assist all Employees in addressing any clarifications regarding the Regulations and Code of the Bank.

- viii) Apprising the Audit Committee on becoming aware of leak or suspected leak of UPSI and reporting such instances along with details of inquiry and results of inquiry to SEBI.
- ix) Put in place and maintain the Structural Digital Database as per prescribed in the SEBI PIT Regulations and ensure preservation of the entries in the database for a period of at least eight years or such other tenure as may be specified by the SEBI from the date of transaction/declaration.
- x) In consultation with HR & IR Department, develop a mechanism to make employees aware of the duties and responsibilities attached to the receipt of UPSI and the responsibility attached to misuse or unwarranted use of such information.
- xi) Put in place appropriate operational guidelines/procedures (SOPs) with necessary administrative approval from the Managing Director and CEO to ensure compliance with the requirements under this Code including 9A mentioned below.

9A. Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons where Bank is an Intermediary and/or Fiduciary:

Need-to-know: All information obtained from external stakeholders i.e., information pertaining to a company or securities listed or proposed to be listed including but not limited to customers, service providers, vendors of the Bank etc., as an intermediary or in banker-customer relationship or in furtherance of any commercial relationship shall be handled within the Bank on a need-to-know basis and no UPSI of the external stakeholders shall be communicated to any person except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

List of Restricted Securities: The Compliance Officer shall confidentially maintain a list of securities of such Companies as the “restricted list” which shall be used as the basis for approving or rejecting applications for pre-clearance of trades.

Note: The operational guidelines with regard to maintaining the list of restricted securities is provided in the Annexure.

Restriction on Trading by Designated Persons and their immediate relatives:

The restriction on handling of UPSI and trading in securities of companies where Bank is acting in the capacity of intermediary or fiduciary, shall be applicable as mentioned in para 3.0 of the code and the designated persons and their immediate relatives shall strictly adhere to the requirements of the code.

Pre-clearance by Compliance Officer: Prior to approving any trades, the Compliance Officer shall seek declarations to the effect that the applicant for pre-clearance is not in possession of any unpublished price sensitive information. He/she shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.

Execution of pre-cleared trades: The designated person shall execute the pre-cleared trades within a period of seven trading days. If the trade is not executed within that time, a fresh pre-clearance would be needed for the trades to be executed.

Intimation of violation in the capacity of an Intermediary and/or Fiduciary:

In case any violation of these regulations is observed, Bank shall inform the stock exchange(s) where the concerned securities are traded within such time, in such form and such manner as may be specified by SEBI from time to time.

All other provisions of the Code shall *mutatis mutandis* apply to this part of the Code (i.e., 9A) also.

10.0 REVIEW OF THE POLICY:

The policy is adopted based on the provisions of Listing Regulations as amended from time to time. This policy may be reviewed by the Audit Committee once in a financial year or as and when changes are to be incorporated in the Policy due to change in regulations or as may be felt by the Audit Committee and shall verify that the system for internal control are adequate and are operating effectively.

Any amendments to the applicable laws be implemented with the administrative approval of the Managing Director & CEO/Executive Director which shall be included in the Code immediately in the subsequent meeting.

11.0 VIOLATIONS, CONTRAVENTIONS AND PENALTIES:

- a) Any person being an insider or Designated person or connected person being in possession of UPSI of the Bank violates any of the provisions of this code, (including the code of conduct discussed under para 9A above) or the provisions of the SEBI (PIT) Regulations, 2015, shall be subject to penal action by the Bank which may include remittance of the profit from such trade to the SEBI for credit to the Investor Protection and Education Fund administered by the SEBI or issuing warning letter, wage freeze, suspension, ineligibility for future participation in the Bank’s stock option plans or termination of services or relationship with the Bank.
- aa) The instances of leak of UPSI, if any, along with details of inquiry and results of such inquiry shall be promptly reported to SEBI by the Compliance Officer.
- b) The Audit Committee of the Board (ACB) will be the competent authority to review all such cases and take appropriate penal action, if any. ACB may also order an appropriate inquiry, wherever felt necessary.

Appropriate penal action and wherever felt necessary based on the gravity of violation / position held, the Audit Committee of the Board, may levy penalty as per the table as given below:

Type of Violation	Penalty
Dealing in securities of the Bank without obtaining pre-clearance	<ul style="list-style-type: none"> • 1st time violation and equal to or less than 100 shares - Written warning and a Minimum penalty of Rs.5,000/- • 1st time violation and equal to or more than 100 shares - Minimum penalty of Rs. 10,000/- or 10% of the transaction value or profit made in the transaction, whichever is higher. • Repeat violation and equal to or less than 100 shares - Minimum penalty of Rs. 20,000/- or 20% of the transaction value or profit made in the transaction, whichever is higher. • Repeat violation and equal to or more than 100 shares - Minimum penalty of Rs. 30,000/- or 30% of the transaction value or profit made in the transaction, whichever is higher.
Dealing in securities of the Bank during trading window closed period.	
Short-term dealings or dealings in derivatives	
Dealing in Bank securities based on price sensitive information	<ul style="list-style-type: none"> • Repeat violation and equal to or less than 100 shares - Minimum penalty of Rs. 20,000/- or 20% of the transaction value or profit made in the transaction, whichever is higher. • Repeat violation and equal to or more than 100 shares - Minimum penalty of Rs. 30,000/- or 30% of the transaction value or profit made in the transaction, whichever is higher.
Dealing in contra-trade (opposite transaction of buying and selling or selling and buying)	

Dealing in Bank securities based on price sensitive information	The Audit Committee shall determine the penalty.
Violation of the Code not involving trading in the securities of the Bank like non-disclosure of information / declarations under the Code	Written warning.

- i. Any person aggrieved by the order passed by the Audit Committee may prefer an appeal before the Board of Directors within 15 days from the date of passing of the order by the ACB and the decision of the Board in this matter will be final.
- c) Such disciplinary action will be irrespective of action that may be taken by SEBI under the SEBI (PIT) Regulations, 2015 and SEBI Act, 1992.
- d) The format for "Reporting violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015" shall be as per **Form No. D** of the Code.

12. Whistle Blowers

The Bank has a whistle-blower policy to enable employees to report instances of unethical practices including leak of unpublished price sensitive information.

13. Protection against retaliation and victimization

The Bank will provide suitable protection against any discharge, termination, demotion, suspension, threats, harassment, directly or indirectly or discrimination against any employee who files a Voluntary Information Disclosure Form, irrespective of whether the information is considered or rejected by the Audit Committee of the Board (ACB) or he or she is eligible for a Reward under violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015 , by reason of:

- i. filing a Voluntary Information Disclosure Form as given under SEBI (Prohibition of Insider Trading) Regulations, 2015;
- ii. testifying in, participating in, or otherwise assisting or aiding the ACB in any investigation, inquiry, audit, examination or proceeding instituted or about to be instituted for an alleged violation of insider trading laws or in any manner aiding the enforcement action taken by the ACB; or
- iii. breaching any confidentiality agreement or provisions of any terms and conditions of employment or engagement solely to prevent any employee from cooperating with the ACB in any manner.

(Form No. A)
INITIAL DISCLOSURE AND DISCLOSURE UPON BECOMING
KMP/DIRECTOR/PROMOTER

(Regulation 7(1) (a) &(b) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015)
 {Ref: SEBI/HO/ISD/ISD/CIR/P/2021/22 March 01, 2021}

SUBMITTED TO: The Compliance Officer-Company Secretary, HO-Secretarial Department

Name of the company : **The Karnataka Bank Limited**
 ISIN of the company : IN614B01018, IN614B08021, IN614B08039, IN614B08047

Details of Securities held by, Key Managerial Personnel (KMP), Director and Designated Persons(DP)

Name, PAN No., CIN/DIN & address with contact nos. (including details of relatives)	Category of Person (KMP/ Director/ Designated Person)	Folio No/ Dmat A/c No.	Date of appointment of KMP/Director/ becoming DP	Securities held as on the date of Regulation coming into force/at the time of appointment of KMP/Director/becoming DP		% of Share holding
				Type of security*	No.	
1	2	3	4	5	6	7
Self						
Immediate Relatives						
Persons with whom material financial relationship is shared:						

*(For eg. - Shares, Warrants, Convertible Debentures etc.)

Material Financial Relationship means a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift from a **designated person** during the immediately preceding twelve months, equivalent to at least 25% of the **annual income of such designated person** but shall exclude relationships in which the payment is based on arm's length transactions.

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

Details of open interest in derivatives of the Company held by Promoter, Key Managerial Personnel (KMP), Director and Designated Persons

Open Interest of the Future contracts held as on the date of Regulation coming into force/at the time of appointment of Director/KMP			Open Interest of the Option Contracts held as on the date of Regulation coming into force/at the time of appointment of Director/KMP		
Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
8	9	10	11	12	13

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

Names of educational institutions from which designated person has graduated:

1.

Details of the past employers:

Name of the employer	Address	Designation held

Name : _____
 Signature: _____
 Designation : _____
 Date : _____
 Place : _____

(Form No. B)
CONTINUAL DISCLOSURE

(Regulation 7(2) (a) &(b) read with Regulation 6(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015)
{Ref: SEBI/HO/ISD/ISD/CIR/P/2021/22 March 01, 2021}

SUBMITTED TO: The Compliance Officer-Company Secretary, HO-Secretarial Department

Name of the company : **The Karnataka Bank Limited**
CIN : L85110KA1924PLC001128
ISIN of the company : **IN614B01018, IN614B08021, IN614B08039, IN614B08047**

1. Details of change in holding of securities of Promoter, Designated Persons and Director of a listed company and their immediate relatives and such persons as mentioned in Regulation 6(2)

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person~	Folio No/ Dmat A/c No.	Securities held prior to Acquisition/ disposal		Securities acquired/Disposed				Securities held post acquisition / disposal	
			Type of securities#	No. and % of share holding	Type of securities#	No.	Value	Transaction Type*	Type of securities	No. and % of shareholding
1	2	3	4	5	6	7	8	9	10	11
Self										
Immediate Relatives										
Persons with whom material financial relationship is shared:										

~Promoter/ member of the promoter group/ designated person/ Director s/ immediate relative to/ others etc.

#(For eg.-Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)

*Purchase/ sale/ Pledge /Revocation / Invocation / Others- please specify

Material Financial Relationship means a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift from a designated person during the immediately preceding twelve months, equivalent to at least 25% of the annual income of such designated person but shall exclude relationships in which the payment is based on arm's length transactions.

Date of allotment advice/acquisition of shares/ disposal of shares, specify		Date of intimation to company	Mode of acquisition /disposal**	Exchange on which the trade was executed
From	To			
12	13	14	15	16

** (on market/public/ rights/ preferential offer/off market/Inter-se transfer, ESOPs, etc.)

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

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

2. 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 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	17	18	19	20	21	22

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

3. Statement of loans taken on the security of securities of Karnataka Bank Limited as on _____

Name	Amount of loan taken	Name of the financing Bank/ FI	Terms of loans	Total securities pledged*

Name & Signature:

Designation:

Date:

Place:

(FORM No. C)
DETAILS OF TRADING IN SECURITIES BY OTHER CONNECTED PERSONS
(Regulation 7(3) - Transactions by Other connected persons)
(Revised format as per SEBI/HO/ISD/ISD/CIR/P/2021/22 March 01, 2021)

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	Folio No/Dmat A/c No.	Securities held prior to acquisition/disposal		Securities acquired/Disposed			Securities held post acquisition/disposal		
			Type of securities*	No. and % of shareholding	Type of securities**	No.	Value	Transaction Type#	Type of securities*	No. and % of shareholding
1	2	3	4	5	6	7	8	9	10	11

*(For eg.- Shares,Warrants,Convertible Debentures, Rights entitlementetc.)

** (For eg.- Shares,Warrants,Convertible Debentures, Rights entitlementetc.)

#(Purchase/ sale Pledge /Revocation / Invocation/ Others- please specify)

Date of allotment advice/ acquisition of shares/disposal of shares specify		Date of intimation to company	Mode of acquisition/ disposal ~	Exchange on which the trade was executed
From	To			
12	13	14	15	16

~(onmarket/public/ rights/ Preferential offer/ offmarket/ Inter-se transfer,ESOPs etc.)

Note:

- (i) "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 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)	
17	18	19	20	21	22	23

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

Name & Signature:

Date:

Place:

(Form No. D)

[On the Bank's letterhead]

Format for Reporting violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

{Ref: SEBI/HO/ISD/ISD/CIR/P/2021/22 March 01, 2021}

[For listed companies: Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015

For Intermediaries/ Fiduciaries: Schedule C read with Regulation 9(1) and 9(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

Sr. No.	Particulars	Details
1	Name of the listed company/ Intermediary/Fiduciary	
2	Please tick appropriate checkbox Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	
3	A. Details of Designated Person (DP)	
	i. Name of the DP	
	ii. PAN of the DP	
	iii. Designation of DP	
	iv. Functional Role of DP	
	v. Whether DP is Promoter or belongs to Promoter Group	
	B. If Reporting is for immediate relative of DP	
	i. Name of the immediate relative of DP	
	ii. PAN of the immediate relative of DP	
	C. Details of transaction(s)	
	i. Name of the scrip	
	ii. No of shares traded and value (Rs.) (Date- wise)	
	D. In case value of trade(s) is more than Rs.10 lacs in a calendar quarter	
	i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under Regulation 7 of SEBI (PIT) Regulations, 2015	
ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015		
4	Details of violations observed under Code of Conduct	
5	Action taken by Listed company/ Intermediary/ Fiduciary	
6	Reasons recorded in writing for taking action stated above	
7	Details of the previous instances of violations, if any, since last financial year	
8	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	

ii. Details of transfer/ paymentIn case of :	
Online:	
Particulars	Details
Name of the transferor	
Bank Name, branch andAccount number	
UTR/Transaction referenceNumber	
Transaction date	
Transaction Amount (in Rs.)	
In case of Demand Draft (DD):	
Particulars	Details
Bank Name and branch	
DD Number	
DD date	
DD amount (in Rs.)	
9	Any other relevant information

Yours faithfully,

Date and Place

Name and Signature of Compliance Officer

PAN:

Email ID:

APPLICATION FOR PRE-CLEARANCE OF TRADE

(Reference: Schedule B of SEBI (Prohibition of Insider Trading) Regulations, 2015)
(For trade value of Rs.10 lakh or 10,000 shares and above)

To
The Compliance Officer
The Karnataka Bank Limited
Regd & Head Office,
Mangaluru-575002

Dear Sir,

Sub: Pre-clearance of trade

Ref: DP's name :

DP ID : _____
CLIENT ID : _____
Name of insider : _____
Address : _____

Your approval is solicited for purchase/sale of _____ securities of the Bank in demat form. I state on solemn affirmation:

- 1 that I am Director/employee/Designated Employee of the Bank and I may reasonably be expected to have an access to unpublished price sensitive information in relation to the Bank;
- 2 that I intend to purchase/sell _____ (state No. of securities) securities of the Bank in demat form immediately on receipt of clearance for trade;
- 3 that I am aware of the Bank's 'Code of Conduct to regulate, monitor and report trading by Insiders' and that the provisions are applicable to me.
- 4 that at this point of time, trading window is open and I am permitted to trade in securities;
- 5 that I do not have access to the unpublished price sensitive information and also have not received unpublished price sensitive information till today;
- 6 that in case I have access to the unpublished price sensitive information or receive it after signing this undertaking, I shall refrain from dealing in securities till the information becomes public and inform about the non-dealing in the securities;
- 7 that whatever is stated above is true and correct to the best of my knowledge and nothing has been concealed.

Yours truly
Signature
Date

Name
Designation
Staff ID

(You are requested to use the above format for pre-clearance of trade of your immediate relative/s)

Recommended for considering the request.

(General Manager)
(In absence of GM, Head of Department)

PRE-CLEARANCE OF TRADE

(Reference: Schedule B of SEBI (Prohibition of Insider Trading) Regulations, 2015)
(Format of approval to be given by the Compliance Officer)
(For trade value of Rs.10 lakh or 10,000 shares and above)

To,
Name of Employee :
Staff No. :

Madam/Dear Sir,

This has reference to your application dated _____, received by us on _____ for approval to purchase/sale of securities. Your application is considered and based on the undertaking given by you, the proposed trade is approved. This approval is valid till _____ (7 trading days). In case you have in possession of any unpublished price sensitive information on and from the date of this approval, you shall not deal in the securities of the Bank. You are hereby advised not to execute any contra trade including this trade and also for the next 6 months from the date of this trade (*'Contra trade' means any buy or sell trade which is opposite to the previous trade, irrespective of price or quantity*).

Thanking you
Yours faithfully,

For The Karnataka Bank Limited

Compliance Officer

UNDERTAKING

In compliance with the requirements of SEBI (Prohibition of Insider Trading) Regulations, 2015, I hereby undertake that while I have access to the unpublished price sensitive information:

- i. I will not deal in Bank's securities on my own or on behalf of any other person;
- ii. I will not communicate, counsel or procure directly or indirectly any unpublished price sensitive information to any person who, while in possession of such unpublished price sensitive information shall not deal in Bank's securities.
- iii. I am aware that whatever is contained in (ii) above shall not be applicable to any communication required in the ordinary course of business or under any law.
- iv. I shall keep the confidential information which is in my possession secured. Computer files containing the unpublished price sensitive information shall have security of log in or password.
- v. I confirm that no contra trade has been/will be executed including this trade.

Date :

Signature : _____

Name : _____

Emp. No. : _____

COMPLETION OF TRADE

To
The Compliance Officer
The Karnataka Bank Ltd
Regd & Head Office
Mahaveera Circle
Kankanady
Mangaluru-575002

Date : _____

Dear Sir,

Folio No: _____ / **D.P.ID. No.** _____ **Client I.D. No.** _____

Sub : Pre-clearance of trade dated _____

This is to inform you that the trade for purchase/sale of Bank's shares cleared by you vide No. _____ dated _____ has been completed. _____ is my D.P. My D.P.I. D. No. is _____, my client I.D. No. is _____ / my folio No. is _____ (state if the shares are purchased for the first time.)

Thanking you,

Yours truly

Signature
Name
Designation

APPLICATION FOR APPROVAL OF THE TRADING PLAN

(Regulation 5 of SEBI (Prohibition of Insider Trading) Regulations, 2015)

To
The Compliance Officer
Karnataka Bank Ltd
Regd & Head Office,
Mangaluru-575002

Dear Sir,

Sub: Trading Plan

DP ID : _____
CLIENT ID : _____
Name of insider : _____
Address : _____

Your approval is solicited for purchase/sale of securities of the Bank in physical/demat form as per the Trading Plan stated below:

Sl No.	Scheduled Date / time of Trade not exceeding five consecutive trading days ¹	Whether Buy/Sell	Price limit (optional) ² (Round off to nearest numeral)	Number of Securities / Value of trades
		TOTAL=>		

¹scheduled date shall not be prior to 120 calendar days from the date of public disclosure of this trading plan.

²Buy Trade: Upper limit = *Closing price plus up to 20% higher than closing price

Sell Trade: Lower limit = *Closing price minus up to 20% lower than closing price

*Closing price means the price on the day before the submission of trading plan.

I state on solemn affirmation:

- 1 that I am a Director/Officer/Designated Person of the Bank.
- 2 that I shall adhere to the trading plan.
- 3 that the dates mentioned above do not overlap the dates already declared under my earlier plan. (Strikeout if it is not applicable)
- 4 that I am aware of the Code of Prohibition of Insider Trading (PIT) and that the provisions are applicable to me.
- 5 that at this point of time trading window is open and I am permitted to define 'trading plan' with regard to securities of the Bank.
- 6 I understand that the above trading plan, once approved, is irrevocable.
- 7 I am not in possession of any form of Unpublished Price Sensitive Information (UPSI) pertaining to the Bank.

8 that whatever is stated above is true and correct to the best of knowledge and nothing has been concealed.

Yours truly

Name :

Signature

Designation :

Date :