THE ANANDAM RUBBER COMPANY LIMITED

41/298-D2,2nd Floor, Saniya Plaza, Mahakavi Bharathiyar Road,
Near KSRTC Bus Stand, Ernakulam, Kerala, Cochin - 682 035
Phone: 0484-4032952, 6596725
CIN: L25191KL1942PLC000045

February 13, 2016

To,
Listing Department,
National Stock Exchange of India Limited.
Exchange Plaza, Plot No C/1, G Block, Bandra Kurla Complex,
Bandra (E), Mumbai-400051

Stock Code: **ANANDAMRUB**

Dear Sir/Madam,

Sub: Revised Code - CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION AND CODE OF INTERNAL PROCEDURES AND CONDUCT TO REGULATE, MONITOR, AND REPORT TRADING BY INSIDERS.

Please find enclosed herewith Revised **CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION** and **CODE OF INTERNAL PROCEDURES AND CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS** framed under SEBI (Prohibition of Insider Trading) Regulation, 2015 which is adopted in the board meeting held on February 13, 2016.

The above is for your information and record.

Yours Faithfully,

For, **The Anandam Rubber Company Limited,**

THE ANANDAM RUBBER CO. LTD. COCHIN 682 035 ERNAKULAM

NIDHIN JOSE
COMPANY SECRETARY

The Anandam Rubber Company Limited

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

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

(Pursuant to Securities Exchange Board of India, (Prohibition of Insider Trading) Regulations, 2015)

SCOPE

This code shall apply to all insiders and designated persons as defined in this code. The Insiders and designated persons are advised not to trade in the securities of the Company while in possession of Unpublished Price Sensitive Information. It is important for 'Insiders' and designated persons to read and understand the Regulations completely to acquaint themselves with the obligations set out therein.

1. DEFINITIONS

1.1 "**Act**" means the Securities and Exchange Board of India Act, 1992.

1.2 "**Board**" means the Board of Directors of the Company.

1.3 "**the Code**" or "**Code of Conduct**" shall mean the Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading by insiders of M/s The Anandam Rubber Company Limited, as amended from time to time.

1.4 **"Company"** means M/ s The Anandam Rubber Company Limited.

1.5 "**Compliance Officer**" means the Company Secretary of the Company, who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and implementation of the code under overall the overall supervision of the Board.

1.6 **'Connected Person'** shall have the meaning given to it under Regulation 2(1) (d) of the SEBI(Prohibition of Insider Trading) Regulations, 2015.

1.7 "**Dealing in Securities**" means an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in the securities of the Company either as principal or agent.

1.8 **"Derivative"** " includes—

(i) a security derived from a debt instrument, share, loan, whether secured or unsecured, risk instrument or contract for differences or any other form of security;

(ii) a contract which derives its value from the prices, or index of prices, of underlying securities.

1.9 **"Designated Person"** means, Directors of the Company, Key Managerial Personnel, heads of divisions and such other persons identified and notified by the Compliance Officer on the basis of their role and function who would have access to Unpublished Price Sensitive Information, as per the provisions of the Regulations, from time to time

1.10 **"Director"** means and includes every Director on the Board of the Company.

1.11. **"Employee"** means every Employee of the Company, including the Directors in the employment of the Company.

1.12 **"Generally Available Information"** means information that is accessible to the public on a non-discriminatory basis. Information published on the website of company or stock exchange, would ordinarily be considered generally available.

1.13 **"Immediate Relative"** means Spouse of a person and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to Trading in securities.

1.14 **"Insider**" means any person who is:

i. a Connected Person; or

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

1.15 **"Key Managerial Personnel"** means a person as defined in Section 2 (51) of the Companies Act, 2013.

1.16 **"Trading Window Close Period"** means:

(a) the period commencing from the time of announcement of the Board of Directors meeting for consideration of all matters which are deemed to be 'Unpublished Price Sensitive Information' and ending 48 hours after the public announcement of the decision taken by the Board of Directors of the Company; or

(b) such other period as may be notified by the 'Compliance Officer' from time to time.

1.17 **"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.

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

1.19 **"Trading Day"** means a day on which the recognized stock exchanges are open for Trading.

1.20 **"Trading Plan"** shall mean a plan for trades to be executed in the future by persons who have perpetual access to the unpublished price sensitive information.

1.21 **"Trading Window"** shall mean the window available for Trading in the Securities of the Company.

1.22 **"Unpublished Price Sensitive Information(UPSI)"** means any information, relating to the Company or its Securities, directly or indirectly, that is not Generally Available which upon becoming Generally Available, is likely to materially affect the price of the Securities and shall, ordinarily include 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; and
(vi) Material events in accordance with the SEBI (Listing Obligation and Disclosure Requirement) Regulation, 2015.

2 TRADING BY INSIDERS – COMMUNICATION /EXEMPTIONS

2.1 COMMUNICATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION:

2.1.1 No Insider shall communicate, provide or allow access to 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.

2.1.2 No person shall procure from or cause the communication by any Insider of UPSI, relating to the Company or its Securities, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

2.1.3 The Insiders who are in possession of unpublished price sensitive information are required to handle such information with care and to deal with the information with them when transacting their business strictly on a need-to-know basis.

2.1.4 Need-to-Know
(i) "need to know" basis means that unpublished price sensitive information should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.
(ii) All non-public information directly received by any employee should immediately be reported to the Compliance officer.

2.1.5. Limited access to confidential information Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password, etc.

2.2 EXEMPTIONS TO COMMUNICATE THE UNPUBLISHED PRICE SENSITIVE INFORMATION:

UNPUBLISHED PRICE SENSITIVE INFORMATION may be communicated, provided, allowed access to or procured, in the following cases:

2.2.1 Open Offer as per the Takeover Regulations where the Board is of the informed opinion that such an offer is in the best interests of the Company.

2.2.2 Not an Open Offer as per the Takeover Regulations but where the Board is of the informed opinion that the proposed transaction is in the best interests of the Company. If the information that constitutes UNPUBLISHED PRICE SENSITIVE INFORMATION is disseminated to be made Generally Available at least 2 Trading Days prior to the proposed transaction being affected in such form as the Board may determine. However, the Board would cause public disclosures of such UNPUBLISHED PRICE SENSITIVE INFORMATION well before the proposed transaction to rule out any information asymmetry in the market.

2.3 For the purpose of the aforementioned exemptions, the parties shall keep information so received confidential, and shall not otherwise trade in securities of the Company when in possession of UNPUBLISHED PRICE SENSITIVE INFORMATION.

3 COMPLIANCE OFFICER

3.1 The Company has appointed the Company Secretary as the Compliance Officer who shall report to the Board and shall provide reports to the Chairman of the Audit Committee at such frequency as may be stipulated by the Board if any events of insider trading occurs.

The Compliance Officer shall report on insider trading to the Board and, in particular, will submit a report to the Chairman of Audit Committee, instances of violation of the Code or the Regulations by any person and on the disclosures, Trading Plans and pre- clearances approved and rejected on the basis of information furnished at a frequency as may be stipulated by the Board if any events of disclosures, Trading Plans and pre- clearances submitted by the insiders.

CONTENTS OF THE REPORT

The Report shall contain all relevant details including, without prejudice to the generality thereof:
i. Instances of violation of the Code or the Regulations by any person;
ii. Disclosures;
iii. Trading Plans; and
iv. Pre-clearances approved and rejected.

3.2 The Compliance Officer shall, prior to approving any trade, be entitled to seek declaration to the effect that the applicant for pre-clearance is not in possession of any UNPUBLISHED PRICE SENSITIVE INFORMATION.

3.3 TRADING PLAN FOR PREVENTION OF MISUSE OF UNPUBLISHED PRICE SENSITIVE INFORMATION:

3.3.1 An insider shall be entitled to formulate a Trading Plan and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.

3.3.2 Trading shall be commenced only after 6 months from the public disclosure of the Trading Plan. Trading Plan shall 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. Trading Plan shall entail Trading for a period of not less than 12 months.

3.3.3 The Compliance Officer shall review the Trading Plan to assess whether the plan would have any potential for violation of the Regulations.

3.3.4 The Compliance Officer shall have the right to seek express undertakings to enable assessment of the Trading Plan and approve the same.

3.3.5 The Trading Plan once approved shall be irrevocable and the Insider shall mandatorily implement without any deviation.

3.3.6 The Securities outside the scope of Trading Plan shall not be dealt with by the Insiders.

3.3.7 The implementation of the Trading Plan shall not be commenced if any UNPUBLISHED PRICE SENSITIVE INFORMATION in possession of the Insider at the time of formulation of the plan has not become Generally Available at the time of the commencement of implementation. In such event, the Compliance Officer shall confirm that the commencement ought to be deferred until such UNPUBLISHED PRICE SENSITIVE INFORMATION becomes Generally Available Information.

3.3.8 The Trading Plan shall not overlap any period for which another Trading Plan is already in execution.

3.3.9 The Trading Plan shall state the following:

- Value of trade / number of securities;
- Nature of trade;
- Intervals / dates of effecting such trades

3.3.10 The Trading Plan shall not entail Trading in Securities for market abuse.

3.4 DISCLOSURE OF TRADING PLAN:

3.4.1 Upon approval of the Trading Plan, the Compliance Officer shall notify the Trading Plan to the Stock Exchanges.

3.5 PRE- CLEARANCE OF TRADE:

APPLICABILITY:

3.5.1 The Designated Persons who intend to trade in the Security (ies) of the Company, when the 'Trading Window' is not closed, exceeding Rs.10 lakh in market value terms, whether in one transaction or a series of transactions over any calendar quarter, shall make prior application in the prescribed Form **(Form 1.1)**, with the necessary declarations and undertakings, to the Compliance Officer for Pre-clearance of Trade.

It is hereby clarified that the value of Securities traded will include the aggregate of purchases as well as sale of Securities of the Company.

3.5.3 The Compliance Officer shall have the authority to ask for further information, if deemed necessary and it shall be obligatory for the Designated Person to immediately furnish the information sought for by the Compliance Officer.

3.5.4 No such person shall apply for pre-clearance of any proposed trade, as aforesaid, if such person is in possession of Unpublished Price Sensitive Information even if the Trading Window is not closed.

3.5.5 The Compliance Officer (and in his absence the person nominated by the Managing Director of the Company) shall grant approval or reject the application within 2 Trading Days of receipt of the application for pre-clearance in the prescribed Form **(Form 1.2). if the compliance officer does not respond within 2 days trading days, it shall be deemed to be a rejection of the application.**

3.5.6 Such persons shall execute the trade for which preclearance has been obtained within 7 Trading Days of such approval. The details of the executed trade shall be communicated to the Compliance Officer in the prescribed form **(Form 1.3)**, within 2 Trading Days thereof.

3.5.7 In case, the person is unable to execute the trade within 7 Trading Days after the approval, the person should report, his decision not to trade, to the Compliance Officer in the prescribed form **(Form 1.4)** and seek fresh approval as mentioned under clause (a), if required.

3.5.8 Pre-clearance, if any, required by the Compliance Officer, shall be obtained from the Chairman or Managing Director or Manager or Chief Executive Officer of the Company and the above provisions shall apply accordingly.

3.5.9 The Designated Person shall communicate to the Compliance Officer the details of the Trading in Securities of the Company in the prescribed form **(Form 1.3)**, within two Trading Days thereof.

3.5.10 ***The Pre-clearance granted would, however, become void with immediate prospective effect if a Trading Window Close Period is notified during the validity of the pre-clearance***

3.6 MINIMUM HOLDING PERIOD

3.6.1 Designated Person who trade in the Securities of the Company, shall not enter into a contra transaction during the next six months following the prior execution of trade i.e. if the Designated Persons and their Immediate Relatives buy any Securities they should not sell any Securities for the next 6 months and vice versa. However, the minimum holding period is not applicable for shares acquired under ESOP.

This restriction is also not applicable for participating in buy-back offers, open offers, rights issues, FPOs, bonus, preferential issue and private placement of the Securities of the Company.

3.6.2 The Designated Persons shall make an application to sell the Securities acquired, other than those acquired under ESOP, in the prescribed form **(Form 1.5),** to the Compliance Officer for granting relaxation of the minimum holding period of six months by providing proper justification for seeking such relaxation. The compliance officer shall give relaxation only with consultation of Managing Director.

The restriction of minimum holding period of six months shall not apply to participating in buy-back offers, open offers, rights issues, FPOs, bonus, preferential issue and private placement, of the Securities of the Company,

3.6.3 The Compliance Officer (in his absence the person nominated by the Managing Director) shall grant approval or reject the application within two Trading Days of receipt of the application for granting relaxation of minimum holding period in the prescribed Form **(Form 1.6).**

3.6.4 In case the relaxation of the minimum holding period of six months is sought by the Compliance Officer, application shall be made to the Chairman or Managing Director or Manager or Chief Executive Officer.

4 TRADING OF SECURITIES OF THE COMPANY

4.1 TRADING WHILE IN POSSESSION OF UNPUBLISHED PRICE SENSITIVE INFORMATION:

4.1.1 No Insider shall trade in Securities of the Company when in possession of unpublished price sensitive information, provided that the Insider may prove his/her innocence by demonstrating the circumstances including the following:

4.1.1.1 The transaction is an off-market inter-se transfer between Promoters who were in possession of the same unpublished price sensitive information without being in breach of restrictions imposed on communication and Trading by Insiders and both parties had made a conscious and informed trade decision.

4.1.1.2 In 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 the 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.

4.1.1.3 The trades were pursuant to a Trading Plan set up in accordance with the Regulations/Code.

4.1.2 In the case of Connected Persons the onus of establishing, that they were not in possession of unpublished price sensitive information, shall be on such Connected Persons and in other cases, the onus would be on SEBI.

4.1.3 SEBI may specify such standards and requirements, from time to time, as it may deem necessary for the purpose of the Regulations.

5. TRADING WINDOW CLOSE PERIOD

5.1 The Compliance Officer shall determine "Trading Window Close Period' and shall notify the same to the Designated Persons in relation to such Securities of the Company, as may be decided by the Compliance Officer.

5.2 The timing for re-opening the Trading Window shall be determined by the Compliance Officer taking into account various factors including 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 48 hours after the information becomes Generally Available.

5.3 The notice for 'Trading Window Close Period' shall be notified by the Compliance Officer to the Designated Person through email and for other Insiders including persons having contractual or fiduciary relation with the Company in the company website and Stock Exchange website.

5.4 All Designated Persons of the Company shall conduct all their Dealings in Securities only during the Trading Period and shall not deal in any transaction involving the purchase or sale of Securities during the Non – Trading Period, as referred above or during any other period as may be specified by the Company from time to time.

6 DISCLOSURES OF TRADING BY INSIDERS

6.1 Disclosures to be submitted to the Compliance Officer are as detailed below:

a. An initial disclosure of the total number of Securities of the Company held by the Promoters, Directors and the Key Managerial Personal, in the prescribed form **(Form A)**, within 30 days from May 15, 2015.

b. An initial disclosure of the total number of Securities of the Company held by the Promoters, Directors and the Key Managerial Personal, in the prescribed form **(Form B)**, within 7 days of becoming a Promoters, Directors and the Key Managerial Personal.

6.2 **CONTINUAL DISCLOSURE:**

Every Promoter, Employee and Director of the Company shall disclose to the Company;

The number of such Securities acquired or disposed of within 2 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 Rs. 10,00,000 or such other value as may be prescribed in **Form- C.**

Company shall notify the particulars of such Trading (mentioned in Clause 6.2 above) to the Stock Exchanges within 2 Trading Days of receipt of the disclosure or from becoming aware of such information.

It is hereby clarified that the value of Securities traded will include the aggregate of purchases as well as sale of Securities of the Company, including Securities allotted under ESOPs and arising out of participation in buy-back offers, open offers, rights issues, FPOs, bonus, Preferential Allotment and Private Placement of the Company.

6.3 The Designated Person shall communicate to the Compliance Officer the details of the Trading in Securities of the Company in the prescribed form **(Form 1.3)**, within two Trading Days thereof.

6.4 Half-yearly disclosure, in the prescribed form, by Key Managerial Personnel, Directors, Designated Person shall furnishing details of trades executed in the Securities, if any, during the half-year by them within 30 days of the end of each half-year i.e September 30 and March 31, in the prescribed form (**Form 1.7)**.

No disclosures need to be submitted, if there are no trades during the half-year.

6.5 Annual disclosure, in the prescribed form **(Form 1.8)**, by Designated Persons shall furnishing the total number of Securities held by them at the end of the financial year of the Company, within 30 days from the end of financial year.

This annual disclosure is mandatory and should be submitted even if no Security is held by the Designated Persons.

7 PENALTIES FOR CONTRAVENTION OF THE CODE

7.1 Any person who violates this Code shall be deemed to be in violation of the Company's Integrity policy, the penalty for which shall be decided as per the discretion of the Managing

Director of the company in consultation with compliance officer after discussion with the Audit Committee and whether the violation was intentional or unintentional.

7.2 For a transaction involving the Managing Director of the Company, the Chairman of the Audit Committee shall decide the penalty and whether the violation was intentional or unintentional.

7.3 Where necessary, the Company shall inform the SEBI and any other applicable regulatory authority for any instances of violation of this Code or the Regulations which comes to the Company's knowledge. In addition to the action taken by the Company, the designated persons who violated the provisions of this Code shall provide any information required by and comply with any order passed by SEBI or other regulatory authorities under any other applicable laws/rules/regulations.

10. INTERPRETATION OR CLARIFICATION

In case any difficulty or doubt arises in the interpretation of the Code, the matter shall be referred to Compliance officer and Managing Director, and their decision shall be final and binding. If the issue involves any act or matter involving the Managing Director, the Chairman of the Audit Committee shall decide upon such issue.

11. ENQUIRIES

For any questions regarding whether they possess or have access to Unpublished Price Sensitive Information, Insiders and Designated Persons may contact the Compliance Officer.

12. DISCLAIMER

The Code is the internal policy of the Company to prevent Insiders and Designated Persons who are considered by the Company to be insiders of the Company for the purposes of the Regulations, from Trading. It is however the responsibility of each of them to ensure compliance with the provisions of the Regulations and other related laws. The Company and the Compliance Officer shall not be responsible or liable for any violation or contravention by any Insiders or Designated Person, of the SEBI (Prohibition of Insider Trading) Regulations, 2015 or other related laws.

9 AMENDMENTS

The Board reserves its right to amend or modify the Code in whole or in part, at any time without assigning any reason whatsoever.

10 CONCLUSIONS

All Designated Persons are advised to familiarize themselves with the SEBI Regulations and comply with the same, as well as with the Code; both in letter and in spirit. Designated Persons are also advised to ensure compliance by their Immediate Relatives. For any assistance or clarifications, kindly contact the Compliance Officer of the Company at secretarial@anandamrubberco.com.

SR. NO._____ **FORM 1.1** Date: _____

APPLICATION FOR PRE-CLEARANCE

To
The Compliance Officer
The Anandam Rubber Company Limited

From: Name _____
Designation _____

Dear Sir,

I, _____, as a Key Managerial Person / Director / Designated Person, seek approval as per details given below:

Securities Held				**Trade Proposed**		
Name	**Relationship**	**Type of Security**	**Nos.**	**Type (Acquisition/ Disposal)**	**Nos.**	**Mode (Market/ Others)**

Undertaking to be submitted along with the application for preclearance of trade:

In relation to the above dealing, I represent and undertake that:

a) I have no access to nor do I have any information that could be construed as "Unpublished Price Sensitive Information" up to the time of signing this undertaking;
b) In the event that I have access to or received any information that could be construed as "Unpublished Price Sensitive Information" after signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public;
c) I have not contravened any provisions of the Code;
d) I have made full and true disclosure in the matter;
e) The information given above is true and correct

Yours faithfully,

Signature:_____

Name:_____

FORM 1.2

APPROVAL FOR PRE-CLEARANCE APPLICATION

To
Name: _____

Dear Sir/Madam,

Sub: Approval for pre-clearance to trade

Ref: Your application No.____ dated _____

This has reference to your above mentioned application. Your proposal to trade as below is hereby approved:

Securities Held				**Trade Proposed**		
Name	**Relationship**	**Type of Security**	**Nos.**	**Type (Acquisition/ Disposal)**	**Nos.**	**Mode (Market/ Others)**

The above approval is valid for 7 Days from today.

You are advised to ensure that the trade executed by you is in full compliance with the Code to Regulate, Monitor and Report Trading by Insiders (Code) as also SEBI (Prohibition of Insider Trading) Regulations, 2015.

Please ensure that:

(i) after the trade is executed, report the same to the Compliance Officer, by filling Form 1.3 within two Trading Days from the date of execution of the trade;

(ii) If the trade is not executed for any reason, report the same to the Compliance Officer, by filling Form 1.4, within two Trading Days from the date of expiry of this approval.

For The Anandam Rubber Company Limited

Compliance Officer
Date:

FORM 1.3

DISCLOSURE OF TRADE EXECUTED

To
The Compliance Officer
The Anandam Rubber Company Limited

Ref: Preclearance No.____

I give below the details of trade:

Name & Relationship	Type of Security (Shares/ Debentures)	Mode of acquisition/ disposal [on market/ ESOP/ Others (specify)*]	If Market, mention Exchange through which traded	No of Security	Date of Allotment Advice	Date(s) of Trading		Value (Rs.)	Date of Intimation to the Company
						From	To		

*public/rights/preferential offer/ off market/ transfer within accounts, etc.

Signature:_____

Name:_____

Date:

FORM 1.4

To,

The Compliance Officer
The Anandam Rubber Limited

Dear Sir,

I refer to the approval for pre-clearance obtained on _____ vide application no._____. In this regard, I have decided not to sell / buy the shares of the Company for the following reasons:

[or]

[*In case of part transactions]*

I give below the particulars of trading done for the part quantity in Form 1.3 and I have not traded for the balance quantity for the following reasons:

Yours faithfully,

Signature:_____

Name : _____

Date:

FORM 1.5

APPLICATION FOR WAIVER OF MINIMUM HOLDING PERIOD AND RESTRICTION ON TRADE

Date: _____

To

The Compliance Officer
The Anandam Rubber Limited

Sub: Application for waiver of minimum holding period and / or restriction on Trade

I, _____, as a Key Managerial Person / Director / Designated Person, seek approval for executing a sale transaction of the below securities, which if executed, result in non-compliance of Clause 3.6 of the Code to Regulate, Monitor and Report Trading by Insiders:

Securities Held			**Trade Proposed**		
[Self or Immediate Relative (IR), if IR mention Name and relationship]	**Type (Shares, Warrants, Convertible Securities, etc.**	**Nos.**	**Type (Acquisition/ Disposal)**	**Nos.**	**Mode (Market/ Others)**

I have to execute the trade [*give reasons - such as these equity shares have been allotted by the Company under ESOS which are funded by* _____.]

I hereby declare that:

(i) I am not presently in possession of Unpublished price Sensitive Information;

(ii) In the event if I get access to any Unpublished Price Sensitive Information before the validity of this approval and before executing trade for which approval is given, I undertake that I shall not execute the trade until such Unpublished Price Sensitive Information in my possession becomes generally available

Yours faithfully,
Signature_____

FORM 1.6

WAIVER OF MINIMUM HOLDING PERIOD AND RESTRICTION ON TRADE

To
Name: _____
Designation:_____

Dear Sir/Madam,

Sub: Approval for waiver of minimum holding period and / or restriction on trade
Ref: Your application No.____ dated _____

This has reference to your application number cited under reference on the above. We hereby approve your application to trade as below:

Securities Held			**Trade Proposed**		
[Self or Immediate Relative (IR), if IR mention Name and relationship]	**Type (Shares, Warrants, Convertible Securities, etc.**	**Nos.**	**Type (Acquisition/ Disposal)**	**Nos.**	**Mode (Market/ Others)**

The above approval is valid for 7 Trading Days from today.

You are advised to ensure that the trade executed by you complies with the Code to Regulate, Monitor and Report Trading by Insiders (Code) except the waiver given by this communication as also SEBI (Prohibition of Insider Trading) Regulations, 2015.

Please ensure that:

(i) after the trade is executed, report the same to the Compliance Officer, by filling Form 1.3 within two Trading Days from the date of execution of sale;
(ii) If the trade is not executed for any reason, report the same to the Compliance Officer, by filling Form 1.4, within two Trading Days from the date of expiry of this approval.

For The Anandam Rubber Limited

Compliance Officer

FORM A

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (1) (a) read with Regulation 6 (2) – Initial disclosure to the company]

Name of the company: The Anandam Rubber Company Limited

ISIN of the company: INE618N01014

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

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

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

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

Open Interest of the Future contracts held as on the date of regulation coming into force			Open Interest of the Option Contracts held as on the date of regulation coming into force		
Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms

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

Name & Signature:

Designation:

Date:

FORM B

SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015

[Regulation 7 (1) (a) read with Regulation 6 (2) – Disclosure on becoming a director/KMP/Promoter]

Name of the company: The Anandam Rubber Company Limited

ISIN of the company: INE618N01014

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

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

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

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

Open Interest of the Future contracts held as on the date of regulation coming into force			Open Interest of the Option Contracts held as on the date of regulation coming into force		
Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms

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

Name & Signature:

Designation:

Date:

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

Name of the company: _____
ISIN of the Company: _____

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

Name, PAN, CIN/ DIN & address with contact nos.	Category of person (Promoters/ KMP/ Directors/ immediate relative to/ others, etc.)	Securities held prior to acquisition/ disposal		Securities acquired / Disposed				Securities held post acquisition / disposal		Date of allotment advice/ acquisition of shares / sale of shares specify		Date of intimation to company	Mode of acquisition/ disposal (on market/ public/ rights/ preferential offer/ off market/ Inter-se transfer, ESOPs, etc.)
		Type of security (For eg. – Shares, Warrants, Convertible Debentures, etc.)	No. and % of shareholding	Type of security (for e.g.- Shares, Warrants, Convertible Debentures, etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge/ Revoke/ Invoke)	Type of security (For eg. – Shares, Warrants, Convertible Debentures, etc.)	No. and % of shareholding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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

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

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

Form 1.7

HALF-YEARLY DISCLOSURE

DISCLOSURE OF SECURITIES HELD BY THE KEY MANAGERIAL PERSONNEL, DIRECTORS AND DESIGNATED PERSONS

Name of Employee:

Category: KMP / Director / Designated Person

Name(Category of person)	Type of Security (Share / Debenture)	Securities			
		Held at the beginning of the half year	Acquired	Disposed	Held at the end of the half year

Signature:

Date:

Form 1.8

ANNUAL DISCLOSURE

DISCLOSURE OF SECURITIES HELD BY THE KEY MANAGERIAL PERSONNEL, DIRECTORS AND DESIGNATED PERSON

Name of Employee:

Category: KMP / Director / Designated Person

Name & Category of person	Type of Security (Share / Debenture)	Securities			
		Held at the beginning of the year	Acquired	Disposed	Held at The end of The year

Signature:
Date:

The Anandam Rubber Company Limited

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

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

[Sub-regulation (1) of Regulation 8, of Securities Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015]

PURPOSE:

The Board of Directors of every company, whose securities are listed on a stock exchange, shall formulate and publish on its official website, a Code of practices and procedures for fair disclosure ("the Code") of unpublished price sensitive information that it would follow in order to adhere to each of the principles as stated in Schedule A of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("the Regulations").

The Board of Directors of The Anandam Rubber Company Limited("the Company") is expected to manage the affairs of the Company in a fair, transparent and ethical manner keeping in view the needs and interests of all the stakeholders and to further the objective of good corporate governance.

The Board of Directors of the Company resolves to adopt the Code in furtherance of the long time commitment of the Company to transparency and fairness in dealing with all stakeholders and in consonance with the mandate of the Regulations.

PREAMBLE:

The Board of Directors of the Company has formulated and adopted the Code for the Company in compliance with Chapter IV read with Schedule A of the Regulations. The Code is also published on the official website of the Company www.anandamrubberco.com.

CODE OF FAIR DISCLOSURE OF THE COMPANY

1. The Company shall promptly disclose to the public all the Unpublished Price Sensitive Information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.

2. The Company shall follow uniform and universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure.

3. The Board of Directors of the Company designated Company Secretary of the company as the Chief Compliance Officer and Chief Investor Relations Officer of the Company to deal with dissemination of information and disclosure of Unpublished Price Sensitive Information.

4. In the event of any Unpublished Price Sensitive Information getting disclosed selectively either inadvertently or otherwise, the Company shall ensure prompt dissemination of Unpublished Price Sensitive Information as generally available, by publishing the same on Company's website www.anandamrubberco.com.

5. The Company shall ensure appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.

6. The Company shall ensure that information shared with analysts and research personnel is not Unpublished Price Sensitive Information.

7. The Company shall develop best practices to make transcripts or record of proceedings of meetings with analysts and conference calls with investors/analysts on the official website of the Company to ensure official confirmation and documentation of disclosures made.

8. The Company shall handle all Unpublished Price Sensitive Information on a need-to-know basis.

   "Need-to-know" basis means that Unpublished Price Sensitive Information should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.

9. Powers of the Board of Directors

   The Board of Directors reserves the right to amend or modify the Code in whole or in part, at any time without assigning any reason whatsoever and to establish further rules and procedures, from time to time, to give effect to the intent of the Code.

   The decision of the Board of Directors of the Company with regard to any or all matters relating to the Code shall be final and binding on all concerned.

10. Disclosure of the Code on Public Domain

    The Code shall be published on the official website of the Company.

    Any amendment(s) to the Code, duly approved by the Board of Directors of the Company, shall be promptly intimated to the Stock Exchanges and shall also be updated on the official website of the Company.

    Subsequent modification (s) / amendment (s) to the Regulations shall automatically apply to the Code.