यूनियन बैंक ऑफ इंडिया Union Bank of India

भारत सरकार का उपक्रम A Government of India Undertaking

आन्ध्रा Andhra Corporation

Ref: ISD/20-21/315

March 31, 2021

The Deputy General Manager, Corporate Relationships Dept. **BSE Ltd.** Phiroze Jeejeebhoy Towers, Dalal Street, Mumbai-400 001. Scrip Code 532 477	The Deputy General Manager, Listing Dept. **National Stock Exchange of India Ltd.** Exchange Plaza, Plot No. C/1, G Block Bandra-Kurla Complex, Bandra (E), Mumbai-400 051. Scrip Symbol/Series-UNIONBANK-EQ

Madam/Sir,

Subject: **Code of Conduct for Fair Disclosure of Unpublished Price Sensitive Information and Code of Conduct for Prohibition of Trading by Insiders**

Pursuant to Regulation 8(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended, we are submitting herewith Bank's Code of Conduct for Fair Disclosure of Unpublished Price Sensitive Information (UPSI) 2021-22 and Code of Conduct for Prohibition of Trading by Insiders 2021-22 approved by the Board.

These codes are applicable w.e.f. 01.04.2021.

The said codes are also uploaded on Bank's website.

This is for your information and appropriate dissemination.

Thanking you.

Yours faithfully,

Mangesh Mandrekar

(Mangesh Mandrekar)
Company Secretary



CODE OF CONDUCT FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI) 2021-22

निवेशक सेवायें प्रभाग, बोर्ड सचिवालय
Investor Services Division,Board Secretariat
239, Vidhan Bhavan Marg, Nariman Point, Mumbai – 400 021.

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CODE OF CONDUCT FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI) 2021-22

1. Preface

Securities and Exchange Board of India (SEBI) vide Gazette notification no. LAD-NRO/GN/2014-15/21/85 dated 15th January 2015 had issued **Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.** As per the said guidelines, 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shall formulate and publish on its official website, a code of practices and procedures for fair disclosure of unpublished price sensitive information.

The Board of Directors (the **"Board"**) of Union Bank of India (the **"Bank"**) has adopted this Code of practices and procedures for fair disclosure of unpublished price sensitive information(the **"Code"**). The Audit Committee of the Board (the **"ACB"**) is empowered to review and amend this Code from time to time.

2. Objective

The Code was framed as per the requirements of the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended.

3. Definition

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

3.2 **"Connected person"** means -

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

(ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established -

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

3.3 **"Designated Persons"** The following class of persons will be treated as Designated Persons for the purpose of the Code:

(i) Promoters of the Bank

(ii) All the Directors of the Bank and its material subsidiary

(iii) **Employees based on functional role and access to UPSI** - All the officers (Scale I and above) of following verticals -

a) Finance and Accounts
b) Strategy
c) Management Information System (MIS)
d) Treasury
e) Risk Management
f) Compliance
g) Stressed Asset Management
h) Audit and Inspection
i) Board Secretariat
j) MD & CEO's Secretariat
k) Executive Directors' Secretariat

l) Secretaries of all Chief General Managers (CGMs)/General Managers (GMs) posted at Central Office of the Bank
m) Employees posted at Department of Information Technology (DIT), identified by the General Manager (DIT) on quarterly basis based on their access to unpublished price sensitive information.

(iv) **Employees upto two levels below Board of Directors** of the Bank and its material subsidiary irrespective of their functional role in the Bank or ability to have access to unpublished price sensitive information.

The employees referred above in sub-clause (iii) and (iv) are hereinafter referred to as "Designated Employees**" for the purpose of the Code.*

3.4 **Generally available information"** means information that is accessible to the public on a non-discriminatory basis.

3.5 **"Immediate relative"** means any of the following who is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities-

a) Spouse
b) Father
c) Mother
d) Brother
e) Sister
f) Son (including step-son)
g) Daughter (including step-daughter)

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

i) a connected person; or

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

Note: It may be clarified here that anyone in possession of or having access to unpublished price sensitive information should be considered an "insider" regardless of how one came in possession of or had access to such information. Various circumstances are provided for such a person to demonstrate that he has not indulged in insider trading. Therefore, this definition is intended to bring within its reach any person who is in receipt of or has access to unpublished price sensitive information. The onus of showing that a certain person was in possession of or had access to unpublished price sensitive information at the time of trading would, therefore, be on the person leveling the charge after which the person who has traded when in possession of or having access to unpublished price sensitive

information may demonstrate that he was not in such possession or that he has not traded or he could not access or that his trading when in possession of such information was squarely covered by the exonerating circumstances.

3.7 **"Unpublished Price Sensitive Information (UPSI)"** means any information, relating to Bank or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following:

(i) Financial results;
(ii) Dividends;
(iii) Change in capital structure;
(iv) Mergers, de-mergers, acquisition, delistings, disposals and expansion of business and such other transactions;
(v) Changes in Key Managerial Personnel;

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

4. Code

4.1 Preservation of Unpublished Price Sensitive Information (UPSI):

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

4.1.2 Department Heads shall identify all the UPSI available in their departments and shall ensure its confidentiality as per the requirement of this code.

4.1.3 Adequate restrictions shall be placed by the Department Head on communication or procurement of UPSI.

4.1.4 No UPSI shall be shared with Analysts and Research personnel.

4.2 Limited access to Confidential Information:

4.2.1 All files containing confidential information shall be kept secured under lock and key.

4.2.2 Confidential documents/files shall be marked **"Confidential"** and access to such documents/files shall be made available on need to know basis.

4.2.3 Confidential Computer files shall have adequate security of login and Passwords.

4.2.4 Documents/Files containing confidential information should be deleted/ destroyed after its use. Shredders should be used wherever necessary for the destruction of physical files.

4.2.5 Chinese Wall Procedure and process as detailed hereinafter shall be followed by departments dealing with confidential information.

4.3 **Prohibition on Unlawfully Procuring Possession of UPSI:**

No person shall procure from or cause the communication by any insider of unpublished price sensitive information, 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.

4.4 **Chief Investor Relations Officer (CIRO):**

Chief Financial Officer (**CFO**) shall be designated as Chief Investor Relations Officer (the **"CIRO"**). The CIRO shall deal with uniform and universal dissemination of information and disclosure of unpublished price sensitive information.

4.5 **Need to know:**

'Unpublished Price Sensitive Information' shall be handled on a 'need to know' basis. Such information should be disclosed only to those within the Bank 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.

All non-public information directly received by any Employee should be reported to the head of his/her department/Compliance Officer immediately.

4.6 **Dissemination of Unpublished Price Sensitive Information:**

4.6.1 Unpublished price sensitive information may be communicated, provided, or allowed access to any employee other than the designated employee or to third parties if such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

4.6.2 The Bank shall adopt a Chinese wall procedure to prevent the misuse of confidential information, which separates those areas of the Bank which routinely have access to confidential information.

4.6.3 Department Heads to satisfy that UPSI is shared only for legitimate purposes among the authorised employees on need to know basis.

4.6.4 The Department of Information Technology (DIT) to create a platform for maintaining database containing the names of such persons or entities as the case may be with whom Unpublished Price Sensitive Information is shared under this Code along with the Permanent Account Number (PAN) or any other identifier authorized by law where PAN is not available. Such databases shall have adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.

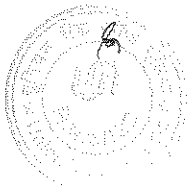
4.6.5 Prior approval from CIRO shall be obtained by all the Departments before sharing any Unpublished Price Sensitive Information with any person or entity. CIRO shall after approving sharing of such information, send the details viz. names of such persons or entities along with the PAN or any other identifier authorized by law where Permanent Account Number is not available to Investor Services Division, Board Secretariat for updating the database.

4.6.6 Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

4.6.7 Appropriate and fair response of queries on news reports and requests for verification of market rumors by regulatory authorities by Compliance Officer as per information provided by the Department Heads whose departments such information pertains to.

4.6.8 Transcripts or records of proceedings of meeting with analysts and other investor relations conferences may be made available on the official website to ensure official confirmation and documentation of disclosures made.

4.6.9 An unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction that would:-



a. entail an obligation to make an open offer under the takeover regulations where the Board of Directors of the Bank is of informed opinion that sharing of such information is in the best interests of the Bank;

b. not attract the obligation to make an open offer under the takeover regulations but where the Board of Directors of the Bank is of informed opinion that sharing of such information is in the best interests of the Bank and the information that constitute unpublished price sensitive information is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the Board of Directors may determine to be adequate and fair to cover all relevant and material facts;

c. for purposes of para 4.6.2 , the parties shall be required to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the purpose of para 4.6.1 and shall not otherwise trade in securities of the Bank when in possession of unpublished price sensitive information.

5. Determination of Legitimate Purpose

5.1 **Meaning of Legitimate Purpose:** The term legitimate purpose 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 prohibition of this Code.

5.2 **Recipient of UPSI pursuant to legitimate purpose to be deemed Insider:** Any person in receipt of unpublished price sensitive information pursuant to a legitimate purpose shall be considered as an "insider" for purposes of this Code and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with this Code by the person sharing such information.

5.3 **Illustrations of legitimate purpose:** In following cases which are illustrative in nature, sharing of UPSI would be considered as legitimate purpose:

5.3.1 **Statutory or Government Requirement:** For investigation, inquiry or request for information by statutory or governmental authorities or any other administrative body recognized by law; Example: Any call for

information or query received from Central Government, Reserve Bank of India, Securities and Exchange Board of India, Stock Exchanges etc.

5.3.2 **Legal Requirement:** As part of compliance with applicable laws, regulations, rules and requirements or under any proceedings or pursuant to any order of courts or tribunals; Example: Court of Law, National Company Law Tribunal, National Company Law Appellate Tribunal, Quasi-judicial authority, Other Appellate Tribunals, Arbitration Proceedings, etc.

5.3.3 **Contractual Requirement:** Arising out of any contractual obligations or arrangement entered by the Bank set forth in any contract, agreement, arrangement, settlement, understanding or undertaking. Example: Due-diligence for any kind of restructuring, namely mergers & acquisitions, joint venture agreements, share purchase agreements, franchisee agreement, etc.

5.3.4 **Auditing Purpose:** For audit by statutory, internal, concurrent, secretarial or management auditors as per the scope of audit.

6. Disclosures

Code of Conduct for Fair Disclosure of UPSI and every amendment thereto shall be promptly intimated to the stock exchanges where Bank's securities are listed and Code shall be published on Bank's official website.

References:

- SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended
- SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015



CODE OF CONDUCT
FOR PROHIBITION OF TRADING BY INSIDERS 2021-22

निवेशक सेवायें प्रभाग, बोर्ड सचिवालय
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CODE OF CONDUCT FOR PROHIBITION OF TRADING BY INSIDERS 2021-22

1. Preface

Securities and Exchange Board of India (SEBI) vide Gazette notification no. LAD-NRO/GN/2014-15/21/85 dated 15th January 2015 has issued Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("**PIT Regulations**"). The same has been amended from time to time. Last such amendment was made vide SEBI (Prohibition of Insider Trading) (Second Amendment) Regulations, 2020.

As per the PIT Regulations, the Board of Directors of listed intermediaries& fiduciaries which includes listed Banks shall formulate a code of conduct to regulate, monitor and report trading by its designated persons and immediate relatives of designated persons with respect to trading in Bank's securities and trading in securities of other companies for which Bank is acting as Intermediary or Fiduciary.

The Board of Directors (the "**Board**") of Union Bank of India (the "**Bank**") has adopted this **Code of Conduct for Prohibition of Trading by Insiders** (the "**Code**") to comply with the above requirements. The Audit Committee of the Board (the "**ACB**") is empowered to review and amend this Code from time to time.

2. Objective

This Code is framed as per the requirements of the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended to regulate, monitor and report trading by insiders.

3. Applicability

The Code shall be applicable to Designated Persons and immediate relatives of designated persons as described in the Code or as may be specified by the Board of Directors in consultation with the Compliance Officer.

4. Definition

In the Code, unless the context otherwise requires, the following words, expressions and derivations there from shall have the meanings assigned to them as under:-

4.1 "Act" means the Securities and Exchange Board of India Act, 1992;

4.2 **"Bank"** means Union Bank of India;

4.3 **"Connected person"** means-

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

(ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established -

a) an immediate relative of connected persons specified in clause (i); or

b) a holding company or associate company or subsidiary company; or

c) an intermediary as specified in section 12 of the Act or an employee or director thereof; or

d) an investment company, trustee company, asset management company or an employee or director thereof; or

e) an official of a stock exchange or of clearing house or corporation; or

f) a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or

g) a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or

h) an official or an employee of a self-regulatory organization recognised or authorized by the Board; or

i) a banker of the Bank; or

j) a concern, firm, trust, Hindu undivided family, Bank or association of persons wherein a director of the Bank or his immediate relative, has more than ten percent of the holding or interest;

4.4 **"Contra Trade"** means a trade or transaction which involves buying or selling any number of shares of the Bank and within 6 months trading or transacting an opposite transaction involving sell or buy following the earlier transaction.

4.5 **"Designated Persons"** The following class of persons will be treated as Designated Persons for the purpose of the Code:

(i) Promoters of the Bank

(ii) All the Directors of the Bank and its material subsidiary

(iii) **Employees based on functional role and access to UPSI** - All the officers (Scale I and above) of following verticals -

a) Finance and Accounts
b) Strategy
c) Management Information System (MIS)
d) Treasury
e) Risk Management
f) Compliance
g) Stressed Asset Management
h) Audit and Inspection
i) Board Secretariat
j) MD & CEO's Secretariat
k) Executive Directors' Secretariat
l) Secretaries of all Chief General Managers (CGMs)/General Managers (GMs) posted at Central Office of the Bank
m) Employees posted at Department of Information Technology (DIT), identified by the Chief/General Manager (DIT) on quarterly basis based on their access to unpublished price sensitive information.

(iv) **Employees upto two levels below Board of Directors** of the Bank and its material subsidiary irrespective of their functional role in the Bank or ability to have access to unpublished price sensitive information.

The employees referred above in sub-clause (iii) and (iv) are hereinafter referred to as "Designated Employees**" for the purpose of the Code.*

4.6 **"Fiduciaries"** includes professional firms such as auditors, accountancy firms, law firms, analysts, insolvency professional entities, consultants, banks etc., assisting or advising the Bank.

4.7 **"Generally available information"** means information that is accessible to the public on a non-discriminatory basis;

4.8 **"Immediate relative"** means any of the following who is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities-

a) Spouse
b) Father
c) Mother
d) Brother
e) Sister
f) Son (including step-son)
g) Daughter (including step-daughter)

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

i) a connected person; or
ii) in possession of or having access to unpublished price sensitive information;

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

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

4.12 **"Proposed to be listed"** shall include securities of an unlisted company:

(i) if such unlisted company has filed offer documents or other documents, as the case may be, with the Board, stock exchange(s) or registrar of companies in connection with the listing; or
(ii) 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.

4.13 **"Regulation"** means the "Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015".

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

4.15 **"Trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly. Further, it also include trading in derivatives of securities;

4.16 **"Trading day"** means a day on which the recognized stock exchanges are open for trading;

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

(i) Financial results;
(ii) Dividends (both interim and final);
(iii) Change in capital structure;
(iv) Mergers, de-mergers, acquisition, delistings, disposals and expansion of business and such other transactions;
(v) Changes in key managerial personnel;

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

5. Compliance Officer

Company Secretary of the Bank shall be designated as the **Compliance Officer** under this Code who shall report to the Board of Directors of the Bank.

6. Duties of Compliance Officer

6.1 The Compliance Officer shall maintain a record of the designated employees and changes, if any, from time to time.

6.2 The Compliance Officer shall be responsible for setting forth policies, procedures, monitoring and adherence to the rules for the preservation of "Unpublished Price Sensitive Information", pre-clearance of trades of designated employees and their dependents (directly or through respective department heads as decided by the Bank), monitoring of trades and the implementation of the Code of Conduct under the overall supervision of the Board of Directors of the Bank.

6.3 The Compliance Officer may in consultation with the Officer designated as Chief Investor Relations Officer (CIRO) under the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information and Managing Director& CEO or Executive Director(s), specify prohibited period from time to time and immediately make an announcement thereof to all concerned.

6.4 The Compliance Officer shall maintain a record of Prohibited Period specified from time to time.

6.5 The Compliance Officer shall maintain records of all the declarations submitted in the appropriate form given by the Directors and Designated Employees for a minimum period of three years.

6.6 The Compliance Officer shall assist all the Designated Employees in addressing any clarification regarding the Regulations and the Bank's Code.

6.7 The Compliance Officer shall report on quarterly basis on compliance of the Code to the Audit Committee.

6.8 The Compliance Officer shall confidentially maintain a list of such securities as a "restricted list" which shall be used as the basis for approving or rejecting applications for pre clearance of trades.

6.9 The Compliance Officer shall put in place adequate and effective system of internal controls to ensure compliance with the requirements of SEBI (PIT) Regulations to prevent insider trading.

7. Trading Restrictions

Trading Window is the period during which the purchase or sale of transactions is allowed by the Designated Persons and their immediate relatives subject to their satisfying the conditions laid down by the Code.

The period prior to declaration of price sensitive information is particularly sensitive for transactions in the Bank's securities. This sensitivity is due to the fact that the Designated Persons will, during that period, often possess unpublished price sensitive information. During such sensitive times, the Designated Persons and their immediate relatives will have to forego the opportunity of trading in the Bank's securities.

The Designated Persons and their immediate relatives shall not deal in the securities of the Bank when the trading window is closed.

The Compliance Officer shall decide the period during which Trading Window shall be closed. Generally, the closure of Trading Window for securities of the Bank shall be announced when any of the following events occurs -

a) Declaration of Financial results (quarterly, half-yearly and annual)**
b) Declaration of dividends (interim and final)
c) Issue of securities by way of public/rights/bonus, etc.

d) Any major expansion plans or execution of new projects
e) Amalgamation, mergers, takeovers and buy-back
f) Disposal of whole or substantially whole of the undertaking
g) Any changes in policies, plans or operations of the Bank

**Trading window shall be closed from the end of every quarter till 48 hours after the declaration of financial results.

The timing for re-opening of the trading window shall be determined by the compliance officer taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, which in any event shall not be earlier than forty-eight hours after the information becomes generally available.

The trading window shall also be applicable to any person having contractual or fiduciary relation with the Bank, such as auditors, accountancy firms, law firms, analysts, consultants etc. assisting or advising the Bank. These insiders who are in possession of UPSI shall not trade even when trading window is not closed

In case any director or employee has to be allotted securities in terms of ESOP/ESPS of the Bank, there shall be no restriction on allotment of securities even during the Trading Window closure period. However, the employee shall not be permitted to dispose off the securities during the Trading Window closure period.

8. Trading when in possession of unpublished price sensitive information

No insider shall trade in securities that are listed or proposed to be listed on a stock exchange when in possession of unpublished price sensitive information. 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.

Exemptions: 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 Code of Conduct for Fair Disclosure of UPSI and both the parties had made a conscious and informed trade decision.

Provided that the off-market trades shall be reported by the insiders to the Compliance Officer within two working days. Further, the Bank shall notify the particulars of such trades to the stock exchanges within two trading days from receipt of 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 Code of Conduct for Fair Disclosure of UPSI and both parties had made a conscious and informed trade decision.

(iii) The transaction in question was carried out pursuant to a statutory or regulatory obligation to carry out a bona fide transaction.

(iv) The transaction in question was undertaken pursuant to the exercise of stock options in respect of which the exercise price was pre-determined in compliance with applicable regulations.

(v) 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;

(vi) The trades were pursuant to a trading plan set up in accordance with para 9 of this Code.

9. Trading Plans

9.1 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.

9.2 Such trading plan shall:-

a. not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;

b. 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;

c. entail trading for a period of not less than twelve months;

d. not entail overlap of any period for which another trading plan is already in existence;

e. set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and

f. not entail trading in securities for market abuse.

9.3 The compliance officer shall review the trading plan to assess whether the plan would have any potential for violation of these regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.

9.4 The trading plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.

Provided that 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 and 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 so as to avoid a violation.

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

10. Pre-Clearance of Trades for dealing in securities

10.1. Designated Person can deal in the securities of the Bank only when the trading window is open and Designated Person is not in the possession of any unpublished price sensitive information.

10.2. If the traded value of securities of the Bank is less than or equal to Rs. 10,00,000 (Rupees Ten Lakhs) in a calendar quarter no pre clearance is required. However, **if the traded value of securities is likely to be more than Rs. 10,00,000 (Rupees Ten Lakhs) in a calendar quarter then pre-clearance from the Compliance Officer is required.**

10.3. Pre-clearance of trades shall not be required for a trade executed as per an approved trading plan.

10.4. Designated Person has to apply for pre-clearance of trades to Compliance Officer in the **Form 1** and has to provide an undertaking to the effect that the applicant for pre-clearance is not in possession of any unpublished price sensitive information in **Form 2.**

10.5. The Compliance Officer may grant the pre-clearance in **Form 3** after -

a) seeking such information as may be necessary from the applicant;
b) confirming the accuracy of declaration submitted by applicant that he is not in the possession of unpublished price sensitive information;
c) confirming that the applicant has not done any prior contra trade within the period of six months;
d) confirming that the securities for which pre-clearance has been sought is not covered under the restricted list;

The pre-clearance shall be valid for a period of seven trading days and within which trades that have been pre-cleared have to be executed by the designated person, failing which fresh pre-clearance would be needed for the trades to be executed.

10.6. Designated Person shall inform the Compliance Officer in **Form 4** of execution of trade for which pre-clearance was sought within 2 trading days from the execution of trade.

10.7. In case the Designated Person decides not to execute the trade after securing pre-clearance, he/she shall inform the Compliance Officer of such decision alongwith reasons thereof immediately in **Form 4.**

10.8. **Prohibition on Contra Trade within six months:** A Designated Person who is permitted to trade (buy or sell) shall not execute a contra trade (sell or buy) any number of securities for the next six months following the prior transaction unless permission in this regard has been obtained from Compliance Officer in **Form 5**.This restriction is not applicable for trades carried out in accordance with the approved trading plan.

10.9. The Compliance Officer may grant relaxation to a contra trade for reasons recorded in writing provided that such relaxation does not violate the Code or Regulations, on receipt of application from Designated Person. The said relaxation order shall be issued in **Form 6.**

10.10. In case a contra trade is executed within 6 months inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the SEBI for credit to the Investor Protection and

Education Fund administered by the SEBI under the Act. This provision shall not be applicable for trades pursuant to exercise of employee stock option.

11. Disclosures of Trading by Insiders

11.1 Initial Disclosures

Every person on appointment as a **Director or Key Managerial Personnel** of the Bank or upon becoming a Promoter or member of the Promoter group shall disclose their as well as their immediate relatives' holding of securities of the Bank as on the date of appointment, to the Bank **within seven days** of such appointment in **Form 7**.

11.2 Continual Disclosures

a) **To Bank** - Every Promoter, member of the Promoter group, Director and Designated person of the Bank shall disclose to the Bank the number of such securities acquired or disposed of **within two trading days** of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of **Rs.10,00,000 (Rupees Ten Lakhs) in Form 8**;

b) **To Stock Exchanges** - Compliance Officer shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure from the insider in Form 8 or from becoming aware of such information.

Note: The disclosure of the incremental transactions after any aforesaid disclosure shall be made when the transactions effected after the prior disclosure cross the threshold limit of Rs.10,00,000 (Rupees Ten Lakhs).

11.3 Disclosures by other connected persons

Compliance Officer may at his discretion require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the Bank in **Form 9** and at such frequency as may be determined by the Compliance Officer in order to monitor compliance with these regulations.

12. Disclosures by Directors & Designated Employees

12.1 Disclosure of Name & PAN etc. by Designated Employees

All designated persons shall be required to submit Names and Permanent Account Number (PAN) or any other identifier authorized by law (such as Aadhaar, Voter ID,

Passport etc.) of the following to the Bank on an annual basis and as and when the information changes:

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

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

Explanation - the term "material financial relationship" shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding twelve months, equivalent to at least 25% of such payer's annual income but shall exclude relationships in which the payment is based on arm's length transactions.

All designated employees shall submit the above disclosure in 'Union Parivar' on an Annual basis.

12.2 **Disclosure of holding of Bank's Securities by Directors and Designated Employees**

All the Directors and Designated Employees are required to submit Disclosure of holding of Bank's Securities in their name and in name of their immediate relatives in **Form 10** for every quarter within 30 days from the end of quarter.

All designated employees shall submit the Disclosure of Shares in 'Union Parivar' on quarterly basis.

13. Other Internal Controls to prevent Insider Trading

13.1 The Compliance Officer is authorised to identify any employee who have access to unpublished price sensitive information as designated employee even if he is not covered under the definition of designated employee under the Code and all the provisions of the Code shall be applicable to such employee.

13.2 All the unpublished price sensitive information shall be identified by the Department Heads and its confidentiality shall be maintained as per the requirements of the Code.

13.3 Adequate restrictions shall be placed on communication or procurement of unpublished price sensitive information as required by these regulations.

13.4 Lists of all employees and other persons with whom unpublished price sensitive information is shared shall be maintained and confidentiality agreements shall be signed or notice shall be served to all such employees and persons.

13.5 All other relevant requirements specified under these regulations shall be complied with.

13.6 Periodic process review to evaluate effectiveness of such internal controls.

14. Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons in securities of other companies for which Bank is acting as Intermediary or Fiduciary

14.1 **Need-to-know:** All information obtained from the customers of the Bank as an intermediary or in banker-customer relationship shall be handled within the Bank on a need-to-know basis and no unpublished price sensitive information of the customers shall be communicated to any person except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

14.2 **Restriction on Trading:** Designated person and their immediate relatives shall not trade in securities of a Company (listed or proposed to be listed on a stock exchange) when in possession of unpublished price sensitive information related to that Company. 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.

14.3 **List of Restricted Securities:**

14.5.1 All Credit verticals shall prepare a list of companies *(listed or in process of listing with a recognised stock exchange)* which are customers of the Bank and from whom Bank has received or may receive any unpublished price sensitive information during its dealing with the said Company. For e.g. Bank obtains unpublished price information (financial projections, orders in hand, details of new business line, sales achievements, unaudited financial results etc.) for sanctioning of a loan proposal of listed companies.

14.5.2 Credit Verticals shall update the said list on regular basis and forward the same to Compliance Officer.

14.5.3 The Compliance Officer shall confidentially maintain list of securities of such Companies as a "restricted list" which shall be used as the basis for approving or rejecting applications for pre-clearance of trades.

14.4 **Pre-Clearance of the Trade:** Designated persons may execute trades subject to compliance with this Code. Trading by designated persons shall be subject to pre-clearance by the Compliance Officer, if the value of the proposed trades in securities of any listed entity is more than **Rs. 10,00,000 (Rupees Ten Lakhs)** in a calendar quarter.

14.5 Designated person has to apply for pre-clearance of trades as per Para 10.3 to 10.6 of this Code.

14.6 Provisions of para 10.5 to 10.6 shall be applicable for such pre-clearance mutais-mutandis.

15. Awareness among employees

Investor Services Division, Board Secretariat with consultation with Human Resource Department shall develop mechanism to make employees aware of the duties and responsibilities attached to the receipt of Insider Information and the liability that attaches to misuse or unwarranted use of such information.

16. Online submission of Forms

Department of Information Technology (DIT) in consultation with Human Resource Department and Compliance Officer shall evolve mechanism to enable Designated Employees to submit the forms required under this Code online in Union Parivar or any other software package as DIT may deem fit.

All designated employees shall submit the forms available in Union Parivar through online mode only and no physical forms will be accepted in such cases.

17. Penalty and punishment for contravention of code of conduct:

Any Designated Person and any other person considered as an Insider who deals in securities or communicates any price sensitive information, in violation / contravention of the Code may be penalized by the Bank. The Bank may take appropriate disciplinary action including wage freeze, suspension, ineligibility for future participation in employee stock option plans, promotion process, imposition of penalty etc.

Such a person shall also be subject to any action that may be taken by SEBI for violation of the Code.

18. Inquiry in case of leak/suspected leak of UPSI:

A Committee of three General Managers shall be formed with approval of MD & CEO to inquiry in case of leak of unpublished price sensitive information or suspected leak of unpublished

price sensitive information. Such Committee shall accordingly initiate appropriate inquiries on becoming aware of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information and inform the SEBI promptly of such leaks, inquiries and results of such inquiries.

If an inquiry has been initiated by the Bank in case of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information, the relevant intermediaries and fiduciaries shall be requested to co-operate with the Bank in connection with such inquiry conducted by listed company.

19. Whistle Blower Policy

The Bank shall have a whistle-blower policy and make employees aware of such policy to enable employees to report instances of leak of unpublished price sensitive information.

20. Information to the Audit Committee of the Board

The Audit Committee the Board shall review compliance with the provisions of PIT regulations &this Code of Conduct at least once in a financial year and shall verify that the systems for internal control are adequate and are operating effectively.

21. Information to SEBI in case of non compliance

The Bank/Compliance Officer shall inform SEBI of all violations of Regulations observed by them.

22. Disclosures

22.1 This code and any amendments thereto shall be made available on the website of the Bank.

22.2 The Compliance Officer shall make all required disclosures to stock exchanges within the stipulated time as required in this Code.

References:

1. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

2. SEBI Circular dated 09.02.2021 on Revised Disclosure Formats under SEBI (Prohibition of Insider Trading)Regulations, 2015

3. SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015



FORM - 1
APPLICATION FOR PRE-CLEARANCE OF TRADE IN BANK'S SECURITIES
(If the traded value of securities is more than Rs. 10 lakhs)

Date: .....

To,

The Compliance Officer,
Union Bank of India

Dear Sir/Madam,

Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Code of Conduct for Prohibition of Trading by Insiders of the Bank, I seek your approval to subscribe to/ purchase / sale / deal as an agent / principal in securities of the Bank in my name or on behalf of my immediate relatives as per the details given below:

Name of Director / Designated Employee	
PF No. (in case of Designated Employees)	
Department	
Name of Relative & Relationship (if transaction on behalf of immediate relatives)	Name: _____ Relation: _____

Nature of Transaction *(Buy / Sell / Subscribe)*	
Type of Security	
No. of Securities	
Market Price	
Name of the Proposed Buyer/Seller *(for off-market trade)*	
Date by which trade is proposed to be executed	
Folio No./DP ID & Client ID No. along with the name of Depository	
Present Holding (No. of Securities)	

I enclose herewith the Declaration in Form-2 duly signed by me. I request you to kindly pre-clear the above transaction.

Yours faithfully,

(Signature)

For Office Use only

Form received on:

Verified on:

Verified by: Signature of Verifying Officer

Approved / Declined

Compliance Officer

Form - 2
UNDERTAKING TO BE SUBMITTED ALONG WITH APPLICATION FOR PRE-CLEARANCE

Date: .....

To,

The Compliance Officer,
Union Bank of India

Dear Sir/Madam,

I, _____ a Director / Designated Employee of the Bank in relation to my application dated _____ for pre-clearance of the trade hereby declare & undertake that:

a. I have no access to nor I am in possession of any unpublished price sensitive information at the time of signing this undertaking.

b. In the event that I have In case, I get access to or receive any "Price Sensitive Information" after signing this undertaking but before the execution of the transaction for which approval is sought, I shall inform the Compliance Officer of the same in writing and shall completely refrain from trading in securities of the Bank until such information is made public.

c. I have not contravened the Bank's Code of Conduct for Prohibition of Trading by Insiders and Code for Fair Disclosure of Unpublished Price Sensitive Information.

d. In case the traded value exceeds Rs. 10 lakh or any such other value as may be specified, disclosures required under the Code of Conduct for Prohibition of Trading by Insiders will be immediately furnished by me.

e. I hereby agree to indemnify and keep the Bank and its Board indemnified from and against all and any penalties/fines that may be imposed on them by the SEBI and/or any other Statutory Authorities as a result of violation by me of the Regulation of the Codes prescribed by the Bank.

f. I hereby declare that I shall execute my order in respect of the securities for which pre-clearance is sought within one week after the approval is given. If the order is not executed within one week after the approval, I undertake to obtain fresh pre-clearance.

g. I have not done any prior contra trade within the period of six months and shall not execute a contra trade for a period of 6 months from the date of current transaction.

h. I have made full and true disclosure in the above matter.

_____
(Signature)

Name of Designated Employee:_____

PF No:_____ Department:_____

Form - 3
PRE-CLEARANCE ORDER

Ref No.: Date: .....

To,

_____
_____
_____
_____

Dear Madam/Sir,

Ref: Your application dated _____ for pre-clearance of transaction for shares/securities of the Bank in your name / in the name of _____.

With reference to your application seeking pre-clearance of your transaction in shares of the Bank, we hereby accord our approval to the proposed transaction.

You may kindly note that pursuant to said Code of Conduct, the aforesaid transaction shall be executed within one week from the date of receipt of this approval letter, failing which, an application seeking pre-clearance to the proposed transaction together with undertaking in the prescribed format, shall be made afresh.

As stipulated in the Code of Conduct, you shall not execute a contra trade for a period of 6 months from the date of current transaction i.e. the securities purchased shall be held for a minimum period of six months from the date of acquisition and securities sold shall not be repurchased within a minimum period of six months from the date of sale.

Thanking you,

Yours faithfully,

For Union Bank of India

Compliance Officer

Form - 4

CONFIRMATION OF EXECUTION OF TRADE

INFORMATION REGARDING DECISION NOT TO EXECUTE THE DEAL

From:

Name of Director/Designated Employee	
PF No.	
PAN No.	
Department	
Location	

To,

The Compliance Officer,
Union Bank of India

Dear Sir/Madam,

I hereby confirm that the execution of trade for which approval was granted on _____ was completed on _____. Details of the transactions are given in Form-8 attached with this letter.

OR

I like to inform you that due to the reasons mentioned here below, I will not be executing the trade for which pre-clearance was granted vide order no. _____ dated _____ -

_____

_____

_____

(Strike out whichever is not applicable)

Place:

Date: (Signature)

Encl.: Duly filled in and signed Form - 8

For Office Use only

Form received on:

Verified on:

Compliance Officer:

FORM - 5
APPLICATION FOR SEEKING PERMISSION FOR CONTRA TRADE WITHIN 6 MONTHS

From:

Name of Director/Designated Employee	
PF No.	
PAN No.	
Department	

To,

The Compliance Officer,
Union Bank of India

Dear Sir/Madam,

Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Code of Conduct for Prohibition of Trading by Insiders of the Bank, approval to trade in _____ (Nature of Bank's Securities) was given to me/my immediate relative _____ (Name of Relative) vide your order no. _____ dated _____.

I desire to deal in the said shares on account of _____ (give reasons) and request you to allow me to execute a contra trade of _____ (Nature & Number of securities).

Thanking you,

(Name of the Applicant)

For Office Use only

Form received on:

Verified on:

Compliance Officer:

Form - 6

APPROVAL FOR EXECUTING CONTRA TRADE WITHIN 6 MONTHS

Ref No.: **Date:** .....

To,

_____

_____

_____

_____

Dear Madam/Sir,

Ref: Your application dated _____ for seeking permission for contra trade

With reference to your application seeking approval for execution of contra trade within 6 months of transaction for which pre-clearance was given, we hereby accord our approval to the contra trade considering the reason mentioned by you as a special case.

You may kindly note that the aforesaid transaction shall be executed within one week from the date of receipt of this approval letter, failing which, an application seeking approval for contra trade shall be made afresh.

Thanking you,

Yours faithfully,

For Union Bank of India

Compliance Officer

FORM - 7

DISCLOSURE OF HOLDING OF SECURITIES OF BANK ON APPOINTMENT

(As on the date of appointment to be submitted within seven days of appointment)

To,
The Compliance Officer,
Union Bank of India

Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Code of Conduct for Prohibition of Trading by Insiders of the Bank, I am here below submitting the Initial Disclosure of my as well as my immediate relatives' holdings of Bank's securities:

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/member of the Promoter group/ KMP / Directors/ immediate relative to/ others etc.)	Date of appointment of Director /KMP OR Date of becoming Promoter/ member of Promoter group	Securities held at the time of becoming Promoter or member of Promoter group/ appointment of Director/KMP		% of Share-holding	Open Interest of the Future contracts held at the time of becoming Promoter/member of Promoter group/appointment of Director/KMP			Open Interest of the Option Contracts held at the time of becoming Promoter/member of Promoter group/ appointment of Director/KMP		
			Type of security (For eg. -Shares, Warrants, Convertible Debentures, Rights entitlements etc.)	No.		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

Add more rows if necessary.

Place:

Date:

(Signature)

Name: _____

Please submit the following additional details in case of employees:

Designation: _____

PF No.: _____

Department:

_____

FORM - 8

CONTINUAL DISCLOSURE OF HOLDING OF SECURITIES OF BANK BY DESIGNATED PERSONS

(Regulation 7(2) read with Regulation 6(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015)

Disclosure to be submitted with two trading days from the date of transaction or the date when aggregate transaction (purchase and sales) exceeds Rs. 10.00 lakhs in a quarter)

Name of the Company: Union Bank of India

ISIN of the Company: INE692A01016

Details of change in holding of Securities of Promoter, member of Promoter group, designated person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ member of promoter group /designated person/ Directors/immediate relatives/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 Bank	Mode of acquisition / disposal (on market /public/ rights/ preferential offer / off market/ Inter-se transfer, ESOPs etc.)	Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
														Type of contract	Contract Specification	Buy		Sell		
		Type of security (For eg. - Shares, Warrant, Convertible Debentures, Rights Entitlements etc.)	No. & % of shareholding	Type of security (For eg. - Shares, Warrants Conve-rtible Debentures, Rights entitleet c.)	No.	Value	Transaction Type (Buy/Sale/Pledge/Revoke/Invoke) Others - Please specify	Type of security (For eg. - Shares, Warrants, Convertible Debentures, Rights entitlements etc.)	No. & % of shareholding	From	To					Notional Value	No. of units (contracts * lot size)	Notional Value	No. of units (contracts * lot size)	

Place:

Date: (Signature)

Name of Director/Designated Employee: _____

Please submit the following additional details in case of employees:

Designation: _____ PF No.: _____ Department: _____

FORM - 9
CONTINUAL DISCLOSURE OF HOLDING OF SECURITIES OF BANK BY CONNECTED PERSONS

Name of the Company: Union Bank of India
ISIN of the Company: INE692A01016

Name, PAN No., CIN/DIN & address of connected persons, as identified by the Bank with contact nos.	Connection with company	Securities held prior to acquisition/ disposal		Securities acquired/ Disposed				Securities held post acquisition/ disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to Bank	Mode of acquisition / disposal (on market /public/ rights/ preferential offer / off market/ Inter-se transfer, ESOPs etc.)	Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
		Type of security (For eg. - Shares, Warrants, Convertible Debentures, Rights Entitlement etc.)	No. & % of share holding	Type of security (For eg. - Shares, Warrants Conve-rtible Debenture, Rights Entitlementetc.)	No.	Value	Transa-ction Type (Buy/Sale/Pledge/Revoke/Invoke)	Type of security (For eg.- Shares, Warrants, Convertible Debentures, Rights Entitlement etc.)	No. & % of shareholding	From	To			Type of contract	Contract Specification	Buy		Sell		
																Notional Value	No. of units (contracts * lot size)	Notional Value	No. of units (contracts * lot size)	

Add more rows if necessary.
Note: In case of options, notional value shall be calculated based on premium plus strike price of options

Place:
Date:

(Signature)

Form - 10

STATEMENT OF DISCLOSURE OF SHARES HELD IN THE BANK

(To be submitted for every quarter within 30 days from the quarter end)

Name of Director/Designated Employee	
PF No.	
PAN No.	
Department	
Location	
For the Quarter ended (Please tick whichever is applicable)	March / June / September / December
Year	

Details of securities held by me:

Folio No./ DP ID Client ID	No. of securities held

Details of securities held by Immediate Relative(s):

Particulars		Particulars of Shareholding	
Name of Relative	Relation	Folio No./ DP ID Client I.D.	No. of shares held

Add more rows if necessary.

Place:
Date:

(Signature)

For Office Use only

Form received on:

Verified on:

Compliance Officer: