ABHISHEK CORPORATION

www.abhishekcorporation.com

November 04, 2015

**Bombay Stock Exchange Limited**
**Floor I, Rotunda Building, Dalal Street, Mumbai 01**

**Kind Attn: Department of Corporate Services**

**BSE Code: 532831**
**FAX No. 022-22723121**

**National Stock Exchange of India Limited**
**"Exchange Plaza", Bandra –Kurla Complex, Bandra (East),Mumbai 400051**

**Kind Attn: Listing Department**

**NSE Code: ABHISHEK**
**FAX No. 022-26598120**

Dear Sir/Madam,

**Sub: Code of Conduct and Fair Disclosure** under SEBI (Prohibition of Insider Trading) Regulation, 2015.

With reference to SEBI (Prohibition of Insider Trading) Regulation, 2015 please find attached herewith the **Code of Conduct and Fair Disclosure** containing practices and procedures for fair disclosure of unpublished price sensitive information and regulating, monitoring and reporting of trading by insiders adopted by the Company. The same shall also be published on the website of the Company.

Kindly take the same on your record and acknowledge the receipt.

Thanking you,

**For Abhishek Corporation Limited**

**Authorised Signatory**

ABHISHEK CORPORATION LTD. KOLHAPUR

Abhishek Corporation Limited
Regd Office : Gat no 148, Tamgaon, Kolhapur-Hupri Road. Tal. Karveer, Kolhapur - 416 234, INDIA Ph.:+91-231-2676191, Fax: +91-231-2676194
City Office : 'Shiv-parvati', 17'E' Nagala Park, Kolhapur - 416 003, INDIA
Ph.:+91-231-2651364 Email : admin@abhishekcorporation.com
CIN : L51491PN1993PLC073706

MOHITE GROUP

ABHISHEK CORPORATION

www.abhishekcorporation.com

# Code of Conduct and Fair Disclosure

## under SEBI (Prohibition of Insider Trading) Regulation, 2015.

## OF

# Abhishek Corporation Limited

ABHISHEK CORPORATION LTD. KOLHAPUR

Abhishek Corporation Limited
Regd Office : Gat no 148, Tamgaon, Kolhapur-Hupri Road, Tal. Karveer,
Kolhapur - 416 234, INDIA Ph.:+91-231-2676191, Fax: +91-231-2676194
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# CODE OF CONDUCT AND FAIR DISCLOSURE

## INTRODUCTION

The Securities and Exchange Board of India (SEBI), has formulated the SEBI (Prohibition of Insider Trading) Regulations, 2015 under the powers conferred on it under the SEBI Act, 1992. The regulations shall be applicable to all companies whose shares were listed on Indian Stock Exchanges. In order to comply with the mandatory requirement of the Regulations, it was necessary to formulate and adopt **Code of Conduct and Fair Disclosure.**

This **Code contains** practices and procedures for fair disclosure of unpublished price sensitive information and regulating, monitoring and reporting of trading by insiders to be adopted by the Company and seeks to ensure timely, fair and adequate disclosure of price sensitive information to the investor & to enable them to take informed investment decisions with regard to the Company's Securities.

## 1. DEFINITIONS

**"Act"** means the Securities and Exchange Board of India Act, 1992, as may be amended from time to time.

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

**"Code of Conduct and Fair Disclosure"** shall mean the Code of practices and procedures for fair disclosure of unpublished price sensitive information and regulating, monitoring and reporting of trading by insiders as amended from time to time.

**"Company"** means Abhishek Corporation Limited.

**"Compliance Officer"** has the meaning ascribed to it in Clause 3.

**"Connected Person"** means:

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



(ii) 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,

1. an immediate relative of connected persons specified in clause (i); or
2. a holding company or associate company or subsidiary company; or
3. an intermediary as specified in Section 12 of the Act or an employee or director thereof; or
4. an investment company, trustee company, asset management company or an employee or director thereof; or
5. an official of a stock exchange or of clearing house or corporation; or
6. 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
7. 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
8. an official or an employee of a self-regulatory organization recognised or authorized by the Board; or
9. a banker of the Company; or
10. a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of the Company or his immediate relative or banker of the Company, has more than ten per cent, of the holding or interest.

"**Dependent",** with respect to any person, means the parents, siblings, spouse, children, children of the spouse (whether minors or adults) of such person who are either financially dependents on such person or consult with such person while taking decisions relating to trading in securities.

**"Designated Employee(s) / Designated Persons shall include":**

(i) The Promoter/Founder of the Company or any person who is part of the promoter group of the Company
(ii) Members of the Board of Directors of the Company including, executive or non-executive or independent or nominee directors.
(iii) Chief Executive Officer
(iv) Chief Finance Officer
(v) Company Secretary
(vi) every employee in the grade of Assistant General Managers and above;
(vii) every employee in the finance, accounts, secretarial and legal department as may be determined and informed by the Compliance Officer; and
(viii) Any other employee designated by the Compliance Officer, either for a specific period of time or for an indefinite period of time, based on such person's role, function, designation seniority and professional capacity and the extent to which such person may have access to Unpublished Price Sensitive Information.



**"Director"** means a member of the Board of Directors of the Company.

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

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

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

**"Insider"** means any person who,
(i) a connected person; or
(ii) in possession of or having access to unpublished price sensitive information.

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

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

**"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;

**"Takeover regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;

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

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

**"Unpublished Price Sensitive Information"** means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following:
(i) Financial results;
(ii) Dividends;
(iii) Change in capital structure;
(iv) Mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;

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(v) Changes in key managerial personnel; and
(vi) Material events in accordance with the listing agreement

**"Regulations"** shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments there etc.

**"Specified Persons"** means the Directors, connected persons, the insiders, the Designated Employees and the promoters and immediate relatives are collectively referred to as Specified Persons.

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.

## 2. COMPLIANCE OFFICER

The Company Secretary or such other officer of the Company as may be designated by the Board of Directors as such shall be the Compliance Officer ("the Compliance Officer") for the purposes of the Regulations. The Compliance Officer shall report to the Board of Directors.

**"Role of Compliance Officer"**

(i) The Compliance Officer shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of "Price Sensitive Information, grant of pre-dealing approvals for directors'/officers'/ designated employees' and 'their dependents' dealing in the Company's monitoring of such dealings and the implementation of this Code under the overall supervision of the Board of Directors.

(ii) The Compliance Officer shall maintain a record of the Designated Employee and of any changes made in the list of Designated Employee.

(iii) The Compliance Officer shall maintain records of all declarations and disclosures received by him under the Code for a minimum period of 5 (five) years.

(iv) The compliance officer shall confidentially maintain a list of such securities as a restricted list **("Restricted List")** which shall be used as the basis for approving or rejecting applications for preclearance of trades.

(v) The Compliance Officer shall be responsible for disclosing to the stock exchange disclosures as required under the Regulations

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(vi) The Compliance Officer shall assist all the employees in addressing any clarifications regarding the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation, 1992 and this code.

(vii) The Compliance Officer shall also implement and oversee the Code of Corporate Disclosure Practices for Prevention of Insider Trading. (please refer Annexure 1).

## 3. RESPONSIBILITIES OF / DESIGNATED PERSONS AND CONNECTED PERSONS

**a.** Preservation of Price Sensitive Information

All Directors, Officers and Employee shall maintain strictly confidential all PSI in or coming in their possession or control. To this end, no Directors, Officers or Employee shall:

i pass on PSI to any person directly or indirectly by way of making a recommendation for the purchase or sale of Securities, or

ii disclose PSI to family members, business acquaintances, friends or any other individual, or

iii discuss PSI in public places where others might overhear, or

iv disclose PSI to any Employee who does not need to know the information to do his or her job, or

v recommend to anyone that they buy or sell the Company Securities while being in possession, control or knowledge of PSI, or

vi give others the perception that he/ she is trading on the basis of unpublished PSI.

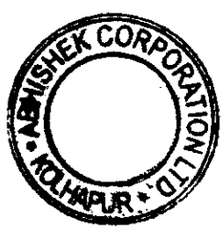
**b.** Need to Know

Unpublished PSI is to be handled on a "need to know" basis, i.e., Unpublished PSI should be disclosed only to those within the Company who need the same to discharge their duty and whose possession of PSI 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 immediately be reported to the head of the department.

**c.** Limited access to confidential information

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and pass word etc. without prejudice to the above.

**d.** Restrictions on opposite transactions (Contra Trade)



All Designated Persons who buy or sell any number of Securities of the Company shall not enter into an opposite transaction i.e. sell or buy any number of Securities during the next 6 (six) months following the prior transaction ("Contra Trade"). All Designated Persons shall also not take positions in derivative transactions in the Securities of the Company at any time.

- If a Designated Person intends to enter into a Contra Trade, such Contra Trade may be made only with prior approval of the Compliance Officer. The Compliance Officer while approving such exception shall record in writing the reasons for which such exception was granted and why such exception would not be in violation of the Code or the Regulations.
- In the event that a Contra Trade has been executed without prior approval of the Compliance Officer the profits from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

**e. Declaration required from all Promoters, KMPS and Directors**

- All Promoters, KMPS , Directors and Designated Employee(s) / Designated Persons of the Company shall by the 30th day of enforcement of the regulation shall declare to the Compliance Officer, his/her shareholding in the Company as on date of enforcement of this regulation .

- Any Promoters, KMPS and Directors upon being designated by the Compliance Officer as a Designated Person or joining the company as a Designated Person shall within 7 (seven) calendar days shall declare to the Compliance Officer, his/her shareholding in the Company and the shareholding of his/her Dependents

**f. No Insider and Designated Employee/ Designated Person shall-**

- either on his own behalf, or on behalf of any other person, Trade when in possession of any Unpublished Price Sensitive Information unless made in accordance with the Trading Plan;
- advise any person to Trade in the Securities while being in possession, control or knowledge of Unpublished Price Sensitive Information. For avoidance of any doubt it is clarified that "advice" shall mean to include recommendations, communications or counseling.

  Provided that for the purposes of the Code, Trading and advising any person to Trade shall be liable to comply with all the provisions of the Code as may be applicable to such dealings and advice.



Insider and Designated Employee/ Designated Person shall ensure that their respective wealth managers, portfolio managers or similar persons do not Trade in the Securities of the Company on behalf of any Insider, unless such Insider is permitted to trade in the Securities of the Company in accordance with this Code.

## 4. TRADING WINDOW

The Company shall specify a trading period, to be called "Trading Window", for dealing in the Securities of the Company.

Unless otherwise specified (please refer Annexure 2) by the Compliance Officer, the trading window shall be, inter alias, closed 2 days prior to :-

(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 / right / 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, and
(g) any changes in policies, plans or operation of the Company.

- The trading window shall remain closed during the time the PSI remain un-published.
- The trading window shall be opened **48** hours after the information referred to in above para is made public.

- All Directors, Officers and Designated Employee shall conduct all their dealing in the Securities of the Company only when the trading window is open and no Directors, Officers or Employee of the Company shall deal in the Securities of the Company during such period when the trading window is closed or during any other period as may be specified by the Compliance Officers from time to time.

- In case of ESOPs, exercise of option may be allowed in the period when the trading window is closed. However, sale of Securities allotted on exercise of ESOPs shall not be an allowed when trading window is closed. However, exercise of a "cashless" stock option shall not be allowed when the trading window is closed since this type of exercise requires a sale of the Company's Securities.

## 5. TRADING PLAN

a. All Designated Persons and Connected Persons shall be entitled to formulate a trading plan in accordance with Clause b **("Trading Plan").** The Trading Plan so formulated shall be presented to the Compliance Officer and for public disclosure and



such may Trade only in accordance with his Trading Plan.

b. The Trading Plan shall not entail commencement of trading on behalf of Designated Persons or Connected Person earlier than 6 (six) months from the public disclosure of the plan;

c. not entail trading of Securities 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 Company and the second Trading Day after the disclosure of such financial results;

d. entail trading for a period of not less than 12 (twelve) months;

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

f. 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 (which shall not exceed more than 1 (one) week) at, or dates on which such trades shall be effected; and

g. not entail trading in securities for market abuse.

The Compliance Officer shall review the Trading Plan to assess whether such plan would have any potential for violation of the Regulations and shall be entitled to seek such express undertaking as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.

The Trading Plan once approved shall be irrevocable and shall be mandatorily implemented and shall not be entitled to deviate from it or to execute any trade outside the scope of the Trading Plan.

## 6. PRE CLEARANCE OF DEALS IN SECURITIES.

1. Applicability

Every Directors, Officers and Designated Employee/ Designated Person who (or whose dependent) intends to Trade in the Securities in a calendar quarter (either in one transaction or in a series of transactions) of a consideration price exceeding Rs.

10,00,000 (Rupees Ten Lakhs) for the Securities should obtain a prior approval for the transactions as per the procedure described hereunder. This is a mandatory requirement even when the trading window is open.

2. Procedure

For the purpose of obtaining a pre-dealing approval, the concerned Directors/Officers/ Designated Employee/ Designated Person should make an application in the prescribed

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form (please refer Annexure 3) to the Compliance Officers. Such application should be complete and correct in all respects and should be accompanied by such undertakings, declarations, indemnity bonds and other documents / papers as may be prescribed by the Compliance Officers from time to time.

3. Approval

(a) The Compliance Officers shall consider the application made as above and shall approve it unless he is of the opinion that grant of such approval would result in a breach of the provisions of this code, or the regulations or the Companies Act, 2013.

(b) Every approval letter shall be in such format (please refer annexure 4) as may be prescribed by the company from time to time. Every approval shall be dated and shall be valid for a period of 7 calendar days from the date of its issue.

4. Completion Of Pre-Cleared Dealing

All Directors, Officers and Designated Employee/ Designated Person shall ensure that they complete execution of every pre-cleared deal in the Company's Securities as above within 7 calendar days from the date of the approval and file within 2 days of execution of deal, the details of such deal, with the Compliance Officers in the prescribed format (please refer Annexure 5)

If a deal is not executed within 7 calendar days as above, the Directors, Officers and Designated Employee must apply to the Compliance Officers for pre clearance of the transaction once again.

**7. DISCLOSURE REQUIREMENTS FOR TRANSACTIONS IN SECURITIES**

**Initial Disclosures.**

(a). Every promoter, key managerial personnel and director of the company shall disclose his holding of securities of the company as on the date of these regulations taking effect, to the company within thirty days of these regulations taking effect;

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

**Continual Disclosures.**

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

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(b). The company 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 or from becoming aware of such information.

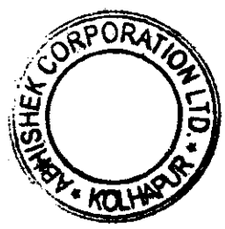
**8. Penalty for Contravention**

1. Every Directors, Officers and Employee is individually responsible for complying with the applicable provisions of this code (including to the extent the provisions hereof are applicable to his / her dependents).

2. Employees, Officers and Directors of the Company who violate this code shall, in addition to other any other action taken by the Company pursuant to law, also be subject to disciplinary action by the Company, which may include fine/ penalty, wage freeze, ineligibility for future participation in employee stock option plans, suspension termination, etc. Such disciplinary action by the Company shall not preclude SEBI from taking any action for violation of SEBI (Prohibition on Insider Trading), Regulations, 1992 or any other applicable laws / rules/ regulations.

**9. Enquiries**

For any questions regarding whether they have PSI, the Directors, Officers, and Employee may also contact the Compliance Officer of the Company.



ANNEXURE 1

## Code of Corporate Disclosure Practices for Prevention of Insider Trading

**Corporate Disclosure Policy** To ensure timely and adequate disclosure of price sensitive information, the following norms shall be followed by the company **Overseeing and co-ordinating disclosure.**

The Company has appointed the Compliance Officer to oversee corporate disclosure. The Compliance Officer shall be responsible for ensuring that the company complies with continuous disclosure requirements, overseeing and co- coordinating disclosure of price sensitive information to stock exchanges, shareholders etc. and educating staff on disclosure policies and procedure.

**Prompt disclosure of price sensitive information**

The Department heads shall send any Price Sensitive Information, which is proposed to be shared with the shareholders and media, to the Chairman/ Manager/ CEO for his advance approval. Where the disclosure of information is approved by the Chairman and Managing Director, a copy of the approval shall be forwarded to the Compliance Officer who shall further disseminate such price sensitive information to stock exchanges on a continuous and immediate basis. If information is accidentally disclosed without prior approval, the person responsible may inform the Compliance officer or the Chairman Manager/ CEO immediately, even if the information is not considered price sensitive.

**Responding to market rumors**

The Compliance Officer shall immediately consult the concerned Departmental head for verification of any market rumors or queries forwarded by the Stock Exchanges. The Compliance Officer or the concerned Departmental head shall reply to the queries or requests for verification of market rumors within 48 hours of receipt or such further period as may be allowed by the Stock Exchange. As and when necessary the Compliance Officer may in consultation with the Chairman and Managing Director make a public announcement for verifying or denying rumors before making the disclosure.

**Timely Reporting of shareholdings, ownership and changes in ownership:**

Disclosure of shareholdings, ownership by major shareholders and disclosure of changes in ownership as provided under any Regulations made under the SEBI Act and the listing agreement shall be made in a timely and adequate manner.

**Disclosure, dissemination of Price Sensitive Information with special reference to Analysts, Institutional Investors** The Company shall follow the guidelines given hereunder while dealing with analysts and institutional investors :-

**i.Only Public information to be provided**

The Company shall provide only public information to analysts, research persons, large investors like institutions. No Price Sensitive information shall be disclosed to analysts, research persons, large investors unless prior confirmation from the Compliance officer is received that the said price sensitive information has been made public. The information given to the analyst shall be simultaneously made public by issue of Press Release/ otherwise.

ii.**Recording of Discussion**

In order to avoid misquoting or misrepresentation, it is desirable that at least two company representatives be present at meetings with analysts, brokers or Institutional Investors and discussions should preferably be recorded.

iii. **Handling of Unanticipated Questions**

The Company's representatives shall be careful when dealing with analysts' questions that raise issues outside the intended scope of discussions. Unanticipated questions may be taken on notice and a considered response given later. If the answer includes price sensitive information, a public announcement should be made before responding.

**Medium of Disclosure/ Dissemination**

The Company shall ensure that disclosure/ dissemination of information is done promptly to the Stock Exchange. The Company may also facilitate disclosure through the use of internet website.



**ANNEXURE 2**

**DRAFT FOR INTIMATING CLOSURE OF TRADING WINDOW**

Subject: Urgent: Insider Trading- Restrictive period

Dear All Directors, Employees of Abhishek Corporation

Limited,

The Board meeting for approving _____shall be held in the _____week of

_____200 .

In view of this, as per the Company's Code of Conduct and Fair, I request all of you to refrain from trading in the Company's shares with immediate effect till the expiry of 48 hours after the public announcement of _____is made.

Any contravention of the above will be offence under the SEBI Act, 1992 Regulations and punishable under provisions same act and regulation made thereunder.

In case you have any doubts, please contact the Compliance Officer of the Company. Thanks for your co-operation in this regard,

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**ANNEXURE 3**

**APPLICATION FOR PRE - DEALING APPROVAL**

To
Mr. _____
Compliance Officer Abhishek Corporation Limited

Dear Sir/Madam,
**Subject: Application for Pre-Dealing Approval**

My personal details are as under:

| | |
|---|---|
| Name of the Employee | |
| Employee No. & Grade | |
| Department | |

I and my dependents propose to buy/sell equity shares of Ltd as under:

| Nature of Transaction (Whether "Buy" or "Sell") | Name of Proposed Buyer/Seller | No. of Equity Shares to be Bought/Sold | *Date of Purchase/ allotment |
|---|---|---|---|
| | | | |
| | | | |

* applicable if application is to sell ____Ltd shares

I hereby declare that neither me nor my dependents are in possession of or otherwise privy to unpublished Price Sensitive Information (as defined in the Company's Code of Conduct and Fair disclosure).

I further declare that I have disclosed all unpublished Price Sensitive Information in possession/ knowledge to the head of my department.

I am aware that I shall be liable to face penal consequences as set forth in the Company's Code of Conduct for prevention of Insider Trading, in case the above declarations are found to be false or incorrect at any time.

I hereby indemnify the Company and its Directors from and against any penalties imposed on them by the Securities and Exchange Board of India and/or any other statutory authorities as a result of violation of the SEBI (Prohibition of Insider Trading) Regulations 1992 and the Company's Code of Conduct and Fair disclosure.

Yours faithfully,

(Signature)

Date:

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**ANNEXURE 4**

## DEALING APPROVAL LETTER

Date: _____

To

Name: _____

Emp No. : _____

Designation: _____

Location:

**Subject: Pre-Dealing Approval – Abhishek Corporation Ltd's Shares**

With reference, to your application dated_____seeking approval for undertaking certain transactions in the equity shares of the Company, please be informed that you are hereby permitted to undertake the said transaction(s). You may buy/sell not more than_____equity shares of the Company pursuant to this approval letter.

This approval is being issued relying on the various declarations and indemnities made by you in your said application.

This approval letter is valid till _____(i.e. for 7 days) . If you don't execute the approved transaction /deal on or before this date you would have to seek fresh pre-dealing approval before executing any transaction/ deal. Further, you are required to file the details of the executed transactions in the attached format within 4 days from the date of transaction/deal.

Yours truly,

**For Abhishek Corporation Limited**

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**Compliance Officer**

## ANNEXURE 5

**FORMAT FOR DISCLOSURE OF PRE-APPROVED TRANSACTIONS**

(To be submitted within 2 days of transaction/deal)

To

_____

Compliance Officer
Abhishek Corporation Limited

Dear Sir/Madam,

Subject: Details of Pre-approved Transaction

Ref: Your Approval letter No. _____ dated

This is to inform you that I/my dependents have bought/sold _____ equity shares of the Company. Thus I/my dependents have duly completed the transaction(s) in the equity shares of the Company as approved by you vide your above said approval letter.

In this connection, I undertake to preserve for a period of 3 years and produce to the Compliance Officer/ SEBI any of the following documents:

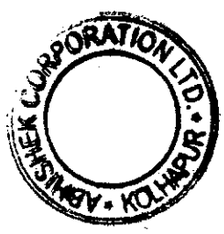
Broker's contract note

Proof of payment to/from brokers

Extract of bank passbook/statement (to be submitted in case of demat transactions)

I declare that the above information is correct and that no provisions of the Company's Code of Conduct for prevention of Insider Trading and/or applicable laws have been contravened in relation to conduct or completion of the above transaction(s).
Please contact me on _____in case you need further information/clarifications.
Yours truly,

Sign:
Name: __



**ANNEXURE 6**

**FORM FOR DISCLOSURE OF PARTICULARS BY DIRECTOR/ OFFICERS/ DESIGNATED EMPLOYEES**

To,

---

Compliance Officer
Abhishek Corporation Limited

| | |
|---|---|
| Name of The Employee | |
| Employee No. & Grade | |
| Department | |

**Declaration**

Pursuant to the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015, I declare that I have the following dependents:

| Sr. No. | Name of Dependent | Relationship with Director/ Officer/Designated Employee |
|---|---|---|
| 1. | | |
| 2. | | |
| 3. | | |
| 4. | | |
| 5. | | |

I further declare that I and my above mentioned dependents collectively hold shares of Abhishek Corporation Limited as follows:

| Name of Holder* | Physical Holdings | | | Electronic Holdings | | |
|---|---|---|---|---|---|---|
| | Folio No. | Cert. No. | Total holdings | DP ID | Client ID | Total holdings |
| | | | | | | |
| | | | | | | |
| | | | | | | |
| | | | | | | |

* Include holdings where Director/ Officer/ Designated Employee or dependent is a joint holder. I hereby undertake to promptly inform you about any changes in the above details.

Date:_ Sign:
Place: Name:

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