

**Banswara Syntex Limited**  
**Industrial Area, Dahod Road, Banswara-327001**

**Code of conduct to regulate, monitor and report trading by insiders – insider trading code.**

**1. Preliminary**

- 1.1 The Board of Directors of Banswara Syntex Limited (BSL) in dealing with securities of BSL has formulated the code of conduct to regulate, monitor and reporting trading by insiders hereinafter called as **Insider Trading Code**.
- 1.2 It shall come into force w.e.f. 27<sup>th</sup> May, 2015 and the amendments to the code, if any, shall be effective from the date on which it is notified from time to time.
- 1.3 The existing code of internal procedure and conduct for prevention of insider trading in dealing with the securities of BSL, stands repealed with the new code coming into effect.

**2. Objective of the Insider Trading Code.**

Insider trading code aims to ensure monitoring, timely reporting and adequate disclosure of price sensitive information by the promoters, Directors, and Key Managerial Personnel and connected persons of the Company.

Further it is also aimed to put in place a framework for Prohibition of Insider Trading in securities and to strengthen the legal framework thereof.

**3. Definitions**

**“Act”** means the securities and Exchange Board of India Act, 1992.

**“Board”** means the securities and Exchange Board of India.

**“Company”** means Banswara Syntex Limited “BSL”.

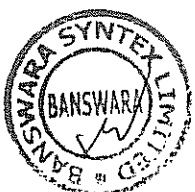


“Code for Prevention of Insider Trading” or “Code” shall mean the Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of trading by insiders of Banswara Syntex Limited as amended from time to time.

“**Compliance Officer**” for the purpose of the code, the Company Secretary of the Company shall act as the Compliance Officer. In absence of the Company Secretary, the Board of Directors may authorize any officer of the Company to discharge the duties of Compliance Officer.

“**Connected Person**” means connected person as defined in regulation 2 (d) of SEBI (Prohibition of Insider Trading) Regulations, 2015 i.e.

- i. Any person who is or has during 6 months prior to the concern Act been associated with the Company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being any contractual, fiduciary or employment relationship or by being a Director, officer or any employee of the Company or holds any position including a professional or business relationship between himself and the Company whether temporarily 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; or
  - c) A 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 Stock Exchange or of clearing house of Corporation; or
  - f) A member of the Board of trustees of a Mutual Fund or a member of the Board of Directors of the Asset Management Company of the 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 recognized or authorized by the Board of Directors of the Company; or
- i) A banker of the Company; or
- j) A concern , firm, trust, hindu undivided family, Company or association of persons wherein the Director of the Company or his immediate relative or banker of the Company, has more than 10% of the holding or interest.

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

**“Designated Employees”** shall include:-

1. Top four tiers of executives i.e. Directors, Executive Directors, Vice Presidents and General Managers.
2. All other employees of the Company that may be notified by the Compliance Officer, from time to time, with the approval of Managing Director.

In case of any designated officer leave the services of the Company, he shall continue to be considered as designated employees for a further period of 6 months subsequent to the date of his leaving the Company as envisage under SEBI (Prohibition of Insider Trading) Regulation, 2015.

**“Designated Person”** includes designated employees, their immediate relatives, insiders auditors, accounting firms, law firms, analyst, consultant etc., assisting or advising the Company.

**“Directors”** shall mean Directors on the Board of Banswara Syntex Limited including Independent Directors and Nominee Directors.



**“Generally available information”** means generally available information as defined in regulation to (e) of the SEBI (Prohibition of Insider Trading) Regulation, 2015:

Information i.e. accessible to the public on a non-discriminatory basis. Information published on the website of a Stock Exchange, would ordinarily be considered generally available.

**“Immediate relative”** means immediate relative as defined in regulation (f) of SEBI (Prohibition of Insider Trading) Regulation, 2015.

A spouse of a person and includes parents, sibling and child of such person or of spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to the trading in securities.

**“Insider”** means insider as defined in regulation 2(g) of SEBI (Prohibition of Insider Trading) Regulation, 2015 i.e.

**Any person who is:-**

- i) A connected person; or
- ii) In possession of or having access to unpublished price sensitive information.

**“Insider Trading”** means insider trading as defined in Section 195(1) of the Companies Act, 2013 i.e.

- i) An act of subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell or deal in any securities by any Director or Key Managerial Personnel or any other officer of the Company either as a principal or agent if such Director or Key Managerial Personnel or any other officer of the Company is reasonably expected to have access to any nonpublic price sensitive information in respect of securities of the Company; or
- ii) An act of counseling about procuring or communicating directly or indirectly any non -public price -sensitive information to any person.



**“Key Managerial Personnel”** means Key Managerial Personnel (KMP) as defined in Section 2(51) of the Companies Act, 2013 i.e.:-

- i) The Chief Executive Officer or Managing Director or Manager;
- ii) The Company Secretary;
- iii) The Whole Time Director;
- iv) The Chief Finance Officer; and
- v) Such other officer as may be prescribed.

**“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,

**“Regulation(s)”** means SEBI (Prohibition of Insider Trading) Regulation, 2015 and any amendments thereto.

**“Securities”** shall have the meaning assigned to it under the Securities Contract (Regulation), Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund, in case of Banswara Syntex Limited, the securities would mean the securities issued by BSL listed on the Stock Exchanges from time to time such as equity shares.

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

**“Trading”** means trading as defined in regulation 2(1) and 6(3) of SEBI (Prohibition of Insider Trading) Regulation, 2015 i.e.:-

Includes subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell, deal in any securities and trading in derivatives of securities.



**“Trading day”** means trading day as defined in regulation 2(m) of the SEBI (Prohibition of Insider Trading) Regulation, 2015 i.e.:-

A day on which the recognized stock exchanges are open for trading.

**“Trading window”** means a trading period in which Company’s securities can be traded.

**“Unpublished price sensitive information”** means Unpublished Price Sensitive Information as defined in regulation 2(n) of the SEBI (Prohibition of Insider Trading) Regulation, 2015 i.e.:-

Any information, relating to a Company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall ordinarily including but not restricted to, information relating to the following:-

- i) financial results;
- ii) Dividends;
- iii) Change in capital structure;
- iv) Mergers, de-mergers, acquisitions, de-listings, disposal and expansion of business and such other transactions;
- v) Changes in the Key Managerial Personnel;
- vi) Material events in accordance with the listing agreement;
- vii) Any such other information which may affect the price of the securities.

#### 4. **Applicability**

This code shall be applicable and binding on the designated persons as defined in the insider trading code.



## 5. Restrictions on communication and trading by insiders

### 5.1 Communication or procurement of unpublished price sensitive information:-

- i) All information shall be handled within the organization on a need to know basis and insider shall not communicate, provide, or allow access to any unpublished price sensitive information, relating to a Company 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 the duties or discharge of the legal obligations.
- ii) No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to BSL or its securities listed or proposed to be listed, except in furtherance of legitimate purpose, performance of the duties or discharge of legal obligation.
- iii) Notwithstanding anything contained in this regulation, an unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction that would entail:
  - an obligation to make an open offer under the takeover regulations where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the Company; or
  - not attract the obligation to make an open offer under the takeover regulations but where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the Company and the information that constitute unpublished price sensitive information is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the Board of Directors may determine.



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

**5.2 Trading when in possession of unpublished price sensitive information:-**

- i) Subject to the provision of SEBI (Prohibition of Insider Trading) Regulation, 2015, no insider shall either on his behalf or on behalf of any other person, trade in securities of BSL on any stock exchange when in possession of any unpublished price sensitive information.
- ii) The onus of establishing that they were not in possession of unpublished price sensitive information shall be on such connected person.

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

- (i) The transaction is a off-market inter-se retransfer between the promoters who were in possession of such unpublished price sensitive information when they took the decision to trade;
- (ii) 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;

(iii) the trades were pursuant to a trading plan.

In the case of connected persons the onus of establishing, that they were not in possession of unpublished price sensitive information, shall be on such connected persons and in other cases, the onus would be on the Board of Directors of the Company.

The Board of Directors may specify such standards and requirements, from time to time, as it may deem necessary for the purpose of these regulations.

### 5.3 Need to know

- i) Price sensitive information is to be handled on a need to know basis i.e. price sensitive information should be disclosed only to those within the Company who need the information to discharge their duties and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.
- ii) All non-published published information directly received by an employee should immediately be reported to the head of department.



## 5.4 Limited access to confidential information

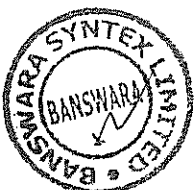
Files containing the confidential information shall be kept secured. Computer files must have adequate security of login and password etc.

## 6. Trading Plans

6.1 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 trade may be carried out on his behalf in accordance with such plan.

### 6.2 Such Trading plan shall:-

- i) Not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
- ii) Not entail trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced by the issuer of the securities and second trading day after the disclosure of such financial results;
- iii) Entail trading for a period of not less than twelve months;
- iv) Not entail overlap for any period for which another trading plan is already in existence;
- v) Set out either the value of trades to be affected or number of securities to be traded along with the nature of trade and the intervals at, dates on which such trades shall be affected, and
- vi) Not entail trading in securities for market abuse.

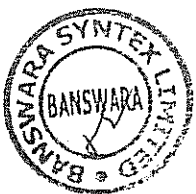


- 6.3 The compliance officer shall review the trading plan to assess whether the plan would have any potential for violation of these regulations and shall be entitled to seek such express understanding as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.
- 6.4 The trading plans 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 commencement of the implementation and in such event the Compliance Officer shall confirm that the commencement is to be deferred until such unpublished price sensitive information becomes generally available information so as to avoid violation. Upon approval of the trading plan, the Compliance Officer shall notify the plan to the stock exchanges on which the securities are listed.

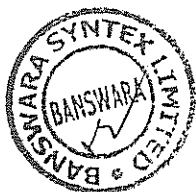
## 7. Trading Window

- 7.1 No designated person shall deal in any transaction involving the purchase or sale of the BSL's security, either in their own name or in the name of their immediate relatives, during the period mentioned below, when "trading window" shall remain close.



S.No.	Particulars	Restrictive Period
(a)	Declaration of financial results (quarterly, half yearly and annual)	One week up to the date of board meeting or as may be notified.  Explanation: trading window shall be opened 2 days (48 hours) after the "price sensitive information", for which the trading window is closed, is generally available, excluding the day of intimation to the stock exchanges.
(b)	Declaration of dividends (interim and final)	-do-
(c)	Issue of securities by way of public/rights/bonus etc.	-do-
(d)	Any major expansion plans or execution of new projects	-do-
(e)	Amalgamation, merger, takeovers and buy back	-do-
(f)	Disposal of whole or substantially whole of the undertaking	-do-
(g)	Any change in policies, plans or operations of the Company	-do-
(h)	Any other event as may be notified	-do-

7.2 The remaining days of a year other than the days mentioned under clause 7.1 above shall be called "Valid Trading Window".



- 7.3 All Designated Persons shall conduct their dealings in the securities of the Company only in the 'Valid Trading Window" period as mentioned above at clause 7.2 and shall not enter into "Contra Trade" i.e. opposite or reverse transactions, in the securities of BSL during the next six months following the prior transaction.
- 7.4 The Compliance Officer may grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate these regulations. In case of contra trade executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Board  
for credit to the Investor Protection and Education Fund administered by the Board under the Act.
- 7.5 The Compliance Officer shall maintain a register of the periods of "Closed Trading Window", wherein he shall record the date of closure and opening of the trading window and the purpose for which trading window is closed. A performa of the register or periods of closure of Trading Window is given in FORM-I.

## 8. Pre-Clearance of Trades

- 8.1 Designated Persons who intend to deal in the securities of the Company (above the minimum threshold limits of 2500 shares in a calendar month) shall obtain pre-clearance of the transaction as per the pre-dealing procedure as described hereunder. Application for pre-clearance shall be made only during valid trading period. Application submitted during closer of trading window shall be invalid.
- 8.2 Designated persons shall make pre-clearance application to the Compliance Officer in the format given in FORM-II. The application shall indicate the estimated number of securities that the Designated Employee intends to deal in, the details as to the depository with which he has a security account, the details as to securities in such depository



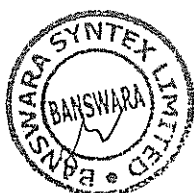
mode and such other details, as may be required by the Compliance Officer from time to time in this behalf.

- 8.3 The pre-clearance shall not be necessary if the number of shares to be traded is up to 2500 shares in a calendar month.
- 8.4 Immediately on receipt of the pre-clearance application, the date and time of the receipt of the same shall be recorded thereon. The Compliance Officer shall process the pre-clearance applications and if the pre-clearance application is in accordance and in Compliance with the provisions of Insider Trading Code, the Compliance Officer shall communicate the pre-clearance immediately not later than 48 hours from the time of receiving the application. In the absence Compliance Officer, the Officer authorized by the Compliance Officer shall give the pre-clearance. A performa letter of intimation of pre-clearance is annexed as FORM-III.
- 8.5 Designated Persons shall execute their order in respect of securities of the BSL within seven trading days after the approval or pre-clearance is given. If the order is not executed within seven trading days after the approval is given, the Designated Persons shall obtain fresh pre-clearance.
- 8.6 The Compliance Officer may be empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate these regulations. Should a contra trade be executed inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Board for credit to the Investor Protection and Education Fund administered by the Board under the Act.

## **9. Disclosure by Certain Persons**

### **9.1 Initial Disclosures**

Every person on appointment as a Director or Key Managerial Personnel or Designated Employee shall disclose his/her holding of securities in BSL, as on the date of appointment including the securities held by their



immediate relatives, to the Company within seven days of such appointment, as per performance provided at FORM-IV.

Every promoter/ Key Managerial Personnel / Director / Officers / Designated Employees of the Company, within thirty days of these regulations taking effect, shall forward to the Company the details of all holdings in securities of the Company presently held by them including the statement of holdings of dependent family members in the prescribed Form-V

## **9.2 Continual Disclosures**

Every Director, Key Managerial Personnel or every employee(s) shall disclose the number of such securities acquired or disposed-off within two trading days of such transaction including the securities held by their immediate relatives, 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 Only) in Form V1.

The disclosure of the incremental transactions after any continual disclosure shall be made when the transactions effected after the prior disclosure cross the threshold as specified at 9.2 above.

The Compliance Officer shall notify the particulars of such trading by Director or Key Managerial Personnel or Employee to the stock exchange on which the securities are listed within two trading days of (a) receipt of allotment of shares, or (b) the acquisition or sale of shares or voting rights, as the case may be.

## **10. Penalty for Contravention of Code of Conduct**

Any Director, Key Managerial Personnel or Employee, who trades in securities of BSL or communicates any unpublished price sensitive information in contravention of Insider Trading Code may be penalized and appropriate action may be taken by the Competent Authority as defined under Employees (Conduct, Discipline and Appeal) Rules, 1986 of the Company and shall also be



subject to disciplinary action by the competent authority of the Company as specified in Employees Code of Conduct.

#### **11. Dissemination of Price Sensitive Information**

No information shall be passed by Specified Persons by way of making a recommendation for the purchase or sale of securities of the Company.

Disclosure/dissemination of Price Sensitive Information with special reference to analysts, media persons and institutional investors:

The following guidelines shall be followed while dealing with analysts and institutional investors

- Only public information to be provided.
- At least two Company representatives be present at meetings with analysts, media persons and institutional investors.
- 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.
- Simultaneous release of information after every such meet.

#### **12. Power of SEBI**

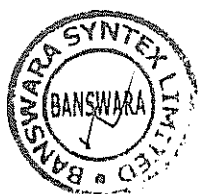
The action taken by the Company shall not preclude SEBI and other authorities from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

#### **13. Information to SEBI in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015**

Any violation of SEBI (Prohibition of Insider Trading) Regulations, 2015, shall be promptly reported by the Compliance Officer to SEBI after obtaining the approval of the Stakeholders Relationship Committee.

#### **14. Periodical Returns**

The Compliance Officer shall place before the chairperson of the Audit Committee and Managing Director, the details of continual disclosure made by





the Director, Key Managerial Personnel during Financial year within 30 days of the end of financial year.

## **15. Code of Fair Disclosure**

A code of practices and procedures for fair disclosure of unpublished price sensitive information for adhering each of the principles is set out below:

1. Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available;
2. Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure;
3. Designation of a senior officer as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information;
4. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available;
5. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities;
6. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information;
7. Developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made;
8. Handling of all unpublished price sensitive information on a need-to-know basis.

## **16. Amendments**

Managing Director may amend the Insider Trading Code as per industry practice and or in case of change in legal framework rules and regulation as covered in the policy. BSL's Board shall have the power to amend any of the provisions of this Insider Trading Code, substitute any of the provisions with a new provision or replace Insider Trading Code entirely with a new Insider Trading Code.



## **DISCLAIMER**

THIS IS ONLY INTERNAL INSIDER TRADING CODE AND ONE OF THE MEASURES TO AVOID INSIDER TRADING. EVERY INSIDER IS REQUIRED TO FAMILIARISE HIMSELF/HERSELF WITH THE SEBI REGULATIONS OR ANY AMENDMENT THEREOF AS IT WILL BE THE RESPONSIBILITY OF EACH DESIGNATED PERSON (AND HIS RELATIVES) TO ENSURE COMPLIANCE OF THIS CODE, SEBI REGULATION(S) AND OTHER APPLICABLE LAWS.



**BANSWARA SYNTEX LIMITED**

**FORM-II**

**APPLICATION FOR PRE-CLEARANCE OF TRADES IN SECURITIES**

To

The Compliance Officer,  
Banswara Syntex Limited,  
Industrial Area,  
Dahod Road,  
Banswara-327001

Dear Sir,

I,.....a Director/KMP/Designated Employee of the Company intend to carry out transaction(s) in the shares of BSL as per the details given below:-

Name :  
Employee No. :  
Designation :  
Department :  
PAN :  
Email id :  
Date of becoming Director/KMP/Designated :  
Employee :

No. of shares held (including immediate relative) as on the date of application	Folio No./DP & Client ID	Nature of new transaction for which approval is sought	Estimated number of securities to be dealt	Estimated consideration value
1	2	3	4	5

**UNDERTAKING**

In this connection I solemnly confirm and declare:

- a) **THAT** I do not have access and/or have not received any "Unpublished Price Sensitive Information" up to the time of signing the undertaking;



- b) **THAT** in case I have access to or receive "Unpublished Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction, I shall inform the Compliance Officer about such "Unpublished Price Sensitive Information" and that I shall completely refrain from dealing in the securities of the Corporation till the time of such information becomes public.
- c) **THAT** I have not contravened the Insider Trading Code as notified by the Company from time to time.
- d) **THAT** I shall not undertake any contra trade for a minimum period of six months from the date of this pre-clearance.

I hereby solemnly declare that I have made a full and true disclosure in this regard to the best of my knowledge and belief.

Pre-clearance may kindly be accorded in terms of the provisions of the Insider Trading Code of BSL.

Signature : \_\_\_\_\_  
 Date : \_\_\_\_\_  
 Place : \_\_\_\_\_

OFFICE USE

Serial number of the application received : \_\_\_\_\_  
 Date & time of receipt of the Application : \_\_\_\_\_  
 Date & time of communication of the pre-clearance or otherwise : \_\_\_\_\_

Signature of the Compliance Officer/Authorized Officer



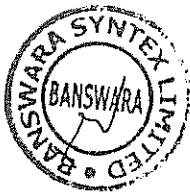
**BANSWARA SYNTEX LIMITED**

**FORM-III**

**REGISTER OF PRE-CLEARANCE FOR TRADE IN SECURITIES**

S.No.	Name	Designation	Department	Date & time of receipt of pre-clearance application	Name of person in whose name transaction is being made	Relationship
1	2	3	4	5	6	7

Nature of Transaction (Purchase or Sale)	Estimated no. of securities	Estimated Consideration	Date of communication of the clearance by Compliance Officer	Reasons for non-clearance, if any	No. of securities actually traded, if intimated
8	9	10	11	12	13



# BANSWARA SYNTEX LIMITED

## FORM-IV

### PROFORMA FOR INITIAL DISCLOSURE OF DETAILS OF SHARES HELD BY DIRECTOR/KMP/DESIGNATED EMPLOYEE

To

The Compliance Officer,  
Banswara Syntex Limited,  
Industrial Area,  
Dahod Road,  
Banswara-327001

Dear Sir,

I,.....a Director/KMP/Designated Employee of BSL furnish below the details of shareholding in BSL as on \_\_\_\_\_ in terms of regulation 7(1) of SEBI (Prohibition of Insider Trading) Regulation, 2015 and clause 7 of the Code of Conduct to Regulate, Monitor and Reporting Trading by Insider of BSL:-

Name :  
Employee No. :  
Designation :  
Department :  
PAN :  
Email id :  
Date of becoming Director/KMP/Designated Employee :  
Employee :

I. *Details of shareholding or position taken in derivatives in own name:*

No. of shares held	Date of acquisition	Mode of Acquisition	Buy quantity	Buy value	Folio No./DP & Client ID

II. *Details of shares held or position taken in derivatives by immediate relative:*

Name, PAN No. & Address and relationship	No. of shares held	Date of acquisition	Mode of Acquisition	Buy quantity	Buy value	Folio No./DP & client ID

Signature : \_\_\_\_\_  
Date : \_\_\_\_\_  
Place : \_\_\_\_\_



# BANSWARA SYNTEX LIMITED

## FORM-V

### PROFORMA FOR INITIAL DISCLOSURE OF DETAILS OF SHARES HELD BY DIRECTOR/KMP/DESIGNATED EMPLOYEE

To

The Compliance Officer,  
Banswara Syntex Limited,  
Industrial Area,  
Dahod Road,  
Banswara-327001

Dear Sir,

I,.....a Director/KMP/Designated Employee of BSL furnish below the details of transactions of my own/immediate relatives in the securities of BSL exceeding Rs. 10 lacs during the period from ..... to ..... in terms of regulation 7(1) of SEBI (Prohibition of Insider Trading) Regulation, 2015 and clause 7 of the Code of Conduct to Regulate, Monitor and Reporting Trading by Insider of BSL:-

Name :  
Employee No. :  
Designation :  
Department :  
PAN :  
Email id :  
Date of becoming Director/KMP/Designated :  
Employee :

#### I. Details of change in shareholding (on own account) exceeding Rs. 10 lacs

No. & % of shares/ voting rights held by the Director/ Officer	Date of receipt of allotment advice/ acquisition/ sale of shares/ voting rights	Mode of acquisition (market purchase/ public/ rights/ preferential offer etc.)	No. & % of shares/ post acquisition/ voting rights sale	Trading member through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which trade was executed	Buy/Sell quantity	Buy/ Sell value	DP Id./ client ID. Or Folio No.



II. Details of change in shareholding exceeding Rs.10 lacs of immediate relatives

Name, PAN No. & Address and relationship	No. & % of shares/ voting rights held	Date of receipt of allotment advice/ acquisition / sale of shares/ voting rights	Mode of acquisition (market purchase/ public/ rights/ preferential offer etc.)	No. & % of shares/ post acquisition / voting rights sale	Trading member through whom the trade was executed with SEBI Registrati on No. of the TM	Exchange on which trade was executed	Buy/ Sell Quantity	Buy/ Sell value	DP Id./ Client Id.Or folio No.

I declare that I have complied with the requirement of the minimum holding period of 6 months with respect to the securities purchased/sold.

I hereby declare that the above details are true, correct and complete in all respects.

Signature : \_\_\_\_\_  
Date : \_\_\_\_\_  
Place : \_\_\_\_\_

For- BANSWARA SYNTEX LTD.

  
(J. K. JAIN)  
CFO & Company Secretary