



**CODE OF INTERNAL PROCEDURES &
CONDUCT FOR PREVENTION OF INSIDER TRADING**



Code of Internal Procedures & Conduct for Prevention of Insider Trading

The Policy and Obligations

The Company endeavors to preserve the confidentiality of un-published price sensitive information and to prevent misuse of such information. The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations.

Every Director, Officer, Designated Person of the Company has a duty to safeguard the confidentiality of all such information obtained in the course of his or her work at the company. No Director, Officer, Designated Person and Connected Person may use his or her position or knowledge of the Company to gain personal benefit or to provide benefit to any third party.

To achieve these objectives, **COSMO FERRITES LIMITED** (herein after referred to as "the Company") hereby notifies that this code of conduct is to be followed by all Directors, Officers, Designated Persons and Connected Persons.

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1. This Code of Internal Procedures & Conduct for prevention of Insider Trading may be known as "Code of Internal Procedures & Conduct for Prevention of Insider Trading of **COSMO FERRITES LIMITED**" hereinafter referred to as the "Code of Conduct", which shall come into effect from 15th May, 2015 (i.e., from the date of approval by the Board of Directors) in supersession of earlier code of Conduct for Prevention of Insider Trading as prevailed in the company.
 2. This Code of Conduct has been made pursuant to Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended and may be modified by the Board of Directors of the Company from time to time. The Code of Conduct is in addition to the regulations framed by the Securities & Exchange Board of India (SEBI) in this regard, and accordingly the disclosure requirement contained in the SEBI regulations are not covered herein. For the details of the same, the person may refer to the compliance officer in that regard.

3. Definitions: -

For the purpose of this Code of Conduct: -

- a. "Act" means the Securities and Exchange Board of India Act, 1992 (15 of 1992).
- b. "Board" means the Board of Directors of COSMO FERRITES LIMITED
- c. "Company" means COSMO FERRITES LIMITED, having its Registered Office at Jabli, Himachal Pradesh.
- d. "Compliance Officer" means the Company Secretary of the Company.
- e. "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, -
- 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 company; or
 - j) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten per cent. of the holding or interest;
- f. **“Designated Person”** means –
- 1. The Chairman & Managing Director ;
 - 2. All Executive Directors including Independent Directors;
 - 3. All Promoters of the Company;
 - 4. All key Managerial Personnel of the Company;
 - 5. All executives in grade General Manager & above ;
 - 6. All employees (including trainees, if any) in the Finance & Accounts section ;
 - 7. Company Secretary & Compliance Officer & all employees (including trainees, if any) in the Company Secretarial function
 - 8. All staff in the Chairman’s office, Chief Financial Officer’s office and Chief Strategy Officer’s office.
 - 9. Immediate Relative of (1) to (8) above.
- g. **“Director”** means Directors on the Board of the Company.



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- h. **“Generally Available Information”** means information that is accessible to the public on non-discriminatory basis.
- i. **“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;
- j. **“Insider”** means any person who is :
 - i. a Connected Person; or
 - ii. in possession of or having access to Unpublished Price Sensitive Information
- k. **“Key Managerial Personnel”** shall have the same meaning as defined under clause (51) of Section 2 of the Companies Act, 2013.
- l. **“Legitimate Purpose”** shall include sharing of unpublished price sensitive information in ordinary course of business by an Insider with Partners, Collaborators/ Lenders, Customers, Suppliers, Merchant Banker, Legal Advisors, Auditors, Insolvency Professionals or other advisors or consultants provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.
- m. **“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.
- n. **“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.
- o. **“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.
- p. **“Regulations”** means the SEBI (Prohibition of Insider trading) Regulations, 2015 as amended from time to time.
- q. **“Stock Exchange”** means a stock exchange which is recognised by the Central Government or SEBI under Section 4 of Securities Contracts (Regulations) Act, 1956 (42 of 1956).
- r. **“Trading”** means and includes an act of subscribing, buying, selling dealing or agreeing to subscribe, buy, sell, deal in the securities of the Company by any person.
- s. **“Trading Day”** means a day on which the recognized Stock exchanges i.e. NSE & BSE are open for trading.
- t. **“Trading Window”** means the period during which the Company's securities can be traded by the Designated Persons/Directors as provided in this Code.
- u. **“Whistle Blower”** means an employee who reports instance of leak of price sensitive information under this Policy.
- v. **“Unpublished Price Sensitive Information”** means any information, relating to the Company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: –



1. Financial Results;
2. Dividends;
3. Change in Capital Structure;
4. Mergers, Demergers, Acquisitions, Delisting, Disposals and expansion of Business and such other Transactions;
5. Changes in the Key Managerial Personnel; and
6. Material events in accordance with the Listing Agreement.

Terms that have not been defined in this code shall have the same meaning assigned to them in the Act, SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and/or any other SEBI Regulation(s) as amended from time to time.

4. Preservation of “Unpublished Price Sensitive Information”

All Employee/Director/Officer shall maintain the confidentiality of all unpublished Price Sensitive Information. No Employee/Director/Officer shall communicate, provide or allow access to any Unpublished Price Sensitive Information, relating to the Company to any person including other insiders except where such communication is in furtherance of legitimate purpose, performance of duties or discharge of legal obligations.

5. Need to Know Basis

No Employee/Director / Officer shall communicate any unpublished price sensitive information to any person except those within the Company who need the information to discharge their duty.

6. Periodical Reporting to Board/Audit Committee

The Compliance Officer shall report on insider trading to the Audit Committee or the Chairman of the Board at least once in a year or at such frequency as may be stipulated by the Board of Directors

7. Prohibition on Communication or counseling on matters relating to Insider Trading

No Employee/Director / Officer shall communicate or counsel any unpublished price sensitive information to any person. Further, no employee /Director/Officer, who while in possession of such unpublished price sensitive information shall not deal in the shares of the Company.

Unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction which entails:

- 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



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- not attracting 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.

Unpublished price sensitive information shall be considered to be communicated for legitimate purpose when any employee or any other insider (who is in possession of such information):

- a) communicates such information, in the ordinary course of business, to the auditors, lenders, customers, suppliers, legal advisers, merchant bankers, partners, collaborators, insolvency professionals or any other advisers or consultants as may be considered necessary;
- b) submits or provides such information to a court of law or any governmental or regulatory authority;
- c) communicates or shares such information for any other genuine or reasonable purpose as may be determined jointly by the Compliance Officer and the Chief Investor Relations Officer appointed by the Board of Directors of the Company.

Any person in receipt of Unpublished Price Sensitive Information for legitimate purpose shall be considered as insider for the purpose of this code. Accordingly, the person who shares UPSI shall give proper notice to the recipient of UPSI to maintain confidentiality of such UPSI in compliance with the Regulations.

8. Dissemination of “Price Sensitive Information”

- (i) No information shall be passed by way of making a recommendation for the purchase or sale of securities of the Company.
- (ii) The following guidelines shall be followed while dealing with analysts, research personnel, media persons & institutional investors.
 - 1. Only public information to be provided.
 - 2. Unanticipated questions may be taken note and a considered response given later, if the answer includes unpublished price sensitive information, a public announcement should be made before responding.

9. Trading Restrictions: All Directors and Designated Persons of the company shall be subject to trading restrictions as enumerated below:

A. Trading Window

Trading Window refers to the period during which the Directors, Designated Persons of the Company can deal in the securities of the Company.

The Trading Window shall also be applicable to any person having contractual or fiduciary relationship with the Company such as Auditors, Accountancy Firms, Law Firms, Analysts, Consultants etc. assisting or advising the Company.

The trading window shall be, inter alia, closed during the following periods:

- i) **For Board meetings to be held for consideration of quarterly/annual financial results:** starting from end of quarter till 48 hours after the declaration of the financial results;



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- ii) **For any other Board meeting:** starting as soon as the day on which the date of Board meeting is finalized and communicated to Stock Exchanges, whichever is later and till 48 hours after communication of the decision of the Board to the Stock Exchanges.

When the Trading Window is closed the Directors, Designated Persons and their immediate relatives shall not trade in the Company's securities in such period.

B. Prohibition on trading at the time of closure of Trading Window

All Designated Persons shall conduct all their dealings in the securities of the Company only in a valid trading window and shall not deal in any transaction involving the purchase or sale of the Company's securities during the periods when the trading window is closed, as referred to in Point No. (i) & (ii) above or during any other period as may be specified by the Company from time to time.

j) Trading Plan

- (1) An insider shall be entitled to formulate a trading plan for dealing in securities of the Company 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. **(Annexure-I)**

(2) 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 the 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 of any period for which another trading plan is already in existence;
- (v) 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
- (vi) not entail trading in securities for market abuse.

The Compliance Officer shall consider the Trading Plan made as above and shall approve it forthwith. However, he shall be entitled to take express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per provisions of the Regulations.

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.

However, the implementation of the trading plan shall not be commenced, if at the time of formulation of the plan, the Insider is in possession of any unpublished price sensitive information and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Plan shall be deferred until such unpublished price sensitive information becomes generally available information.

Further, the Insider shall also not be allowed to deal in securities of the Company, if the date of trading in securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.

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

k) Pre-clearance of Trades:



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The Directors/Designated Persons intending to deal in the shares of the Company (when the Trading Window is open) exceeding the threshold limit 5000 shares per transaction (including that of the dependents') will have to make:

- i. An application as per **Annexure II** to the Compliance Officer for pre-clearance of the transaction along with the following undertaking:
 - a. that the Applicant does not have any access or has not received "Unpublished price sensitive information" up to the time of signing the undertaking.
 - b. that in case the applicant has access to or receives "unpublished price sensitive information" after signing of the undertaking but before the execution of the transaction, he/she shall inform the Compliance Officer of the change in his position and that he/she would completely refrain from dealing in the securities of the Company till the time such information becomes generally available.
 - c. that he/she has not contravened the Code of Conduct for prevention of Insider Trading as notified by the Company from time to time.
 - d. that he/she has made a full and true disclosure in the matter.
- ii. The Compliance Officer shall confidentially maintain a list of such Securities as "restricted list" which shall be used as the basis for approving or rejecting applications for pre-clearance of trade.
- iii. Only after receiving the clearance, the transaction shall be carried out.
- iv. No designated person shall apply for pre-clearance of any proposed trade if such designated person is in possession of un-published price sensitive information even if the Trading Window is not closed.
- v. All the Designated Persons shall execute their order in respect of securities of the Company within not more than seven trading days after the approval of pre-clearance is given. If the order is not executed within seven trading days after the approval is given, such person must pre-clear the transaction again
- vi. All Designated Persons who are permitted to trade shall not enter into an opposite transaction i.e., sell or buy any number of shares during the next 6 months following the prior transaction.
- vii. The Compliance Officer is empowered to grant relaxation from strict application of such restrictions to be recorded in writing provided that such relaxation does not violate the provisions of the Code.
- viii. No pre-clearance is required where the trade is pursuant to the Trading Plan.

I) REPORTING REQUIREMENT:

A. Initial Disclosure:

Every Person on appointment as 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/becoming a promoter to the Company within 7(seven) days of such appointment/becoming a promoter in **Annexure III**.

B. Continual Disclosure:

Every Promoter, employee and Director of the Company shall disclose to the Company the number of



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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 Lakhs in **FORM C (Annexure IV)** as prescribed under SEBI (Prohibition of Insider Trading regulations) 2015.

The Company may, at its, discretion, require any other connected person or class of connected persons to make disclosures of holding and trading in securities of the company in order to monitor compliance with these regulations, in **Form D (Annexure- V)**

C. Disclosure by the Company to the Stock Exchange(s)

Within 2 trading days of the receipt of intimation under Clause IX (b), the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received.

D. Yearly Disclosure:

All Directors/Key Managerial Personnel/Designated Persons shall submit to the Company Yearly statement, indicating the details of the all holdings in the securities held by him and his immediate relatives, as at the end of every calendar year within one month from the date of completion of each calendar year as per **Annexure III**.

m) Other Restriction

The disclosures to be made by any person under this Code shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.

n) Responsibility/Accountability

It is the duty of the employee to inform their relatives, being covered under this Code, about the Closure of the Trading Window.

Company will facilitate this information only in case they provide the list of email id's of their relatives and not otherwise.

o) Mechanism on Internal Control:

For ensuring adequate and effective system of internal controls in line with the requirements of SEBI (Prohibition of Insider Trading) Regulations, 2015, the following procedure shall be followed:

A. Sharing of information pursuant to Legitimate Purpose

- a) Any person in receipt of Unpublished Price Sensitive information pursuant to legitimate purpose shall be considered Insider for the purpose of Code.
- b) Advance Notice shall be served on such person by way of email/ letter to maintain confidentiality while possession of such Unpublished Price Sensitive information.
- c) Such person has to ensure compliance with SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time and the Code.

B. Limited Access to Confidential Information

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

C. Documents to be shared by Designated Person with Company



Designated person shall be required to disclose names and PAN or any other identifier authorized by law of the following persons to the Company on an Annual basis and as when the information changes:

- a) Immediate Relatives
- b) Person with whom such designated person(s) share a material financial relationship;
- c) Phone, mobile and cell number which are used by them.

In addition, the name of educational 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 loan/gift during immediate preceding 12 months, equivalent to atleast 25% of such payer's annual income but shall exclude relationships in which the payment is based on arm's length transactions.

D. Chinese Wall

- a) To prevent the misuse of confidential information, the Company shall adopt a "Chinese Wall" policy separating those areas of the Company which routinely have access to confidential information, considered "inside areas" from those areas which deal with sale/marketing/operations or other departments providing support services, considered "public areas".
- b) The employees in inside area shall be segregated from employees in public area.
- c) The employees in the inside area shall not communicate any Price Sensitive Information to anyone in public area.
- d) In exceptional circumstances, Designated Persons from the public areas may be brought "over the wall" and given confidential information on the basis of "need to know" criteria, under intimation to the compliance officer.

E. Digital Database

The Company shall maintain digital base internally with time stamping and audit trails to ensure non-tampering of the database containing following information:

- a) Name and PAN of Designated Person along with their immediate relatives
- b) Name and PAN of the person/entity(ies) with whom information is shared pursuant to Legitimate Purpose.

The Company shall ensure that the structured digital database is preserved for a period of not less than eight years after completion of the relevant transactions and in the event of receipt of any information from the Board regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.

F. Whistle Blower in case of leak of Unpublished Price Sensitive Information ("UPSI")

- a) The Whistle Blower may report any instance of leak of Unpublished Price Sensitive Information on the basis of a direct first- hand experience of the Whistle Blower. It should not be based on any secondary, unreliable source such as grapevine or any other form of informal communication.
- b) The Whistle Blower may report leak of Unpublished Price Sensitive Information by an email to the Compliance Officer mentioning the subject line "LEAK OF UNPUBLISHED PRICE SENSITIVE INFORMATION".
- c) On the basis of reporting, the Compliance Officer shall conduct examination about the genuineness of the reporting before conduct of inquiry.



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- d) The Compliance officer as soon as ascertaining the genuineness of the reporting about leak of Unpublished Price Sensitive Information, intimate to Board of Directors and Audit Committee.
- e) The Company shall take further action based on the recommendations of Board of Directors and Audit Committee accordingly.

The instance of leak of Unpublished Price Sensitive Information made by the Whistle Blower must be genuine with adequate supporting data/proof. If it is established that the allegation was made with mala-fide intentions or was frivolous in nature or was not genuine, the Whistle Blower shall be subject to disciplinary action.

p) Process to be followed in sensitive transaction

a) In case of Specific Transaction(s)

The Compliance officer shall give prior notice to employee who are brought inside on sensitive transaction and also made aware about the duties and responsibilities attached to receipt of inside information and liability that attaches to misuse or unwarranted use of such information on case-to-case basis.

b) In general

Non-disclosure Agreement shall be executed with every incoming/existing employee of the Company.

q) Documentation

The Compliance officer shall maintain following documents/ records for a period of five years:

- a. Record of initial & continuous disclosure;
- b. Record of Designated Persons and changes therein;
- c. Record of date of closing and opening of trading window;
- d. Record of application made for pre-clearance along with undertaking taken thereof;
- e. Record of cases waiving holding period during emergency;
- f. Record of periodical and annual disclosures.

r) Penalty for Contravention

- a. Every Designated Person shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her dependents).
- b. Any Designated Person who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalized and appropriate action may be taken by the Company.
- c. Designated Persons who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligibility for future participation in employee stock option plans etc.
- d. Any amount collected as penalty under this clause shall be remitted for credit to the Investor Protection and Education Fund administered by SEBI.
- e. The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.
- f. In case of violation of the Insider Trading Regulations, the Company shall promptly inform the stock exchange(s) where the concerned securities are traded, in such form and such manner as may be specified by the Board from time to time.



s) Other Restrictions

The disclosures to be made by any person under this Code shall include those relating to trading by such person's immediate relatives and by any other person for whom such person takes trading decisions.

t) Disclaimer

This policy is only internal code of conduct and one of the measures to avoid insider trading. Every insider is required to familiarize himself with the SEBI regulation as it will be the responsibility of each insider to ensure compliance of this code, SEBI regulation and other related statutes fully.

u) SEBI Regulations/Statutory Provisions to Prevail

Please note that in case the SEBI regulations or any statutory provisions are more stringent than those contained in the code, the SEBI regulations / statutory provisions will prevail.

This policy is only internal code of conduct and one of the measures to avoid insider trading. It will be the responsibility of each employee to ensure compliance of SEBI guidelines and other related statutes.

This document was approved by the Board of Directors at its meeting held on May 15, 2015. First, second & third Modification approved by Board of Directors on November 14, 2016, May 13, 2019 & October 26, 2021 respectively.



Annexure 'I'
Format for Trading Plan
(UNDER CODE OF INTERNAL PROCEDURES & CONDUCT FOR PREVENTION OF INSIDER TRADING
Of COSMO FERRITES LIMITED)

Dated:

The Compliance Officer
COSMO FERRITES LIMITED
517, DLF Tower – A
Jasola Distt. Centre
New Delhi- 110025

Dear Sir,

I _____ in my capacity as _____ of the Company hereby submit the trading plan with respect to dealing in securities of the Company for a total period of 12 months from _____ to _____.

Folio No./DP & Client ID No.	Type of Security	Nature of Trade (Buy/Sell)	Proposed Date/time period of trade	No. /total amount of securities proposed to be traded

With respect to the above trading plan, I hereby undertake that I shall:

- I. Not entail commencement of trading on behalf of the insider earlier than 06 months from the public disclosure of the plan.
- II. Not entail trading for the period between the 20th 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 financial results for the said period;
- III. Not commence the trading as per above plan if the Unpublished Price Sensitive Information which is in my possession at present, do not comes into public domain till the time of commencement of trading plan & shall defer the commencement of trading plan till such information becomes generally available.
- IV. Not tender any other trading plan for the period for which the above trading plan is already in force; and
- V. Not entail trading in securities for market abuse.

Yours Faithfully

Name
Designation
Date

Signature



Annexure 'II'
Application for Pre-Clearance of trade in securities of the Company
(UNDER CODE OF INTERNAL PROCEDURES & CONDUCT FOR PREVENTION OF INSIDER TRADING
Of COSMO FERRITES LIMITED)

Dated:

The Compliance Officer
COSMO FERRITES LIMITED
517, DLF Tower – A
Jasola Distt. Centre
New Delhi- 110025

Sub : Application for Pre Clearance of trade in terms of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Dear Sir,

I _____ S/D/W/o _____, being a Director/ Designated Person of Company hereby seek your approval for :

- a. buying _____ (number) of _____ (type of security) of the company in my/immediate relative's name;
- b. Selling _____ (number) of _____ (type of security) of the company in my/ immediate relative's name;

Through Stock Exchange / private arrangement with M/s /Mr./ Mrs. _____ having Folio no. / DP & Client ID No. _____.

As on date I/my immediate relatives hold the under mentioned securities of the company:

Name of Holder	Folio No./DP & Client ID No.	Type of Securities	No. of Securities.	Nature of Transaction (i.e. Purchase/Sell)

I further I undertake and confirm that:

- a. I do not have any access to nor in receipt of any "Unpublished Price Sensitive Information" upto the time of signing this undertaking.

Signature with date:

- b. In case I get access to or receive any " Unpublished Price Sensitive Information" subsequent to the signing of this undertaking but prior to the execution of the transaction I shall inform you of the change in my position and that I would completely refrain from dealing in the securities of the company till the time such information becomes generally available.
- c. I have not contravened the code of conduct for prevention of insider trading as notified by the Company from time to time.
- d. I have made a full and true disclosure in the matter.
- e. I/ my immediate relatives shall execute the transaction in respect of the proposed securities of the Company within one week after the approval of pre-clearance is obtained. In the event of the transaction not being executed within one week from the said



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approval, I shall again apply for pre clearance approval for the transaction.

- f. I/ my immediate relatives undertake to hold the said securities for a minimum period of 180 days.

Yours Faithfully

Name

Designation

Date

Signature

-



“ANNEXURE III”

(FORMAT FOR YEARLY DISCLOSURE/DISCLOSURE ON BECOMING PROMOTER/APPOINTMENT AS DIRECTOR/KMP)

FORM-B

**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (b) read with Regulation 6(2)]**

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a listed company/Yearly Disclosure

Name of the Company: Cosmo Ferrites Limited

ISIN of the Company: INE124B01018

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters /KMP /Directors/ immediate relatives/ others etc)	Date of appointment of Director/ KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP		% of Shareholding	Open Interest of the Future contracts held at the time of becoming Promoter/appointment of Director/KMP		Open Interest of the Option Contracts held at the time of becoming Promoter/appointment of Director/KMP	
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms

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

Signature:

Designation:

Date:

Place:



“ANNEXURE IV”

(DISCLOSURE FOR CHANGE IN SHAREHOLDING)

FORM-C

**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (2) read with Regulation 6(2)]**

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

Name, PAN No., CIN/ DIN, & address of Promoter / Employee / Director with contact nos.	Category of Person (Promoter /KMP / Director/ Immediate Relative/ others etc.)	Securities held prior to acquisition/ disposal		Securities acquired/ Disposed		% of Shareholding		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of Intimti on to Co.	Mode of acquisition (market Purchase/ public rights/ preferential offer / off market/ Inter-se transfer etc.	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
		Type of security (Foreg. – Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For eg. – Share, Warrants, Convertible Debentures etc.)	No.	Pre-transaction	Post-transaction	From	To			Buy		Se ll		
												Value	No. of units (contracts *lot size)	Value	No. of units (contra cts * lot size)	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

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

Signature:
Designation:

Date:
Place



“ANNEXURE V”

(DISCLOSURE FOR CHANGE IN SHAREHOLDING)

FORM-D

**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
Regulation 7 (3) Transactions by Other connected persons as identified by the company**

Name, PAN No., CIN/ DIN, & address of Promoter / Employee / Director with contact nos.	Category of Person (Promoter /KMP / Director/ Immediate Relative/ others etc.)	Securities held prior to acquisition/ disposal		Securities acquired/ Disposed		% of Shareholding		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of Intimation to Co.	Mode of acquisition (market Purchase/ public rights/ preferential offer / of market/ Inter-se transfer etc.	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
		Type of security (Foreg.– Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For eg. – Share, Warrants, Convertible Debentures etc.)	No.	Pre-transac tion	Post-transac tion	From	To			Buy		Sell		
												Value	No. of units (contracts * lotsize)	Value	No. of units (contra cts * lot size)	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

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

Signature:
Designation:

Date:
Place