



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

Version – R6

Amended policy effective from 30th January, 2025

[Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 and as approved by the Board of Directors in their Meeting held on 30th January, 2025]

IVP Limited

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

1. INTRODUCTION

- 1.1 Securities and Exchange Board of India (“SEBI”) vide its Notification dated January 15, 2015, had issued the SEBI (Prohibition of Insider Trading) Regulations, 2015 and further amended the same vide its notification dated December 31, 2018, the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 (“Regulations”), to put in place a framework for prohibition of insider trading in securities and to strengthen the legal framework thereof.
- 1.2 Regulation 9 of the Regulations requires that Board of Directors of every listed company shall ensure that CEO/MD formulates a code of conduct with their approval to regulate, monitor and report trading by its designated person and immediate relatives of designated person towards achieving compliance with the Regulations, adopting minimum standards as set out in Schedule B of the Regulations, without diluting the provisions of the Regulations in any manner.
- 1.3 In the above context, IVP Limited (the “Company”) has formulated this Code as a part of Code of Conduct to Regulate, Monitor and Report Trading by Insiders of the Company (“Code”).
- 1.4 This Code is adopted in place of the existing “Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading by Insiders.”
- 1.5 This Code is applicable to all Insiders of the Company including Designated Persons and immediate relatives of Designated Persons.

2. DEFINITIONS AND INTERPRETATIONS

- 2.1 **Act:** Act means the Securities and Exchange Board of India Act, 1992.
- 2.2 **Board:** Board means Securities and Exchange Board of India.
- 2.3 **Board of Directors:** Board of Directors means the board of directors of the Company.
- 2.4 **Chief Investor Relations Officer:** Chief Investor Relations Officer (“CIRO”) means Chief Financial Officer of the Company.
- 2.5 **Company:** Company means IVP Limited.
- 2.6 **Compliance Officer:** Compliance Officer means the Company Secretary of the Company, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under the regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in the SEBI regulations under the overall supervision of the board of directors of the company.
- 2.7 **Code:** Code means this Code of Conduct to regulate, monitor and report Trading

by Insiders and shall include amendments/ modifications made thereto from time to time.

2.8 Connected Person: Connected Person means

- (i) any person who is or has been, during the six months prior to the concerned act, associated with a company, in any capacity, directly or indirectly, 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, whether temporary or permanent, with the company, that allows such a 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) a 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.
 - (k) a firm or its partner or its employee in which a connected person specified in sub-clause (i) of clause (d) is also a partner; or
 - (l) a person sharing household or residence with a connected person specified in sub-clause (i) of clause (d);

2.9 **Relative:** Relative shall mean the following:

- i) spouse of the person;
- ii) parent of the person and parent of its spouse
- iii) sibling of the person and sibling of its spouse;
- iv) child of the person and child of its spouse;
- v) spouse of the person listed at sub-clause (iii); and
- vi) spouse of the person listed at sub-clause (iv)

2.10 **Designated Person:** Designated Person shall mean the following:

- i) Directors;
- ii) Promoters and Promoter Group;
- iii) Key Managerial Personnel;
- iv) Functional heads;
- v) Employees in the grade of Assistant General Manager and above;
- vi) All employees in the finance, accounts, secretarial and legal department;
- vii) Executive assistant/ secretaries to executive directors, legal department
- viii) Immediate Relatives of the persons specified in (i) to (vii) above; and
- ix) Any other employee/ person as may be determined and informed by the Compliance Officer from time to time, based on such person's role, designation, function and the extent to which such person may have access to Unpublished Price Sensitive Information.

2.11 **Director:** Director means a member of the Board of Directors of the Company.

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

2.13 **Generally Available Information:** Generally Available Information means information that is accessible to the public on a non-discriminatory basis and shall not include unverified event or information reported in print or electronic media.

2.14 **Immediate Relative:** 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;

2.15 **Insider:** Insider means any person who is:

- (i) a Connected Person; or
- (ii) in possession of or having access to Unpublished Price Sensitive Information.

2.16 **Key Managerial Personnel:** Key Managerial Personnel means Chairman and Managing Director, Whole-time Director, Chief Executive Officer, Chief Operating Officer, Company Secretary, Chief Financial Officer and such other person who may be designated as Key Managerial Person under applicable law from time to time.

2.17 **Promoter:** 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.

- 2.18 **Promoter Group:** 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.
- 2.19 **SEBI Regulations:** SEBI Regulations means the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended.
- 2.20 **Securities:** Securities shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 or any modification thereof.
- 2.21 **Takeover Regulations:** Takeover Regulations means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.
- 2.22 **Trading:** Trading means and includes subscribing, redeeming, switching, buying, selling, dealing, or agreeing to subscribe, redeem, switch, buy, sell, deal in any securities, and "Trade", shall be construed accordingly.
- 2.23 **Trading Day:** Trading Day means a day on which the recognized stock exchanges are open for trading.
- 2.24 **Trading Window:** Trading Window means a trading period for trading in the Securities of the Company as specified by the Company from time to time.
- 2.25 **Unpublished Price Sensitive Information or UPSI:** 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:-
- (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;
 - (v) changes in key managerial personnel;

Words and expressions used and not defined in this Code, but defined in the Act, Regulations, the Securities Contract (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made thereunder shall have the meanings respectively assigned to them in such legislations.

3. ROLE OF COMPLIANCE OFFICER

- 3.1 Subject to the supervision of the Board of Directors, the Compliance Officer, shall be responsible for:
- (i) Setting forth policies, procedures, monitoring adherence to the Code and

SEBI Regulations for the preservation of UPSI, approval and review of trading plans, pre-clearance of Trades and monitoring of Trades and implementation of this Code.

- (ii) The Compliance Officer shall assist all employees in addressing any clarifications regarding the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended and the Company's Code of Conduct.

3.2 The Compliance Officer shall report to the Board of Directors and shall provide reports to the chairman of the Audit Committee at such frequency as may be stipulated by the Board of Directors, but not less than once in a year.

4. RESTRICTIONS ON COMMUNICATION OR PROCUREMENT OF UPSI

4.1 No Insider shall communicate, provide, or allow access to any UPSI, relating to the 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 duties or discharge of legal obligations.

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

4.3 Notwithstanding anything contained in this Code, any UPSI may be communicated, provided, allowed access to or procured, in connection with a transaction that would: -

- (i) entail an obligation to make an open offer under the Takeover Regulations where the Board of Directors are of the informed opinion that the proposed transaction is in the best interests of the Company;
- (ii) not attract the obligation to make an open offer under the Takeover Regulations but where the Board of Directors are of the informed opinion that the sharing of such information is in the best interests of the Company and the information that constitutes UPSI is disseminated to be made Generally Available Information at least 2 (two) Trading Days prior to the proposed transaction being effected in such form as the Board of Directors may determine, to be adequate and fair to cover all material and relevant facts;

4.4 For purposes of sub-clause 4.3 above, 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 such limited purpose, and shall not otherwise Trade in Securities of the Company when in possession of UPSI.

4.5 The Company shall maintain a structured digital database, containing such information as may be prescribed, with adequate internal controls and checks. The Company is required to maintain internally a structured digital database to handle Unpublished Price Sensitive Information. The structured digital database shall be 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.

5. RESTRICTION ON TRADING WHEN IN POSSESSION OF UPSI

An Insider shall not, directly or indirectly, -

- (i) Trade in securities of the Company that are listed or proposed to be listed when in possession of UPSI;
- (ii) Trade in securities of the Company except when the Trading Window is open and the Insider is not in possession of UPSI.
- (iii) provide advise/ tips to any third party on trading in Company's securities while in possession of UPSI and

An insider who has ceased to be associated with the Company shall not, for a period of six months from date of such cessation, directly or indirectly trade in the Company's Securities while in possession of UPSI.

No Insider may take positions in derivative transactions in the securities of the Company at any time.

The restriction in 5 (i) above may not apply to:

- (a) a transaction that is an off-market inter-se transfer between Insiders who were in possession of the same UPSI without being in breach of this Code and both parties had made a conscious and informed trade decision; and
- (b) Trades pursuant to a Trading Plan set up in accordance with this Code and SEBI Regulations.

When a person has traded in securities while in possession of UPSI, his trades would be presumed to have been motivated by the knowledge and awareness of such information in his possession.

6 PREVENTION OF MISUSE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

A. TRADING PLAN

- 6.1 An Insider shall be entitled to formulate a trading plan and present it to the Compliance Officer for approval as per format given in **Annexure A** and public disclosure pursuant to which Trades may be carried out on his behalf in accordance with such plan.
- 6.2 The Compliance Officer shall approve the trading plan. 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.

Provided that pre-clearance of trades shall not be required for a trade executed as per an approved trading plan. However, after obtaining the approval for the trading plan and/or preclearance, if the person partly deals in the securities as approved and subsequent to such transaction obtains a UPSI then the balance quantity as per the trading plan /pre clearance shall be deemed as null & void.

The compliance officer shall approve or reject the trading plan within two trading days of receipt of the trading plan and notify the approved plan to the stock exchanges on which the securities are listed, on the day of approval.

6.3 Such trading plan shall:

- (i) not entail commencement of Trading on behalf of the Insider earlier than 120 days from the public disclosure of the trading plan;
- (ii) not entail overlap of any period for which another trading plan is already in existence;
- (iii) set out the following parameters for each trade to be executed:
 - a. either the value of trade to be effected or the number of securities to be traded;
 - b. nature of the trade;
 - c. either specific date or time period not exceeding five consecutive trading days;
 - d. price limit, that is an upper price limit for a buy trade and a lower price limit for a sell trade, subject to the range as specified below:
 - 1. for a buy trade: the upper price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent higher than such closing price;
 - 2. for a sell trade: the lower price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent lower than such closing price.

Explanation -

- a. While the parameters in sub-clauses (a), (b) and (c) shall be mandatorily mentioned for each trade, the parameter in sub-clause (d) shall be optional.
 - b. The price limit in sub-clause (d) shall be rounded off to the nearest numeral.
 - c. Insider may make adjustments, with the approval of the compliance officer, in the number of securities and price limit in the event of corporate actions related to bonus issue and stock split occurring after the approval of trading plan and the same shall be notified on the stock exchanges on which securities are listed.
- (iv) not entail Trading in securities for market abuse; and

- 6.4 The Trading Plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the plan without being entitled to either execute any trade in the securities outside the scope of the trading plan or to deviate from it except due to permanent incapacity or bankruptcy or operation of law. 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 UPSI 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 UPSI becomes generally available information.
- 6.5 If the insider has set a price limit for a trade, the insider shall execute the trade only if the execution price of the security is within such limit. If price of the security is outside the price limit set by the insider, the trade shall not be executed.
- 6.6 In case of non-implementation (full/partial) of trading plan due to either reasons enumerated in clause 6.4 & 6.5 above or failure of execution of trade due to inadequate liquidity in the scrip, the following procedure shall be adopted:
- (i) The insider shall intimate non-implementation (full/partial) of trading plan to the compliance officer within two trading days of end of tenure of the trading plan with reasons thereof and supporting documents, if any.
 - (ii) Upon receipt of information from the insider, the compliance officer, shall place such information along with his recommendation to accept or reject the submissions of the insider, before the Audit Committee in the immediate next meeting. The Audit Committee shall decide whether such non-implementation (full/partial) was bona fide or not.
 - (iii) The decision of the Audit Committee shall be notified by the compliance officer on the same day to the stock exchanges on which the securities are listed.
 - (iv) In case the Audit Committee does not accept the submissions made by the insider, then the compliance officer shall take action as per this Code.

B. TRADING WINDOW

- 6.7 All Designated Persons shall execute Trades in the Securities of the Company only in a valid trading period called Trading Window prescribed hereunder and shall not execute any Trade or deal in any transaction involving the purchase or sale of the Company's Securities in their own name or in the name of their Immediate Relatives during the period when the Trading Window is closed or any other period as may be specified by the Company from time to time.
- 6.8 In case of declaration of financial results, the Trading Window shall be closed from the end of every quarter till 48 hours after the declaration of financial results.
- 6.9 In addition to the above, the trading window shall be closed in particular for a Designated Person or class of Designated Persons when the Compliance Officer in consultation with CISO determines that a Designated Person or class of Designated Persons can reasonably be expected to have possession of UPSI, for such periods as determined by the Compliance Officer. Designated Person or class of Designated Persons will receive a notice on such special blackout periods.

- 6.10 The Compliance Officer after taking into account various factors including the UPSI in question becoming Generally Available Information and being capable of assimilation by the market, shall decide the timing for re-opening of the Trading Window, which however shall not in any event be earlier than 48 hours after the information becoming Generally Available Information.
- 6.11 The notice of closure of the Trading Window intimated to the stock exchanges, if any, wherever the Securities of the Company are listed.

C. PRE-CLEARANCE OF TRADES

- 6.12 During a valid Trading Window, trading by Designated Persons shall be subject to pre-clearance by the Compliance Officer, if the value of proposed trade of the Securities, whether in one transaction or a series of transactions over a calendar quarter, aggregates to a traded value in excess of Rs. 10,00,000/-

6.13 PROCEDURE FOR PRE-CLEARANCE OF TRADES

- i. An application for pre-clearance of Trade shall be made to the Compliance Officer in the format attached as **Annexure B** hereto, indicating the estimated number of Securities that the Designated Person making such application intends to deal in, the details as to the depository with which he/she has a security account and such other details as may be required by the Company in this regard.
- ii. In case of the Compliance Officer himself/ herself intending to deal in the Securities of the Company beyond the threshold limit specified, the pre-clearance of the Chief Executive Officer/ Whole Time Director or in his absence, the Chairman of the Company, will have to be obtained.
- iii. An undertaking in the format set out in **Annexure C** of this Code, shall be executed in favour of the Company by such persons applying for pre-clearance stating that he is not in possession of any UPSI.
- iv. The Compliance Officer shall on receiving an application, provide the Designated Persons with an acknowledgement on the duplicate of the application or in any electronic form.
- v. The Compliance Officer shall communicate the order in a format attached as **Annexure D** on application for preclearance within 5 days from the date of acknowledgement.
- vi. The Compliance Officer shall retain copies of all applications and acknowledgements either in physical or electronic mode.
- vii. In exceptional circumstances consent may not be given if the Compliance Officer is of the opinion that the proposed deal is on the basis of possession of any UPSI. There shall be no obligation to give reasons for any withholding of consent.

6.14 **Validity of Pre-Clearance Period**

If the pre-cleared Trade is not executed within seven trading days after the approval is given, the Designated Person must secure pre-clearance of the transaction again.

6.15 **Reporting**

Designated Persons executing pre-cleared Trades shall file within 2 working days of the execution of the Trade, the details of such Trade, with the Compliance Officer in the format set out in **Annexure E** of this Code. In the event such Trade is not executed, a report to that effect shall be filed with the Compliance Officer also in the format set out in **Annexure E** of this Code.

7 ADDITIONAL TRADING RESTRICTIONS ON DESIGNATED PERSONS

- (i) No Insiders shall enter any derivative transactions like Futures/Options/forwards/Swaps, etc. in respect of the securities of the Company.
- (ii) All Designated Persons who Trade in the securities of the company shall not enter into a contra trade during the next six months following the prior transaction. In case of any 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 SEBI for credit to the Investor Protection and Education Fund administered by SEBI.
- (iii) The above restriction on contra trade shall not apply in case of exercise / sale of ESOP shares provided the Designated Persons do not possess UPSI and the sale is executed when the trading window is open and after obtaining pre-clearance.

8 PRESERVATION OF UPSI

- 8.1 All employees who have access to UPSI are identified as designated employee.
- 8.2 Access to UPSI shall be on a “need-to-know” basis and no UPSI shall be communicated to any person except in furtherance of legitimate purposes, in the course of performance of his duties or in discharge of his legal obligations.
- 8.3 Files containing UPSI shall be kept secure. Computer files shall have adequate security of login and passwords, etc.
- 8.4 To prevent the misuse of UPSI, the Company adopts the “Chinese Wall” policy which separates those areas of the Company which routinely have access to UPSI, considered “inside areas” from those departments which deal with sale/marketing or other departments providing support services, considered “public areas”.
- 8.5 As per the Chinese Wall Norms:-

- (i) The Employees in the inside areas are not allowed to communicate any UPSI to anyone in the public areas.
- (ii) The Employees in inside area may be physically separated from the Employees in public area.
- (iii) Demarcation of the various departments as inside areas may be implemented by the Departmental Heads in consultation with the Compliance Officer;
- (iv) The Employees within the inside area of the Chinese Walls have a responsibility to ensure the Chinese Wall is not breached deliberately or inadvertently. Known or suspected breaches of the Chinese Wall must be referred to the Compliance Officer immediately;
- (v) The establishment of Chinese Wall is not intended to suggest that within inside areas material, UPSI can be circulate freely. Within inside areas, the need-to-know shall be in effect; and
- (vi) Only in exceptional circumstances, Employees from the public areas may be permitted to 'cross the wall' are brought 'over the wall' and provided UPSI on "need to know" basis, under intimation to the Compliance Officer.

9 POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES

The sharing of UPSI may be carried out for legitimate purposes. While all instances of sharing of information may not be defined / covered under the definition of 'legitimate purposes', the Company and the Insiders will be guided by the following factors in determining legitimate purposes:

- (i) Whether the transaction/ business pursuant to which UPSI is required to be shared, is legal in India as well as the country of the Recipient?
- (ii) Whether the transaction/ business and the sharing of UPSI, is pursuant to a prior legal or regulatory obligation owed to the party?
- (iii) Whether the sharing of UPSI is necessary for taking an informed decision or action by the third party and / or the Company?
- (iv) Whether the transaction / business and sharing of the UPSI is furtherance of the legal and business interests of the Company?

The term legitimate purposes shall include sharing of UPSI in the ordinary course of business by an Insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisor, auditors, insolvency professionals or other advisors and consultants provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.

The CIRO shall guide the Designated Persons in respect of communication of any UPSI for legitimate purpose. Such person in receipt of UPSI pursuant to a 'legitimate purpose' shall be considered an "Insider" for purposes of these regulations and due notice shall be given to such persons to maintain confidentiality of such UPSI in compliance with these regulations.

Sharing of UPSI shall be considered for a legitimate purpose whenever the CIRO in consultation with CEO considers deems fit in compliance with the provisions.

The policy will stand amended whenever there is an amendment in provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 time to time.

10 DISCLOSURES

10.1 General provisions:

- (i) All public disclosures required to be made pursuant to the SEBI Regulations and this Code shall be made in the formats specified in the SEBI Regulations and this Code and as may be amended by SEBI from time to time.
- (ii) 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.
- (iii) The disclosures of Trading in Securities shall also include Trading in derivatives of Securities and the traded value of the derivatives shall be taken into account for purposes of disclosure. Provided that Trading in derivatives of Securities is permitted by any law for the time being in force.
- (iv) The policy will stand amended whenever there is an amendment in provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 time to time.

10.2 Disclosures by certain persons:

(i) Initial Disclosures

- (a) Every Promoter, member of the Promoter Group, 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 30 (thirty) days of these regulations taking effect as per Form A as set out in **Annexure F** hereto;
- (b) Every person on appointment as a Key Managerial Personnel Director or of the Company or upon becoming a Promoter or member of the Promoter Group shall disclose his holding of Securities of the Company as on the date of appointment or becoming a Promoter, to the Company within 7 (seven) days of such appointment or becoming a Promoter, as per Form B as set out in **Annexure G** hereto.

(ii) Continual Disclosures

- (a) *Every Promoter, member of the Promoter Group, Designated Person and Director of the company and their relatives 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 10,00,000 (Ten lakh) rupees or such other value as may be specified as per Form C as set out in **Annexure H** hereto.

- (b) The Compliance Officer may, require any other Connected Person to disclose the holdings and trading in securities of the Company as per Form D as set out in **Annexure I** at such frequency as he may determine.
- (c) The disclosure mentioned in (ii) (a) and (ii) (b) above shall be made within 2 trading days of:
 - 1. the receipt of intimation of allotment of shares, or
 - 2. the acquisition or sale of shares or voting rights, as the case may be.
- (d) The Company shall notify the particulars of such Trading to the stock exchange on which the Securities of the Company are listed within 2 (two) Trading Days from the receipt of such disclosure or becoming aware of such information.

* The Company has uploaded details of Promoter, Promoter Group, Directors and Designated persons to comply with SEBI circular no. SEBI/HO/ISD/ISD/CIR/P/2020/168 dated 9th September, 2020 for tracking on System Driven disclosure.

Further, SEBI vide circular no. SEBI/HO/ISD/ISD/CIR/P/2021/617 dated 13th August, 2021, clarified that Companies who have complied with the requirements of circular dated 9th September, 2020 are not required to file manual disclosure as required under Regulation 7(2) (a) and (b) of PIT Regulations.

Further, with reference to the aforesaid circulars, it is required to be noted that the immediate relatives of designated persons and persons for whom the designated person takes/assists trading decision need to continue making disclosure under Regulation 7(2)(a) & (b) of PIT Regulations 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 10,00,000 (Ten lakh) rupees or such other value as may be specified as per Form C as set out in **Annexure H** but the entities referred to in SEBI circular dated 9th September, 2020 will not be required to submit the details in Form C as mentioned above.

It is hereby clarified that the disclosure of the incremental transactions after any continual disclosure made under this sub-clause, shall be made when the transactions effected after the prior disclosure cross the threshold specified in this sub-clause above.

The above disclosures shall be made in such form and such manner as may be specified by the Board from time to time.

(iii) Annual Disclosures

Designated Persons shall furnish to the Compliance Officer annual statement of all their holdings in Securities of the Company to be submitted within 30 days of the close of each financial year in the format specified in **Annexure J** hereto.

11. PRESERVATION OF DISCLOSURES

All undertakings, disclosures and applications made/submitted under these

regulations shall be maintained by the Compliance Officer, for a minimum period of 5 years.

12. PROCESS TO BE FOLLOWED IN SENSITIVE TRANSACTION(S)

The CEO shall give prior notice to employee who are brought inside on sensitive transaction(s) 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.

- 12.1 The Company is empowered to take appropriate action against any person who violates this Code. Such action may include wage freeze, suspension, recovery, claw back, ineligibility for future participation in employee stock option plan etc. Any amount collected under this clause shall be remitted to the Board for credit to the Investor Protection and Education Fund administered by the Board under the Act.
- 12.2 Designated Employees/ Insiders who violate the Code and/ Regulation, (whether the violation was intentional or unintentional) shall also be subject to disciplinary action, which may include action such as wage freeze, suspension, recovery of wrongful gains, issue of warning letters, termination from employment/ business or other legal or commercial relation, filing a suit and such other remedy as may be available under the law for the time being in force at the sole discretion of the Company. Any amount collected under this Clause shall be remitted to the Board for credit to the Investor Protection and Education Fund administered by the Board under the Act.

13 COMPLIANCE WITH CODE OF CONDUCT

- 13.1 Designated persons 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:
- (i) Immediate Relatives;
 - (ii) Person with whom such designated person(s) share a material financial relationship; &
 - (iii) Phone, mobile and cell number which are used by them.

In addition, the names 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.

- 13.2 Intermediary or fiduciary engaged by the Company shall put in place adequate and effective system of internal controls to ensure compliance with the requirements given in the SEBI Regulations to prevent insider trading.
- 13.3 It is the responsibility of the Connected Person to ensure compliance with the Code of Conduct as required under SEBI (Prohibition of Insider Trading) Regulations, 2015

- 13.4 When a person who has traded in securities has been in possession of UPSI, his trades would be presumed to have been motivated by the knowledge and awareness of such information in his possession. The onus is on the Insiders to prove that they are innocent.
- 13.5 Any violation under the Regulations and this Code will be reported by the Compliance Officer promptly to the stock exchange(s) where the securities are traded, in such form and such manner as may be specified by the SEBI from time to time in the format attached as **Annexure K** hereto.

14 AMENDMENTS AND MODIFICATIONS

The decision of the Board of Directors with regard to any or all matters relating to this Code shall be final and binding on all concerned. This Code shall be reviewed from time to time and the Board of Directors shall have the power to modify, amend or replace this Code in part or full, as may be thought fit from time to time in their absolute discretion.

15 PENALTY FOR CONTRAVENTION

- 15.1 Any Designated Person or Insider who trades in Securities or communicates, provides or allows access to any information for Trading in Securities in contravention of the Code, shall be penalized and appropriate action taken shall be taken against him/her by the Company basis his/ her seniority, number and nature of contraventions.

The penalty imposed/action by the Company may include but shall not be restricted to:

- (i) Reprimanding of defaulting Designated Person/Insider;
 - (ii) Ban from engaging in any trade of the securities or exercise of stock options of the Company;
 - (iii) Suspension from employment;
 - (iv) Ban from participating in all future employee stock option schemes including lapse of all existing options;
 - (v) No increment and/or bonus payment; and/or
 - (vi) Termination from employment;
 - (vii) Disgorgement of the gain accrued through the transactions in violation of the Code.
- 15.2. 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.

ANNEXURE A
APPLICATION FOR ANNUAL TRADING PLAN

Date: _____

To,
The Compliance

Officer, IVP Limited,
Ghorupdeo,
Mumbai.

1. Name of the Applicant _____
2. PAN : _____
3. No. of securities held in the Company as on date: _____
4. Approval sought for: Self [☐] Immediate Relative (IR) [☐]
5. Trading plan belongs for a period of ____ months i.e. for a period commencing from _____ and ending on
6. Details of the proposed trade

DP ID/ Client ID/ Folio No	Type of Security	Nature of Transaction(Buy/ Sell)	Proposed date/ time period of transaction	No of Securities to be traded/ Value of Trade

Undertaking:

- (a) I will not commence trading earlier than six months from the public disclosure of the plan.
- (b) I do not have overlapping trading plan for the same period.
- (c) In the event that I am in possession/knowledge of any information that is construed as “Unpublished Price Sensitive Information” as defined in the Policy, at the time of formulation and approval of this plan but which is not made public at the time of trading as per the approved time schedule in the said plan, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public;
- (d) I have not contravened the provisions of the Insider Trading Policy as notified by the Company from time to time;
- (e) I have made full and true disclosure in the matter.
- (f) I undertake to abide by this trading plan once approved and shall furnish such declarations disclosures as may be deemed necessary by compliance officer for the monitoring of this plan.
- (g) I shall not use this trading plan as a tool for market abuse.

Date:

Signature

For use of Compliance Officer:

Application recd. Date	Approval Date	Approval No.	Approval Compliance signature	No. Officer's

Approval granted for Trading Plan for a period of ____months commencing from ____Upto ____.

Notification to Stock Exchange: _____

Signature:_____

Compliance Officer

Please provide all the information. Incomplete forms will not be accepted.

ANNEXURE B

FORMAT OF APPLICATION FOR OBTAINING PRE-CLEARANCE APPROVAL

Date:

To,
The Compliance Officer,
IVP Limited,
Ghorupdeo, Mumbai.

Dear Sir/Madam,

Application for Pre-clearance approval in securities of the Company.

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS, I seek approval to purchase / sale / subscription of _____ equity shares of the Company as per details given below:

1.	Name of the Applicant	
2.	Designation	
3.	Number of Securities held as on date	
4.	Folio No. / DP ID / Client ID No.)	
5.	The proposal is for	(a) Purchase of Securities (b) Subscription to Securities (c) Sale of Securities
6.	Proposed date of dealing in securities	
7.	Estimated number of securities proposed to be acquired/ subscribed/ sold.	
8.	Price at which the transaction is proposed	
9.	Current Market price (as on date of Application)	
10.	Whether the proposed transaction will be through Stock Exchange or off-market deal.	
11.	Folio No. / DP ID / Client ID No. where the Securities will be credited or debited.	

I enclose herewith the Form of Undertaking signed by me. Yours

faithfully,

(Signature of Designated Person)

ANNEXURE- C

FORMAT OF UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-CLEARANCE

UNDERTAKING

Date:

To,
The Compliance Officer,
IVP Limited, Ghorupdeo,
Mumbai.

Dear Sir/Madam,

I _____, _____ of the Company residing at _____, am desirous of dealing in _____* shares of the Company as mentioned in my application dated _____ for pre-clearance of the transaction.

I further declare that I am not in possession of or otherwise privy to any Unpublished Price Sensitive Information (as defined In the Company's CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS (the Code) up to the time of signing this Undertaking.

In the event that I have access to or received any Information that could be construed as "Unpublished Price Sensitive Information" as defined in the Code, after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public.

I declare that I have not contravened the provisions of the Code as notified by the Company from time to time.

I undertake to submit the necessary report within 2 days of execution of the transaction / a 'Nil' report if the transaction is not undertaken.

If approval is granted, I shall execute the deal within 7 days of the receipt of approval failing which I shall again seek pre-clearance.

I declare that I have made full and true disclosure in the matter.

Date:

Signature:

* Indicate number of shares.

ANNEXURE- D

FORMAT FOR PRE- CLEARANCE ORDER

Name :

Designation / Category :

Place :

This is to inform you that your request for dealing in [Nos.] shares of the Company as mentioned in your application dated _____ is approved. Please note that the said transaction must be completed on or before _____ (date) that is within 7 days from today.

In case you do not execute the approved transaction / deal on or before the aforesaid date, you would have to seek fresh pre-clearance before executing any transaction/deal in the securities of the Company. Further, you are required to file the details of the executed transactions in the attached format within 2 days from the date of transaction/deal. In case the transaction is not undertaken a 'Nil' report submission shall be necessary.

Yours Faithfully,

For IVP Limited

Compliance Officer

Date :

End: Format for submission of details of transaction.

ANNEXURE E

FORMAT FOR DISCLOSURE OF TRANSACTIONS EXECUTED/NOT EXECUTED AFTER OBTAINING PRE-CLEARANCE

To,
The Compliance Officer,
IVP Limited, Ghorupdeo,
Mumbai.

With reference to the trading approval granted by the Company to me on _____
(Date), I hereby inform that I:

- Have not bought/ sold/ subscribed any Securities of the Company
- Have bought/ sold/ subscribed to _____ Securities of the Company as mentioned below on _____ (date):

Name Holder	of No Securities with	of Nature (Buy/ Sell/ Subscribed)	DP ID- Client ID/ Folio No	Price (Rs.) per share and in aggregate

In connection with the aforesaid transaction, please find enclosed copy of the following for your records:

1. Broker's contract note.
2. Proof of payment to/from brokers
3. Extract of bank passbook/statements (in case of demat transaction)
4. Copy of Delivery instruction slips (applicable in case of sale transactions)

I hereby undertake to preserve the original copy of the above mentioned document for a period of 5 years and produce to the Compliance Officer/Securities Exchange Board of India, if required in future.

I agree to hold the above Securities for a minimum period of 6 months. In case there is any urgent need to sell these securities within the said period, I shall approach the Compliance Officer, for necessary approval. *(Applicable in case of Purchase/ Subscription)*

I declare that above information is correct and that no provisions of the Company's code and / or Applicable Laws/ Regulations have been contravened for effecting the above said transactions.

Yours truly,

Name & Signature:
Designation:
Date:

Note: After pre-clearance, if the Designated Person opts not to trade in securities should enclose the reasons for taking such decision along with this form

ANNEXURE F

FORM A

SEBI (Prohibition of Insider Trading) Regulations, 2015

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

Name of the company: _____

ISIN of the company: _____

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

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP /Directors/immediate relative to/others etc.)	Securities held as on the date of regulation coming into force		% of Shareholding
		Type of security (For e.g., Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5

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

Details of Open Interest (OI) in derivatives of the company held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(3)

Open Interest of the Future contracts held as on the date of regulation coming into force			Open Interest of the Option Contracts held as on the date of regulation coming into force		
Contract Specifications	Number of units (contracts lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts lot size)	Notional value in Rupee terms
6	7	8	9	10	11

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

Name & Signature: Designation:

Date: Place

ANNEXURE G

FORM B

SEBI (Prohibition of Insider Trading) Regulations, 2015[Regulation 7 (1) (b) read with Regulation 6(2) – Disclosure on becoming a Key Managerial Personnel/Director/Promoter/Member of the promoter group]

Name of the company: _____

ISIN of the company: _____

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/ DIN & Address with contact nos.	Category of Person (KMP / Director or Promoter or member of the promoter group/ Immediate relative to/others, etc.)	Date of appointment of KMP/Director /OR Date of becoming Promoter/ member of the promoter group	Securities held at the time of appointment of KMP/Director or upon becoming Promoter or member of the promoter group		% of Shareholding
			Type of securities(For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements, etc.)	No.	
1	2	3	4	5	6

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

Details of Open Interest (OI) in derivatives on the securities of the company held on appointment of KMP or Director or upon becoming a Promoter or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).

Open Interest of the Future contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group			Open Interest of the Option Contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group		
Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
7	8	9	10	11	12

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

Name & Signature:

Designation:

Date:

Place:

ANNEXURE H

FORM C

SEBI (Prohibition of Insider Trading) Regulations, 2015[Regulation 7 (2) read with Regulation 6(2) – Continual Disclosure]

Name of the company: _____

ISIN of the company: _____

Details of change in holding of Securities of Promoter, Member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoter/member of the promoter group/designated person/Director s/immediate relative to/others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/acquisition of shares/disposal of shares, specify		Date of intimation to company	Mode of acquisition/disposal (on market/public/rights/preferential offer/off market/Inter-se transfer, ESOPs, etc.)	Exchange on which the trade was executed
		Type of securities (Foreg. – Shares, Warrants, Convertible Debentures, Rights entitlements etc.)	No. and % of share holding	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No.	Value	Transaction Type (Purchase/sale/Pledge / Revocation / Invocation / Others-please specify)	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of shareholding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

Note: (i) "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.
(ii) Value of transaction excludes taxes/brokerage/any other charges

Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

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

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

Name & Signature:

Designation:

Date:

Place:

ANNEXURE I

FORM D (Indicative format)

SEBI (Prohibition of Insider Trading) Regulations, 2015 Regulation 7(3) – Transactions by Other connected persons as identified by the company

Details of trading in securities by other connected persons as identified by the company

Name, PAN, CIN/DIN, & address with contact nos. of other connected persons as identified by the company	Connection with company	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/ acquisition or disposal of shares specify		Date of intimation to company	Mode of acquisition/ disposal (on market/ public/ rights/ Preferential offer / off market/ Inter-se transfer, ESOPs etc.)	Exchange on which the trade was executed
		Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of shareholding	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No.	Value	Transaction Type (Purchase/Sale/ Pledge/ Revocation / Invocation/ Others-please specify)	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of share holding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

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

(ii) Value of transaction excludes taxes/brokerage/any other charges

Details of trading in derivatives on the securities of the company by other connected persons as identified by the company

Trading in derivatives (Specify type of contract, Futures or Options etc.)						Exchange on which the trade was executed
Type of Contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
16	17	18	19	20	21	22

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

Name:

Signature:

Place:

ANNEXURE J

ANNUAL DISCLOSURE

Transactions by Designated Persons as identified by the Company

Details of transactions executed during the Financial Year _____ in securities of the Company

To,
The Compliance Officer,
IVP Limited, Ghorupdeo,
Mumbai.

I, _____ (name of the Designated Person) of the Company, residing at _____ hereby declare that -

The following is the consolidated statement of transactions made during the Financial Year _____.

Opening balance of securities of the Company held as on 01.04.20_____	Purchase/Sale made during the year	Closing balance of securities of the Company held as on 31.03.20_____

*I was holding (number of securities) securities of the Company on 01 April 20 (start of the financial year). However, I have not traded in securities of the Company during the Financial Year ended 31 March 20 (end of the financial year).

Name & Signature

Designation:

Date:

Place:

*** Please delete/modify as per the factual position**

Annexure K
Report by IVP Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015.

Sr No.	Particulars	Details
1	Name of the Listed Company	
2	Please tick appropriate checkbox Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	
3	A. Details of Designated Person i. Name of the Designated Person (DP) ii. PAN of the DP iii. Designation of DP iv. Functional role of DP v. Whether DP is Promoter / Promoter Group	
	B. If reporting is for immediate relative of DP i. Name of the immediate relative of DP ii. PAN of the immediate relative of DP	
	C. Details of transaction(s) i. Name of the scrip ii. No of shares traded and value (Rs.) (Date-wise)	
	D. In case value of trade(s) is more than Rs 10 lacs in a calendar quarter - i. Date of intimation of trade(s) by concerned DP/director/ promoter/promoter group to Company under regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015 ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015	
4	Details of violations observed under Code of Conduct	
5	Action taken by Listed Company	
6	Reasons recorded in writing for taking action stated above	
7	Details of the previous instances of violations, if any, since last financial year	
8	If any amount collected for Code of Conduct violation(s)	

	<p>i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)</p> <p>ii. Details of transfer/payment</p> <p>In case of Online:</p> <p>Particulars</p> <p>Name of the transferor</p> <p>Bank Name, branch and Account number</p> <p>UTR/Transaction reference Number</p> <p>Transaction date</p> <p>Transaction Amount (in Rs.) In</p> <p>case of Demand Draft (DD):</p> <p>Particulars</p> <p>Bank Name and branch</p> <p>DD Number</p> <p>DD date</p> <p>DD amount (in Rs.)</p>	
9	Any other relevant information	

Yours faithfully,

Date:

Place:

Name and Signature of Compliance Officer PAN:
Email id: