



Coral India Finance And Housing Limited

INSIDER TRADING CODE

(CODE OF INTERNAL PROCEDURES AND CONDUCT FOR REGULATING, MONITORING AND REPORTING OF TRADING BY INSIDERS)

[Under Regulation 9 and 9A of SEBI (Prohibition of Insider Trading) Regulations, 2015]

Policy approved by the Board on: 27th May, 2015
Revised Policy approved by the Board on: 12th February, 2019
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Table of Content

Sr. No.	Particulars	Page No.
1	Introduction	3
2	Objectives	3
3	Terms and Definition	3
4	Applicability & Disclosures	5
5	Role of Compliance Officer	5
6	Responsibility of Managing Director	6
7	Restrictions on Dealing, Communicating or Counselling on Matters Relating to Insider Trading	6
8	Trading Window	7
9	Trading Plan	8
10	Pre-Clearance of Trade	9
11	Restrictions on Contra Trade	9
12	Disclosures & Reporting	10
13	Maintenance of Records & Registers	11
14	Penalty for Contravention of this Code of Conduct	12
15	Information to SEBI in case of Violation	12
16	Amendments	12
17	Conclusion	12
18	Annexure	13-31



1. Introduction

- 1.1 The Securities and Exchange Board of India (“SEBI”) notified the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“Regulations”) on January 15, 2015, which is effective from May 15, 2015.
- 1.2 Sub-regulation (1) of Regulation 9 inter alia, requires all listed companies to frame a Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of trading by insiders by adopting the minimum standards as set out in Schedule B to the Regulations.
- 1.3 Accordingly the Board of Directors of Coral India Finance and Housing Limited (*hereinafter referred to as “the Company”*) have formulated the Code of Conduct on 27th May, 2015.
- 1.4 In order to ensure compliance with Regulation 9 and 9A of the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time by the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018, the Board of Directors of Coral India Finance and Housing Limited has adopted this revised Code of Conduct for Prevention of Insider Trading on February 12, 2019. The Policy shall be effective from April 01, 2019.

2. Objectives

- 2.1 The Company is committed to
 - i. Preserving the confidentiality and preventing misuse of any unpublished price sensitive information about the Company or any of its securities;
 - ii. Adherence to transparency and fairness in dealing with all stakeholders of the Company; and
 - iii. Strict compliance with applicable regulations of the Securities and Exchange Board of India.
- 2.2 The Objective of this Insider Trading Code is to set out the standards, and regulate and/or monitor compliance of Insider Trading Regulations of the Company by all “Insiders” and “Connected Persons” and their responsibility to preserve and maintain confidentiality of unpublished price sensitive information that may or is expected to affect the price of securities of the Company.

3. Terms and Definitions

In this Code, unless otherwise defined, the terms used have the meaning as defined under the Regulations:

- 3.1 **“Company”** means Coral India Finance and Housing Limited.
- 3.3 **“Compliance Officer”** means Company Secretary or such other senior officer, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations designated so and reporting to the Board of Directors 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 these regulations under the overall supervision of the Board of Directors of the Company.



- 3.3 **"Connected person"** this term shall have the meaning given to it under Regulation 2(d) of the Regulations and shall also include the promoters and members of the promoter group of the Company and such other persons as may be identified by the Company from time to time.
- 3.4 **"Designated Persons"** means Directors, Key Management Personnel, Connected Persons and employees as designated on the basis of their functional role in the Company. In this regard, the Board of Directors shall from time to time in consultation with the Compliance Officer specify the Designated Persons to be covered under this Code.
- 3.5 **"Generally available information"** means information that is accessible to the public on non-discriminatory basis.
- 3.6 **"Immediate Relatives"** 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.
- Note: It is intended that the immediate relatives of a connected person too become connected persons for the purposes of this regulations, unless rebutted so.*
- 3.7 **"Insider"** - this term shall have the meaning as assigned to it under Regulation 2(g) of the Regulations.
- 3.8 **"Key Management Personnel" ("KMP")** - this term shall have the meaning as assigned to it under Section 2(51) of the Companies Act, 2013, as amended.
- 3.9 **"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.
- 3.10 **"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.
- 3.11 **"Proposed to be listed"** shall include securities of an unlisted company:
- a) if such unlisted company has filed offer documents or other documents, as the case may be, with the Board, stock exchange(s) or registrar of companies in connection with the listing; or
 - b) if such unlisted company is getting listed pursuant to any merger or amalgamation and has filed a copy of such scheme of merger or amalgamation under the Companies Act, 2013.
- 3.12 **"Regulations"** shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.
- 3.13 **"Securities"** - this term shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 or any modification thereof except units of a mutual fund.
- 3.14 **"Trade", "Traded" or "Trading"** - means and includes subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell and deal in any Securities of the Company.
- 3.15 **"Trading day"** - means a day on which the recognized stock exchanges are open for trading.
- 3.16 **"Trading Plan"** is a plan formulated by an Insider and presented to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on behalf of the Insider in accordance with such plan as per Clause 5(1) of the SEBI Regulations.



- 3.17 **“Trading Window”** shall mean the trading period of the stock exchanges which is available for trading in the Company’s securities.
- 3.18 **“Unpublished Price Sensitive Information(“UPSI”)** means any information, relating to a company or its securities , directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to information relating to the following:-
- i. Financial results;
 - ii. Dividends;
 - iii. Change in Capital Structure;
 - iv. Mergers, de-mergers, acquisitions, delisting , disposals and expansion of business and such other transactions;
 - v. Changes in Key Managerial Personnel.
- 3.19 **“Working Day”** means working day of the Company.

Note: Words and expressions used and not defined in this Code but defined in the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and the Rules and Regulations made there under shall have the meanings respectively assigned to them in those legislation.

4. Applicability & Declaration

- 4.1 The Code is applicable to all Designated Persons and to the extent specified, to their Immediate Relatives.
- 4.2 All Designated Persons are advised to carefully go through and familiarize themselves with and adhere to the Code.
- 4.3 In case a Designated Person hold Securities jointly with any other person, related or not, such holding will be considered as the holding of the Designated Person. Accordingly, all the provisions of the Code shall be applicable in totality.
- 4.4 All Designated Persons are required to give their understanding of the policy by signing a Declaration to comply with the Code, in the format prescribed in **Annexure -1**.

5. Role of Compliance Officer

- 5.1 The Company Secretary designated as such by the Board will act as the Compliance Officer for the purpose of this Code and will perform the following functions and shall have the following powers:
- a. Monitor and administer this Code.
 - b. Process the pre-clearance of trade as per approval matrix.
 - c. Maintain, update and preserve records, as per SEBI Regulations.
 - d. Clarify issues regarding the Code and redress the grievances of the Designated Persons.
 - e. Decide and notify the ‘No-Trading Period’ for Designated Persons / selected persons or specific departments, as deemed necessary.
 - f. Identify and notify the list of Designated Persons on the basis of specific transactions, as required under the Code.
 - g. The Compliance Officer shall send reports to the Chairman of Audit Committee, on a



Designated Persons and the accompanying documents such persons had executed under the pre-dealing procedure as envisaged in this Code.

- 5.2 The Compliance Officer can delegate all or any of the above powers to any officer / employee of the Company.
- 5.3 In absence of the Compliance Officer for any reason, any senior officer, reporting to the Board, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under the Regulations, shall carry out the responsibilities of the Compliance Officer as required under this Code, and the Regulations.

6. Responsibilities of Managing Director

The Managing Director of the Company, shall formulate/amend this Code with the approval of the Board of Directors of the Company to regulate, monitor and report trading by its designated persons and their Immediate relatives towards achieving compliance with SEBI (Prohibition on Insider Trading) Regulations, 2015 (“PIT Regulations”), adopting the minimum standards set out in Schedule B of the Regulations, as may be amended from time to time, without diluting the provisions of its regulations in any manner.

7. Restrictions on Dealing, Communicating or Counselling on Matters Relating to Insider Trading

7.1 Preservation of UPSI

No insider shall communicate, provide, or allow access to any unpublished price sensitive information and shall maintain confidentiality of all UPSI coming into their possession, or control or access 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.

7.2 Need-to-know

All information shall be handled within the Company on a need-to-know basis i.e. all the Unpublished Price Sensitive Information should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information. All non-public information directly received by any employee should immediately be reported to the head of the department and no Insider shall communicate, provide or allow access to any UPSI except in furtherance of the Insider’s legitimate purposes, performance of duties of his legal obligations.

7.3 Limited access

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

7.4 Chinese Walls

To prevent the misuse of UPSI, the Company shall follow the ‘Chinese Wall’ approach and separate those departments which routinely have access to such information, considered as “inside areas” from other departments, considered as “public areas”. Employees in the inside areas shall not be allowed to communicate any UPSI to anyone in the public areas, except as may be required on a need-to-know basis in accordance with the Code and the Regulations.



7.5 Disclosure of Inside Information

The Board of Directors shall from time to time in consultation with the Compliance Officer specify that, how and when the people are brought 'inside' on sensitive transactions.

All the individuals, on becoming insider should be made aware of the duties and responsibilities attached to the receipt of Inside Information, and the liability that attaches to misuse or unwarranted use of such information.

8. Trading Window

All Designated Persons shall be subject to trading restrictions as enumerated below:

- 8.1 The "Trading Window" for the purpose of Code shall mean the period during which Trading is permitted.
- 8.2 Unless otherwise specified (Annexure-2) by the Compliance Officer, the trading window shall be, inter alia, closed for the purposes detailed below:

Sr. No.	Event	Trading Window to Remain Closed		
		For	From	To
1.	Declaration of Financial Results	1 st Qtr 2 nd Qtr 3 rd Qtr 4 th Qtr	Trading restriction period can be made applicable from the end of the quarter or as determined by the Compliance Officer.	48 Hours after the Results are submitted to Stock Exchange

	Event	Trading Window to Remain Closed	
		From	To
1.	Declaration of Dividend (Interim/Final)	Date of Notice of Board Meeting to Directors or Stock Exchange whichever is earlier	48 Hours after the Results are submitted to Stock Exchange
2.	Issue of Securities by way of Public Issue Rights Issue Bonus Issue	-do-	-do-
3.	Major Expansion Plans or execution of new project	-do-	-do-
4.	Amalgamation, Mergers, Takeovers and Buyback	-do-	-do-
5.	Disposal of whole or substantially whole of Undertaking	-do-	-do-
6.	Changes in Policies, Plans, Operations	-do-	-do-

- 8.3 Designated Persons and their Immediate Relatives shall not, either directly or through their advisors including investment managers, brokers, or other persons trading for or on behalf of their account, trade in Securities when the trading window is closed.



- 8.4 The trading window shall remain closed until the Price Sensitive Information becomes generally available information, however in any event it shall not be earlier than forty-eight hours after the information becomes generally available.
- 8.5 All Directors/Officers/Designated Employees may trade in Company's Securities without pre-clearance where the trade is for not exceeding 5000 nos. of shares or Rs.1, 50,000 whichever is lower during Trading Window.
- 8.6 All Directors/Officers/Designated Employees shall obtain prior approval of the Compliance Officer in the prescribed form for every trade exceeding threshold limit as specified in 8.5 above.
- 8.7 The application for trade shall be accompanied by an undertaking in the prescribed form.

9. Trading Plan

- 9.1 An insider shall be entitled to formulate a trading plan and present it to the compliance officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.

Such Trading Plan shall:-

- a. Not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
 - b. Not entail trading for the period between the twentieth trading days prior to the last day of any financial period for which results are required to be announced by the issuer of the securities and the second trading day after the disclosure of such financial results;
 - c. Entail trading for a period of not less than twelve months;
 - d. Not entail overlap of any period for which another trading plan is already in existence;
 - e. Set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates, on which such trades shall be effected; and
 - f. Not entail trading in securities for market abuse.
- 9.2 The Compliance officer shall review the trading plan to assess whether the plan would have any potential for violation of these regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.
 - 9.3 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 any unpublished price sensitive information in possession of the Insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation.

The Compliance Officer shall confirm that the commencement of the Plan shall be deferred until such unpublished price sensitive information becomes generally available information.



Further, the Compliance officer shall notify the plan to the stock exchange on which the securities are listed.

10. Pre-clearance of Trades

- 10.1 Every Designated Person shall obtain a pre-trading approval as per the procedure prescribed hereunder for any Trading in the Securities of the Company proposed to be undertaken by such Designated Person or his / her Immediate Relatives. Such pre-trading approval would be necessary, if the transactions (either single or aggregate) in any quarter exceed Rs. 10, 00,000/- (Rupees Ten Lakhs).
- 10.2 An application for pre-clearance along with an undertaking in favour of the Company shall be made in the format prescribed in **Annexure - 3 - Application cum Undertaking for Pre-clearance of Trade** to the Compliance Officer.
- 10.3 The trades that have been pre-cleared would need to be executed by the Designated Persons or his/her Immediate Relative, within 7 (seven) Trading Days from the date of pre-clearance, failing which fresh pre-clearance would need to be sought from the Compliance Officer.
- 10.4 On receipt of the application, the Compliance Officer shall scrutinize the application and grant his approval / rejection within three Working Days after the receipt of the application in the format as prescribed in **Annexure - 4**.
- 10.5 The Designated Person or Immediate Relative, as the case may be, shall file within 2 (two) Working from the expiry of 7 Trading Days, the details of execution/non-execution of the Pre-cleared trade, with the Compliance Officer in the format as prescribed in **Annexure - 5**.

11. Restrictions on Contra Trade

- 11.1 All Designated Persons and their Immediate Relatives who are permitted to Trade shall not enter into an contra trade i.e. sell or buy any number of Securities during the next **6 months** following the prior Trade.
- 11.2 In case the sale of Securities of the Company is necessitated due to personal reasons like marriage or education expenses or due to medical emergencies the Compliance officer may be empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing, provided that such relaxation does not violate the Regulations. It may however, be noted that in terms of the Regulations, no such sale will be permitted when the Trading Window is closed. The format for application of waiver of minimum holding period is provided in **Annexure - 6**.
- 11.3 Notwithstanding the above, should the Designated Person or his/her Immediate Relative executes an opposite transaction, inadvertently or otherwise, in violation of the restrictions set out above, the profits from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the SEBI Act, 1992.



12. Disclosures & Reporting

Sr. No.	Event	Disclosure By	Disclosure To	Time Duration	Format
1.	<u>Initial Disclosure:</u> On appointed as Director/KMP or becoming Promoter or member of Promoter Group.	Designated Person	Company	Within 7 Days of such appointment or becoming Promoter or member of Promoter Group.	Annexure - 7 (Form B)
2.	<u>Continual Disclosure:</u> Every promoter, employee and director of the Company shall disclose to the Company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. Ten Lakhs.	Designated Person	Company	Within 2 Working Days of such transaction.	Annexure - 8 (Form C)
3.	<u>Disclosure to Stock Exchange(s):</u> Disclosure of such transaction as mentioned in point no. 2 above.	Company	Stock Exchange	Within 2 Trading Days of: a. Receipt of information b. Becoming aware of such information.	Annexure - 8 (Form C)
4.	<u>Annual Disclosure:</u> Disclosure of holding in securities of the Company as on 31 st March of relevant financial year including acquisition or sale of shares or voting rights.	a) Designated Person b) Immediate Relatives	Company	Within 7 Days from the start of the Financial Year (i.e. on or before 07 th April of the relevant F.Y.)	Annexure -9
5.	<u>Disclosure by Connected Persons:</u> Disclosure by other Connected Persons or	Every other Connected	Company	As demanded by	Annexure -10

	class of Connected Persons of holding and trading in securities of the Company.	Persons/Class of Connected Persons		the Compliance Officer of the Company.	
6.	<p><u>Disclosure by Designated Persons:</u></p> <p>Disclosure on Annual Basis or as and when the information changes, the below listed details:</p> <ul style="list-style-type: none"> • PAN Number/Other ID Proof. • Contact Details. • Name of the Educational Institution from where the designated person have graduated. • Name of their past employers. 	<p>a) Designated Person</p> <p>b) Immediate Relatives</p> <p>c) Person with whom such Designated Person(s) share a material financial relation.</p>	Company	<p>Within 7 Days from the start of the Financial Year (i.e. on or before 07th April of the relevant F.Y.) or as and when specified by the Compliance Officer.</p>	Annexure -11

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

13. Maintenance of Records and Registers

- 13.1 Register of the periods of “Closure of Trading Window”, wherein he shall record the date of closure and opening of the trading window and purpose for which trading window is closed. A pro forma of the register of periods of closure of Trading Window is given in **Annexure -12**.
- 13.2 Register of Pre-clearance of trading of Securities and record therein the name and designation of the Designated Persons submitting the application, date of the application, date & time of receipt of the application, nature of the transaction, number of securities, consideration value, name of the dependent family member if the transaction is in the name of the dependent family member, communication by Compliance Officer and date & details of the actual transaction. A pro forma of the Register of Pre-clearance of Trading is given in **Annexure -13**.
- 13.3 Register of Waiver of restriction on holding investment in the securities of the Company and shall record thereon the name of the Designated Persons/details of securities for which waiver is granted, date of waiver and the ground of the waiver. A pro forma of the Register of Waiver is given at **Annexure -14**.
- 13.4 Register of Designated Person as per pro forma given in **Annexure -15**.
- 13.4 Register of Immediate Relatives of all the Designated Persons and the person with whom the Designated Person have a Material Financial Relationship as per pro forma given in **Annexure -16**.
- 13.5 Records of all the declarations in the appropriate form given by the Designated Persons and their dependents for a minimum period of five years.



13.6 Registers for recording the Initial disclosure, continual disclosure and Annual disclosure received under sub-clause 12 above. Pro forma of the Registers to be maintained are given in **Annexure -17**.

14. Penalty for Contravention of this Code of Conduct

- 14.1 Any Director / Designated employees, who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalized and appropriate action will be taken by the Company.
- 14.2 Designated employees of the Company who violate this Code shall also be subject to disciplinary action by the Company, which may include wage salary freeze, suspension, recovery, clawback etc. The action by the Company shall not preclude SEBI from taking any action in case of violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015.
- 14.3 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. However, where any direction is issued by the SEBI in any specific case relating to interpretation or application of any provision of this code, it shall be done only after affording a reasonable opportunity of being heard to the concerned person and after recording reasons for the direction.

15. Information to SEBI in case of Violation

In case it is observed by the Company and / or Compliance Officer that there has been a violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Compliance Officer shall inform the SEBI promptly after obtaining the approval of the Audit Committee.

16. Amendment

The Board reserves its rights to amend or modify the code in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding unless the same is notified in writing.

17. Conclusion

All Specified Persons are advised to familiarize themselves with the Regulations and comply with the same, as well as with the Code, both in letter and spirit. Specified Persons are also advised to ensure compliance by their immediate relatives.



ANNEXURE - 1

DECLARATION BY DIRECTOR / DESIGNATED PERSON

To	From
The Compliance Officer	Name :
Coral India Finance and Housing Limited	Designation :
Dalamal House, 04 th Floor,	Employee Code :
J.B. Marg, Nariman Point,	Company name :
Mumbai - 400 021	Tel. No. & Email :

I, the undersigned, being a Director / Designated Person as defined under the Code, hereby declare and confirm as under:

1. I have received, read and understood the Code;
2. I agree to comply with Code and that I and my Immediate Relatives shall be bound by the Code to the extent applicable to us;
3. I agree to hold the Company harmless in the event of any investigation against me and / or my Immediate Relatives for any Insider Trading by the regulatory agencies;
4. I agree to compensate the Company for all economic losses, loss / damage to the Company's public image, fines imposed on the Company, any penalty imposed on the Company, suffered in or as a result of any investigation by regulatory agencies into my or my Immediate Relatives Trades; and
5. I agree to compensate the Company for all legal expenses incurred in defending itself in such investigations.

Date:

Signature:

Place:

Name:



ANNEXURE - 2

DRAFT OF E-MAIL FOR INTIMATING CLOSURE OF TRADING WINDOW

Subject: Urgent–Window Closing Notice (Insider Trading Restrictive period)

Dear All Directors, Employees of Coral India Finance and Housing Limited,

The Board meeting for approving _____ shall be held in on _____.

In view of this, as per the Company's Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of trading by Insiders, I request all of you to refrain from trading in the Company's shares with immediate effect till the expiry of 48 hours after the public announcement of is made.

Any contravention of the above will be offence under the SEBI Act, 1992 Regulations and necessary disciplinary action may be taken by the Company including Penalty.

I request all of you to go through the Company's Code of Conduct for prevention of Insider Trading which is available in the Company's website.

In case you have any doubts, please contact me (Tel: 022 22853910, Email: cs@coralhousing.in).

Thanks for your co-operation in this regard,

For Coral India Finance and Housing Limited

Compliance Officer



ANNEXURE – 3

SPECIMEN OF APPLICATION FOR PRE-CLEARANCE APPROVAL CUM UNDERTAKING

Date:

To,
The Compliance Officer
Coral India Finance and Housing Limited
Dalamal House, 04th Floor,
J.B. Marg, Nariman Point,
Mumbai-400 021

Dear Sir/Madam,

Sub: Application for Pre-trading approval in securities of the Company

Pursuant to the SEBI (prohibition of Insider Trading) Regulations, 2015 and the Company's **Insider Trading Code**, I seek approval to purchase/sale/subscription of equity shares of the Company as per details given below:

1.	Name of Applicant	
2.	Designation	
3.	Number of Securities held as on date	
4.	Folio No/ DPID/Client ID No.	
5.	The Proposal is for: a. Purchase of securities b. Subscription to securities c. c. Sale of securities	
6.	Proposed date of trading in securities	
7.	Estimated number of securities proposed to be acquired / subscribed / sold	
8.	Price at which transaction is proposed	
9.	Current Market price (as on date of application)	
10.	Whether the proposed transaction will be made through stock exchange or off-market	

In connection with my request for approval to deal in shares of the Company, as required by the Insider Trading Code of the Company, I hereby state and undertake that:

1. Neither do I have access to nor do I have any information that could be construed as 'Unpublished Price Sensitive Information' upto the signing of this undertaking.
2. In the event if have access or receive any information that could be construed as 'Price Sensitive Information', after signing 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.



3. I, confirm that I have not contravened the provisions of the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the Insider Trading Code of the Company.
4. I, undertake to submit the necessary report within 2 working days of execution of the transaction/or 'Nil' report if the transaction is not undertaken.
5. If approval is granted I, shall execute the deal within 7 Trading Days of the receipt of approval failing which I, shall seek pre-clearance.
6. I have made full and true disclosures in the matter.

Yours faithfully,

(Signature of Employee)



ANNEXURE - 4

FORMAT FOR PRE- CLEARANCE APPROVAL

Date:

To

Name:_____

Designation:_____

Place:_____

This is to inform you that your request for dealing in (Nos.) of 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 Trading 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 form within 2 working days from the date of transaction/deal. In case the transaction is not undertaken a 'Nil' report shall be necessary.

Yours faithfully,

For **Coral India Finance and Housing Limited**

Compliance Officer

Encl: Format for submission of details of transaction



ANNEXURE - 5

CONFIRMATION OF EXECUTION/NON-EXECUTION OF PRE-CLEARED TRADE

(To be submitted within 2 working days of transaction/dealing in securities of the Company)

Date:

To,
The Compliance Officers
Coral India Finance and Housing Limited
Dalamal House, 04th Floor,
J.B. Marg, Nariman Point,
Mumbai-21

I, hereby inform that I,

- have not bought/sold/subscribed any securities of the Company
- have bought/sold/subscribed to securities as mentioned below on (date)

Name of holder	No. of securities Dealt with	Bought/ sold / subscribed	DPID./Client ID /Folio No.	Price(Rs)

In connection with the aforesaid transaction(s) I, hereby undertake to preserve, for a period of 3 years and produce to the Compliance officer /SEBI any of the following documents:

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

I, agree to hold the above securities for a minimum period of six 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.

I, declare that the above information is correct and that no provisions of the Company's Code and/or applicable laws/regulations have been contravened for effecting the aforesaid transactions(s).

Signature:

Name:

Designation:



ANNEXURE – 6

APPLICATION FOR WAIVER OF MINIMUM HOLDING PERIOD

Date: _____

To,
The Compliance Officers
Coral India Finance and Housing Limited
Dalamal House, 04th Floor,
J.B. Marg, Nariman Point,
Mumbai-21

Dear Sir,

Folio No./D.P.ID. No. Client ID No. _____

Sub: Waiver of minimum holding period

I, the undersigned, request you to grant me waiver from the minimum holding period as required under Clause 11.1 of the Insider Trading Code with respect to (nos.) of _____ (Specify type of security) of the Company held by me/my Immediate Relative singly/jointly acquired on [Date] by way of (Bonus/Rights/ESOPs/etc).

I desire to sell the above securities on account of the following reasons:
.....

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

Date:

Signature:

Place:

Name & employee code:

Approval/Rejection by Compliance Officer

With reference to the above application I, approve/reject the selling of (no. and description of securities) of the Company.

Date: _____

Signature: _____

Place: _____

Compliance Officer: _____



ANNEXURE - 7

FORM B
SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (b) read with Regulation 6(2) - Disclosure on becoming a director/KMP/Promoter]

Name of the company: Coral India Finance and Housing Limited
ISIN of the company: INE558D01021

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a listed company 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.)	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
			Type of security (For eg. - Shares, Warrants, Convertible Debentures 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 of the company held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation 6(2)

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		
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:

Encl: Details of Shareholding



DETAILS OF SHAREHOLDING

Tick Mark as applicable

- I am not holding any Securities of the Company.
- I am holding Securities of the Company as detailed below.
- None of my relative(s) is/are holding any Securities of the Company.
- My relative(s) is/are holding Securities of the Company as detailed below.

Sr.No	Name	No. of Securities				
		Physical Form	Folio No.	Demat Form	Client ID No.	DPID No.
1.	Self					
2.	Spouse					
3.	Father					
4.	Mother					
6.	Son					
7.	Daughter					
8.	Brother					
9.	Sister					

In future whenever I/my dependent family member will decide to purchase the Securities of the Company I/my dependent family member will do so as per the procedure laid down by the Company.

In future, whenever I/my dependent family member will decide to purchase additional Securities of the Company or sell the Securities of the Company, I/my dependent family member will do so as per the procedure laid down by the Company.

Signature:

Name:

Date:



ANNEXURE – 8

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

Name of the company: **Coral India Finance and Housing Limited**
INE558D01021

ISIN of the company:

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

Name, PAN, CIN/DIN, & addresses with contact nos.	Category of Person (Promoters/ KMP / Director or 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/ sale 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.)
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge / Revoke / Invoke)	Type of security (For eg. – Shares, Warrants Convertible Debentures etc.)	No. and % of shareholding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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

Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company 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)	
15	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 - 9

ANNUAL DISCLOSURE

Date: _____

To,
The Compliance Officers
Coral India Finance and Housing Limited
Dalamal House, 04th Floor,
J.B. Marg, Nariman Point,
Mumbai-21

I, _____ Designated persons of Coral India Finance and Housing Limited furnish below the details of transaction(s) in the shares of the Coral India Finance and Housing Limited during the financial year as well as shareholding as on 31st March,

I. Details of transaction/shareholding in own name

No. of shares held as on (date of previous disclosure)	Date of transaction	Details of shares purchased during the year		Details of shares sold during the year		No. of shares Held as on --- (date of present disclosure)	Folio / DPID / Client ID
		No	Consideration (Rs)	No.	Consideration (Rs)		

II. Details of transaction/shareholdings of dependent family members

Name of the dependent family members	Relationship	No. of shares held as on 01 st April, 20.....	Details of shares purchased during the year		Details of shares sold during the year		No. of shares held as on 31.3.20.....	Folio/ DPID/ Client ID No.
			No.	Value(Rs)	No.	Value(Rs)		

Date: Signature:

Place: Name & Designation:

Encl: Details of Shareholding



ANNEXURE – 10

**FORM D (Indicative format)
SEBI (Prohibition of Insider Trading) Regulations, 2015
Regulation 7(3) – Transactions by Other Connected Persons as identified by the company**

Name of the company: **Coral India Finance and Housing Limited**

ISIN of the company: **INE558D01021**

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 of shares/ sale 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.)
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of share holding	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/Sale/Pledge / Revoke /Invoke)	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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

Details of trading in derivatives 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)	
15	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:

Date:

Place:



ANNEXURE - 11
ANNUAL DISCLOSURE BY DESIGNATED PERSON

Date: _____

To,
The Compliance Officers
Coral India Finance and Housing Limited
Dalamal House, 04th Floor,
J.B. Marg, Nariman Point,
Mumbai-21

Dear Sir/madam,

I, _____ Designated persons of Coral India Finance and Housing Limited resident of _____ hereby furnish the details as required by SEBI (PIT), 2015 for myself, my immediate relatives and person with whom I have Material Financial Relations as on 31st March, 20.....

A. Details of Designated Person:

PAN/Other ID Number (please specify)	Contact Details (Mobile No. & Email Id)	Name of the Institution from where Graduated	Name of the all past Employers

B. Details of Immediate Relatives:

Name of the Relative	Nature of Relationship	PAN/Other ID Number (please specify)	Contact Details (Mobile No. & Email Id)	Name of the Institution from where Graduated	Name of the all past Employers

C. Details of the Person with whom Material Relationship Exist

Name of the Person	Nature of Material Relationship	PAN/Other ID Number (please specify)	Contact Details (Mobile No. & Email Id)	Name of the Institution from where Graduated	Name of the all past Employers

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

Date: Signature:

Place: Name & Designation:



ANNEXURE - 12

REGISTER OF PERIODS OF CLOSURE OF TRADING WINDOW

Sr. No.	Purpose	Date of Notifying Closure of Trading Window	Start Date of Closure of Trading Window	Date of Notifying Opening of Trading Window	Date of Opening of Trading Window	Remarks



ANNEXURE - 13

REGISTER OF PRE-CLEARANCE FOR TRADING IN SECURITIES

Sr. No.	Name	Designation	Dept	Date & time of receipt of Preclearance Application	Nature of Transaction (purchase or Sale)	Estimated Number of Securities Indicated In the Application	Estimated Consideration value Indicated In The Application	Name of the Dependent if the Transaction is in the Name of the Dependent/ Relationship	Communication of the Clearance By the Compliance officer	Reasons For non Clearance, if not Cleared	Date of placing before the Committee	Date & Number of Securities Actually Traded, if Intimated	Remarks



ANNEXURE - 14

REGISTER OF WAIVER OF RESTRICTION FOR DISPOSAL OF SECURITIES

Sr. No.	Name	Designation	Department	Name of the Dependent, if the Shares held in the name of Dependent	No. of Shares	Consideration Value	Reason for Waiver	Date of Waiver	Remarks



ANNEXURE -15

REGISTER OF DESIGNATED PERSONS

Em p. No .	Name of Employe e	PAN No.	Contact Details (Address and Mob. No.)	Name of the Education Institute of Graduation	Names of the Previous Employer s	Designati on	Dept	Date of Joinin g	Date of becomi ng Design ated Person	Date of Cessation as Designate d Person	Remarks



ANNEXURE - 16

REGISTER OF IMMEDIATE RELATIVES & MATERIAL FINANCIAL RELATIONSHIPS OF DESIGNATED PERSONS (DP)

Name & Designation of the DP:

Company Code:

Date of Becoming DP:

Date of Cessation as DP:

Name of the immediate Relatives	Nature of Relation	Name of the person with whom Material Financial relationship exist	Nature of Material Financial Relationship	PAN No.	Contact Details (Address and Mob. No.)	Name of the Education Institute of Graduation	Names of the Previous Employers	Date of entering into the relation (material otherwise)	Date of Cessation of the Relationship (material or otherwise)	Remarks



ANNEXURE - 17

REGISTER OF DISCLOSURE OF SHAREHOLDING BY DESIGNATED PERSONS

Name & Designation of the DP: Company Code:
Date of Becoming DP: Date of Cessation as DP:

INITIAL DISCLOSURE					
Sr. No.	Date of Receipt of Information	Number of Securities (CIFHL)	Date of Acquisition	Consideration Value (Rs.)	Name of the Dependant/Relationship if securities held in the name of the Dependant
1	2	3	4	5	6

CHANGE IN HOLDING					
Date of Receipt of Information	Number of Securities (CIFHL)	Date of Transaction	Nature of Transaction (Purchase/Sale)	Consideration Value (Rs.)	Name of the Dependant/Relationship if securities held in the name of the Dependant
7	8	9	10	11	12

YEAR END DISCLOSURE

Date of Receipt of Information	Number of Securities (CIFHL)	Aggregate Value (Rs.)	Name of the Dependant/Relationship if securities held in the name of the Dependant	Remarks
13	14	15	16	17