



# Uttam Value Steels Limited

Regd. Office: Uttam House,69, P.D'Mello Road, Mumbai - 400 009

CIN : L27100MH1970PLC014621 Website : [www.uttamvalue.com](http://www.uttamvalue.com)

**\*Code of Internal Procedures and Conduct for Prevention of Insider Trading in  
Uttam Value Steels Limited Securities**

**\*Amended in pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 and  
applicable from 15.05.2015**

**CODE OF INTERNAL PROCEDURES AND CONDUCT FOR PREVENTION OF  
INSIDER TRADING IN UTTAM VALUE STEELS LIMITED (UVSL)  
SECURITIES**

**1. BACKGROUND:**

Pursuant to the **SEBI (Prohibition of Insider Trading) Regulations, 2015 (Regulations)** the Company has formulated this Insider Trading Code to define, establish and clarify the standards for behavior in Uttam Value Steels Limited (UVSL) and to set out

- i. Internal Procedures and Conduct for Prevention of Insider Trading in UVSL's Securities.
- ii. Code of practice and procedure for fair disclosure of Unpublished price sensitive information.

**2. OBJECTIVES:**

The Company is committed to preserve the confidentiality of unpublished price sensitive information and to prevent the misuse of such information.

Accordingly, this Insider Trading Code has been formulated with a view to maintain uniformity, transparency and fairness in dealing with all stakeholders and to ensure timely, fair and adequate disclosure of unpublished price sensitive information to the investor community by the Company to enable them to take informed investment decisions with regard to UVSL's securities

**3. DEFINITIONS**

For the purpose of UVSL code all the words and phrases not specifically defined hereunder shall have the same meaning as assigned to them under the Insider Trading Regulations;

- (a) "**Act**" means the Securities and Exchange Board of India Act, 1992 as may be amended from time to time;
- (b) "**Code**" means **this** Code of Internal Procedures and Conduct for regulating, monitoring and reporting of trading by insiders in UVSL's also referred as "**Insider Trading Code 2015**".
- (c) "**Compliance Officer**" means any senior officer, designated so and reporting to the board of directors or head of the organization in case board is not there, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these 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 these regulations under the overall supervision of the board of directors of the listed company or the head of an organization, as the case may be.

- (d) **“Connected Persons”** means any person who:-
- (i) A Director of the Company
  - (ii) A Key Managerial Personnel of the Company
  - (iii) Any Officer of the Company
  - (iv) Any person who is or has been in any contractual, fiduciary or employment relationship at any time in the six months period prior to the date of determining whether that person, as a result of such relationship, was, directly or indirectly, allowed access to unpublished price sensitive information (UPSI) or reasonably expected to be allowed access to UPSI;
  - (v) Any person who is or has been in frequent communication with an Officer of the Company at any time in the six month period prior to the date of determining whether that person, as a result of such frequent communication, was, directly or indirectly, (x) allowed access to UPSI or (y) reasonably expected to be allowed access to UPSI;
  - (vi) An employee of the Company who has access to UPSI or is reasonably expected to have access to UPSI.
  - (vii) Any person who has a professional or business relationship and that relationship that, directly or indirectly, allows access to UPSI or is reasonably expected to allow access to UPSI
  - (i) concerned act been associated with a company or by being a director , officer or an employee of the company or holds any position including a professional or business relationship between himself and the company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.

The persons enumerated below shall be deemed to be Connected Persons if such person has access to UPSI or is reasonably expected to have access to UPSI

- (a) an immediate relative of connected persons specified
- (b) a holding company or associate company or subsidiary company;
- (c) an intermediary as specified in section 12 of the Act or an employee or director thereof;
- (d) an investment company, trustee company, asset management company or an employee or director thereof;
- (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;
- (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;
- (h) an official or an employee of a self-regulatory organization recognised or authorized by the Board;

- (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;
- (e) **“Designated Persons”** shall include:
- i) Executives and Non-Executive Directors of the Company
  - ii) Key Managerial Personnel of the Company.
  - iii) Officers comprising the top three tiers of the Company Management.
  - iv) The employees in the Secretarial, Legal Finance, Accounts Departments.
  - v) Any other employees of the Company, as may be notified by the Compliance officer with approval of the Board.
- (e) **"Dealing in Securities"** shall mean an act of subscribing, buying, selling or agreeing to subscribe, buy, sell or deal, in any securities of UVSL by the directors, designated employees and their family members either as principal or agent;
- (g) **“Generally available Information”** means information that is accessible to the public on a non –discriminatory basis.
- (h) **"Insider"** shall include the following persons;
- i) A Connected Persons.
  - ii) In possession of or having access to unpublished price sensitive information.
- (i) **“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;
- (k) **“Unpublished price sensitive information”** means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: -
- (i) financial results;
  - (ii) dividends;
  - (iii) change in capital structure;
  - (iv) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
  - (v) changes in key managerial personnel; and
  - (vi) material events in accordance with the listing agreement.

- (l) **"Trading"** means and includes subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell, deal in any UVSL's securities and Trade shall be construed accordingly.
- (m) **"Trading Day"** means a day on which the Recognized stock exchanges are open for trading.

Words and expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation.

## **2. RESTRICTIONS ON COMMUNICATION AND TRADING BY INSIDERS**

An Insider shall not,

- i. communicate, provide, or allow access to any UPSI, relating to the Company or its securities, to any person including other insiders, except to the extent allowed by this code;
- ii. procure from or cause the communication by an Insider of UPSI, relating to the Company or its securities;

Provided that nothing contained above shall be applicable when an UPSI is communicated, provided, allowed access to or procured in connection with

- i. entail an obligation to make an open offer under the takeover regulations where the board of directors of the company is of informed opinion that the proposed transaction is in the best interests of the company.
- ii. not attract the obligation to make an open offer under the takeover regulations but where the board of directors of the company is of informed opinion that the proposed transaction is in the best interests of the company and the information that constitute UPSI is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the board of directors may determine.

## **3. PROHIBITION OF TRADING BY INSIDERS**

An Insider shall not directly or indirectly,

- i. Trade in securities 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.

Provided that nothing contained above shall be applicable when

- i. A transaction that is an off-market inter-se transfer between Promoters who were in possession of the same UPSI without being in breach of these Rules and both parties had made a conscious and informed trade decision; and
- ii. Trades pursuant to a Trading Plan set up in accordance with this code.

**4. PRESERVATION OF "PRICE SENSITIVE INFORMATION"**

- 4.1 All information shall be handled within the Company on a need -to-know basis.
- 4.2 No unpublished price sensitive information shall be communicated to any person except in furtherance of the insider's legitimate purposes, performance of duties or discharge of his legal obligations
- 4.3 The Insiders shall not pass on such information to any person, directly or indirectly by way of making a recommendation for the purchase or sale of securities, which are listed on Stock Exchange(s).
- 4.2 All such information directly received by any Insider from any source outside of UVSL should immediately be reported to the concerned Head of the Department / CEO & Managing Director as the case may be.
- 4.3 All the files / papers containing confidential information (whether or not the Price Sensitive Information) shall be kept secured. If such files are computer files, then the same must have adequate security of login and pass word etc.

**5. PREVENTION OF MISUSE OF "UNPUBLISHED PRICE SENSITIVE INFORMATION"**

Employees and connected persons designated on the basis of their functional role ("**designated persons**") in the Company shall be governed by this insider code governing dealing in securities.

**5.1 Trading Plan**

An insider shall be entitle to formulate a trading plan for dealing in securities of the Company and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.

**5.2 Trading Plan shall:**

- (i) not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;

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

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

5.4 The Trading Plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.

However, the implementation of the trading plan shall not be commenced, if at the time of formulation of the plan, the Insider is in possession of any unpublished price sensitive information and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Plan shall be deferred until such unpublished price sensitive information becomes generally available information. Further, the Insider shall also not be allowed to deal in securities of the Company, if the date of trading in securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.

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

5.6 All the Insiders (directly or indirectly) shall conduct all their dealings in UVSL securities only in a Valid Trading Window and shall not deal in any transaction involving the purchase or sale of the Securities during the periods when Trading Window is closed;

5.7 When the Trading Window is closed, Insiders shall be prohibited from dealing in Securities in such period;

- i) the trading window shall be closed in particular for a Designated Person or class of Designated Persons when the Compliance Officer 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.

- ii) the Trading Window will be closed seven days prior to the date of the meetings of the Board of Directors of UVSL or during such periods as may be notified by the Compliance Officer;
- iii) The Trading Window will be opened 24 hours after the Board Meeting is over;
- iv) The Compliance Officer shall inform all the Insiders about the exact period when the Trading Window will be closed at least 2 days prior to the beginning of such closure;

5.8 All the Insiders who intend to deal in UVSL's Securities, where Traded value of in excess of Rs 10,00,000/- (Rupees Ten Lacs only) or such other value as may be specified. , except in the case of inter-se transfer amongst qualifying promoters, should pre-clear the transactions as per the pre-dealing procedure as described as under;

- a) An application be made by the Insider in the form specified in **Annexure-C** to the Compliance Officer indicating the estimated number of securities that the Insider intends to deal in, the details as to the Depository with which the Insider has a Security Account, the details as to the securities in such Depository mode, the price at which the securities are traded etc.;
- b) Along with the application, the Insider shall submit an undertaking in the form specified in **Annexure-D**;
- c) The Compliance Officer shall not approve any proposed Trade by Designated Person if the Compliance Officer determines that such Designated Person is in possession of UPSI even though the trading window is open.
- c) Within two working days of the receipt of the application together with the necessary undertaking, the Compliance Officer shall either clear the requested deal or refuse to clear the deal by giving the reasons thereof in writing.
- d) the Compliance officer will clear the trading by Designated Person on the condition that the Trade so approved shall be executed within seven trading days following the date of approval. In failure to do so, the Designated Person must secure pre-clearance of the transaction again
- e) If the Insider does not receive any response from the Compliance Officer within the said period, then the requested transaction shall be deemed as cleared by the Compliance Officer.

5.10 All the Insiders shall execute their order in respect of Securities of UVSL within one week after the clearance by Compliance Officer/ deemed clearance of the transaction. If the order is not executed within the said period of one week, the Insider must pre-clear the transaction again by following the procedure mentioned in Clause 5.4.



- 5.11 All Directors / Officers/ Designated Employee who buy or sell any number of the shares of the company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the net six months following the prior transaction. All Directors / Officers/ Designated Employee shall also not take position in derivative transactions in the shares of the Company at any time.

In the case of subscription in the primary market (initial public offer), the above mentioned entities shall hold the investment for a minimum period of 30 days. The holding period would commence when the securities are actually allotted.

- 5.12 In case the sale of UVSL Securities by the Insider is necessitated by personal emergency, the holding period may be waived by the Compliance Officer after recording in writing his/ her reasons in this regard.

## **6. REPORTING REQUIREMENT FOR TRANSACTIONS IN SHARES / SECURITIES**

All the Insiders shall be required to forward following details in respect of Securities held by the Insider (including the Securities held by the Family Members) in the form specified hereunder to the Compliance Officer:

### **6.1 Initial Disclosure**

- (i) Every promoter/ Key Managerial Personnel / Director / Officers / Designated Employees of the Company, within thirty days of these regulations taking effect, shall forward to the Company the details of all holdings in securities of the Company presently held by them including the statement of holdings of dependent family members in the prescribed Form (Annexure 5).
- (ii) Every person on appointment as a key managerial personnel or a director of the Company or upon becoming a promoter shall disclose his holding of securities of the Company as on the date of appointment or becoming a promoter, to the Company within seven days of such appointment or becoming a promoter.

### **6.2 Continual Disclosure**

- (i) 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.
- (ii) The disclosure shall be made within 2 working days of:
  - (a) the receipt of intimation of allotment of shares, or
  - (b) the acquisition or sale of shares or voting rights, as the case may be.

### **6.3 Disclosure by the Company to the Stock Exchange(s)**

- (i) Within 2 days of the receipt of intimation under Clause 8.3, the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received.
- (ii) The Compliance officer shall maintain records of all the declarations in the appropriate form given by the directors / officers / designated employees for a minimum period of five years.

### **3. ROLE OF COMPLIANCE OFFICER**

- 3.1 The Compliance Officer shall report on insider trading to the Board of Directors and in particular, shall provide reports to the Chairman of the Audit Committee, if any, or to the Chairman of the board of directors at such frequency as may be stipulated by the board of directors.
- 3.2 The Compliance Officer shall assist all employees in addressing any clarifications regarding the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations 2015 and the said Insider Code 2015.
- 3.3 The Compliance Officer shall maintain a record of the Insiders as specified in **Annexure-A** and any changes made in the list of such Insiders updated based on the communication received from the HR Department on a periodically;
- 3.4 The Compliance Officer shall assist the Board of Directors to specify the designated persons to be covered by this Insider code, on the basis of their role and function in the organization.

### **7. CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION FAIR DISCLOSURE**

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

1. The Company will make prompt public disclosure to the Stock exchange of any UPSI would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. The Company will make uniform and universal dissemination of UPSI to avoid selective disclosure which could have an adverse impact on the market and the price discovery process.
3. The Compliance officer of the Company shall act as a Chief Investor Relations Officer to deal with dissemination of information and disclosure of UPSI.
4. The Company will make prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

5. The Company will provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company will ensure that information, if any, shared with analysts and research personnel is not UPSI.
7. As a means of following best practices in respect of meetings with analysts and other investor relations conferences and to ensure official confirmation and documentation of disclosures made, the Company will :
  - a. Make transcripts or records of proceedings of meetings with analysts and other investor relations conference available on the official website of the Company, where the Company considers necessary;
  - b. Endeavour that at least 2 company representatives be present at meetings with analysts, brokers, institutional investors and research personnel ;
  - c. In appropriate circumstances, consider posting of relevant information on its website or issuing a press release or disseminating information in any other mode it deems appropriate in relation to meeting with analysts
8. The Company will handle and disclose all UPSI on a need to-know basis

**8. PENALTY FOR CONTRAVENTION OF UVSL CODE**

- 7.1 Every Specified Person shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her dependents).
- 7.2 Any Specified Person who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalised and appropriate action may be taken by the Company.
- 7.3 Specified Persons who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligibility for future participation in employee stock option plans, etc.
- 7.4 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.
- 7.4 The Insiders who violate this Code (other than as specified in Clause 7.1 above) shall be subject to disciplinary action by UVSL, which may include wage freeze, suspension, ineligibility for future participation in Employee Stock Option Plans, etc. Such action shall be taken only on the recommendation of the Share Transfer Committee;
- 7.5 Any action taken by UVSL pursuant to above shall not preclude SEBI from taking any action in case of violation of Insider Trading Regulations.
8. **Information to SEBI in case of violation of SEBI (Prohibition of Insider Trading) Regulations 1992.**

In case it is observed by Compliance Officer that there has been a violation of Insider Trading Regulations, then the Compliance Officer shall inform SEBI about such violation within a period of 7 (seven) days from the date of knowledge of such violation.

9. This Code has been duly approved by the Board of Directors at their meeting held on 07-05-2015 and the Code shall be deemed to have come into force with effect from 15.05.2015.

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**ANNEXURE –C**  
**FORMAT OF APPLICATION BY INSIDER FOR**  
**PRE-CLEARANCE OF DEALING IN UVSL SECURITIES**

Date :

To  
The Compliance Officer,  
Uttam Value Steels Limited,  
Uttam House, 69, P.D'Mello Road,  
Mumbai 400 009

Dear Sir,

Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Internal Procedures & Conduct for Prevention of Insider Trading in UVSL's Securities, I \_\_\_\_\_ (*Name of Insider*) hereby seek approval to purchase/ sell/ subscribe \_\_\_\_\_ Equity shares of the Company, the details whereof are given below:

Sr. No.	Particulars	Details
1.	Name of the applicant	
2	Designation	
3	Number of shares held as on date	
4	Folio No./ DP ID/ Client ID	
5	The proposal is for	a. Purchase of Securities b. Subscription of Securities c. Sale of Securities
6	Proposed date of Trading	
7	Estimated number of securities proposed to be purchased/ subscribed/ sold	
8	Current market price	
9	Whether the proposed transaction will be through stock exchange or off-market trade	
10	Folio No./ DP ID/ Client ID where the securities will be credited/ debited	

I declare that the order for buying/selling\* shall be executed **within one week** after the approval is granted to me.

I further declare that if the order for buying/selling\* has not been executed **within one week after** the approval is granted to me, a revised approval will be taken in that behalf.

I enclose herewith the undertaking signed by me.

Thanking you,

**Signature** :

**Name** :

**Date** :

**ANNEXURE - D**

**UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-CLEARANCE**

To  
The Compliance Officer,  
Uttam Value Steels Limited,  
Uttam House, 69, P.D'Mello Road,  
Mumbai 400 009

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 for prevention of Insider Trading (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 two 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 seek pre-clearance.

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

**Signature** :

**Name** :

**Date** :

## ANNEXURE 4

### FORMAT FOR DISCLOSURE OF TRANSACTIONS

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

To,  
The Compliance Officer,  
Uttam Value Steels Limited,  
Uttam House, 69, P.D'Mello Road,  
Mumbai 400 009

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)  
(*strike out whichever is not applicable*)

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

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 above said transactions(s).

**Signature** :

**Name** :

**Designation:**

**Date** :

## ANNEXURE 5

### FORMAT FOR INITIAL DISCLOSURE OF SECURITIES

To,  
The Compliance Officer,  
Uttam Value Steels Limited,  
Uttam House, 69, P.D'Mello Road,  
Mumbai 400 009

I, \_\_\_\_\_, in my capacity as \_\_\_\_\_ of the Company hereby submit the following details of securities held in the Company as on \_\_\_\_\_ (date of becoming Specified Person).

#### I. Details of securities held by me:

Type of Securities	No. of securities held	Folio No	Beneficiary A/c Client ID

#### II. Details of dependent(s) :

Pursuant to the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Procedures and Conduct for Prevention of Insider Trading, I hereby declare that i have the following dependents :

Sr. No.	Name of the dependent	Relation with Director / Officer / Designated Employee

#### III. Details of securities held by dependent(s) :

Name of Relative	Relationship	Type of securities	No. of Securities held	Folio No	Beneficiary A/c Client ID

Signature :

Name :

Designation :

Date :



## ANNEXURE 6

### DISCLOSURE OF CHANGE IN SHAREHOLDING

To,  
The Compliance Officer,  
Uttam Value Steels Limited,  
Uttam House, 69, P.D'Mello Road,  
Mumbai 400 009

I, \_\_\_\_\_, in my capacity as \_\_\_\_\_ of the Company hereby submit the following details of change in holding of securities of the Company:

<i>Name, PAN No. &amp; address of shareholder</i>	<i>No. of securities held before the transaction</i>	<i>Receipt of allotment advice/ acquisition of /sale of securities</i>	<i>Nature of transaction &amp; quantity ( Purchase / Sale/ Others)</i>	<i>Trading member through whom the trade was executed with SEBI Registration No. of the TM</i>	<i>Exchange on which the trade was executed</i>

#### Details of change in securities held by dependent family members:

<i>Name, PAN No. &amp; address of shareholder</i>	<i>No. of securities held before the transaction</i>	<i>Receipt of allotment advice/ acquisition of /sale of securities</i>	<i>Nature of transaction &amp; quantity ( Purchase / Sale/ Others)</i>	<i>Trading member through whom the trade was executed with SEBI Registration No. of the TM</i>	<i>Exchange on which the trade was executed</i>

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

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

**Signature** :

**Name** :

**Designation** :

**Date** :

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

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 No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relatives/others etc)	Securities held as on the date of regulation coming into force	% of Shareholding		Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Future contracts held as on the date of regulation coming into force	
			No.		Number of Units (contracts * lot size)	Notional value in Rupee terms	Number of Units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	6	7	8	9
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)						

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

**Signature:**

**Designation:**

**Date:**

**Place:**

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

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 of a listed company and other such persons as mentioned in Regulation 6(2).**

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relatives/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding	Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Future contracts held as on the date of regulation coming into force	
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.		Number of Units (contracts * lot size)	Notional value in Rupee terms	Number of Units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	6	7	8	9

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

**Signature:**

**Designation:**

**Date:**

**Place:**



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

**Name of the company:** \_\_\_\_\_

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

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

**Signature:**

**Designation:**

**Date:**

**Place:**



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

**Name of the company:** \_\_\_\_\_

**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 No., CIN/DIN, & address of Promoter / Employee / Director with contact nos.	Category of Person (Promoters/ KMP / Directors/ Immediate relatives / others etc.)	Securities held prior to acquisition/ disposal		Securities acquired/Disposal			% of shareholding		Date of allotment advice/acquisition of shares/sale of shares specify		Date of Intimation to company	Mode of acquisition (market purchase/public rights/ Preferential offer / off market / Inter-se transfer etc.	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.	Pre transaction	Post transaction	From	To	Buy			Sell				
										Value			Number of units (contracts* lot size)	Value	Number of units (contracts* lot size)		

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

**Signature:**

**Date:**

**Place:**





**ANNEXURE - E**

**FORMAT OF INTIAL DISCLOSURE BY INSIDER**

Date :

To  
The Compliance Officer,  
Uttam Value Steels Limited,  
Uttam House, 69, P.D'Mello Road,  
Mumbai 400 009

Dear Sir,

I, \_\_\_\_\_ (Name of the insider) hereby declare that I do not hold any Securities of UVSL / do hold Securities of UVSL\* as on the effective date of this Code / as on the date of joining UVSL\*, the details of which are given below:-

<b>Sr. No.</b>	<b>Particulars</b>	<b>Details</b>
1	Number of Equity Shares	
2	If Shares in physical form	
	Folio Number	
	Joint Holders, if any	
3	If Shares in Demat Form :	
	Name of Depository (NSDL / CDSL)	
	Name of Depository Participant (DP)	
	Account Number	
	Joint Holders, if any	
4	Other details, if any	

**(Name of the Insider & Signature)**

\* Strike out whichever is not applicable.

**ANNEXURE – F**

**FORMAT OF MONTHLY DISCLOSURE BY INSIDERS**

Date :

To  
The Compliance Officer,  
Uttam Value Steels Limited,  
Uttam House, 69, P.D'Mello Road,  
Mumbai 400 009

Dear Sir,

I, \_\_\_\_\_ (Name of the Insider) hereby declare that following are the details of transaction in UVSL's Securities during the Month \_\_\_\_\_.

<b>Particulars</b>	<b>Opening Balance</b>	<b>Add Purchase(s) during the month and the price</b>	<b>Less Sale(s) during the month and price</b>	<b>Closing Balance</b>
Name of the Insider				
Spouse				
Father				
Mother (include step-mother)				
Son (including step-son)				
Son's wife				
Daughter				

(Name of the Insider & Signature)

**ANNEXURE – G**

**FORMAT OF ANNUAL DISCLOURE BY INSIDERS**

Date :

To  
The Compliance Officer,  
Uttam Value Steels Limited,  
Uttam House, 69, P.D'Mello Road,  
Mumbai 400 009

Dear Sir,

I, \_\_\_\_\_ (Name of the Insider) hereby declare that following are the details of transaction in UVSL's Securities during the Financial Year \_\_\_\_\_.

<b>Particulars</b>	<b>Opening Balance As on 1<sup>st</sup> April</b>	<b>Add Purchase(s) during the month and the Average price</b>	<b>Less Sale(s) during the month and the Average price</b>	<b>Closing Balance As on 31<sup>st</sup> March</b>
Name of the Insider				
Spouse				
Father				
Mother (include step-mother)				
Son (including step-son)				
Son's wife				
Daughter				

**(Name of the Insider & Signature)**