

Technopoints and Chemicals Limited (“the company”)
CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSONS AND THEIR IMMEDIATE RELATIVES

(Effective from 30.08.2026 approved by Board of Director on 29.08.2026)

INTRODUCTION

The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“**PIT Regulations**” or “**Regulations**”) have been promulgated to prevent Insider Trading, i.e. trading in securities based on Unpublished Price Sensitive Information (UPSI).

Trading in securities of a company by Designated Persons and their Immediate Relatives based on Unpublished Price Sensitive Information erodes the investors’ confidence in the integrity of the management and is unhealthy for the capital markets.

In compliance with Regulation 9 of the Insider Trading Regulations, the board of directors of Technopoints and Chemicals Limited (“the Company”, and the Board of Directors, the “Board”) has adopted this Code of Conduct to regulate, monitor and report trading by Designated Persons and their Immediate Relatives (“Insider Trading Code” or “Code”).

This document embodies the Insider Trading Code to be followed by the Company effective from the commencement of listing and trading of the equity shares of the Company on the stock exchange(s), i.e. BSE Limited or the National Stock Exchange of India Limited, in accordance with applicable laws.

Provided however that the relevant provision of the Insider Trading Regulations which are applicable to ‘proposed to be listed’ company shall become applicable from the date of filing of the Red Herring Prospectus by the Company with the Securities and Exchange Board of India (SEBI) and the Registrar of Companies, with immediate effect.

1. DEFINITIONS

“**Act**” means the Securities and Exchange Board of India Act, 1992 as amended from time to time.

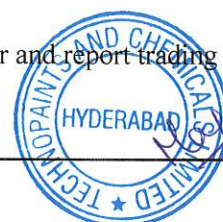
“**Applicable Law**” means the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, including any amendments thereto, or any statute, law, listing agreement, regulation, ordinance, rule, judgment, order, decree, bye-law, clearance, directive, guideline, policy, requirement, notifications and clarifications, circulars or other governmental instruction and/or mandatory standards and or guidance notes as may be applicable in the matter of trading by an Insider.

“**Audit Committee**” means Audit Committee of the Board constituted as per the regulatory requirements.

“**Board**” shall mean the Board of Directors of the Company.

“**Company**” shall mean Technopoints and Chemicals Limited.

“**Code**” or “**Insider Trading Code**” means this “Code of Conduct to regulate, monitor and report trading



by Designated Persons and their Immediate Relatives” as amended from time to time.

“**Compliance Officer**” means person as defined under Regulation 2(c) of the PIT Regulations.

“**Connected Person**” means person as defined under Regulation 2(d) of the PIT Regulations.

“**Contra Trade**” Any buy/sell trade, undertaken by a Designated Person (DP) and their immediate relatives, within 6 months of an earlier sell/buy trade, respectively, where both the trades have been done in open market, will tantamount to contra trade.

“**Designated Persons**” means:

- a. Promoters;
- b. Members of the promoter group;
- c. Directors;
- d. Chief Executive Officer and employees up to two levels below the Chief Executive Officer of the Company and its Material Subsidiary (if any) irrespective of functional role or ability to have access to Unpublished Price Sensitive Information;
- e. Key Managerial Personnel and functional/ departmental heads of the Company, by whatever name called;
- f. Such employees of the Company who have access to unpublished price sensitive information such as [all/ certain identified] employees in the Finance & Accounts, Legal, Secretarial & Compliance, Business planning, Information security and Data privacy, Investor Relations, Communications and Media Communications departments.
- g. Any support staff of the Company such as IT staff or secretarial staff who have access to Unpublished Price Sensitive Information; and
- h. Any other person who on the basis of their role and function in the Company or Material Subsidiary (if any), is reasonably expected to have access to unpublished price sensitive information(s) relating to the Company, as may be decided by the Board of Directors of the Company in consultation with the Compliance Officer of the Company, from time to time.

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

“**Insider Trading Regulations**” means Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended.

“**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.

Note: It is hereby clarified that “spouse” of a person will be considered immediate relative irrespective of

whether he/she is financially dependent or consults such person in taking decisions relating to trading in securities.

“Insider” means person as defined under Clause 2 (g) of the PIT Regulations.

“Key Managerial Personnel” means person as defined in Section 2(51) of the Companies Act, 2013.

“Legitimate Purpose” shall include sharing of unpublished price sensitive information in the ordinary course of business by an Insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of Insider Trading Regulations.

“Material Subsidiary” shall mean a material subsidiary of the Company in accordance with Regulation 16(1)(c) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 and the materiality policy of the Company, each as amended.

“Securities” shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956, as amended (**“SCRA”**).

“Takeover Regulations” means the Securities and Exchange Board India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, or any modification thereof.

“Trading” means activities as defined under Regulation 2 (l) of PIT Regulations.

“Stock Exchange” means a recognised Stock Exchange as defined under clause (f) of Section 2 of the SCRA.

“Unpublished Price Sensitive Information” or **“UPSI”** means information as defined under Regulation 2 (n) of PIT Regulations.

All terms used but not defined herein shall have the meaning ascribed to such term under the Insider Trading Regulations. In case of any discrepancy between the Insider Trading Regulations and the terms defined herein, the meaning as ascribed under the Insider Trading Regulations, shall prevail.

2. COMPLIANCE OFFICER

- a. The Compliance Officer is responsible for compliance of policies, procedures, monitoring adherence to the rules for the preservation of UPSI, monitoring of trades and the implementation of the codes specified in the Insider Trading Regulations under the overall supervision of the Board of the Company.
- b. The Compliance Officer shall maintain records of Designated Persons and any changes made to the list of Designated Persons, all the declarations submitted in the appropriate form given by the Designated Persons.
- c. The Compliance Officer shall ensure proper assistance to all the employees/ directors in addressing any clarifications regarding the Insider Trading Regulations and this Code.

- d. The Compliance Officer shall in consultation with the Chairman and/or Managing Director and the Board specify the prohibited period (i.e. closure of the trading window in accordance with the Insider Trading Regulations) from time to time and make announcement/s thereof ensuring that prohibited period is intimated to all concerned before the commencement of the said period.
- e. The Compliance Officer shall recommend to the Audit committee and/or the Managing Director or the Board punitive measures or disciplinary action prescribed for any violation or contravention of this Code.
- f. The Compliance Officer shall report to the Board and in particular, shall provide reports to the Chairman of the Audit Committee, or to the Chairman of the Board at the beginning of each financial year or at such frequency as may be stipulated by the Board.
- g. The Compliance Officer shall monitor the bringing in of Insiders on sensitive transactions and shall make them aware of the duties and responsibilities attached to the receipt of UPSI, and the liability that attaches to misuse or unwarranted use of such information.

3. PRESERVATION OF “UNPUBLISHED PRICE SENSITIVE INFORMATION”

- a. All UPSI is to be handled on a “Need to Know” basis, i.e. UPSI 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 likelihood of misuse of the information.

To prevent the misuse of confidential information the Company adopts a ‘**Chinese** Wall’ policy thereby separating those areas of the Company which routinely have access to confidential information, considered as ‘inside areas’ from those areas which deal with sale / marketing / investment advice or other departments providing support services, considered as ‘public areas’.

The employees in the inside areas shall not communicate any UPSI to any one in public area. Demarcation of various departments as ‘inside area’ shall be implemented by the Compliance Officer, in consultation with the Chief Financial Officer of the Company.

In exceptional circumstances i.e. in furtherance of legitimate purposes, performance of duties or discharge of legal obligations, any Designated Person may be permitted to ‘cross the wall’ and give UPSI to any person on a ‘need to know’ basis, under intimation to and with prior approval of the Compliance Officer.

- b. No insider shall communicate, provide, or allow access to any UPSI, relating to the Company or securities, to any person including other Insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- c. No person shall procure from or cause the communication by any insider of UPSI, relating to the Company or securities, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- d. However, UPSI may be communicated, provided, allowed access to or procured, in connection with a transaction which:
 - i. entails an obligation to make an open offer under the Takeover Regulations where the Board of the Company is of informed opinion that sharing of such UPSI is in the best interests of the Company; or
 - ii. does not attract the obligation to make an open offer under the Takeover Regulations but where the Board of the Company is of the informed opinion that sharing of such UPSI is in the best interests of the Company and the information that constitutes 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 may determine to be adequate and fair to cover all relevant and material facts.
- e. For the above purposes, the Board shall require the parties to such transactions to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the purpose of this clause 4 and shall not otherwise trade in securities of the Company when in possession of UPSI.
- f. Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password etc.
- g. Digital Database: A structured digital database shall be maintained containing the nature of UPSI and the names of such persons or entities with whom information is shared or who has shared such information along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such databases shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database. This digital database should be preserved for a period of not less than eight years after completion of the relevant transactions. The Board of Directors shall ensure compliance with this clause in consultation with the Compliance Officer.

4. PREVENTION OF MISUSE OF “UNPUBLISHED PRICE SENSITIVE INFORMATION”

All Designated Persons and their Immediate Relatives shall be subject to trading restrictions enumerated herein. As a general overriding rule, no Insider shall trade in securities of the Company when in possession of UPSI. When a person who is in possession of UPSI, has traded in securities, his trades would be presumed to be motivated by the knowledge and awareness of such information in his possession except in the circumstances and exceptions specified under the Insider Trading Regulations.

5. TRADING IN SECURITIES OF THE COMPANY

An Insider shall not, directly or indirectly, trade in securities of the company when in possession of UPSI. No Designated Person shall take positions in derivative transactions in the Securities of the Company at any time.

The above restriction may not apply to:

- i. off-market *inter-se* transfer between Insiders who were in possession of the same UPSI without violating the Code and the PIT Regulations and both parties had made a conscious and informed trade decision provided that such UPSI was not obtained by either person under sub regulation 3 of Regulation 3 of the Insider Trading Code. Further such off-market trades shall be reported by the insiders to the company within two working days and the company shall notify the particulars of such trades to the stock exchange on which the securities are listed within two trading days from receipt of the disclosure or from becoming aware of such information.
- ii. transaction carried out through the block deal window mechanism between persons who were in possession of the UPSI without violating the Code or the PIT Regulations and both parties had made a conscious and informed trade decision, provided that such UPSI was not obtained by either person under sub regulation 3 of Regulation 3 of the Insider Trading Code
- iii. transaction carried out pursuant to a statutory or regulatory obligation to carry out a *bona fide* transaction.
- iv. transaction undertaken pursuant to the exercise of stock options in respect of which the exercise price was pre-determined in compliance with applicable regulations.
- v. trades executed as per the Trading Plan set up in accordance with the Code.

The exceptions above reflect the exceptions allowed as per the PIT Regulations, and nothing above shall preclude the prior approval or other requirements in relation to Trading in Company's Securities under the Code, as set out herein, and all such transaction must always be in compliance with the PIT Regulations.

6. TRADING WINDOW AND PRE- CLEARANCE OF TRADES

Trading Window

- a. The Trading Window shall be closed for trading by Designated Persons during the period when unpublished price sensitive information remains unpublished or is being processed.
- b. Trading Window shall also be closed when the Compliance Officer determines that a Designated person or class of Designated Persons can reasonably be expected to have possession of UPSI, till 48 hours after the UPSI is made public and becomes generally available.
- c. In addition to such periods prescribed by the Compliance Officer, the Trading Window shall be closed from the end of every quarter till 48 hours after the declaration of financial results.
- d. No Designated Person and their Immediate Relatives shall trade in the securities of the Company when the Trading Window is closed.
- e. It shall be the responsibility of the Designated Persons to advise their Immediate Relatives of Trading Window period closures.
- f. Other than the period(s) for which the 'Trading Window' is closed as prescribed hereunder, the same shall remain open for trading in the Securities of the Company by the Designated Persons and their Immediate Relatives.

The trading window restrictions shall not apply in respect of transactions:

- a. specified in clauses (i) to (iv) and (vi) of the proviso to sub-regulation (1) of regulation 4 of the Insider Trading Regulations.
- b. in respect of a pledge of shares for a *bona fide* purpose such as raising of funds, subject to pre-clearance by the Compliance Officer and compliance with the respective regulations made by SEBI.
- c. which are undertaken in accordance with respective regulations made by SEBI such as acquisition by conversion of warrants or debentures, subscribing to rights issue, further public issue, preferential allotment or tendering of shares in a buy-back offer, open offer, delisting offer or transactions which are undertaken through such other mechanism as may be specified by SEBI from time to time.

Pre- clearance of Trades

- a. All Designated Persons of the Company, who intend to trade in the securities of the Company, if the value of the securities likely to be traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of INR 10,00,000, will have to make an application to the Compliance Officer in the prescribed form (**Form A**) given in this Code for pre-clearance of the transaction.
- b. Prior to approving any trades, the Compliance Officer shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any Unpublished Price Sensitive

Information. The Compliance Officer shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.

- c. The restrictions contained in this clause shall also apply to Immediate Relatives in respect the concerned Designated Person.
- d. All the pre-approved trades shall in respect of the securities of the Company shall be executed within seven Trading Days after the approval for pre-clearance is given, failing which, fresh pre-clearance for trades to be executed shall be obtained.
- e. The concerned persons shall disclose to the Company the number of securities acquired or disposed of for which pre-clearances is obtained within two trading days of such transaction.
- f. The concerned persons shall disclose to the Company the number of securities not traded, in respect of transactions for which pre-clearances is obtained within seven Trading Days after the approval of pre-clearance is given.
- g. The disclosures to be made by any person under this Code shall include those relating to trading by such person's Immediate Relatives.

7. TRADING PLAN

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.

2. 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 overlap of any period for which another trading plan is already in existence;
- c. set out the following parameters for each trade to be executed
 - i. either the value of trades to be effected or the number of securities to be traded
 - ii. nature of the trade;
 - iii. either specific date or time period not exceeding five consecutive trading days;
 - iv. 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:
 - (a) for a buy trade: the upper price limit shall be between the closing price on the day before submission of the trading plan and up to twenty per cent higher than such closing price;
 - (b) for a sell trade: the lower price limit shall be between the closing price on the day before submission of the trading plan and up to twenty percent lower than such

closing price.

3. The compliance officer shall review the trading plan to assess whether the plan would have any potential for violation of these regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan. Pre-clearance of trades shall not be required for a trade executed as per an approved trading plan and that trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

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 any UPSI 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 and in such event the commencement of the plan shall be deferred until such UPSI becomes Generally Available Information.

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

8. OTHER RESTRICTIONS

- a. Designated Persons and/or their Immediate Relatives shall be prohibited from entering into derivative transactions in respect of Securities of the Company.
- b. Any Designated person who is permitted to trade shall not execute a Contra Trade within six months. In case any Contra Trade is executed, inadvertently or otherwise, in violation of the restriction, the profits from such trade shall be liable to be disgorged for remittance to the SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.
- c. In case any Contra Trade is necessitated by personal emergency, the holding period of six months as specified above may be waived by the Compliance Officer after recording in writing his/her reasons in this regard, subject to the Insider Trading Regulations. An application for waiver of holding period shall be made to the Compliance Officer through the prescribed Form (**Form F**).

9. REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES

a. Initial Disclosures

- a. Every person on appointment as a Key Managerial Personnel or a Director 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 promoter to the Company within seven days of such appointment or becoming promoter in the prescribed Form (**Form B**).

- b. The Compliance Officer shall maintain records of all such disclosures for a minimum period of five years.

b. Continual Disclosures

- a. Every promoter member of the promoter group, designated person and director of every company shall disclose in **Form C** 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 ten lakh rupees.
- b. The company shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.
- c. Designated Persons shall be required to disclose names and Permanent Account Number or any other identifier authorized by law of the following persons to the company on an annual basis and as and when the information changes:
 - i. immediate relatives
 - ii. persons with whom such Designated Person(s) shares a material financial relationship
 - iii. Phone, mobile and cell numbers 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 a loan or gift from a designated person during the immediately preceding twelve months, equivalent to at least 25% of the annual income of such designated person but shall exclude relationships in which the payment is based on arm’s length transactions.

- d. The Company shall provide information pertaining to the Designated Persons to the relevant depository/ stock exchanges, in compliance with the requirements of applicable law relating to system driven disclosures.

- e. The Company may, at its discretion, require any other Connected Person(s) apart from the Entities as mentioned above to make disclosure of its holdings and trading in securities of the Company in the prescribed form (**Form D**) and at such frequency as may be determined by the Compliance Officer.

10. PENALTY FOR CONTRAVENTION OF THE CODE OF CONDUCT

- a. Every Designated Person shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her Immediate Relatives). Any Designated Person who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalized and appropriate action may be taken by the Company.
- b. The Compliance Officer shall report all the breaches of this Code to the Audit Committee / Board. In the event of a breach of the Insider Trading Regulations, the Company shall promptly inform the stock exchanges where securities of the Company are traded, in such form and manner as may be specified by SEBI from time to time.
- c. Designated Persons who violate the Code may also be subject to disciplinary action by the Company, which may include wage freeze, suspension, recovery, claw back, ineligibility for future participation in employee stock option plans, etc.
- d. Any amount collected under this Code shall be remitted to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

11. INQUIRY FOR INVESTIGATION

If any non-adherence to the Code and/or the Regulations is observed, the Compliance Officer shall inform such non-adherence to the Audit Committee of the Company for further inquiry or investigation and act accordingly. This would include reporting of instances of violations of the PIT Regulations, Fair Disclosure Code and/or this PIT Code to the Stock Exchanges where the Shares of the Company are listed, in such form and such manner as may be specified by SEBI from time to time.

Inquiry into an instance of leak or suspected instance leak of UPSI shall be initiated in accordance with the investigation procedures under the Policy and procedure for Enquiry in case of leak or suspected leak of UPSI framed by the company.

12. FORMATS

All formats referred to in this Policy shall mean the formats as prescribed and made available as annexures to this policy.

13. POLICY REVIEW AND AMENDMENTS

The Board reserves the power to review and amend this Code from time to time. All provisions of this Code would be subject to revision / amendment in accordance with Applicable Laws. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant statutory, governmental and regulatory authorities are not consistent with the provisions laid down under this Code, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder.

Additionally, policies/procedures for inquiry in case of Leak of UPSI or Suspected Leak of UPSI shall also be adhered to for enquiry and reporting purposes.

FORM A

APPLICATION FOR PRE-CLEARANCE

The Compliance Officer
Technopaints and Chemicals Limited
Plot No. 1A & 1B, Techno Houz, Hitex
Road, Shilpa Hills, Izzat Nagar,
Kothaguda, Serilingampally, K.V.
Rangareddy – 500 084, Telangana, India

Dear Ma'am,

Sub: Application for seeking pre-clearance to deal in the Securities of the Company

In pursuance to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Code, I seek your approval for trading in the Securities of the Company as per the details given below. I understand that the term “trade” or “trading” hereunder includes subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell, deal in securities – even transactions such as creation of security interest or pledge are covered.

S. No	Description		Particulars
1.	- Name of the applicant - Permanent account number	 	
2.	Designation	:	
3.	Number and value of Securities of the Company held as on date.	:	
4.	Nature of Securities held	:	
5.	Mode in which the Securities are held	:	
6.	The proposal is for himself / herself through his/ her immediate relatives	:	
7.	Proposed date of dealing in Securities of the Company	:	
8.	Nature of proposed dealing	:	*a. Purchase of securities *b. Subscription to securities *c. Sale of securities
9.	Estimated number of Securities proposed to be acquired / subscribed / sold	:	
10.	Price at which the transaction is proposed	:	

S. No	Description		Particulars
11.	Current market price (as on the date of application)	:	
12.	Whether the proposed transaction to be undertaken on market or off market	:	
13.	If the Securities are held / proposed to be dealt in dematerialized form	:	
14.	DP ID	:	
15.	Client ID Number	:	

I/ We hereby declare that I shall execute my/ our order in respect of Securities of the Company within 1 (one) week after the approval of pre-clearance is given. If the order is not executed within 1 (one) week after the approval is given, I undertake to obtain pre-clearance for the transaction again.

I/ We attach herewith the undertaking signed by me/ us.

Place :

Date :

Signature

** Strike whichever is not applicable*

UNDERTAKING (PART OF PRE-CLEARANCE APPLICATION)

This undertaking is executed on this day of 202..... with reference to my application for the pre-clearance of trade in the Securities of Technopaints and Chemicals Limited, hereinafter called “Company”

I, ..., (designation / category) of the Company, residing at, desirous of dealing in number of equity shares of the Company as mentioned in my / our application dated for pre-clearance of the transactions and do hereby give an undertaking in favour of Technopaints and Chemicals Limited,
“

I further declare that we are not in possession of or otherwise privy to any UPSI upto the time of signing this undertaking.

All capitalized words used herein but not defined shall have the same meaning assigned to them in the Company’s Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons (“**Code**”).

- (1) THAT we have received and read the Code;
- (2) THAT as on the date we hold equity shares of Rs./- each of the Company;
- (3) THAT we neither have access to nor received any ‘UPSI’ upto the time of signing this undertaking;
- (4) THAT we would refrain from dealing in the Company’s Securities if we / my relatives gained access to or receive any ‘UPSI’, after the date of signing this undertaking but before the execution of transaction, till such time the information becomes the general available information;
- (5) THAT we have never contravened the stipulations laid down in the Code for prevention of insider trading, from time to time;
- (6) THAT we undertake to submit that necessary report within 2 (two) Trading Days of execution of the transaction / a ‘nil’ report, if the transaction is not undertaken. If approval is granted, I / my immediate relatives shall deal in/ execute the trade within 7 (seven) days of the receipt of the pre-clearance failing which we / our Promoter group entities shall re-apply for pre-clearance.

THAT to the best of my knowledge, I / my immediate relatives have made complete and full disclosure of my / my immediate relatives dealing in Securities of the Company from time to time.

Place :

Date :

Signature

This undertaking is required to be given by any Designated Person(s) when he/ she intends to deal in shares of the Company, in excess of the threshold limit, along with the application for pre-clearance.

FORM B

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

Name of the company: Technopoints and Chemicals Limited

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.	

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

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

Name & Signature:

Designation:

Date:

Place:

FORM C

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

Name of the company: Technopaints and Chemicals Limited

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 (For eg. – 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 share holding				

Name –

PAN:

CIN:

Address:

Contact No

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)	

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

Name & Signature:

Designation:

Date:

Place:

FORM D

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (3) transactions by other connected persons as identified by the Company]

Name of the company: Technopaints and Chemicals Limited

ISIN of 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 the Company	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 (For eg. – 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 share holding				

Name –

PAN:

CIN:

Address:

Contact No

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)	

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

Name & Signature:

Designation:

Date:

Place:

