

Akzo Nobel India Limited

**Code of practices & procedures for fair disclosure of unpublished price sensitive information**

**Insider Trading Guidelines**

**INDEX**

<b><u>S.No</u></b>	<b><u>Section</u></b>	<b><u>Page No</u></b>
1	<b>Section A-</b> Definitions	2
2	<b>Section B-</b> Circumstances in which Price Sensitive info can be shared & Coverage area of sharing such info	3
3	<b>Section C-</b> Trading when in position to possess unpublished price sensitive info	5
4	<b>Section D-</b> Trading Plans	6
5	<b>Section E-</b> Duties & Powers of compliance officer	7
6	<b>Section F-</b> Principles of fair disclosures as recommended by SEBI	8
7	<b>Section G-</b> Disciplinary actions & penalties for violation of Code of Conduct	9
8	<b>Annexures &amp; formats</b>	10 (onwards)

The Code of Conduct of the Company incorporates inter-alia the guidelines on conduct expected of those employees who are in possession of unpublished price-sensitive information about the Company ('Inside Information'). In consonance with the Code of Conduct, employees are also required to comply with the guidelines under SEBI (Prohibition of Insider Trading) Regulations, 2015 and the amendments thereof. Some of the guidelines applicable, though not exhaustive, are given below:

**Code of practices and procedures for fair disclosure of unpublished price sensitive information**

*for fair disclosure of unpublished price sensitive information that it would follow in order to adhere to each of the principles set out in Schedule A to these regulations*

**Section A- Definitions**

1. 'Compliance Officer' would mean:
  - a. Any senior officer, designated so and reporting to the board of directors
  - b. Financially literate head of the organization in case board is there/ not there
    - who is capable of appreciating requirements for legal and regulatory compliance under these regulations
    - 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information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
  
2. Personnel who are likely to have access to Inside Information (referred to as 'Connected Person' in the SEBI Regulations) are:
  - a. Any person who is or has during the six months prior to the concerned act been associated with a company, directly or indirectly, in any capacity
    - including by reason of frequent communication with its officers
    - by being in any contractual, fiduciary or employment relationship
    - 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
  - b. an immediate relative of connected persons specified in clause (a) above
  - c. a holding company or associate company or subsidiary company
  - d. an intermediary as specified in section 12 of the Act or an employee or director thereof
  - e. an investment company, trustee company, asset management company or an employee or director thereof
  - f. an official of a stock exchange or of clearing house or corporation 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

- j. a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten per cent. of the holding or interest
  - k. Directors of the Company and any subsidiary company
  - l. Business/ Function Heads/ Financial Controllers
  - m. Any other employee of the Company or its subsidiary who because of his or her office or employment is likely to be in possession of unpublished price sensitive information.
  - n. Broadly, a connected person is also a *person/ persons who may not seemingly occupy any position in a company but are in regular touch with the company and its officers and are involved in the know of the company's operations*
3. 'Generally available information' means information that is accessible to the public on a non-discriminatory basis. For example: Information published on website of Stock Exchange
  4. '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.
  5. "Insider" means any person who is:
    - i) a connected person; or
    - ii) in possession of or having access to unpublished price sensitive information
  5. "Trading" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly
  6. 'Trading day' means a day on which the recognized stock exchanges are open for trading;
  7. 'Unpublished price sensitive information' means any information, relating to 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
  8. An insider must not communicate, provide, or allow access to any unpublished price sensitive information, relating to 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, as listed in Section B.
  9. Such 'price sensitive information' is to be handled with care and dealt with during business transactions strictly on '*need-to know*' basis.

**Section B -**

**PRICE SENSITIVE INFORMATION TO BE SHARED ONLY IN CERTAIN CIRCUMSTANCES**

10. If such information is at all to be shared, than can be communicated, provided, allowed access to or procured, in connection with a transaction that would:-
- (i) entail an obligation to make an open offer under the takeover regulations where the board of directors 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
  - (iii) The board of directors, however, would cause public disclosures of such unpublished price sensitive information well before the proposed transaction to rule out any information asymmetry in the market.

**DUTY OF BOARD to decide coverage area of information sharing**

The board of directors shall:

- in consultation with the compliance officer
- specify the designated persons
- to be covered by such code
- on the basis of their role and function in the organisation.
  
- Due regard shall be had to the access that such role and function would provide to unpublished price sensitive information in addition to seniority and professional designation.

For purposes of above sub-regulation (i) and (ii), the board of directors shall require:

- the parties to execute agreements to contract confidentiality, and
- non-disclosure obligations on the part of such parties, and
- such parties shall keep information so received confidential,
- except for the purpose of sub-regulation (i) and (ii), and
- shall not otherwise trade in securities of the company
- when in possession of unpublished price sensitive information.

## Section C-

### **TRADING WHEN IN POSITION TO POSSESS UNPUBLISHED PRICE SENSITIVE INFORMATION\*#**

Any person/ institution who is a potential insider and can get hold of possession of price sensitive information at any time, may trade in securities only in the following circumstances, and if traded following the below, prove innocence if accused guilty:

- (i) the transaction is an off-market *inter-se* transfer between promoters who were in possession of the same unpublished price sensitive information without being in breach of regulation 3 and both parties had made a conscious and informed trade decision;
- (ii) in the case of non-individual insiders:-
  - (a) the individuals who were in possession of such unpublished price sensitive information were different from the individuals taking trading decisions and such decision-making individuals were not in possession of such unpublished price sensitive information when they took the decision to trade; and
  - (b) appropriate and adequate arrangements were in place to ensure that these regulations are not violated and no unpublished price sensitive information was communicated by the individuals possessing the information to the individuals taking trading decisions and there is no evidence of such arrangements having been breached;
- (iii) the trades were pursuant to a trading plan set up in accordance with Trading Plans as detailed in Section D.

*\* Designated persons and their immediate relatives shall not trade in securities when the trading window is closed. The trading window shall also be applicable to any person having contractual or fiduciary relation with the company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the company.*

*#No designated person shall apply for pre-clearance of any proposed trade if such designated person is in possession of unpublished price sensitive information even if the trading window is not closed.*

## Section D-

### TRADING PLANS

1. Any person who is perpetually in possession of any unpublished price sensitive information is enabled to trade in securities in a compliant manner.

This involves the following steps to be carried out on insider's part:

- the formulation of a trading plan for trades to be executed in future.
  - presenting it to the compliance officer for approval
  - post approval from compliance officer, make appropriate public disclosure
2. Provided that such 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.  
*This is only a statutory cool-off period and would not grant immunity from action if the insider were to be in possession of the same unpublished price sensitive information both at the time of formulation of the plan and implementation of the same.*
    - (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;  
*It means no trading between last 21 days before declaration of results and immediate 1 day after declaration of results.*  
**ESSENCE:** *Since the trading plan is envisaged to be an exception to the general rule prohibiting trading by insiders when in possession of unpublished price sensitive information, it is important that the trading plan does not entail trading for a reasonable period around the declaration of financial results as that would generate unpublished price sensitive information.*
    - (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) not entail trading in securities for market abuse

**NOTE:** *The trading plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan within 7 days, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.*

*If the designated person fails to implement the approved trading plan within 7 days, then fresh pre-clearance would be needed for the trades to be executed.*

Important points to be considered at the time of implementation of Trading Plan have been listed in **Annexure A** to this document.

The duties & powers of compliance officer on receipt of such a trading plan, at any time, have been listed in **Section E**.

## **Section E**

### **Duties of compliance officer**

1. The compliance officer shall confidentially maintain a list of such securities as a "restricted list" which shall be used as the basis for approving or rejecting applications for pre-clearance of trades.
2. Prior to approving any trades, the compliance officer shall seek declarations to the effect that the applicant for pre-clearance is not in possession of any unpublished price sensitive information.
3. He shall report 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.

### **Powers of compliance officer**

1. He shall have regard to whether any such declaration is reasonably capable of being rendered inaccurate.
2. 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 these regulations. Should a contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Board for credit to the Investor Protection and Education Fund administered by the Board under the Act.

### **Process to be followed by Compliance Officer on receiving Trading Plan:**

- (i) review the trading plan
- (i) assess whether the plan would have any potential for violation of above regulations
- (ii) seek such express undertakings as may be necessary to enable such assessment
- (iii) if found satisfactory and in line with regulations, approve the plan
- (iv) upon approval, notify the plan to the stock exchanges on which the securities are listed
- (v) monitor the implementation of the plan
- (vi) if any violation found, inform Board promptly

**NOTE:** *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.*

### **Rule of thumb**

The compliance officer shall

- close the trading window when it is determined
- that a designated person or class of designated persons can reasonably be expected to have possession of unpublished price sensitive info.

## Section F

Though utmost care has been taken in drafting of these guidelines, these are only illustrative and not exhaustive. In case of doubt in the understanding/ interpretation of these guidelines, Connected Persons are encouraged to consult the Company Secretary.

It is however important to list out the principles recommended by SEBI to all Listed Companies, to be adhered to while drafting of the said guidelines:

1. Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
3. Designation of a senior officer as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available. The list of disclosures involved has been enclosed as **Annexure C**.
5. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.
7. Developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
8. Handling of all unpublished price sensitive information on a need-to-know basis.

## **Section G**

Disciplinary actions & penalties for violation of Code of Conduct

Any person who is found to be guilty of insider trading would be subject to any/ all of the following:

- Dismissal/ Removal from Service
- Suspension from service for a limited period
- Warning, reprimand or censure
- Withholding of increment for a period not exceeding two years
- Reduction of emoluments
- Withdrawal of any concession as may have been granted
- Any other action as may be considered appropriate

**Important points to be considered at the time of implementation of Trading Plan**

- A. 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.
- B. In such event,
- the compliance officer shall confirm
  - that the commencement ought to be deferred
  - until such unpublished price sensitive information
  - becomes generally available information
  - so as to avoid a violation.

**DISCLOSURES OF TRADING BY INSIDERS**

Every public disclosure on trading of securities/ derivatives (if allowed by prevailing law at such time) shall be made:

- i. In specified Forms
- ii. by all those persons relating to trading,
  - i. such person's immediate relatives,
  - ii. and by any other person for whom such person takes trading decisions.
- iii. Disclosures made shall be maintained by the company, for a minimum period of five years, in such form as may be specified.

### Disclosures by certain persons

1. Initial disclosures

S.N	Who	Disclose	Intimation to	Period	Format
(i)	*Promoter *Employee *Director	His holding of securities of the company as on the date of these regulations taking effect	The Company	Within 30 days of these regulations taking effect	In Form A (attached)
(ii)	Every person on appointment *as a KMP *as a Director *Promoter	His holding of securities of the Company as on the date of appointment	The Company	Within 7 days of such appointment	In Form B (attached)

2. Continual Disclosures\*

S.N o.	Notifier	Disclose	Intimation to	Period	Format
(i)	*Promoter *Employee *Director	Number of such securities acquired or disposed, if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of 10 lakh rupees	The Company	within 2 trading days of such transaction	In Form C (attached)
(ii)	The Company	The particulars of such trading	The Stock Exchanges	within two trading days of receipt of the disclosure or from becoming aware of such information	In Form D (attached)

*\* It is clarified for the avoidance of doubts that the disclosure of the incremental transactions after any disclosure under this sub-regulation, shall be made when the transactions effected after the prior disclosure cross the threshold specified in above table*

3. Disclosures by other connected persons:

The Company may, at its discretion, call for the below disclosure in order to monitor compliance with regulations:

S.No.	Notifier	Disclose	Intimation to	Period	Format
(i)	Connected person or class of connected persons	Holdings and trading in securities of the company in such form in order to monitor compliance with these regulations	The Company	At such frequency as may be determined by the Company	In Form E (attached)

**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 Option 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	

*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.)	Date of appointment of Director /KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP		% of Shareholding	Open Interest of the Future contracts held at the time of becoming Promoter/appointme nt of Director/KMP		Open Interest of the Option Contracts held at the time of becoming Promoter/appointme nt of Director/KMP	
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	5	6		7	

*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: Akzo Nobel India Limited

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 to (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	17

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

Signature:  
 Designation:  
 Date:  
 Place:

**Form D**

**Securities and Exchange Board of India (Prohibition of Insider Trading)  
Regulations, 2015**

**Regulation 7(3) – Transactions by Other connected persons as identified by  
the company**

1	2	3		4		5		6		7	8	9	10	11	12	13				14	15	16	17	
		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:  
Designation:  
Date:  
Place:

Annexure 1  
**SPECIMEN OF APPLICATION FOR PRE-DEALING APPROVAL**

Date:

To,  
The Compliance Officer,  
**Akzo Nobel India Limited**

Dear Sir/Madam,

**Application for Pre-dealing approval in securities of the Company**

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

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

I enclose herewith the form of Undertaking signed by me.

Yours faithfully,  
\_\_\_\_\_  
(Signature of Employee)



Annexure 2  
**FORMAT OF UNDERTAKING TO BE ACCOMPANIED WITH  
THE APPLICATION FOR PRE-CLEARANCE**

**UNDERTAKING**

To,  
**Akzo Nobel India Limited**

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 "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 four 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.

Date :

Signature : \_\_\_\_\_

\* Indicate number of shares



ANNEXURE 3

**FORMAT FOR PRE- CLEARANCE ORDER**

To,

Name : \_\_\_\_\_

Designation : \_\_\_\_\_

Place : \_\_\_\_\_

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

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

Yours faithfully,  
for **Akzo Nobel India Limited**

COMPLIANCE OFFICER

Date : \_\_\_\_\_

Encl:  
Format for submission of  
details of transaction



**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,  
**Akzo Nobel India Limited**

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)

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

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. *(Applicable in case of purchase/ subscription).*

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).

Date : \_\_\_\_\_

Signature : \_\_\_\_\_

Name :

Designation:

**ANNEXURE 5**  
**FORMAT FOR INITIAL DISCLOSURE OF SECURITIES**

To  
The Compliance Officer,  
**Akzo Nobel India Limited**

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, 1992 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

Date :

Signature:

**ANNEXURE 6**

**DISCLOSURE OF CHANGE IN SHAREHOLDING**

The Compliance Officer,  
**Akzo Nobel India Limited**

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</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>Purchase</i>	<i>Sale</i>	<i>Others</i>		

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

<i>Name, PAN No. &amp; address of shareholder and relationship</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</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>Purchase</i>	<i>Sale</i>	<i>Others</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.

Date :

Signature: \_\_\_\_\_