

# **KALPTARU PAPERS LIMITED**

## **CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING**

**[PURSUANT TO SEBI (PROHIBITION OF INSIDER TRADING)  
REGULATIONS, 2015 AS AMENDED FROM TIME TO TIME.]**

## **KALPTARU PAPERS LIMITED**

### **1. Introduction**

Insider trading means dealing in securities of a company listed/traded on any stock exchange in India based on, or when in possession of, unpublished price sensitive information. With a view to govern the conduct of insiders on matters relating to insider trading, the Securities and Exchange Board of India (SEBI) had formulated SEBI (Insider Trading) Regulations 1992 ('Regulations'). KALPTARU PAPERS LIMITED ("KPL") has formulated this code of conduct called Kalptaru Papers Limited Code of Conduct for Prevention of Insider Trading ("Code").

At present, the Securities and Exchange Board of India ("SEBI") notified SEBI (Prohibition of Insider Trading) Regulations, 2015 ("Regulation") on January 15, 2015 to come into force on 120th day of the date of notification i.e May 15, 2015. This Regulation is applicable to all companies whose securities are listed on Indian stock exchanges. In accordance with the same, the Company needs to modify/amend/alter the Code and all the Directors/Executive Directors/General Managers and other designated employees of KPL are advised to carefully go through and familiarise themselves with and adhere to the Regulations and the Code.

Further, this Code can be modified/amended/alterd by Directors/Compliance Officer. But in case of any statutory modification or amendment or alteration of the provisions of Securities and Exchange Board of India (Prohibition of Insider Trading), Regulations 2015, the newly modified/amended/alterd provisions of the Regulation shall be deemed to be implemented in the Code immediately with effect from the date of the statutory notification for modification or amendment or alteration etc. The amended code should be placed before the Board of Directors of the Company in the Board Meeting held immediately after the date of statutory notification for modification/amendment/alteration etc of the Regulation for noting.

### **2. The Policy and Obligations**

The Company endeavours to preserve the confidentiality of un-published price sensitive information and to prevent misuse of such information. The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations. Every Director and designated employee of the Company has a duty to safeguard the confidentiality of all such information obtained in the course of his or her work at the company. No Director/Executive Director/General Manager and other designated employee may use his or her position or knowledge of the Company to gain personal benefit or to provide benefit to any third party. To achieve these objectives, KALPTARU PAPERS LIMITED (hereinafter referred to as "the Company") hereby notifies that this code of conduct to be followed by all Directors/Officers and other designated employees of KPL.

### **3. Applicability**

This Code shall apply to all Directors/Officers and other designated employees of KPL.

#### 4. Definitions

In this Code, unless the context otherwise requires:

- (i) **"SEBI Act"** means the Securities and Exchange Board of India Act, 1992 (15 of 1992).
- (ii) **"Regulations"** means the SEBI (Prohibition of Insider Trading) Regulations, 1992 as amended from time to time.
- (iii) **"the Company"** means KALPTARU PAPERS LIMITED (KPL).
- (iv) **"Code"** means this KALPTARU PAPERS LIMITED Code of Conduct for Prevention of Insider Trading, as modified from time to time.
- (v) **"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 leKPL 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;
- (vi) **"Connected Person"** means:
  - (i) 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 or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the Company or holds any position including a professional or business relationship 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.
  - (ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established,
    - (a) an immediate relative of connected persons specified in clause (i); or
    - (b) a holding company or associate company or subsidiary company; or
    - (c) an intermediary as specified in Section 12 of the Act or an employee or director thereof; or
    - (d) an investment company, trustee company, asset management company or an employee or director thereof; or
    - (e) an official of a stock exchange or of clearing house or corporation; or
    - (f) a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
    - (g) a member of the Board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
    - (h) an official or an employee of a self-regulatory organization recognised or authorized by the Board; or
    - (i) a banker of the Company; or
    - (j) a concern, firm, trust, hindu undivided family, company or association of persons wherein a director of the Company or his immediate relative or banker of the Company, has more than ten per cent, of the holding or interest.

- (vii) **“Dealing in Securities”** means an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in the securities of the Company either as principal or agent.
- (viii) **Officer/Designated Employee(s)** shall include :  
1. Top three tier of the Management of the company namely :-  
a) Managing Director or the CEO as the case may be or Whole Time Director.  
b) Business Heads by whatever designation may be called or Senior Management of the Company (comprising of President, Vice President, Chief Operative Officer, Chief Financial Officer, Company Secretary etc)  
c) Functional Heads reporting to Business Heads or Senior Management by whatever designation they may called (comprising of Asst. Vice President, General Manager, Dy. General Manager, Asst. Company Secretary etc)  
2. All the employees at or above the level of Sr. Manager in Finance, Accounts, Banking, MIS and Secretarial Department and employees of other departments, on a case to case basis, who would be reasonably expected to have access to unpublished price sensitive information relating to the Company, as may be decided by the Compliance Officer, on a case to case basis.  
3. Any other as per applicable laws.
- (ix) **“Director”** means a member of the Board of Directors (both executive & Non-executive) of the Company.
- (x) **“Employee”** means every employee of the Company including the Directors in the employment of the Company.
- (xi) **"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.
- (xii) **“Insider”** means any person who,  
(i) a connected person; or  
(ii) In possession of or having access to unpublished price sensitive information.
- (xiii) **“Key Managerial Person”** means person as defined in Section 2(51) of the Companies Act, 2013.
- (xiv) **"Promoter"** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof:
- (xv) **"Securities"** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund;
- (xvi) **"Trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly.
- (xvii) **"Trading Day"** means a day on which the recognized stock exchanges are open for trading;
- (xviii) **“Unpublished Price Sensitive Information”** means: 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
  - (v) changes in key managerial personnel; and
  - (vi) material events in accordance with the listing agreement.
- (xix) **“Specified Persons”** means the Directors, connected persons, the insiders, the Designated Employees and the promoters and immediate relatives are collectively referred to as Specified Persons.

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.  
business and such other transactions;

## **KALPTARU PAPERS LIMITED**

### **CHAPTER II CONFIDENTIALITY OF PRICE SENSITIVE INFORMATION**

#### **5. COMPLIANCE OFFICER**

- 5.1 The Compliance Officer of the KPL will act as a Chief Investor Relation Officer (CIO) for this Code and will report to the Managing Director or Executive Director & CEO. The CIO will deal with the dissemination and disclosure of Unpublished Price Sensitive Information. In addition to CIO, the following persons are also authorized to communicate with the Investors/media in co-ordination with the CIO:
- o Managing Director;
  - o CFO; and
  - o Authorised members of Corporate Communication.

- 5.2 The Compliance Officer shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of Price Sensitive Information, addressing any clarifications/difficulties regarding the Regulations and/or the Code and the implementation of the Code, under the overall supervision of the Board of Directors and / or Managing Director and / or Executive Director & CEO.

#### **6. PRESERVATION OF PRICE SENSITIVE INFORMATION**

- 6.1 All the Directors and the Designated Employees shall maintain the confidentiality of all unpublished Price Sensitive Information in their possession.
- 6.2 Directors and the Designated Employees shall not advise, communicate, counsel, inform or pass on such information to any person, directly or indirectly, other than communication required to be made/done in the ordinary course of business, or under any law.
- 6.3 Unpublished Price Sensitive Information shall be handled on a “need-to know” basis, i.e., unpublished Price Sensitive Information should be disclosed only to those within KPL who need the information to discharge their duty and/or functions and whose possession of such

information will not give rise to a conflict of interest or appearance of misuse of the information. Further, all non-public information directly received by any employee should immediately reported to the head of the department.

## **7. LIMITED ACCESS TO UNPUBLISHED PRICE SENSITIVE INFORMATION**

- 7.1 All files, papers and records containing unpublished Price Sensitive Information shall be kept secure.
- 7.2 In case of unpublished Price Sensitive Information being available in the computer files, the same shall be secured in the manner stipulated in the [Information Security] policy of KPL.

## **KALPTARU PAPERS LIMITED**

### **CHAPTER III** **TRADING RESTRICTIONS**

## **8. TRADING WINDOW**

- 8.1 When the trading window is closed, all directors/ designated employees of KPL Shall not trade in the company's securities in such period. The trading window shall be closed during the time the information referred to in para 8.2 is unpublished.
- 8.2 The Trading Window shall be inter-alia closed 7 days prior to and during the time the unpublished price sensitive information is published or for such period and for any such other event as may be deemed fit by the Compliance Officer;
- 8.3 However if the circumstances so warrants the time for closing the window may be increased or decreased with the approval of Managing Director and Whole Time Director
- 8.4 The trading window shall be opened 24 hours after information referred to in para 8.2 is made public.
- 8.5 All Directors/designated employees shall conduct all their dealings in the securities of the company only in a valid trading window and shall not deal in any transaction involving the purchase or sale of the company's securities during the periods when trading window is closed, as referred to in para 8.2 or during any other period as may be specified by the Company from time to time.
- 8.6 In case of ESOPs, exercise of option may be allowed in the period when the trading window is closed. However sale of shares allotted on exercise of ESOPs shall not be allowed when trading window is closed.

## **9. PRE-CLEARANCE OF TRADES**

- 9.1 All Directors/ designated employees and their dependants who intend to deal in the securities of the company when the trading window is opened and if the value of the proposed trades is above 50,000 shares or up to Rs. Ten Lakhs (market value) or 1% of total shareholding, whichever is less, should pre-clear the transactions as per the pre-dealing procedure as described hereunder.
- 9.2 An application shall be made in Form 'I' to the compliance officer indicating the estimated number of securities that the designated employee/ officer/ director intends to deal in, the details as to the depository with which he has a security account, the details as to the

securities in such depository mode and such other details as may be required by any rule made by the company in this behalf.

9.3 An Undertaking (Form IA) shall be executed in favour of the Company by such Designated employee/ Director/ Officer incorporating, inter alia the following clauses, as may be applicable :

(a) That the designated employee/director/officer/dependant family member does not have access or has not received price sensitive information up to the time of signing the Undertaking.

(b) That in case, the designated employee/director/officer/dependant family member has access to or receive any "Price Sensitive Information" after the signing of this undertaking but before execution of the transaction, he/she shall inform the Compliance Officer of the change in position and that he/she shall refrain from dealing in securities of the company till such information is made public.

(c) That he/she has not contravened the Company's Code of Conduct for Prevention of Insider Trading as notified by the company from time to time. (d) That he/she has made full and true disclosure in this application.

9.4 All directors/designated employees and their dependants shall execute their order in respect of securities of the company within one week after the approval of pre-clearance is given (Format of approval in Form II). If the order is not executed within one week after the approval is given, the employee/director must pre-clear the transaction again.

9.5 It shall be the responsibility of designated employees/directors to ensure compliance of clause 8.1 to 8.4 above in case of their dependants also. (Form III format of Disclosure of Transactions as referred in Form I) .

## **10. MINIMUM PERIOD FOR HOLDING OF SECURITIES/LISTED SECURITIES**

10.1 All Directors/designated employees who buy or sell any number of shares of the company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction. All directors/officers/designated employees shall also not take positions in derivative transactions in the shares of the company at any time.

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

10.3 In case the sale of securities is necessitated by personal emergency the holding period may be waived by the Compliance Officer after recording in writing his reasons in this regard.

## **KALPTARU PAPERS LIMITED**

### **CHAPTER IV REPORTING AND DISCLOSURE REQUIREMENTS**

#### **11. REPORTING REQUIREMENTS BY ALL DESIGNATED EMPLOYEES**

- 11.1 The Compliance Officer shall maintain records of all the declarations/undertakings/forms as mentioned in this Code, as received from time to time, for a period of five years.
- 11.2 The Compliance Officer shall place before Chairman & Managing Director\Committee specified by the Company, on a monthly basis, all the details of the dealing in the securities by designated employees/director of the company and the accompanying documents that such persons had executed under the pre dealing procedure as envisaged in this Code.

#### **12. DISCLOSURE REQUIREMENTS DISCLOSURE OF INTEREST OR HOLDING BY DIRECTORS AND OFFICERS AND SUBSTANTIAL SHAREHOLDERS**

The following disclosures shall be made to the Compliance Officer:

##### **I. Initial Disclosures**

Every promoter/ Key Managerial Personnel / Director / Officers / Designated Employees of KPL , 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).

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.

##### **II. Continual Disclosures**

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.

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.

##### **Disclosure by Company to Stock Exchange**

12.2 The information received as per above disclosure shall be intimated to all stock exchanges on which the Shares of the company are listed within two working days of receiving the same. The records of all the declarations in the appropriate form given by the



directors/officers/designated employees shall be maintained for a minimum period of five years.

## **KALPTARU PAPERS LIMITED**

### **CHAPTER IV MISCELLANEOUS**

#### **13. PENALTY FOR CONTRAVENTION OF THE CODE**

- 13.1 All the Directors and the Designated Employees shall be individually responsible for complying with the provisions of the Regulations and the Code to the extent applicable.
- 13.2 Any Director who violates the Code shall be subject to disciplinary action, as may be deemed fit by the Board of Directors of KPL. Any Designated Employee who violates the Code shall be subject to disciplinary action, which may include freeze on emoluments, ineligibility for future participation in the stock option plans or suspension/termination of service/contract, or any other action as may be deemed fit by KPL.
- 13.3 Any action taken by KPL shall not preclude SEBI from taking any further action for violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

#### **14. INFORMATION TO SEBI IN CASE OF VIOLATION OF THE REGULATIONS**

In case any violation of the Regulation or the Code is observed, SEBI shall be informed of the same.

#### **15. CODE OF FAIR DISCLOSURE:**

The Code of Fair Disclosure pursuant to this Code has been set out, adopted and published on our official website of the Company i.e. [www.kalptaru.co.in](http://www.kalptaru.co.in)

**KALPTARU PAPERS LIMITED**

**Form I (Refer Clause 9.2 of the Code)  
Application for Pre-clearance**

(For use by Directors/Officers/ Designated Employees in case deal in the securities of Company above minimum threshold limit)

To,  
The Compliance Officer  
KALPTARU PAPERS LIMITED

Dear Sir,

I am desirous of dealing in the below-mentioned securities of the Company in my own name or on behalf of my dependent family member (write name of family member and relationship) and seek your approval to acquire/ purchase/ sell them.

Type of Security	No. of Shares	Market Price	Mode of acquisition Purchase/ Sale physical/ Demat	Date by which trade is proposed to be executed	Folio No./ DP ID No./Client ID No. alongwith the name of depository	Present Holding (No. of Shares)	
Equity Shares						Physical	Demat

In relation to the above Acquisition/ Purchase/ Sale, I undertake that:

- a) I have no access to nor do I have any information that could be construed as "Price Sensitive Information" upto the time of signing this undertaking .
- b) In case, I get access to or receive any "Price Sensitive Information" after signing this application but before the execution of the transaction, I shall inform you of the change in position and shall refrain from dealing in Shares till such information is made public.
- c) I have not contravened the Company's Code of Conduct for Prevention of Insider Trading as notified by the company from time to time.
- d) I have made full and true disclosure in this application.

**Signature:**

**Name:**

**Designation:**

**Department:**

## **KALPTARU PAPERS LIMITED**

### **Form IA (Refer Clause 9.3 of the Code) Undertaking**

I \_\_\_\_\_ aged about \_\_\_\_\_ years, Son of \_\_\_\_\_ working in the capacity of \_\_\_\_\_ in KALPTARU PAPERS Limited (hereinafter referred to as 'Company') do hereby solemnly declare and undertake as under :-

- 1) That I am working with the company with effect from [ ]....Details given in Annexure A
- 2) That as on date\_\_\_\_\_ I have/have not been allotted any shares from preferential employee quota of the company or (ii) I have been allotted \_\_\_\_\_ nos. of shares from general quota with reference to company's Initial Public Offer (IPO) dated \_\_\_\_\_ (strike out (i) or (ii) which is not applicable)
- 3) That as on date\_\_\_\_\_ I do not possess/own any shares of the company or (b) I have purchased \_\_\_\_\_ nos. of shares of the Company from open market. (strike out (a) or (b) which is not applicable)
- 4) That as on date I possess \_\_\_\_\_ nos. of shares of the Company i.e. total of 1 & 2 above. (Strike out if not applicable)
- 5) That I have received and read the Company's code of conduct and agree to comply with the Company's code of conduct and ethics from time to time.
- 6) That I do not have any access nor do I have any information that could be constructed as "Price Sensitive Information" upto the time of signing the undertaking.
- 7) In the event that I have access to or receive "Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction for which approval is sought, I shall inform the compliance officer of the Company of the change in my position and that I would completely refrain from dealing in the securities of the company till the time such information becomes public.
- 8) That I shall not communicate counsel or procure directly and indirectly any unpublished Price Sensitive Information (PSI) as mentioned in Company's code of conduct to any person who while in possession of such unpublished PSI & shall keep the confidential information which is in my possession secured and shall keep computer files containing the PSI under the securities of log or password.
- 9) That I shall provide Initial disclosure about shareholding in the requisite form to the compliance officer of the Company.
- 10) That I have read the SEBI guidelines and code of conduct in respect to insider trading and agree to fully abide by the same.
- 11) That I has not contravened the code of conduct for prevention of insider trading as notified by the company from time to time & shall be fully liable in any event of contravention/noncompliance of the same.

12) That I have made a full and true disclosure in the matter.

**Date:**

**Signature:**

**Name:**

**Designation:**

**KALPTARU PAPERS LIMITED**

**ANNEXURE- A  
DETAILS**

Name :

Company Name : Kalptaru Papers Ltd.

Location :

Date of Joining :

Department :

Section :

Designation :

Date of Birth :

Age :

Current Residential Address:

Permanent Residential Address:

**KALPTARU PAPERS LIMITED**

**Form II (Refer Clause 9.4 of the Code)  
FORMAT FOR PRE-DEALING APPROVAL LETTER**

Date: \_\_\_\_\_  
Approval No: \_\_\_ of \_\_\_  
To,  
Mr. /Mrs. \_\_\_\_\_  
Emp No. : \_\_\_\_\_  
Designation: \_\_\_\_\_

**PRE-DEALING APPROVAL/DISAPPROVAL -Your application dtd. \_\_\_\_\_**

Dear Mr. /Mrs. \_\_\_\_\_

With reference to your above application seeking approval for undertaking certain transactions in Securities of the Company detailed therein, please be informed that you are hereby authorised/not authorised to undertake the transaction(s) as detailed in your said application.

This approval is being issued to you based on the various declarations, representations and warranties made by you in your said application.

This approval letter is valid till \_\_\_\_\_ (i.e. for {1} week). If you do not execute the approved transaction /deal on or before this date you would have to seek fresh pre-dealing approval 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 four {4} days from the date of transaction/deal. In case the transaction is not undertaken a "Nil" report shall be necessary.

Yours truly,

**Compliance Officer**

**KALPTARU PAPERS LIMITED**

**Form III (Refer Clause 9.5 of the Code)  
FORMAT FOR DISCLOSURE OF TRANSACTIONS**

(To be submitted within 2 days of transaction/Dealing in Securities of the Company)

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

To,  
The Compliance Officer  
KALPTARU PAPERS Limited

Dear Sir/Madam,

**DETAILS OF TRANSACTION**

Ref: Your Approval letter No. \_\_\_\_\_ dated \_\_\_\_\_ (in case of Pre-approved transaction)

I hereby inform you that I

- have not bought/sold/subscribed any Securities of the Company
- have bought/sold/subscribed to the \_\_\_\_\_ Securities (give description) as mentioned below on \_\_\_\_\_ (insert date)

Name holder	of	** First or joint holder	No. Securities dealt with	Of	Bought / Sold/ Subscribed	DP ID/CLIENT ID ( electronic form ) or Folio no. For physical where the Sec. Will be debited or credited	Price (Rs)

\*\* "F" first holder "J" joint holder

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 3 (Three) 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 declare that the above information is correct and that no provisions of the Company's Insider Trading Code and/or applicable laws/regulations have been contravened for effecting the above said transaction(s).

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 Company (Compliance Officer) for necessary approval (applicable in case of purchase / subscription).

Yours truly,

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

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

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

**Department:** \_\_\_\_\_



**KALPTARU PAPERS LIMITED**

**(Refer Clause 12(I) of the Code)  
FORMAT FOR INITIAL DISCLOSURE OF SECURITIES**

To,  
The Compliance Officer,  
KALPTARU PAPERS 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 Client ID	A/c

**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 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	Baneficiary A/c Client ID

Date:

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

**KALPTARU PAPERS LIMITED**

**(Refer Clause 12 (II) of the Code)  
DISCLOSURE OF CHANGE IN SHAREHOLDING**

To,  
KALPTARU PAPERS Limited,

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

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

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

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

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:** \_\_\_\_\_

\*\*\*\*\*