



ELECTROSTEEL CASTINGS LIMITED

CODE OF CONDUCT FOR REGULATING, MONITORING AND REPORTING TRADING BY INSIDERS

1. Introduction

Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“the Regulations”) requires the Board of Directors of a listed company to formulate a Code of Conduct to regulate, monitor and report trading in securities of the company by its employees and other connected persons, towards achieving compliance with the said Regulations, adopting the minimum standards set out in Schedule B to the Regulations.

Accordingly, this Code of Conduct for Regulating, Monitoring and Reporting Trading by Insiders (“the Code of Conduct / the Code”) has been adopted by the Board of Directors of the Company at its meeting held on 12 May, 2015 and shall be effective from 15 May, 2015.

This Code can be modified/amended/alterd by Board of Directors of the Company except in case of any statutory modification/amendment/alteration of the provisions of SEBI (Prohibition of Insider Trading), Regulations 2015, which shall be deemed to be implemented in the Code immediately on such notification for modification/ amendment/alteration etc. coming into effect.

1. Applicability

1.1 This Code shall apply to all Designated Persons and other Connected Persons as mentioned in this Code.

2. Definitions

In this Code, unless the context otherwise requires:

2.1 “**Act**” or “**SEBI Act**” means the Securities and Exchange Board of India Act, 1992.

2.2 “**Company**” means Electrosteel Castings Limited (ECL).

2.3 “**Compliance Officer**” means Company Secretary or such other senior officer, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations designated so and reporting to the Board of Directors and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of

unpublished price sensitive information, monitoring of trades and the implementation of the Code specified in these regulations under the overall supervision of the Board of Directors of the Company.

2.4 “Connected Person” means-

- (i) any person who is or has during the six months prior to the concerned act been associated with the 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 authorised by SEBI; 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.

2.5 “Designated Person(s)” of the Company shall mean and include :

- (i) All Directors;
- (ii) All Key Managerial Personnels;
- (iii) All employees in the grade of Senior General Managers and above;
- (iv) All employees of the finance, accounts, secretarial and legal departments;

- (v) Any other person as may be determined and identified by the Board of Directors in consultation with the Compliance Officer.
- 2.6 **“Director”** means a member of the Board of Directors of the Company.
- 2.7 **“Employee”** means every employee of the Company including the Directors in the employment of the Company.
- 2.8 **“Generally Available Information”** means information that is accessible to the public on a non-discriminatory basis.
- 2.9 **“Key Managerial Personnel”** or **“KMP”** means person as defined in Section 2(51) of the Companies Act, 2013.
- 2.10 **“Immediate Relative”** means the 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.
- 2.11 **“Insider”** means any person who is:
- (i) a connected person; or
 - (ii) in possession of or having access to unpublished price sensitive information.
- 2.12 **“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.
- 2.13 **“Regulations”** shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.
- 2.14 **“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.
- 2.15 **“Takeover Regulations”** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.
- 2.16 **“Trading”** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly.
- 2.17 **“Trading day”** means a day on which the recognized stock exchanges are open for trading.

- 2.18 **“Unpublished Price Sensitive Information”** or **“UPSI”** means any information, relating to the 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.
- 2.19 All other words and phrases will have the same meaning as defined under the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time. Words and expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules & regulations made thereunder shall have the meanings respectively assigned to them in that legislation.

3. Role of Compliance Officer

- 3.1 The Compliance Officer shall report to the Board of Directors for the purpose of the Code and in particular, shall provide reports to the Chairman of the Audit Committee and to the Chairman of the Board annually.
- 3.2 The Compliance Officer shall provide any clarifications with regard to the implementation of this Code.
- 3.3 The Compliance Officer shall maintain records of all disclosures/undertakings/forms as mentioned in this Code, as received from time to time, for a period of five years.

4. Preservation of Price Sensitive Information

- 4.1 All Designated Persons shall maintain the confidentiality of price sensitive information. All information shall be handled within the Company on a need-to-know basis and no unpublished price sensitive information shall be communicated to any person except in furtherance of the Insider's legitimate purposes, performance of duties or discharge of his/her legal obligations.
- 4.2 No Insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to the Company or securities listed or proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

- 4.3 No person shall procure from or cause the communication by any Insider of unpublished price sensitive information, relating to the Company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- 4.4 Notwithstanding anything contained in the Code, an unpublished price sensitive information may 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 an obligation to make an open offer under the takeover regulations but where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the Company and the information that constitute unpublished price sensitive information is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the Board of Directors may determine.
- 4.5 For the purpose of the above clause, the parties shall be required 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 Clause 4.4 and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information.
- 4.6 For the purpose of prompt public disclosure of unpublished price sensitive information, the Company also adopts the Code of Practices & Procedures for Fair Disclosure of Unpublished Price Sensitive Information.
- 4.7 Employees and the connected persons designated on the basis of their functional role ("designated persons") in the Company shall be governed by this Code for dealing in securities.

5. Trading Plan

- 5.1 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.
- 5.2 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;
 - (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 Company and the second trading day after the disclosure of such financial results;

- (iii) entail trading for a period of not less than twelve months;
- (iv) not entail overlap of any period for which another trading plan is already in existence;
- (v) set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
- (vi) not entail trading in securities for market abuse.

5.3 The Compliance Officer shall review the Trading Plan submitted as above to assess whether the plan would have any potential violation of the Regulations. The Compliance Officer 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.

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

Provided that the implementation of the trading plan shall not be commenced, if any unpublished price sensitive information is 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 Compliance Officer shall confirm that the commencement ought to be deferred until such unpublished price sensitive information becomes generally available information.

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

6. Trading Window and Window Closure

6.1 Designated Persons and their immediate relatives may execute trades subject to compliance with these regulations. Towards this end, a notional trading window shall be used as an instrument of monitoring trading by the Designated Persons and their immediate relatives.

- (i) The trading period, i.e. the trading period of the stock exchanges, called "trading window", is available for trading in the Company's securities.
- (ii) The trading window shall be, inter-alia, closed 7 days prior to and during the time unpublished price sensitive information is generally available.
- (iii) When the trading window is closed, the Designated Persons and their immediate relatives shall not trade in the Company's securities in such period.
- (iv) All Designated Persons and their immediate relatives 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 the trading window is closed, as referred to in Point No. (ii)

above or during any other period as may be specified by the Company from time to time.

- 6.2 The Compliance Officer shall intimate the closure of trading window to all the designated persons of the Company when he determines that a designated person or class of designated persons can reasonably be expected to have possession of unpublished price sensitive information. Such closure shall be imposed in relation to such securities to which such unpublished price sensitive information relates.
- 6.3 The Compliance Officer after taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, shall decide the timing for re-opening of the trading window, however in any event it shall not be earlier than forty-eight hours after the information becomes generally available.
- 6.4 The trading window restrictions 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.

7. Pre-clearance of trades

- 7.1 All Designated Persons and their immediate relatives, who intend to trade in the securities of the Company when the trading window is open and if the value of the proposed trade is above Rs.25 lacs (market value) per transaction should pre-clear the transactions as per the pre-trading procedure described hereunder.
- 7.2 An application shall be made in Form 'I' to the Compliance Officer indicating the estimated number of securities that the Designated Persons or their immediate relatives intends to trade 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.
- 7.3 All Designated Persons and their immediate relatives shall execute their order in respect of securities of the Company within seven trading days after the approval of pre-clearance is given. The Designated Persons shall file within 2 (two) days of the execution of the deal, the details of such deal and changes in the holdings with the Compliance Officer in prescribed Form 'II'. In case the transaction is not undertaken, a report to that effect shall be filed in Form 'II' within 9 trading days after the approval of pre-clearance is given.
- 7.4 If the order is not executed within the aforementioned specified period, the Designated Persons must pre-clear the transaction again.

- 7.5 No Designated Persons or his/ her immediate relative 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.
- 7.6 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. He shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.
- 7.7 It shall be the responsibility of Designated Persons to ensure compliance of clauses 7.1 to 7.6 above in case of their immediate relatives also.
- 7.8 All Designated Persons and their immediate relatives who buy or sell any number of shares of the Company shall not execute a contra trade i.e. sell or buy any number of shares during the next six months following the prior transaction. 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 SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.
- 7.9 The Compliance Officer may grant relaxation from strict application of such restriction on contra trade for reasons to be recorded in writing provided that such relaxation does not violate the regulations.

8. Reporting and Disclosure Requirements

8.1 Disclosure Requirements

Initial Disclosures

By Whom	What to be disclosed	When to be disclosed	Form
Promoter / Director / KMP to the Compliance Officer	Holding of securities of the Company as on the date of this Code taking effect i.e. 15.05.2015	Within thirty days of this Code taking effect i.e. by 13.06.2015	Form A
Director / KMP or Promoter to the Compliance Officer	Holding of securities of the Company as on date of appointment as Director/KMP or becoming a Promoter	Within seven days of such appointment as a Director / KMP or of becoming Promoter	Form B

Continual Disclosures

By Whom	What to be disclosed	When to be disclosed	Form
Promoter / Director / Employee to the Compliance Officer	Number of such securities acquired or disposed	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.10 lakh or such other value as may be specified. <i>*disclosure of incremental transactions shall be made when transactions effected after the prior disclosure cross the threshold specified above.</i>	Form C
Company	Details of above disclosure	Within two trading days of receipt of disclosure or becoming aware of such information	Form D

8.2 The disclosures to be made by any person under Clause 8.1 shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.

8.3 The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account for purposes of this Code.

9. Penalty for contravention of the Code

9.1 Every Designated Persons/Insider shall be individually responsible for complying with the provisions of the Code (including to the extent provisions hereof applicable to his/her immediate relatives).

- 9.2 Any Designated Person/Insider who trades in securities or communicates any information for trading in securities in contravention of the Code of Conduct may be penalised and appropriate action may be taken by the Board of Directors of the Company.
- 9.3 Designated Persons /Insider who violate this Code shall also be subject to disciplinary action by the Board of Directors of the Company, which may include wage, salary freeze, suspension, etc.
- 9.4 The action by the Company shall not preclude SEBI from taking any action in case of violation of the Regulations.
- 9.5 In case it is observed by the Company and/or Compliance Officer that there has been violation of the Regulations, SEBI shall be informed by the Company.
- 10. Uploading of Code on ECL Website:** This Code and any amendments thereto shall be available on the website of the Company.

**Form - I (Refer Clause 7.2 of the Code)
APPLICATION FOR PRE-CLEARANCE**

To,
The Compliance Officer,
Electrosteel Casting Limited

Dear Sir,

I and/or my immediate relative(s) am/are desirous of trading in the below-mentioned securities of the Company in my own name or by my immediate relatives (write name of relative and relationship) and seek your approval as under:

Type of Security	No. of Securities	Market Price	Mode of acquisition Purchase/ Sale-physical/ Demat/ other	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)	
						Physical	Demat

In relation to the above, I declare that:

- a) I have no access to nor am I in possession of any unpublished price sensitive information at the time of signing this undertaking.
- b) In the event I have access to or receive any “Unpublished Price Sensitive Information” after signing this application but before the execution of the transaction for which approval is sought, I shall inform you of the same and shall completely refrain from trading in securities until such information is made generally available.
- c) I have not contravened the Company’s Code of Conduct for Regulating, Monitoring and Reporting Trading by Insiders and Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information, as notified by the Company from time to time.
- d) I have made full and true disclosure in this application.

Signature:
Name:
Designation:
Department:
Place:

Form - II (Refer Clause 7.3 of the Code)
REPORT OF TRADES EXECUTED / DECISIONS NOT TO TRADE WITH REASONS

To,
 The Compliance Officer,
Electrosteel Castings Limited

I hereby inform that in furtherance of your Pre-Clearance Order dated _____ for purchase/sale of shares, I and/or my immediate relative(s)

- have not bought / sold / subscribed any securities of the Company for the following reasons:

- have bought / sold / subscribed _____ securities of the Company as mentioned below on _____(date)

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

In connection with the aforesaid transaction(s), I hereby undertake to preserve for a 5 (five) 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 undertake not to execute a contra trade i.e. sell or buy (as applicable) any number of securities during the next six months following the prior transaction.

I submit the following details of change of holding in the securities of the Company:

Name, PAN and Address of the Shareholder	No. of securities held before the transaction	Receipt of allotment advice/acquisition of / sale of securities	Nature of Transaction & Quantity			Trading Member through whom the trade was executed with SEBI Registration No. of TM	Exchange on which the trade was executed
			Purchase	Sale	Others		

Details of change in securities held by the immediate relatives:

Name, PAN and Address of the Shareholder and relationship	No. of securities held before the transaction	Receipt of allotment advice/acquisition of / sale of securities	Nature of Transaction & Quantity			Trading Member through whom the trade was executed with SEBI Registration No. of TM	Exchange on which 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 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 transaction(s).

Signature:

Name:

Designation:

Department:

Place:

FORM A

**SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (a) read with Regulation 6(2) – Initial Disclosure to the Company]**

Name of the Company: **Electrosteel Castings Limited**

ISIN of the Company: **INE086A01029**

Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/ immediate relative to/ others etc.)	Securities held as on the date of regulation coming into force		% of Shareholding
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5

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

Details of Open Interest (OI) in derivatives of the Company held by the Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

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		
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
6	7	8	9	10	11

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

Name & Signature:

Designation:

Date:

Place:

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

Name of the Company: **Electrosteel Castings Limited**

ISIN of the Company: **INE086A01029**

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN & Address with contact nos.	Category of Person (Promoters/ KMP/Directors/ immediate relative to/ others etc.)	Date of appointment of Director /KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/ appointment of Director/KMP		% of Shareholding
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5	6

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

Details of Open Interest (OI) in derivatives of the Company held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation 6(2).

Open Interest of the Future contracts held at the time of becoming Promoter / appointment of Director/ KMP			Open Interest of the Option contracts held at the time of becoming Promoter / appointment of Director/ KMP		
Contract Specifications	Number of Units (Contracts * lot size)	Notional value In Rupee terms	Contract Specifications	Number of Units (Contracts * lot size)	Notional value in Rupee terms
7	8	9	10	11	12

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

Name & Signature:

Designation:

Date:

Place:

FORM C

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

Name of the Company: **Electrosteel Castings Limited**

ISIN of the Company: **INE086A01029**

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

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoters/ KMP/ Directors/ immediate relative to / others etc.)	Securities held prior to acquisition/ disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition / disposal (on market/ public/rights /preferential offer / off market/ Inter-se transfer, ESOPs etc.)
		Type of security (For eg.– Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For eg.– Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge/ Revoke/Invoke)	Type of security (For eg.– Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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

Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Type of contract	Contract specifications	Trading in derivatives (Specify type of contract, Futures or Options etc.)				Exchange on which the trade was executed
		Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
15	16	17	18	19	20	21

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

Name & Signature:

Designation:

Date:

Place:

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: **Electrosteel Castings Limited**

ISIN of the Company: **INE086A01029**

Details of trading in securities by other connected persons as identified by the Company

Name, PAN, CIN/DIN & address with contact nos. of other connected persons as identified by the Company	Connection with Company	Securities held prior to acquisition/ disposal		Securities acquired/ Disposed				Securities held post acquisition/ disposal		Date of allotment advice/acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of Acquisition/disposal (on market/public/rights/ Preferential offer / off market/ Inter-se Transfer, ESOPs etc.)
		Type of security (For eg. Shares, Warrants, Convertible Debentures etc.)	No. and % of Shareholding	Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy /Sale/ Pledge/ Revoke/ Invoke)	Type of security (For eg.– Shares, Warrants, Convertible Debentures etc.)	No. and % of Shareholding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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

Details of trading in derivatives by other connected persons as identified by the Company

Trading in derivatives (Specify type of contract, Futures or Options etc.)						Exchange on which the trade was executed
Type of Contract	Contract specifications	Buy		Sell		
		Notional Value	Number of Units (Contracts * lot size)	Notional Value	Number of Units (Contracts * lot size)	
15	16	17	18	19	20	21

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

Name & Signature:

Designation:

Date:

Place: