

Annexure 1

**DHUNSERI VENTURES LIMITED
APPLICATION FOR PRE-CLEARANCE TO DEAL IN SECURITIES
(Clause 6.0 of the Code)**

To

The Compliance Officer
Dhunseri Ventures Limited

From: Name of the Insider

Grade

Employee No.

Department / Unit

Location

I hereby give notice that I propose to carry out the following transaction:

Transaction Sale / Purchase	No. of Shares/ proposed to be bought/sold	DP & Client Id No (In case of Demat)

UNDERTAKING

I hereby undertake and confirm:

- (a) that I do not have any access or I am not in possession of any unpublished price sensitive information up to the time of signing this undertaking.
- (b) that in case I access to or receive any price sensitive information after the signing of this undertaking but before the execution of the transaction, I shall inform the Compliance Officer 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.
- (c) that I have not entered into any transaction during the past six months and that the proposed transaction will not constitute an opposite transaction i.e. sell or buy any number of shares referred to in the Regulations.
- (d) that I have not contravened the code of conduct for prevention of insider trading as notified by the Company from time to time.
- (e) that I have made a full and true disclosure in this application.

Date: _____

(Signature)

For Office use:
Approved
(Compliance Officer)
Approval No.:
Approved on:

Annexure 2

**DHUNSERI VENTURES LIMITED
REPORT OF TRANSACTIONS CARRIED OUT
(Clause 6.2 of the Code)**

To

The Compliance Officer
Dhunseri Ventures Limited

From: Name of the Insider
Grade
Employee No.
Department / Unit
Location

With reference to Clause 6.2 of the Code of Conduct for Prevention of Insider Trading, I hereby furnish the information relating to the transactions carried out / not carried out by me and my immediate relatives pursuant to the pre-clearance of trade obtained during the month of _____

SL No.	Name of the pre-clearance applicant.	DP Name & Demat Account No.	Pre-clearance of Trade		No. of shares bought pursuant to pre-clearance of trade	No. of shares sold pursuant to the preclearance of trade	No. of shares held on _____(date) (at the end of the month)
			Permission/Reference No.	Purchase or sale			
1	2	3	4		5	6	7

(Signature)

Date:

Note: It would be sufficient if a consolidated monthly report is submitted in respect of all the pre-clearances taken in the previous month.

Annexure 3
DHUNSERI VENTURES LIMITED
ANNUAL DISCLOSURE
(Clause 9(iii) of the Code)

To
The Compliance Officer
Dhunseri Ventures Limited
Dhunseri House,
4A, Woodburn Park
Kolkata 700020

Date:

Sub: Annual Disclosure of Holdings in terms of the code prescribed under SEBI (Prohibition of Insider Trading) Regulations, 2015

I. STATEMENT OF SHAREHOLDINGS OF PROMOTERS/DIRECTORS/KMPs/DESIGNATED PERSONS

Name of the Designated Persons alongwith the Immediate Relatives	Category of Person (Promoters/ KMP / Directors/ Designated Persons alongwith Immediate Relatives)	No. of Shares held on (1 st day of April)	No. of Shares Bought during the year	No. of shares sold during the year	No. of shares held on (31 st day of March)	Folio No./DP ID/ Client ID

I further confirm that none of the above dealings were on the basis of any unpublished Price Sensitive Information of the Company.

I further confirm that the above transaction was executed by me/my Immediate Relative in compliance with the Company's code.

Yours faithfully,

Signature: _____

Name: _____

Annexure 4
DHUNSERI VENTURES LIMITED
UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-CLEARANCE

To
The Compliance Officer,
Dhunseri Ventures Limited,
Dhunseri House,
4A, Woodburn Park,
Kolkata- 700020

I, _____(name), _____(Designation) 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 (UPSI) up to the time of signing this Undertaking.

In the event that I have access to or receive any information that could be construed as UPSI 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 shares of the Company until such UPSI becomes public.

I declare that I have not contravened the provisions of the Code as notified by the Company from time to time.

I undertake to submit the necessary report within two days of execution of the transaction / a 'Nil' report if the transaction is not undertaken.

If approval is granted, I shall execute the deal within 7 days of the receipt of approval failing which I shall seek pre-clearance.

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

Place:
Date :

Signature : _____
Name

Annexure 5

To,
Dhunseri Ventures Ltd.
Dhunseri House,
4A, Woodburn Park,
Kolkata- 700020

Pursuant to the Regulation 9(1) & Schedule B of the SEBI (Prohibition of Insider Trading) Regulations, 2015, I, hereby submit the following information:

1. Name of the Designated Person:
2. PAN of the Designated Person:
3. Mobile no. of the Designated Person:
4. Educational Institution (Graduation):
5. Details of past employers:
6. Information about person with whom Designated Person shares a material financial relationship (please refer Note 1 below)

<u>Name</u>	<u>Relation</u>	<u>PAN/ other identification no.</u>	<u>Contact no.</u>

7. Information about immediate relatives who is either dependent financially or consults in taking decisions relating to trading in securities

<u>Relation</u>	<u>Name</u>	<u>PAN/ other identification no.</u>	<u>Contact no.</u>
Spouse			
Father			
Mother			
Brother			
Sister			
Son (including step-son)			
Daughter (including step-daughter)			

Note 1: The term “material financial relationship” shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding twelve months, equivalent to at least 25% of such payer’s annual income but shall exclude relationships in which the payment is based on arm’s length transactions.

Date:
Place:

Signature : _____
Name

Annexure 6

PRE-CLEARANCE APPROVAL

Date :

To,
Name :
Designation :
Place :

Dear Sir/Madam,

With reference to your application dated _____ 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 {7} trading days from date hereof). If the approved transaction is not executed within the aforesaid timeline, fresh pre-clearance would be required for trades to be executed.

Further, you shall file within two {2} trading days of the execution of the trade, the details of such trade, with the Compliance Officer in prescribed form. In case the transaction is not undertaken, a report to that effect along with the reasons for the same shall be filed in the said Form within two {2} trading days from the expiry of the pre-clearance order.

Yours faithfully,

For Dhunseri Ventures Limited

Compliance Officer

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/Member of the Promoter Group]

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 or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN & Address with contact nos.	Category of Person (KMP / Director or Promoter or member of the promoter group/ Immediate relative to/others, etc.)	Date of appointment of KMP/Director / OR Date of becoming Promoter/ member of the promoter group	Securities held at the time of appointment of KMP/Director or upon becoming Promoter or member of the promoter group		% of Shareholding
			Type of security (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements 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 on the securities of the company held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).

Open Interest of the Future contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group			Open Interest of the Option Contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group		
Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
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: _____

ISIN of the company: _____

Details of change in holding of Securities of Promoter, Member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoters/Member of the Promoter Group/designated person/Director/s/immediate relative to/others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/acquisition of shares/disposal of shares specify		Date of intimation to company	Mode of acquisition / disposal (on market/public/rights/preferential offer / off market/ Inter-se transfer, ESOPs etc.)	Exchange on which the trade was executed
		Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements etc.)	No. and % of shareholding	Type of security (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement etc.)	No.	Value	Transaction Type (Purchase/ Sale/ Pledge / Revocation/Invocation/Others-please specify)	Type of Securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement etc.)	No. and % of shareholding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

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

(ii) Value of transaction excludes taxes/brokerage/ any other charges

Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or Director of a listed company and immediate relatives of such persons and other such persons mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
16	17	18	19	20	21	22

***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 (Indicative format)

**SEBI (Prohibition of Insider Trading) Regulations, 2015
Regulation 7(3) – Transactions by Other connected persons as identified by the company**

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

Name, PAN, CIN/DIN, & address with contact nos. of other connected persons as identified by the company	Connection with company	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/ acquisition of shares/ disposal of shares specify		Date of intimation to company	Mode of acquisition/disposal (on market/public/ rights/ Preferential offer / off market/Inter-se transfer, ESOPs etc.)	Exchange on which the trade was executed
		Type of security (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement etc.)	No. and % of shareholding	Type of Securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement etc.)	No.	Value	Transaction Type (Purchase/Sale/Pledge / Revocation/ Invocation/ Others- please specify)	Type of Securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of shareholding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

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

(ii) Value of transaction excludes taxes/brokerage/ any other charges

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

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of Contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
16	17	18	19	20	21	22

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

Name:

Signature:

Place:
