



**CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT
TRADING BY INSIDERS
UNDER THE SECURITIES AND EXCHANGE BOARD OF INDIA
(PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015
OF
KANSAI NEROLAC PAINTS LIMITED**

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1. Objective and Scope

- (a) The objective of this document is to lay down and communicate the Code of Conduct for regulating, monitoring and reporting the trading in listed or proposed to be listed securities (“**Code**”) of Kansai Nerolac Paints Limited (“**Company**”) by all the Insiders (as defined hereinbelow) of the Company including Designated Persons (as defined hereinbelow) and immediate relatives of Designated Persons, pursuant to the provisions of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as may be amended from time to time.
- (b) This Code is intended to serve as a guideline to all concerned, which they should imbibe and practice, both in letter and spirit, while trading in listed or proposed to be listed securities of the Company.
- (c) “Code of Conduct to regulate, monitor and report trading by Insiders” which was in force till now stands substituted by this revised Code of Conduct and this Code shall be effective from April 1, 2019.

2. Definitions & Interpretations

- (a) “**Act**” shall mean the Securities and Exchange Board of India Act, 1992.
- (b) “**Board of Directors**” shall mean the board of directors of the Company.
- (c) “**Code**” or “**Code of Conduct**” shall mean this Code of Conduct of the Company to regulate, monitor and report trading by all the Insiders of the Company including Designated Persons and immediate relatives of Designated Persons, as amended from time to time.
- (d) “**Company**” shall mean Kansai Nerolac Paints Limited.
- (e) “**Compliance Officer**” shall mean the Company Secretary or such other senior officer, designated so and reporting to the Board of Directors for the purpose of this Code and who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under the SEBI PIT Regulations (as defined hereinbelow) 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information (as defined hereinbelow), monitoring of trades and the implementation of the codes specified under the SEBI PIT Regulations, under the overall supervision of the Board of Directors of the Company.
- (f) “**Connected Person**” means:
 - (i) any person, who is or has during the 6 (six) months prior to the concerned act, been associated with the Company, directly or indirectly, in any capacity including
 - (A) by being a director, officer or an employee of the Company; or
 - (B) by reason of frequent communication with the officers of the Company;
 - or

- (C) by being in any contractual, fiduciary or employment relationship with the Company; or
 - (D) by holding 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 above, the persons falling within the following categories shall be deemed to be connected persons unless contrary is established,
- (A) immediate relatives of connected persons; 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 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.

Explanation: For the purposes of this code, the term “concerned act” shall mean and include any act of trading in listed or proposed to be listed securities of the Company.

- (g) **“Contra Trade”** means a trade or transaction which involves buying or selling any number of shares of the Company and within 6 months trading or transacting in an opposite transaction involving sell or buy following the prior transaction.
- (h) **“Designated Person(s)”** shall include:
 - (i) Directors and Key Managerial Personnel of the Company and its material subsidiary(ies), if any;
 - (ii) Chief Executive Officer and employees upto two levels below the Chief Executive Officer of the Company, and its material subsidiaries irrespective of their functional role in the Company or ability to have access to Unpublished Price Sensitive Information with respect to the Company;
 - (iii) such employees forming part of the various functions of the Company who in the opinion of the concerned functional head could be considered as having access to unpublished price sensitive information;

- (iv) support staff of the Company, such as IT staff or secretarial staff who have access to Unpublished Price Sensitive Information with respect to the Company;
- (v) employees of material subsidiary(ies) of the Company, if any, forming part of the various functions of such material subsidiary(ies) who in the opinion of the concerned functional head of such material subsidiary(ies) could be considered as having access to unpublished price sensitive information;
- (vi) representatives of the statutory auditor and the internal auditor ;
- (vii) all promoters of the Company.

Explanation: For the purposes of this Code,

- (i) the term “Chief Executive Officer” shall mean any officer who has been designated as such by the Company, and in case, no officer of the Company is designated as such, the term shall mean the Managing Director of the Company.
- (i) **“Director”** means a member of the Board of Directors of the Company.
- (j) **“Employee”** means an employee of the Company in the employment of the Company.
- (k) **“Financially literate”** shall mean a person who has the ability to read and understand basic financial statements i.e. balance sheet, profit and loss account, and statement of cash flows;
- (l) **“Generally available Information”** means information that is accessible to the public on a non-discriminatory basis and would also include information published on the website of a stock exchange about the Company.
- (m) **“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.
- (n) **“SEBI PIT Regulations”** shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.
- (o) **“Insider”** means any person who is,
 - (i) a connected person; or
 - (ii) in possession of or having access to Unpublished Price Sensitive Information.

Explanation: It is hereby clarified that any person in receipt of Unpublished Price Sensitive Information pursuant to a “legitimate purpose” shall be considered an insider.

- (p) **“Key managerial personnel”** shall mean and include persons as defined in Section 2(51) of the Companies Act, 2013, including
 - (i) the Chief Executive Officer;
 - (ii) the Executive Director;
 - (iii) the Chief Financial Officer and
 - (iv) the Company Secretary.

- (q) **“Legitimate purpose”** shall mean and include sharing of Unpublished Price Sensitive Information in the ordinary course of business by an insider with following, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the SEBI PIT Regulations :
- (i) Auditors,
 - (ii) Business partners,
 - (iii) Collaborators,
 - (iv) Lenders,
 - (v) Customers,
 - (vi) Suppliers,
 - (vii) Merchant bankers,
 - (viii) Legal advisors,
 - (ix) Insolvency professionals,
 - (x) Other advisors or consultants,
- (r) **“Promoter”** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.
- (s) **“Promoter Group”** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.
- (t) **“Proposed to be listed securities”** shall mean such securities of the Company, ranking *pari passu* with other listed securities of the Company, which may be allotted and proposed to be listed by the Company.
- (u) **“SEBI”** shall mean the Securities and Exchange Board of India.
- (v) **“Trading Restriction Period”** shall mean

(i)	In respect of declaration of Financial Results	From the end of every quarter till 48 hours after declaration of financial results
(ii)	For any other Unpublished Price Sensitive Information	<p>The trading window shall be closed when the Compliance Officer determines that a Designated Person or class of Designated Persons can reasonably be expected to be in possession of any Unpublished Price Sensitive Information.</p> <p>The timing for re-opening of the trading window in such cases shall be determined by the Compliance Officer taking into account various factors including the Unpublished Price Sensitive Information in question becoming generally available and being capable of assimilation by the market, which in any event shall not be earlier than forty-eight hours after the information becomes generally available.</p>

- (w) **“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.
- (x) **“Takeover Regulations”** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.
- (y) **“Trading”** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly.
- (z) **“Trading Day”** means a day on which the recognized stock exchanges are open for trading.
- (aa) **“Unpublished Price Sensitive Information/ UPSI”** 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 business and such other transactions;
 - (v) changes in key managerial personnel.

Words and expressions used and not defined in this Code but defined in the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996, SEBI PIT Regulations or the Companies Act, 2013 and rules/ regulations made thereunder shall have the meanings respectively assigned to them in those legislations.

3. Applicability

- (a) All Insiders as defined in this Code are governed by this Code, including Designated Persons and immediate relatives of Designated Persons.
- (b) Transactions covered: This Code is applicable to transactions of trading in the listed or proposed to be listed securities of the Company.
- (c) The SEBI PIT Regulations prohibit an Insider from trading in the securities of the Company when in possession of any UPSI.

4. Preservation of Unpublished Price Sensitive Information

- (a) No Insider shall communicate, provide or allow access to any Unpublished Price Sensitive Information, relating to the Company or the securities of the Company, 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.
- (b) In cases where in furtherance of legitimate purposes, performance of duties or discharge of legal obligations, the Insider is required to communicate and/or provide or allow access of any Unpublished Price Sensitive Information to those persons as mentioned in Regulation 3(2A) of the SEBI PIT Regulations and such communication of Unpublished Price Sensitive Information shall be accompanied by a Notice, strictly requiring the recipient to treat such Unpublished Price Sensitive Information as 'Confidential'.
- (c) No person shall procure from or cause the communication by any Insider, of any 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.
- (d) Chinese wall:
 - (i) To prevent the misuse of Unpublished Price Sensitive Information, the Company shall follow "Chinese Wall" policy which separates those functions/ areas of the Company which have/ may have access to Unpublished Price Sensitive Information, considered as "inside areas", from those functions/ areas providing support services, which may be considered as "public areas".
 - (ii) The Insiders shall not communicate any Unpublished Price Sensitive Information to anyone in "public areas".
 - (iii) However, in exceptional circumstances and for legitimate purposes, performance of duties or discharge of legal obligations, the Insider may, only after intimation to and in consultation with the Compliance Officer, treat the employees from "public areas" to have been brought in "inside areas" and communicate Unpublished Price Sensitive Information to them, on the basis of "need to know" criteria.
 - (iv) In such cases, the Insider who is communicating the Unpublished Price Sensitive Information, shall handover a Notice, as mentioned in Clause 4(b) of this Code hereinabove, to the recipient of such Unpublished Price Sensitive Information.
 - (v) Further, the Insider shall obtain the details of such persons or entities as the case may be, with whom such Unpublished Price Sensitive Information is shared, such as the names, the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available and shall *immediately* inform such details to the Compliance Officer.
 - (vi) The Compliance Officer shall make the employees brought in "inside areas", aware of the duties and responsibilities attached to the receipt of the Unpublished Price Sensitive Information and the liability that is attached to the misuse or unwarranted use of such information.

- (e) All information shall be handled within the Company on a ‘Need To Know’ basis and the “Code of Fair Disclosure and Conduct” of the Company shall be followed for determining whether the communication of Unpublished Price Sensitive Information has been made for legitimate purposes, performance of duties or discharge of legal obligations in terms of this Code.
- (f) Need to Know: ‘Need to know’ basis shall mean that Unpublished Price Sensitive Information should be disclosed only to those within the Company who need the information in furtherance of legitimate purposes, performance of duties or discharge of legal obligations and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.
- (g) Notwithstanding anything contained in the SEBI PIT Regulations and this 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 is of an informed opinion that sharing of such information is in the best interests of the Company; or
 - (ii) not attract the obligation to make an open offer under the takeover regulations where the Board of Directors is of an informed opinion that
 - sharing of such information is in the best interests of the Company; and
 - such 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 to be adequate and fair to cover all relevant and material facts.
- (h) However, in all the cases mentioned in Clause 4(g) of this Code hereinabove,
 - (i) The Board of Directors shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on their part;
 - (ii) such parties shall keep information so received confidential, except for the limited purpose for which the same is shared; and
 - (iii) such parties shall not otherwise trade in securities of the Company when in possession of Unpublished Price Sensitive Information.
- (i) On basis of the information obtained in terms of the provisions of Clause 4(b) and 4(d)(iv) of this Code, the Board of Directors shall ensure that a structured digital database is maintained containing the names of such persons or entities as the case may be with whom the Unpublished Price Sensitive Information with respect to the Company is shared, along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such database shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.
- (j) Dissemination of the Unpublished Price Sensitive Information shall be made in terms of the provisions of the Company’s Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information which shall be effective from April 1, 2019.

5. Prevention of misuse of Unpublished Price Sensitive Information

- (a) An Insider should not trade in the Company's listed or proposed to be listed securities at any time when in possession of or having access to any Unpublished Price Sensitive Information pertaining to the Company or its securities.
- (b) When a person trades in Company's listed or proposed to be listed securities while being in possession of Unpublished Price Sensitive Information, such trades would be presumed to have been motivated by the knowledge and awareness of such Unpublished Price Sensitive Information in his possession.
- (c) The Insider may prove his innocence by demonstrating the circumstances, including the following :-
 - (i) the transaction is an off-market inter-se transfer between Insiders, who were in possession of the same Unpublished Price Sensitive Information, without being in breach of Clause 4 of this Code and both parties had made a conscious and informed trade decision. Also, such off-market trades shall be reported by the Insiders to the Company within two working days. The Company shall notify the particulars of such trades to the Stock Exchange on which the securities are listed within two trading days from receipt of the disclosure or from becoming aware of such information;
 - (ii) the transaction was carried out through the block deal window mechanism between persons who were in possession of the Unpublished Price Sensitive Information without being in breach of Clause 4 of this Code and both parties had made a conscious and informed trade decision;
 - (iii) the transaction in question was carried out pursuant to a statutory or regulatory obligation to carry out a bona fide transaction;
 - (iv) the transaction in question was undertaken pursuant to the exercise of Stock Options in respect of which the exercise price was pre-determined in compliance with applicable regulations;
 - (v) 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 the SEBI PIT 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;
 - (vi) the trades were pursuant to a trading plan set up in accordance with SEBI PIT Regulations.
- (d) In case of connected persons, the onus of establishing, that they were not in possession of unpublished price sensitive information, shall be on such connected persons.

- (e) Insiders shall also maintain the confidentiality of all Unpublished Price Sensitive Information and shall not pass on such information to any person directly or indirectly, whether by way of making recommendation for the purchase and sale of the securities or otherwise. They shall at all times abide by the provisions of this Code, before passing on any Unpublished Price Sensitive Information to any other person.

6. Trading Window

- (a) Subject to the provisions of Clause 7 and Clause 8 of this Code and also subject to compliance with the SEBI PIT Regulations, the Designated Persons may execute trades, during a notional “Trading Window”, which shall be available during all times other than the Trading Restriction Period.
- (b) The gap between clearance of accounts by audit committee and board meeting should be as narrow as possible and preferably on the same day to avoid leakage of material information.
- (c) Such Trading Restriction Period shall be imposed in relation to such securities to which such Unpublished Price Sensitive Information relates.
- (d) Designated Persons and their immediate relatives shall not trade in securities during the Trading Restriction Period when the trading window is closed.

7. Pre-clearance of trades

- (a) When the trading window is open, trading by Designated Persons shall be subject to pre-clearance by the Compliance Officer, if the value of the proposed trades is equal to or above Rs. 10 (Ten) Lakhs, in one transaction or over a series of transactions in a calendar quarter.
- (b) Pre-clearance process :
 - (i) An application may be made in the prescribed Form ([Annexure 1](#)) to the Compliance Officer indicating the present holding, the estimated number of securities that the Designated Person 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.
 - (ii) An undertaking in the prescribed Form ([Annexure 2](#)) shall be executed in favour of the Company by such Designated Person incorporating, *inter alia*, the following clauses, as may be applicable:
 - (A) that the Designated Person does not have any access or has not received “Unpublished Price Sensitive Information” as at the time of signing the undertaking;
 - (B) that all the declarations made by the Designated Person in the Undertaking are true and accurate;
 - (C) that in case the Designated Person has access to or receives “Unpublished Price Sensitive Information” after the signing of the undertaking but before the execution of the transaction, he/ she shall inform the Compliance Officer of the change in his position and that

- he/she would completely refrain from trading in the securities of the Company till the time such information becomes generally available to the public;
- (D) that he/ she has not contravened the provisions of this Code of Conduct for prevention of insider trading as notified by the Company from time to time; and
 - (E) that he/ she has made a full and true disclosure in the matter.
- (iii) The Compliance Officer shall grant approval to the proposed transaction by a pre-clearance order issued to Designated Person in the prescribed Form ([Annexure 3](#)) within 5 (five) trading days from the receipt of duly filled in application, complete in all respects.
 - (iv) All designated persons shall execute their trades in respect of securities of the Company within 7 (seven) trading days after the approval of pre- clearance is given. The Designated Person shall file the details of such transaction with the Compliance Officer in the prescribed form ([Annexure 4](#)) within 1 (one) trading day of the execution of the transaction.
 - (v) In case the transaction is not undertaken, a report to that effect shall be filed in the prescribed form ([Annexure 5](#)) within 1 (one) trading day from the expiry of 7 (seven) trading days after the approval of pre-clearance.
 - (vi) If the order is not executed within 7 (Seven) trading days after the approval is given, the Designated Person must obtain a fresh “Pre-clearance” for the transaction again.
 - (vii) All designated persons who are permitted to trade shall not execute a Contra Trade during the next 6 (six) months following the prior transaction.
 - (viii) In case any 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 SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.
 - (ix) Provisions of this Clause shall not be applicable for trades pursuant to exercise of stock options.
 - (x) 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 the SEBI PIT Regulations. However, no such sale will be permitted when trading window is closed.
- (c) The Designated Persons shall understand that the pre-clearance is one of the safeguards for avoiding Insider Trading. However, in case any transaction falls within the ambit of Insider Trading, any “pre-clearance” will not absolve the Designated Person from the liability in terms of the SEBI PIT Regulations nor will make the Company a party to such Insider Trading.

8. Trading Plan

- (a) In addition to the provisions of Clause 7 of this Code, the Designated Persons, shall be entitled to formulate a trading plan for dealing in securities of the Company 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.

- (b) Trading Plan shall:
 - (i) not entail commencement of trading on behalf of the Designated Person earlier than 6 (six) months from the public disclosure of the plan;
 - (ii) not entail trading for the period between 20th (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;
 - (iii) entail trading for a period of not less than 12 (twelve) months;
 - (iv) not entail overlap of any period for which another trading plan is already in existence;
 - (v) set out following details :
 - (A) the value of trades to be effected;
 - (B) the number of securities to be traded;
 - (C) the nature of the trade; and
 - (D) the intervals at, or dates on which such trades shall be effected;
 - (vi) not entail trading in securities for market abuse.
- (c) The Compliance Officer shall :
 - (i) review the Trading Plan submitted as above and shall approve it, within 5 (Five) trading days, from the receipt of duly filled in application, complete in all respects, after assessing whether the plan would have any potential for violation of the SEBI PIT Regulations;
 - (ii) seek express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per provisions of the SEBI PIT Regulations;
 - (iii) seek declarations from the Designated Persons that they are not in possession of any Unpublished Price Sensitive Information or for ensuring that any Unpublished Price Sensitive Information in their possession will become generally available before they commence executing his trades.
- (d) Pre-clearance of trades shall not be required for a trade executed as per an approved trading plan and the trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.
- (e) Subject to provisions of Clause 8(f) of this Code, the Trading Plan once approved shall be irrevocable and the Designated Person 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.
- (f) However, the implementation of the trading plan shall not be commenced, if at the time of formulation of the plan, the Designated Person is in possession of any Unpublished Price Sensitive Information and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Plan shall be deferred until such Unpublished Price Sensitive Information becomes generally available information.
- (g) Upon the approval of the trading plan, the Compliance Officer shall notify the plan to the Stock Exchanges on which the securities of the Company are listed.

9. Reporting Requirements for transaction in securities

(a) Initial Disclosures

- (i) Every Promoter, member of the Promoter Group, Key Managerial Personnel and Director of the Company, within 30 (thirty) days of the SEBI PIT 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 6](#)).
- (ii) Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter or member of the Promoter Group shall disclose his/ her/ its holding of securities of the Company as on the date of such appointment or on becoming the promoter of the Company, to the Company, within 7 (seven) days of such appointment or becoming the promoter in the prescribed Form ([Annexure 7](#)).
- (iii) Every Designated Person of the Company, shall disclose following in the prescribed Form ([Annexure 8](#)):
 - (A) the names of educational institutions from which he/she has graduated;
 - (B) names of his/her past employers, on a one time basis.

(b) Continual Disclosures

- (i) Every Promoter, member of the Promoter Group, Designated Person and Director of the Company shall disclose to the Company the number of such securities acquired or disposed of within 2 (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 disclosures shall be made in the prescribed Form ([Annexure 9](#)).
- (ii) Within 2 days of the receipt of intimation under Clause 9(b)(i) of this Code, the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received.

(c) Annual Disclosures

- (i) The Directors and Key Managerial Personnel of the Company shall disclose to the Company the number of such securities held by them (including by their immediate relatives) as at the end of each Financial Year, in the prescribed Form ([Annexure 10](#)).
- (ii) The Designated persons shall disclose names and Permanent Account Number or any other identifier authorized by law, of the following persons to the Company, on an annual basis and as and when the information changes, in the prescribed Form ([Annexure 11](#)) :
 - (A) immediate relatives
 - (B) persons with whom such designated person(s) shares a material financial relationship
 - (C) Phone, mobile and cell numbers which are used by them.

In addition, the names of educational institutions from which Designated Persons have graduated and names of their past employers shall also be disclosed on a one time basis.

Explanation: The term “material financial relationship” shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift 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.

(d) Disclosure by other Connected Persons

The Compliance Officer at his discretion may require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of Company in the prescribed Form ([Annexure 12](#)), in order to monitor compliance with SEBI PIT Regulations.

(e) The Compliance Officer shall maintain records of all the declarations given by the promoters/ directors/ designated employees for a minimum period of 5 (five) years.

(f) Other Restrictions

- (i) The disclosures to be made by any person under this Code shall include those relating to trading by such person’s immediate relatives and by any other person for whom such person takes trading decisions.
- (ii) The disclosures of trading in securities shall also include disclosures regarding trading in derivatives of securities and the traded value of the derivatives shall be taken into account for purposes of this Code.
- (iii) The disclosures made under this Code shall be maintained for a period of five years.

10. Role of Compliance Officer

Other than the specific responsibilities mentioned in this Code, the Compliance Officer shall :

- (a) report, for the purpose of this Code, to the Board of Directors of the Company 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, but not less than once in a year.
- (b) report to Securities and Exchange Board of India, of any violation of this Code or of the SEBI PIT Regulations by any Designated Persons of the Company;
- (c) administer the Code and other requirements under the SEBI PIT Regulations.

11. Internal Control

To ensure compliance with the requirements given in the SEBI PIT Regulations and to prevent Insider Trading, the Chief Executive Officer of the Company, shall put in place adequate and effective system of internal controls to ensure compliance with the requirements given in these regulations to prevent insider trading, which shall include the following:

- (a) all employees having access to Unpublished Price Sensitive Information shall be identified as designated employee;
- (b) Unpublished Price Sensitive Information shall be identified and its confidentiality shall be maintained as per the requirements of SEBI PIT Regulations;
- (c) adequate restrictions shall be placed on communication or procurement of Unpublished Price Sensitive Information;
- (d) list of all employees and other persons with whom Unpublished Price Sensitive Information is shared shall be maintained and confidentiality agreements shall be signed or notice shall be served to all such employees and persons;
- (e) all other relevant requirements specified under SEBI PIT Regulations shall be complied with; and
- (f) periodic process review shall be conducted to evaluate effectiveness of the internal controls.

12. Penalty for contravention of the Code of Conduct

- (a) Every Insider shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her immediate relatives).
- (b) Any Insider who trades in securities or communicates any information for trading in securities in contravention of this Code may be penalised and appropriate action may be taken by the Company. The Company shall inform the SEBI promptly of such contravention.
- (c) Insiders who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, recovery, clawback etc.
- (d) Any contravention of these regulations may be dealt with by SEBI in accordance with the Act.

13. General

- (a) A copy of the Regulations is available on the employee portal of the Company viz. <https://hrscapes.workline.hr/>.
- (b) Insiders and the Employees of the Company are advised to acquaint themselves with their obligations under the SEBI PIT Regulations and in case any clarification/assistance is required in that regard, they may reach out to the Compliance Officer.
- (c) Every person, at the time of their recruitment in the Company, shall be briefed about this Code. Also, in consultation with the Reporting Manager of such person, it shall be assessed if he shall qualify to be an Insider of the Company. In such case, the Company shall obtain a declaration regarding his holding of Securities of the Company.
- (d) The Company, when entering into any contract with any person who shall be a Connected Person under this Code, shall take an undertaking from such person

that he/she shall not enter into Trading of Securities of the Company, if they are in possession of any Unpublished Price Sensitive Information.

- (e) Any act or deed not mentioned under the Code shall be in accordance with the Regulations.
- (f) Any suspected leak of unpublished price sensitive information or violation of this policy can be reported under whistle blower policy of the Company.

14. Review and Amendment

- (a) The Audit Committee of the Company shall review compliance with the provisions of SEBI PIT Regulations at least once in a financial year and shall verify that the systems for internal control are adequate and are operating effectively.
- (b) The Board of Directors is authorised to amend or modify this Code, in whole or in part, as and when deemed necessary, in line with the applicable laws, rules and regulations. However, the amendment in the regulatory requirements shall be binding on the Company and shall prevail over this Policy, even if not incorporated in the Policy.

15. Disclaimer

- (a) This code is only an internal code of conduct and one of the measures to avoid Insider Trading.
- (b) Every Insider is required to familiarise himself/ herself with the SEBI PIT Regulations as it will be the responsibility of each such person to ensure compliance of this Code, SEBI PIT Regulations and other related statutes fully.
- (c) Please note that in case the SEBI PIT Regulations or any statutory provisions are more stringent than those contained in the code, in case of any conflict between the two, the SEBI PIT Regulations / such statutory provisions shall prevail over the provisions of this Code.

APPLICATION FOR OBTAINING PRE-CLEARANCE

Date: __/__/____

To,
The Compliance Officer,
Kansai Nerolac Paints Limited,
Nerolac House, Ganpatrao Kadam Marg,
Lower Parel, Mumbai – 400013.

Sub.: Application for obtaining Pre-clearance for trading in securities of Kansai Nerolac Paints Limited (“Company”)

Sir/ Madam,

Pursuant to the provisions of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the Company’s Code of Conduct to Regulate, Monitor and Report Trading, I, _____ (Name), _____ (Designation), am hereby seeking Pre-clearance for trading in securities of the Company, as per details given below:

Sr. No.	Particulars	Details
1	Type of Securities	
2	Holding of Securities of the Company, as on date	
	- By myself (including shares held in Joint Names)	
	- By my Immediate relatives ⁽¹⁾⁽²⁾	
3	Folio No./ DP ID and Client ID	
4	Nature of Proposed Trading (please ✓ the appropriate box)	
	- Subscription	
	- Purchase	
	- Sale	
	- Pledge	
	- Dealing in any other manner ⁽³⁾	
5	Proposed date of Trading in Securities, in the manner indicated above	
6	Estimated No. of Securities proposed to be traded	
7	Price at which the transaction is proposed	
8	Current Market Price (as on date of application)	
9	Whether the Proposed trading will be through Stock Exchange or off-market	
10	Folio No./ DP ID and Client ID where the Securities will be credited/ debited	

Notes:

- (1) 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.

- (2) *In case any of the immediate relatives hold any securities of the Company, please indicate Nature of relationship.*
- (3) *In case the pre-clearance is requested for dealing with securities of the Company in any other manner, other than mentioned herein, please indicate the nature of such dealing.*

The undertaking in the prescribed format, duly signed by me, is also enclosed herewith, for your reference and records.

Yours Faithfully,

Name : _____

Designation : _____

Address : _____

UNDERTAKING TO BE SUBMITTED
WITH THE APPLICATION FOR PRE-CLEARANCE

Date: __/__/____

To,
The Compliance Officer,
Kansai Nerolac Paints Limited,
Nerolac House, Ganpatrao Kadam Marg,
Lower Parel, Mumbai – 400013.

Ref. : Application dated __/__/____ for obtaining Pre-clearance for trading in securities (“said application”) of Kansai Nerolac Paints Limited (“Company”)

Sir/ Madam,

Please note that as mentioned in the aforesaid application dated __/__/____, I, _____(Name), _____(Designation), residing at _____(Residential Address), am desirous of trading in _____(Nos.) securities of the Company and in that regard, I hereby declare that :

- (b) I do not have any access or I have not received or I am not in possession of or otherwise privy to any Unpublished Price Sensitive Information, as defined by the Company’s Code of Conduct to Regulate, Monitor and Report Trading (“Code”) as at the time of signing this Undertaking.
- (c) I have not contravened the provisions of the Code;
- (d) I have made a full and true disclosure in the matter; and
- (e) all the declarations made by me in this Undertaking are true and accurate;

Further, I hereby undertake that

- (a) if approval to the said application is granted, I shall execute the pre-cleared trading in respect of Securities of the Company within 7 (seven) days from the receipt of approval, failing which I shall seek pre-clearance again;
- (b) in case I get access to or receive any Unpublished Price Sensitive Information, after the signing of this Undertaking but before execution of the transaction with respect to which I have submitted the said application, I shall immediately inform you i.e. the Compliance Officer regarding the same and I shall completely refrain from trading in the Securities of the Company till the time such information becomes generally available;
- (c) I shall submit necessary report,
 - in case of executed transaction, in the format prescribed under the Code (i.e. Annexure 4 to the Code) within 1 (one) trading day of the execution of the transaction;
 - in case the transaction is not undertaken, in the prescribed form (i.e. Annexure 5 to the Code), within 1 (one) trading day from the expiry of 7 (seven) trading days after the approval.

- (d) I will abide by the provisions of Clause 7(b)(vii) of the Code with regard to time norms for holding/ buying/ selling securities. Pre-clearance may kindly be accorded in terms of Clause 7 of the Code, in dealing with the securities of the Company.

Yours Faithfully,

Name : _____

Designation : _____

Address : _____

PRE-CLEARANCE APPROVAL

To,
Name : _____
Designation : _____
Address : _____

Ref. : Application dated __/__/____ for obtaining Pre-clearance for trading in securities (“said application”) of Kansai Nerolac Paints Limited (“Company”)

Dear _____,

This is to inform you that your request for trading in _____ (Nos.) Securities of the Company, as mentioned in your aforesaid application is **APPROVED**.

Please note that in terms of the Company’s Code of Conduct to Regulate, Monitor and Report Trading (“Code”),

- (a) the said transaction must be completed within 7 (seven) days from today i.e. on or before __/__/ (“said date”);
- (b) in case you do not execute the approved transaction on or before the said date, you would be required to seek a fresh pre-clearance before trading in the securities of the Company; and
- (c) you are required to submit the details of the executed transaction, in the format prescribed under the Code (i.e. Annexure 4 to the Code) within 1 (one) trading day of the execution of the transaction;
- (d) in case the transaction is not undertaken, a report to that effect shall be filed in the prescribed form (i.e. Annexure 5 to the Code), within 1 (one) trading day from the expiry of 7 (seven) trading days, after the approval of pre-clearance is given.

In case you require any clarification, you may please contact the undersigned.

Yours faithfully
For **Kansai Nerolac Paints Limited**

Compliance Officer

FORMAT FOR DISCLOSURE OF TRANSACTIONS

(To be submitted within 1 (one) trading day of the execution of the transaction)

Date: __/__/____

To,
The Compliance Officer,
Kansai Nerolac Paints Limited,
Nerolac House, Ganpatrao Kadam Marg,
Lower Parel, Mumbai – 400013.

Ref. : 1. Application dated __/__/____ for obtaining Pre-clearance for trading in securities (“said application”) of Kansai Nerolac Paints Limited (“Company”);
2. Pre-clearance approval date __ / __ / ____ (“said pre-clearance approval”).

Dear Sir/ Madam,

This is in reference to the aforesaid application and the said pre-clearance approval.

In that regard, I hereby inform you that I have traded in _____ (Nos.) Securities of the Company on __/__/____ (date), details of which are as below :

Name of the Holder	No. of Securities traded	Manner of dealing with the Securities ⁽¹⁾	DP ID/ Client ID/ Folio No.	Price (Rs.)

Note:

(1) Please mention the manner in case you have dealt with the Securities of the Company in any other manner.

In connection with the aforesaid transaction(s), I hereby undertake to preserve all the following documents, for a period of 5 years and produce to the Compliance officer / SEBI, if and when called upon :

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); and
4. Copy of Delivery instruction slip (applicable in case of sale transaction).

Further, I hereby agree to not to execute a Contra Trade w.r.t. the above securities for a minimum period of six months.

I also declare that the above information is correct and that no provisions of the Company's Code of Conduct to Regulate, Monitor and Report Trading and/or applicable laws/ regulations have been contravened for effecting the above said transaction(s).

Yours Faithfully,

Name : _____

Designation : _____

Address : _____

FORMAT FOR DISCLOSURE IN CASE OF NO TRADING POSTPRE-CLEARANCE

(To be submitted within 1 (one) trading day from the expiry of 7 (seven) trading days, after the approval of pre-clearance is given)

Date: __/__/____

To,
The Compliance Officer,
Kansai Nerolac Paints Limited,
Nerolac House, Ganpatrao Kadam Marg,
Lower Parel, Mumbai – 400013.

Ref. : 1. Application dated __/__/____ for obtaining Pre-clearance for trading in securities (“said application”) of Kansai Nerolac Paints Limited (“Company”);
2. Pre-clearance approval date __ /_ /____ (“said pre-clearance approval”).

Dear Sir/ Madam,

This is in reference to the aforesaid application and the said pre-clearance approval.

In that regard, I wish to inform you that I have not traded in _____ (Nos.) securities of the Company on __/__/____ (date), despite obtaining the said pre-clearance approval, due to _____ (please mention the reason).

I hereby undertake to make a fresh application for obtaining Pre-clearance for trading in securities of the Company, in terms of the provisions of the Company’s Code of Conduct to Regulate, Monitor and Report Trading, in case I am desirous to trade in the securities of the Company in any manner.

This is for your information and records.

Yours Faithfully,

Name : _____
Designation : _____
Address : _____

FORM A**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015**
[Regulation 7(1)(a) read with Regulation 6(2) – Initial disclosure to the Company]

Name of the Company : Kansai Nerolac Paints Limited

ISIN of the Company : INE531A01024

Details of the securities of the Company held by Promoter, Key Managerial Personnel (“KMP”), Director and other such persons as mentioned in Regulation 6(2) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

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
Name: PAN : CIN: DIN: Address: Contact No.:				

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

Details of Open Interest (OI) in derivatives of the Company held by Promoter, KMP, Director and other such persons as mentioned in Regulation 6(2) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

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**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015****[Regulation 7(1)(b) read with Regulation 6(2) – Disclosure on becoming a Director/ KMP/ Promoter/ Member of Promoter Group]**

Name of the Company : Kansai Nerolac Paints Limited

ISIN of the Company : INE531A01024

Details of Securities of the Company held on appointment of Key Managerial Personnel (“KMP”) or Director or upon becoming a Promoter or member of Promoter Group of the Company and other such persons as mentioned in Regulation 6(2) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

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/ Member of Promoter Group	Securities held at the time of becoming Promoter/ Member of Promoter Group/ Appointment of Director/ KMP		% of Shareholding
			Type of security (For eg. Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5	6
Name: PAN : CIN: DIN: Address: Contact No.:					

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

Details of Open Interest (OI) in derivatives of the Company held on appointment of KMP or Director or upon becoming a Promoter of the Company and other such persons as mentioned in Regulation 6(2) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

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 : _____

Disclosure to be submitted by Designated Persons

Name of the Company : Kansai Nerolac Paints Limited

ISIN of the Company : INE531A01024

Details of immediate relatives

Sr. No.	Nature of relationship ⁽¹⁾	Name	PAN or any other identifier authorized by law ⁽²⁾	Contact Nos.

Notes:

- (1) 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.
- (2) In case PAN is not mentioned, please mention the type of identifier authorized by law alongwith the identifier.

Details of persons with whom material financial relationship⁽¹⁾ is shared

Sr. No.	Nature of relationship	Name	PAN or any other identifier authorized by law ⁽²⁾	Contact Nos.

Notes:

- (1) 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.
- (2) In case PAN is not mentioned, please mention the type of identifier authorized by law alongwith the identifier.

Details of Educational Institutions

Sr. No.	Name of the Institution	Address	Duration

Details of Past Employment

Sr. No.	Name of the Organisation	Duration	Last Position Held	Details of present association, if any

Name & 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) - Continual Disclosure]

Name of the Company : Kansai Nerolac Paints Limited

ISIN of the Company : INE531A01024

Details of change in holding of Securities of Promoter, Employee or Director of the Company and other such persons as mentioned in Regulation 6(2) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

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
Name: PAN : CIN: DIN: Address: Contact No.:													

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

Details of trading in derivatives of the company by Promoter, Employee or Director of the Company and other such persons as mentioned in Regulation 6(2) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

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 in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms	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 : _____

Details of holding of Securities by Director or Key Managerial Personnel of the Company as at the end of the Financial Year

Name of the Company : Kansai Nerolac Paints Limited

ISIN of the Company : INE531A01024

Name, PAN, DIN & address with contact no.	Category of Person (KMP / Directors/ immediate relative to)	Securities held as at the beginning of the Financial Year		Securities acquired/ Disposed during the year				Securities held as at the end of the Financial Year	
		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
1	2	3	4	5	6	7	8	9	10
Name: PAN : CIN: DIN: Address: Contact No.:									

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

Name & Signature : _____
 Designation : _____
 Date : _____
 Place : _____

Annual Disclosure to be submitted by Designated Persons

Name of the Company : Kansai Nerolac Paints Limited

ISIN of the Company : INE531A01024

Details of immediate relatives

Sr. No.	Nature of relationship ⁽¹⁾	Name	PAN or any other identifier authorized by law ⁽²⁾	Contact Nos.

Notes:

(1) 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.

(2) In case PAN is not mentioned, please mention the type of identifier authorized by law alongwith the identifier.

Details of persons with whom material financial relationship⁽¹⁾ is shared

Sr. No.	Nature of relationship	Name	PAN or any other identifier authorized by law ⁽²⁾	Contact Nos.

Notes:

(1) 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.

(2) In case PAN is not mentioned, please mention the type of identifier authorized by law alongwith the identifier.

Name & Signature : _____

Designation : _____

Date : _____

Place : _____

FORM D

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7(3) - Transaction by other connected persons as identified by the Company]

Name of the Company : Kansai Nerolac Paints Limited

ISIN of the Company : INE531A01024

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

Name, PAN, CIN/ DIN & address with contact nos. of other connected persons as identified by the Company	Connection with the Company	Securities held prior to acquisition/ disposal		Securities acquired/ Disposed				Securities held post acquisition/ disposal		Date of allotment advice/ acquisition of shares/ 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
Name: PAN : CIN: DIN: Address: Contact Nos.:													

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

Details of trading in derivatives 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 in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms	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 : _____