



**CODE OF CONDUCT TO  
REGULATE, MONITOR AND REPORTING TRADING BY INSIDERS  
[under Regulation 9(1) of the  
Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015]**

## I. PREAMBLE

The Securities and Exchange Board of India (SEBI) in its endeavor to protect the interests of stakeholders in general, has formulated the new regulations SEBI (Prohibition of Insider Trading) Regulations, 2015 ('Regulations') with aim to regulate and monitor the trading activities by the Designated Persons.

Pursuant to the provisions of Regulation 9, the Board of Directors ('Board') of Indraprastha Gas Limited ('IGL' or 'Company') hereby notifies THE CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING ('the Code'). The purpose of this Code is to elucidate and inform to all Designated Persons that they have a responsibility and duty to preserve UNPUBLISHED PRICE SENSITIVE INFORMATION, possessed by them and no Designated Person shall use such unpublished price sensitive information for personal gain or provide any gain to the third party related to him.

## II. OBJECTIVE OF THE CODE

The Code lays down in a concise manner the ethical values to be followed by the persons to whom the code is applicable and to promote ethical behavior on a day-to-day basis and create the trust, honesty, integrity, transparency, accountability by prohibiting the use of unpublished price sensitive information.

## III. DEFINITIONS

In this Code unless the context otherwise requires

1. '**Act**' means the Securities and Exchange Board of India Act, 1992
2. '**Company**' or '**IGL**' means Indraprastha Gas Limited.

3. **‘Compliance Officer’** means the Company Secretary of the Company or any other senior officer, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these Regulations and duly authorized by the Board of Directors of the Company.
4. **"Connected person"** means,-
- (i) any person who is or has during the six months prior to the concerned act been associated with a Company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the Company or holds any position including a professional or business relationship between himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.
  - (ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established, -
    - (a) an immediate relative of connected persons specified in clause (i); or
    - (b) a holding company or associate company or subsidiary company; or
    - (c) an intermediary as specified in section 12 of the Act or an employee or director thereof; or
    - (d) an investment company, trustee company, asset management company or an employee or director thereof; or
    - (e) an official of a stock exchange or of clearing house or corporation; or
    - (f) a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
    - (g) a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or

- (h) an official or an employee of a self-regulatory organization recognized or authorized by the Board; or
  - (i) a banker of the Company; or
  - (j) a concern, firm, trust, Hindu undivided family, Company or association of persons wherein a director of a Company or his immediate relative or banker of the Company, has more than ten per cent of the holding or interest;
5. "**Designated Person**" means,-
- i. Promoters of the Company;
  - ii. Board of Directors of the Company;
  - iii. Key Managerial Personnel (KMP) of the Company;
  - iv. Employees working in the capacity of Head of Departments, Deputy General Manager (whether or not Head of Department) and above;
  - v. Employees of the Corporate Finance & Accounts Department, Corporate Legal & Secretarial Department & IT Department of the Company irrespective of their grade level;
  - vi. Managing Director/Chief Executive Officer and employees upto two levels below Managing Director/Chief Executive Officer;
  - vii. Secretaries and Personal Assistants of all KMP's and Whole-time Directors;
  - viii. Insiders as defined under the Regulations and/or as decided by the Compliance Officer in consultation with Managing Director, as and when required;
  - ix. Immediate relatives of persons covered in clause (i) to(viii)
6. "**Fiduciaries**" means Professional firms such as auditors, accountancy firms, law firms analysts, insolvency professional entities, consultants, banks etc., assisting or advising the Company
7. "**Generally available information**" means information that is accessible to the public on a non-discriminatory basis;

8. **“Immediate relative”** or **“Dependent”** 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;
9. **“Insider”** means any person who is: i) a connected person; or ii) in possession of or having access to unpublished price sensitive information; or iii) with whom unpublished price sensitive information is shared for **“Legitimate purpose”** in the ordinary course of business by an Insider
10. **“Key Managerial Personnel”** or **“KMP”** means key managerial personnel as defined under the Companies Act, 2013
11. **“Legitimate Purpose”** shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants etc., provided such sharing has not been undertaken to evade or circumvent the prohibition of Regulations
12. **“Promoter”** shall have the same meaning as assigned to it under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modifications thereof;
13. **“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
14. **“Trading”** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and **“trade”** shall be construed accordingly ;
15. **“Trading day”** means a day on which the recognized stock exchanges are open for trading;

16. **“Trading Window”** means the period during which trading may be carried out in Company’s securities by Designated Persons.
17. **“Trading Plan”** (“TP”) means a plan for dealing in securities of the Company for a period not less than 12 months by the persons who may be perpetually in possession of unpublished price sensitive information
18. **‘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:
- a) financial results
  - b) dividends
  - c) change in capital structure
  - d) mergers, de-mergers, acquisitions, delisting’s, disposals and expansion of business and such other transactions
  - e) changes in key managerial personnel
  - f) Any such other information which may materially affect the price of securities
19. **Interpretation:** In this document, unless contrary intention appears:
- (a) The singular includes the plural and vice versa;
  - (b) Any word or expression importing the masculine, feminine or neuter genders only, shall be taken to include all three genders

#### **IV. RESTRICTIONS ON COMMUNICATION AND TRADING BY INSIDERS**

##### **a. Communication or procurement of UPSI**

- (i) All information shall be handled within the Company on a need-to-know basis and Insider shall not communicate, provide, or allow access to any UPSI, relating to a 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.

Factors to be considered while determining what constitutes a Legitimate Purpose(s) is detailed in the Code for Fair Disclosure of UPSI of the Company

- (ii) No person shall procure from or cause the communication by any Insider of UPSI, relating to Company or its securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- (iii) UPSI may be communicated, provided, allowed access to or procured, in connection with a transaction that would: –
  1. 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 sharing of such information is in the best interests of the Company;
  2. not attract the obligation to make an open offer under the takeover regulations but where the Board of Directors of the Company is of informed opinion that sharing of such information 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 to be adequate and fair to cover all relevant and material facts.
- (iv) Any person in receipt of unpublished price sensitive information pursuant to a Legitimate Purpose(s) shall be considered an “Insider” for purposes of this Code and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with the Regulations.

## **b. Trading when in possession of UPSI**

(i) Subject to the provisions of Regulations, no Insider shall either on his own behalf or on behalf of any other person, trade in securities of the Company on any stock exchange when in possession of any UPSI except in the following cases:

a. the transaction is an off market transaction inter-se between the Insiders who were in possession of the Unpublished Price Sensitive Information without breach of regulation 3 of the Regulations and where both parties had made a conscious and informed trade decision.

Provided that such unpublished price sensitive information was not obtained under sub-regulation (3) of Regulation 3 of the Regulations.

b. Transaction can be 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 the Regulations and wherein both parties had made a conscious and informed trade decision.

Provided that such unpublished price sensitive information was not obtained under sub-regulation (3) of Regulation 3 of the Regulations.

c. Transaction can be carried out pursuant to a statutory or regulatory obligation to carry out a bona fide transaction.

d. Transaction can be carried out pursuant to the exercise of stock options in respect of which the exercise price was pre-determined.

e. Trades can be carried out when in possession of UPSI when such trades are pursuant to a Trading Plan set up in accordance with the Regulations and this Code.



- f. In the case of non-individual insiders: –
- i. 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
  - ii. appropriate and adequate arrangements were in place to ensure that these regulations are not violated and no unpublished price sensitive information was communicated by the individuals possessing the information to the individuals taking trading decisions and there is no evidence of such arrangements having been breached.
- (ii) The onus of establishing that they were not in possession UPSI shall be on such Connected Persons.

#### **c. Need to know**

- (i) UPSI is to be handled on a ‘need to know’ basis i.e. UPSI should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.
- (ii) All non-public information directly received by any employee should immediately be reported to the head of the department.

#### **d. Limited access to confidential information**

Files containing the UPSI shall be kept secured. Computer files must have adequate security of log in and password etc.

#### **e. Digital Database**

The names of such persons or entities, along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available, with whom information under IV (a) as aforesaid is shared shall be maintained in a structured digital database. Such databases shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database. The Compliance Officer of the Company shall be responsible for maintaining the said database

### **V. TRADING PLAN (TP)**

#### **a. Importance of Trading Plan**

1. An Insider before possessing an UPSI may formulate a Trading Plan ('TP') and the same is required to be approved by the Compliance Officer subject to compliance of Code and Regulations.
2. By virtue of TP, an Insider can plan for trades to be executed by him/her in future
3. No pre-clearance would be required for dealing in the securities of the Company once the TP gets approved.
4. By doing so, the possession of UPSI when a trade under a TP is actually executed would not prohibit the execution of such trades as that was pre-decided even before the UPSI came into being.
5. Trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved Trading Plan.

## **b. Requisites of Trading Plan**

1. A trading shall be executed on expiry of six months from the date of public disclosure of the TP.
2. Trading as per TP shall not take place between 20<sup>th</sup> trading days prior to the last day of the financial period for which the results are required to be announced by the Company and 2 trading days after the disclosure of such financial results.
3. Designated Person shall give one TP at a time and the same shall not be less than 12 months i.e. there cannot be any overlapping of TP's
4. TP shall set out either the value of trades or the number of securities to be traded, along with specific dates and time intervals.
5. Trading on the basis of TP shall not lead to market abuse. If any manipulative activity is detected, it would open to initiate proceedings breach of SEBI (Prohibition of Fraudulent and Unfair Trade Practices relating to the Securities Market) Regulations, 2003.

## **c. Approval of Trading Plan**

1. The Compliance Officer shall review the TP to assess whether such plan has any potential and in not in violation of the Regulations and shall be entitled to seek such express undertakings as may be considered necessary including but not limited to the effect that the applicant is not in possession of UPSI.
2. On the basis of such assessment, the Compliance Officer shall within 15 days of the receipt of TP, approve or dis-approve any trading plan so submitted. In case of dis-approval the Compliance Officer shall record the reasons for the same.

## **d. Notification to Stock Exchange(s)**

The Compliance Officer shall notify the particulars of the approved TP to the stock exchange(s) where its securities are listed.

### **e. Execution of Trading Plan**

1. TP once approved shall be irrevocable and has to be mandatorily implemented without any deviation.
2. The implementation of the TP shall be deferred if any UPSI in possession at the time of formulation of the plan has not become generally available at the time of commencement of implementation of such plan.

### **VI. TRADING WINDOW**

1. Designated persons are not allowed to trade in the shares of the Company during the period(s) when the Trading Window is closed except when the sale or purchase is being undertaken pursuant to the Trading Plan submitted to the Company.
2. The trading window shall remain closed for 7 days prior to the happening of any of the following events in general, as decided by Compliance Officer in consultation of managing director:
  - Declaration of financial results (quarterly, half-yearly and annually)
  - Declaration of dividend (interim/ final)
  - Issue of securities by way of public / rights / bonus etc.
  - Any major expansion plans or execution of new projects
  - Amalgamation, mergers, acquisitions, takeovers and buy back of shares
  - Disposal of whole or substantially the whole of the Company.
  - Any changes in policies, plans or operations of the Company
  - Any transaction or event which may have any material impact on the price of shares of the Company
  - Any other event as may be notified
3. The Compliance Officer shall take all reasonable steps with regard to the date of closing and re-opening of the Trading Window.
4. The trading in the Company's securities would be permitted only on the expiry of forty eight hours after the information becomes publically available.

## VII. PRE – CLEARANCE OF TRADES

1. Designated Persons who intend to deal, in the securities of the Company which shall be equal to or more than 2000 (Two Thousand) securities in number, in any calendar month, the same shall be subject to pre-clearance by the Compliance Officer as per the procedure described hereunder.
2. Any pre cleared trade not executed within 7 trading days of its pre clearance will require fresh pre-clearance.
3. An application for pre-clearance shall be made to the Compliance Officer in the form annexed to this Code as Annexure A.
4. The Compliance officer may accord his approval/ dis-approval to any of the pre- clearance requests. In case of dis-approval the Compliance officer shall record the reasons for the same.

## VIII. DISCLOSURES

### a. Initial Disclosures

- i. Every Promoter, member of Promoter Group, key managerial personnel and director shall disclose his holding in the securities of the Company within 30 days of the implementation of these Regulations to the Compliance Officer in the Form A of the Regulations annexed to this Code as Annexure B.
- ii. Every person appointed as key managerial personnel or a director of the Company or upon becoming a Promoter or member of Promoter Group shall within 7 days of such appointment or becoming a Promoter or member of Promoter Group, shall provide disclosure of his securities to the Company in the Form B of the Regulations annexed to this code as Annexure C.

## **b. Other Disclosure**

- i. Every Designated Person or member of Promoter Group shall disclose to the Company, the number of securities acquired or disposed of within 2 trading days of such transaction if the value of securities traded, whether in one transaction or in series of transaction over any calendar quarter or after the prior disclosure made to the Company crosses the threshold limit as per Regulations i.e. aggregating to a traded value in excess of INR 1,000,000 in the Form C of the Regulations annexed to this Code as Annexure D.
- ii. Every Company shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.
- iii. An off-market inter-se trade between two Insiders under Clause (IV)(b) of this Code, who possess UPSI in accordance with this Code, shall be reported by the Insiders to the Company within two working days of executing the trade. 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.
- iv. Every Designated persons shall be required to disclose names and Permanent Account Number or any other identifier authorized by law of the following persons to the Company on an annual basis as on March 31 every year on or before April 30, and as and when the information changes in Form D of the Regulations annexed to this Code as Annexure E:
  - (a) immediate relatives
  - (b) persons with whom such designated person(s) shares a material financial relationship
  - (c) Phone, mobile numbers which are used by them
  - (d) 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 transaction.

Every person who become a Designated Person post April 01, 2019 shall be required to submit initial disclosure in Form D within 15 days of becoming as such.

## **IX. PENALTY FOR CONTRAVENTION**

- i. Any contravention of these Regulations shall be dealt with by SEBI in accordance with the SEBI Act, and rules made thereunder.
- ii. Any violation of the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, recovery, claw back, suspension etc. Such disciplinary action shall be recommended by the Audit Committee and approved by the Board of the Company.
- iii. The action by Company shall not preclude SEBI from taking any action in case of violation of Regulations.

## **X. OTHER RESTRICTIONS**

- i. A Designated Person who is permitted to trade shall not execute a contra trade within 6 months of such trade in securities of the Company. The Compliance Officer may be empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate these Regulations.
- ii. Should a contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the SEBI for credit to the Investor Protection and Education Fund administered by the SEBI under the Act.

The restriction of contra-trade will not be applicable for trade pursuant to exercise of options or Trading Plan.

- iii. In case it is observed by the Board of Directors that there has been a violation of Regulations, the Compliance Officer as directed by the Board of Directors, shall promptly inform SEBI.

## **XI. PERIODICAL RETURNS**

The Compliance Officer shall report to the Chairperson of the Audit Committee, on quarterly basis about the pre-clearance or TP's received, if any. Further, the Audit Committee may update the Board of the Company and may seek advice on the matters, if it deems fit.

## **XII. INSTITUTIONAL MECHANISM**

The Managing Director or 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 the Regulations and this Code to prevent insider trading.

## **XIII. SENSITIZATION OF TEAM ENGAGED IN TRANSACTIONS INVOLVING UPSI**

In case of any transaction in the Company which is of sensitive nature i.e. it may involve UPSI or may give rise to UPSI, then the respective head of the Department to which the transaction pertains shall ensure the following:

- UPSI shall be shared only on need-to-know basis and for Legitimate Purpose(s)
- A brief introduction of the Code shall be given to all the Parties involved in the transaction specifically duties and responsibilities attached to the receipt of UPSI, and the liability that attaches to misuse or unwarranted use of such information,
- Wherever necessary, a non-disclosure agreement shall be executed before sharing any UPSI.
- Take Permanent Account Number or any other identifier authorized by law from such persons
- Where such UPSI is shared with Fiduciaries or Intermediaries, then such Fiduciaries or Intermediaries shall ensure the compliance of the aforesaid.



#### **XIV. LEAK OR SUSPECTED LEAK OF UPSI**

In case any whistle blower reports leak or suspected leak of UPSI, then the procedure as prescribed under the Whistle-Blower policy of the Company shall be followed. In any other case, the following procedure will be adopted

- i. The Vigilance Officer shall be responsible to investigate the matter related to leak or suspected leak of UPSI under the supervision of the Audit Committee.
- ii. The Investigators shall have right to call for and examine any information/document of the Company, as may be deemed necessary for the purpose of conducting inquiry/investigation under this policy and can extend the scope of investigation to Fiduciaries and intermediaries, who were also involved in the matter involving UPSI.
- iii. The Fiduciaries and intermediaries involved in the matter shall provide full cooperation during the course of the investigation.
- iv. The investigation shall be completed normally within 90 days of the receipt of the mandate, which can be extended by the Audit Committee for such period as it deems fit.
- v. The Vigilance Officer shall submit a written report of the findings to the Chairman of the Audit Committee.
- vi. Where the results of the inquiry/ investigation highlights wrong doing on the part of the any employee or fiduciaries and intermediaries, then the Audit Committee shall recommend suitable punitive action as provided under Clause IX to the Board.
- vii. The Company on becoming aware of the matter related to leak or suspected leak of UPSI shall immediately report the same to SEBI. Further the result of investigation conducted into the said matter shall also be promptly disclosed to SEBI.

## **XV. AMENDMENT**

This Code and any subsequent amendment(s) thereto, shall be by way of a resolution by the Board of Directors.

### **DISCLAIMER**

THIS IS ONLY INTERNAL INSIDER TRADING CODE AND ONE OF THE MEASURES TO AVOID INSIDER TRADING. EVERY INSIDER IS REQUIRED TO FAMILIARISE HIMSELF WITH THE SEBI REGULATION OR ANY AMENDMENT THEREOF AS IT WILL BE THE RESPONSIBILITY OF EACH DESIGNATED PERSON (AND HIS RELATIVES) TO ENSURE COMPLIANCE OF THIS CODE, SEBI REGULATION(S) AND OTHER APPLICABLE LAWS.

**Annexure A****APPLICATION FOR PRE-CLEARANCE FOR PURCHASE/SALE OF SECURITIES**

Date:

The Compliance Officer,  
Name and Address of the Company

Dear Sir,

**Sub: Application for Pre-clearance of purchase/sale of securities of the Company**

Pursuant to the Company's Code of Conduct for Prevention of Insider Trading I seek your approval for purchase /sale of securities of the Company as under:

I intend to purchase/sell \_\_\_\_ no. of securities of the Company, during the week ending \_\_\_\_ for which I seek your approval. The said securities will be bought / sold in the name as mentioned under:

I.

Name of the Designated Person and / or Dependent Family Member	Type of securities	No. of securities held (with Folio/DP ID/ Client ID)

II. In this respect I do hereby confirm as under:

- a. I have no access to nor do I have any UPSI as defined in the Code up to the time of signing this undertaking;
- b. In the event that I have access to or receive any UPSI as defined in the Code, after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the Securities until such information becomes public;
- c. I have not contravened the Code as notified by the Company from time to time.
- d. I have made a full and true disclosure in the matter.

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

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

**Form A**
**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015  
[Regulation 7 (1) (a) read with Regulation 6 (2)]**

Name of the company: \_\_\_\_\_

ISIN of the company: \_\_\_\_\_

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

Name, PAN No., CIN/DIN & address with contact nos	Category of Person (Promoters/ KMP / Directors/ immediate relatives/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding	Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option Contracts held as on the date of regulation coming into force	
		Type of security (For e.g. – Shares, Warrants, Convertible Debentures Etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	6		7	

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

Signature:

Designation:

Date:

Place:

**FORM B**

**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015  
[Regulation 7 (1) (b) read with Regulation 6(2)]**

Name of the company: \_\_\_\_\_

ISIN of the company: \_\_\_\_\_

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

Name, PAN No., CIN/DIN & Address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate Relatives /others etc.)	Date of appointment of Director /KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP		% of Shareholding	Open Interest of the Future contracts held at the time of becoming Promoter/appointment of Director/KMP		Open Interest of the Option Contracts held at the time of becoming Promoter/appointment of Director/KMP	
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	5	6		7	

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

Signature:

Designation:

Date:

Place:

**Annexure D**

**FORM C**

**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015  
[Regulation 7 (2) read with Regulation 6(2)]**

Name of the company: \_\_\_\_\_

ISIN of the company: \_\_\_\_\_

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

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17
Name, PAN No., CIN/DIN & address of connected persons, as identified by the company with contact nos.	Connection with company	Securities held prior to acquisition/disposal		Securities acquired/Disposed		% of shareholding		Date of allotment advice/acquisition of shares/sale of shares specify		Date of intimation to company	Mode of acquisition (market purchase/public/rights/preferential offer / offer market/ Inter-se transfer etc.)	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
		Type of security (For eg. – Shares, Warrants,	No.	Type of security (For eg. – Shares, Warrants,	No.	Pre transaction	Post transaction	From	To			Buy		Sell		
												Value	Number of units (contract)	Value	Number of units	

		Conv ertibl e Debe nture s etc.)		Con verti b le Debe nture s etc.									ts * lot size)	(co ntra cts * lot size )	
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**Note:** "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Name:

Signature:

Date:

Place:

**FORM D****Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015****Disclosure under Clause [VIII] of Code of Conduct for Regulating, Monitoring and Reporting of Trading by Insiders**

To,  
The Compliance Officer  
Indraprastha Gas Limited

I hereby inform that:

1. The number of shares held by me as on 31<sup>st</sup> March are:
2. Particulars of my immediate relatives & persons with whom I share a material financial relationship\* are:

S. No.	Name of the person	Relation with the designated person	PAN	Phone / mobile Number

\*“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.

3. Educational institutions from which I have graduated:
4. Name of the past employers (chronological order):

S. No.	Name of the past employers	Last position held

Name:  
Designation:  
Employee Id:  
Signature:  
Date:  
Place