



KALYAN JEWELLERS INDIA LIMITED

[CIN: L36911KL2009PLC024641]

**CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY
DESIGNATED PERSONS AND THEIR IMMEDIATE RELATIVES**

I. Introduction

Securities and Exchange Board of India (“SEBI”) vide its Notification dated January 15, 2015, had notified SEBI (Prohibition of Insider Trading) Regulations, 2015 (the “Regulations”) which became applicable w.e.f. May 16, 2015 to all listed entities, as amended and re-enacted from time to time.

Regulation 9 of the Regulations requires that the Board of Directors of every listed company shall ensure that CEO/MD formulates a code of conduct, with their approval, to regulate, monitor and report trading by its designated person and immediate relatives of designated person towards achieving compliance with the Regulations, adopting minimum standards as set out in Schedule B of the Regulations, without diluting the provisions of the Regulations in any manner.

In the above context, *Kalyan Jewellers India Limited* (the “Company”) has adopted this *Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons and their Immediate Relatives* to be applicable immediately on the Listing of the Equity Shares of the Company.

II. Definition

“Code” means this *Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons and their Immediate Relatives* under Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time.

“Compliance Officer” means the Company Secretary the Company or such other Senior Officer as may be designated by the Board of Directors having the requisite qualification as prescribed under the Regulations.

“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 UPSI 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 employe

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 the Company or his immediate relative or banker of the Company, has more than ten per cent, of the holding or interest.

“Designated Persons(s)” shall include:

- (i) Employees of the Company designated based on their functional role or access to unpublished price sensitive information in the organization;
- (ii) Employees of material subsidiaries of the Company based on their functional role or access to unpublished price sensitive information;
- (iii) All promoters of the Company;
- (iv) Chief Executive Officer and employees upto two levels below 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;
- (v) Any support staff of the Company such as IT staff or secretarial staff who have access to unpublished price sensitive information.

“Generally available Information” means information that is accessible to the public on a nondiscriminatory basis.

“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.

“Insider” means any person who is:

- a) A connected person; or
- b) In possession of or having access to UPSI.

“Key Managerial Personnel (KMPs)” in relation to a company, means:

- a) the Chief Executive Officer or the Managing Director or the Manager;
- b) the Whole time director;
- c) the Chief Financial Officer;
- d) the Company Secretary and
- e) Such other officer as may be prescribed by the Companies Act 2013.

“Legitimate Purposes” shall have the same meaning as defined in the Company’s ‘Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)’ under Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

“Need to Know basis” means that UPSI should be disclosed only to those within the Company who need the information to discharge their duty or any kind of statutory obligation or for legal requirements and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.

“Notional Trading Window” means a temporary restriction on the trading during the period when the discussions pertaining to certain transactions which may have a material impact on the Company in future if taken or finalized, are being made within the Company but formal decision for the same is yet to be taken.

“Promoter” or “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.

“Trading” means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly.

“Trading Day” means a day on which the recognized stock exchanges are open for trading;

“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 be 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, delisting, disposals and expansion of business and such other transactions;
- v) changes in key managerial personnel

“Whistle Blower” means an employee who reports instance of leak of price sensitive information under this Policy.

Words and expressions used and not defined in this code but defined in the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), SEBI (Prohibition of Insider Trading) Regulations, 2015, the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislations.

III. APPLICABILITY OF CODE

The Code shall be applicable to all the Designated Person(s) and their Immediate relative(s).

The expression “Designated Person(s)” in any portion of this Code shall be construed as if it included his/her immediate relatives.

IV. Periodical Reporting to Board/Audit Committee

The Compliance Officer shall report on insider trading to the Board of Directors of the Company and in particular, shall provide reports to the Chairman of the Audit Committee or to the Chairman of the Board of Directors at least once in each financial year.

V. Communication or Procurement of UPSI

A. All information shall be handled within the Company on a need-to-know basis and no UPSI shall be communicated to any person except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations. Any person in receipt of unpublished price sensitive information pursuant to a “legitimate purpose” shall be considered an “insider” for purposes of these regulations and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with these regulations.

B. Chinese Wall

- a) To prevent the misuse of confidential information, the Company shall adopt a “Chinese Wall” policy separating those areas of the Company which routinely have access to confidential information, considered "inside areas" from those areas which deal with sale/marketing/operations or other departments providing support services, considered “public areas”.
- b) Demarcation of some of the departments as inside area may be implemented by the Company.
- c) The employees in inside area may be physically segregated from employees in public area.
- d) The employees in the inside area shall not communicate any Price Sensitive Information to anyone in public area.
- e) In exceptional circumstances, Designated Persons from the public areas may “cross the wall” and given confidential information on the basis of “need to know” criteria, under intimation to the Compliance Officer.

VI. Dissemination of UPSI

- A. No UPSI shall be passed by way of making a recommendation for the purchase or sale of securities of the Company.
- B. The following guidelines shall be followed while dealing with analysts, research personnel,

media persons & institutional investors.

- a) Only public information to be provided.
- b) Unanticipated questions may be taken on notice and a considered response given later.
- c) If the answer includes UPSI, a public announcement should be made before responding.

VII. Trading Plan

- A. A Designated Person/Insider 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/her behalf in accordance with such plan.
- B. Trading Plan shall:
 - a) not entail commencement of trading on behalf of the Designated Person/Insider earlier than six months from the public disclosure of the plan;
 - b) not entail trading for the period between the 20th 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 upto 2 (two) trading days after the disclosure of such financial results;
 - c) entail trading for a period of not less than 12 months;
 - d) not entail overlap of any period for which another trading plan is already in existence;
 - e) set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
 - f) not entail trading in securities for market abuse.
- C. The Compliance Officer shall review the Trading Plan, made as above to assess whether the plan would have any potential for violation of these regulations and shall be entitled to seek such express undertaking as may be necessary to enable such assessment and to approve and monitor the implementation of the plan. Provided that pre-clearance of trades shall not be required for a trade executed as per an approved trading plan. Provided further that trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan. After assessing the Trading Plan, the Compliance Officer may approve the same. However, the Compliance Officer shall be entitled to take 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 Regulations.
- D. The Trading Plan once approved shall be irrevocable and the Designated Person/Insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan. However, the implementation of the trading plan shall not be commenced, if at the time of formulation of the plan, the Designated Person/Insider is in possession of any UPSI 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 UPSI becomes generally available information.

- E. Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

VIII. Trading Window

- A. The trading period i.e. the trading period of the stock exchanges, called ‘trading window’, is available for trading in the Company’s securities.
- a) The trading window shall be, inter alia, closed during the following periods:
- i) **For Board meetings to be held for consideration of quarterly/annual financial results:** starting from the end of **every quarter till 48 hours after the declaration of financial results.**
 - ii) **For any other event:** The timing for closure and re-opening of the trading window shall be determined by the Compliance Officer in consultation with Chief Executive Officer/ Managing Director 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 re-opened earlier than forty-eight hours after the information becomes generally available.
- b) There may be instances where a particular transaction is in initial preliminary stage and may not be disseminated to public at large before finalization of terms and conditions of the transaction. To ensure that no fraudulent dealing in securities takes place even at this stage, a Notional Trading Window may be created from time to time by the Compliance Officer for Designated Person(s) or class of Designated Person(s) or any insider who are directly or indirectly involved in the transaction.
- c) Designated Persons shall conduct all their dealings in the securities of the Company only in a valid trading window and shall not deal in any transaction involving the purchase or sale of the Company’s securities during the periods when the trading window is closed, as referred to in Point No. (a) above or during any other period as may be specified by the Company from time to time.
- B. In case of ESOPs, exercise of option may be allowed in the period when the trading window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when trading is closed.

IX. Pre-Clearance of Trades

Designated Persons, who intend to deal in the securities of the Company when the trading window is opened, should pre-clear the transaction from Compliance Officer if the value of the securities proposed to be traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 5 lakhs or such other value as may be specified, from time to time, by the Compliance Officer in consultation with the Chief Executive Officer/Managing Director.

In case, the Compliance Officer wants to trade in excess of the aforesaid threshold limit, he shall seek the pre-clearance from the Chief Executive Officer/Managing Director. All the terms mentioned hereunder will be applicable to such request mutatis mutandis.

When a person who has traded in securities has been in possession of UPSI, his/her trades would be presumed to have been motivated by the knowledge and awareness of such information in his/her possession.

The pre-clearance procedure shall be hereunder:

- a) An application shall be made in the prescribed form to the Compliance Officer indicating the estimated number and amount of securities that the Designated Person intends to deal in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the company in this behalf
- b) An undertaking shall be executed in favour of the Company by such Designated Person incorporating, inter alia, the following clauses, as may be applicable:
 - i) that he/she does not have any access or has not received UPSI upto the time of signing the undertaking.
 - ii) that in case he/she has access to or receives UPSI 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 dealing in the securities of the Company till the time such information becomes public.
 - iii) that he/she has not contravened the code of conduct for prevention of insider trading as notified by the Company from time to time.
 - iv) that he/she has made a full and true disclosure in the matter.
- c) Post receipt of duly executed application form and undertaking, the Compliance Officer, may subject to satisfaction, grant the pre-clearance in prescribed form within 2 (two) trading days.
- d) Designated Person shall execute their order in respect of securities of the Company within the time period as mentioned in pre-clearance which in any event shall not be more than 7 (seven) trading days.
- e) Designated Person shall file within 2 (two) trading days of the execution of the deal, the details of such deal with the Compliance Officer in prescribed form. In case the transaction is not undertaken, a report to that effect shall be filed in the same form.
- f) If the order is not executed within the time mentioned in pre-clearance order, the designated person must pre-clear the transaction again.
- g) Pre-clearance would not be required for trade executed as per approved trading plan.
- h) Designated Person who buy or sell any number of shares of the Company shall not enter into an opposite transaction (contra trade) i.e. sell or buy any number of shares during the next 6 (six) months following the prior transaction. In case of any contra trade has been 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.

This provision shall not be applicable for trades pursuant to exercise of stock options.

- i) Designated Person shall also not take positions in derivative transactions in the shares of the Company at any time.

X. Reporting of Transactions

A. Initial Disclosure

- a) Every promoter, member of the promoter group, key managerial personnel and director of every company whose securities are listed on any recognized stock exchange shall disclose his holding of securities of the company as on the date of these regulations taking effect, to the company within thirty days of these regulations taking effect.
- b) Every person, on being appointed as KMP or a Director of the Company or upon becoming a promoter or member of the promoter group, shall disclose his holding of securities of the Company as on the date of appointment or becoming a promoter or member of the promoter group, to the Company within seven days of such appointment or becoming a promoter in prescribed form.

B. Continual Disclosure

- a) Every Designated Person 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. 10 lakhs in prescribed form.
- b) The Company at its discretion, may require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the company in order to monitor compliance with these regulations, in prescribed form as and when required by the Compliance Officer.

C. Disclosure by the Company

- a) Within 2 (two) trading days of the receipt of intimation under (a) & (b) above or on becoming aware of such information, the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received.
- b) The Company shall promptly inform the Board/Stock Exchanges in case there has been any violation of the regulations in the formats prescribed by SEBI from time to time.

XI. Mechanism on Internal Control

The Company shall place adequate and effective system for internal controls in line with the requirements of SEBI (Prohibition of Insider Trading) Regulations, 2015.

XII. Documents to be shared by Designated Person with Company

Designated person shall be required to disclose names and PAN or any other identifier authorized

by law, of the following persons, to the Company, on an annual basis and as when the information changes:

- a) Immediate Relatives;
- b) Person with whom such designated person(s) share a material financial relationship;
- c) Phone, mobile and cell number which are used by them

In addition, the name 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 loan or gift during immediate preceding 12 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.

Note: The forms prescribed under the Code and Regulations shall be available with the Compliance Officer and such other mediums as per Company's internal control mechanism.

XIII. Digital Database

The Company shall maintain digital database with time stamping and audit trails to ensure non- tampering of the data base containing following information:

- a) Name and PAN of the person/entity(ies) with whom information is shared pursuant to Legitimate Purposes.
- b) Name and PAN of Designated Person along with their immediate relatives.

XIV. Whistle Blowing in case of leak of Unpublished Price Sensitive Information ("UPSI")

- i) Any information on leak of UPSI should be on the basis of a direct first-hand experience of the Whistle Blower and not based on any secondary, unreliable source such as grapevine or any other form of informal communication.
- ii) The Whistle Blower may report leak of UPSI by an email or any other mode of written communication to the Compliance Officer at his e-mail ID, contact no. or address.
- iii) On the basis of reporting, the Compliance Officer shall conduct examination about the genuineness of the reporting before conduct of inquiry.
- iv) The Compliance Officer as soon as ascertaining the genuineness of the reporting about leak of UPSI, intimate to the SEBI/Stock Exchange and the Audit Committee.
- v) The Company shall take further action based on the recommendations of Audit Committee or the directions of SEBI/Stock Exchange.
- vi) The instance of leak of UPSI made by the Whistle Blower must be genuine with adequate supporting data/proof. If it is established that the allegation was made with mala-fide intentions or was frivolous in nature or was not genuine, the Whistle Blower shall be subject to Disciplinary Action.
- vii) Employee who files a Voluntary Information Disclosure Form will be protected against any discharge, termination, demotion, suspension, threats, harassment, directly or indirectly or discrimination to such employee, for any of the following reasons:
 - a. filing a Voluntary Information Disclosure Form under PIT Regulations;

- b. testifying, participating, or otherwise assisting or aiding SEBI in any investigation, inquiry, audit, examination or proceeding instituted or about to be instituted for an alleged violation of insider trading laws or in any manner aiding the enforcement action taken by SEBI; or
- c. breaching any confidentiality agreement or provisions of any terms and conditions of employment or engagement which are solely for preventing such employee from cooperating with SEBI in any manner

Explanation – For the purpose of this clause, “Employee” means any individual who during employment may become privy to information relating to violation of insider trading laws and files a Voluntary Information Disclosure Form under PIT regulations and is a director, regular or contractual employee, but does not include an advocate.

XV. Penalty for Contravention

- a) Every Designated Person shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her dependents).
- b) Any Designated Person who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalized and appropriate action may be taken by the Company.
- c) Designated Persons who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, recovery,, suspension, ineligibility for future participation in employee stock option plans, etc. for the contravention of the code of conduct.
- d) The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Any amount collected under this clause shall be remitted to SEBI for credit to the Investor Protection and Education Fund administered by the SEBI under the Act

XVI. Other Restrictions

- a) 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.
- b) The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be considered for purposes of this Code.

XVII. Disclaimer

This policy is only internal code of conduct and one of the measures to avoid insider trading. Every insider is required to familiarize himself with the SEBI regulation as it will be the responsibility of each insider to ensure compliance of this code, SEBI regulation and other related statutes fully.

XVIII. SEBI Regulations/Statutory Provisions to Prevail

Please note that in case the SEBI regulation or any statutory provisions are more stringent than those contained in the code, the SEBI regulations/ statutory provisions will prevail.

XIX. Process for bringing people `inside' on sensitive transactions

Compliance Officer of the Company shall decide in consultation with Chief Executive Officer/ Managing Director a process for how and when people are brought `inside' on sensitive transactions. Individuals should be made aware of the duties and responsibilities attached to the receipt of Inside Information, and the liability that attaches to misuse or unwarranted use of such information.

XX. Formats for pre-clearance, reporting of trades and Other Disclosures

Formats for making applications for pre-clearance, reporting of trades executed, reporting of decisions not to trade after securing pre-clearance and for reporting level of holdings in securities at such intervals as may be determined as being necessary to monitor compliance with these regulations and further, with respect to other disclosure are enclosed as Annexure A.

This Code shall be subject to review by the Chief Executive Officer/Managing Director who shall have the power to modify/align the Code with the changes in the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended or re-enacted from time to time.

To
The Compliance Officer
Kalyan Jewellers India
Limited (Company Address)

Dear Sir/Madam,

Sub: Application for Pre - clearance approval in securities of the Company

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading in Securities by Designated Person(s). I seek approval to (Type of action) of shares of the Company as per details given below:

1. Name of the applicant (in case of application for relative, please mention your name also)	
2. Designation and Employee Code		Designation: Employee Code:
3. Number of securities held as on date	
4. The Application is for	(a) Purchase of securities (b) Subscription to securities (c) Sale of securities (d) others (please specify)
5. Proposed date for starting the transaction	
6. Folio No. / DP ID / Client ID No. and estimated number of securities proposed to be acquired/ subscribed/ sold / other	
7. Current market price (as on [Stock exchange Last Date])		BSE (Closing Price): NSE (Closing Price):
8. Whether the proposed transaction will be through stock exchange or off-market deal	

I enclose herewith the form of Undertaking signed by me.

Yours Faithfully,

(Signature)

Name of the Employee:

Employee Code:

FORMAT OF UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-CLEARANCE

UNDERTAKING

To
The Compliance Officer
Kalyan Jewellers India
Limited (Company Address)

I, (Designated Person name), (Designation) of the Company residing at (Employee Address), am desirous of trading in shares of the Company as mentioned in my application dated (Current date) for pre – clearance of the transaction.

I further declare that I am not in possession of or otherwise privy to any Unpublished Price Sensitive Information (as defined in the Company's Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading in Securities by Designated Person(s) (the Code) up to the time of signing this Undertaking.

In the event that I have access to or received any information that could be construed as 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 forthwith of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public.

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

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

If approval is granted, I shall execute the deal within 7 trading days of the receipt of approval failing which I shall seek pre – clearance. I declare that I have made full and true disclosure in the matter.

Date: (Current date)

Sd/-
Name: (Designated Person name)
Employee Code: (Employee Code)

FORM A

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

Name of the company: *Kalyan Jewellers India*

Limited ISIN of the company: INE303R01014

Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and other such persons 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 Share holding	Open Interest of the Future contracts held as on the date of regulation coming into force			Open Interest of the Future Contracts held as on the date of regulation coming into force	
		Type of security (For e.g. - Shares, Warrants, Convertible Debentures etc.)	No.		Contract Specification	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specification	No. of units (contracts * lot size)
1	2	3	4	5	6	7	8	9	10

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: *Kalyan Jewellers India*

Limited ISIN of the company: INE303R01014

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 /i 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 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 e.g. -Shares, Warrants, Convertible Debentures etc.)	No.		Contract Specifications	Number of units (contract size * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contract size * lot size)	Notional value in Rupee terms
1	2	3	4	5	6	7	8	9	10	11	12

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 C

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

Name of the company: *Kalyan Jewellers India*

Limited ISIN of the company: INE303R01014

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

Name, PAN No., CIN/DIN, & address of Promoter/ Employee / Director with contact nos.	Category of Person (Promoters / KMP / Directors/ immediate relatives/ others etc.)	Securities held prior to acquisition / disposal		Securities acquired/ Disposed		% of shareholding		Date of allotment / advice/ acquisition / sale of shares specify		Date of intimation to company	Mode of acquisition (market purchase/ public rights/ preferential offer / off 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, Convertible Debentures etc.)	No.	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Pre transaction	Post transaction	From	To			Buy		Sell			
												Value	Number of units (contracts * lot size)	Value	Number of units (contracts * lot size)		
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	

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 D

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

Regulation 7(3) –Transactions by Other connected persons as identified by the company

Name, PAN No., CIN/DIN & address of connected person 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 / off market/ Inter-se transfer etc.)	Trading in derivative (Specify type of contract Futures or Options etc.)				Exchange on which the trade was executed
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Pre transaction	Post transaction	From	To			Buy		Sell		
												Value	Number of units (contracts * lot size)	Value	Number of units (contracts * lot size)	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

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:

ANNUAL DISCLOSURE

Designated Person Name :

Designated Person Id :

Name of the company: *Kalyan Jewellers India*

Limited ISIN of the company: INE303R01014

Details of Securities held by Designated Person as on ... :-

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/ Others	Securities held at the time of becoming Promoter/ appointment of Director/ KMP/ Other s		% of Shareholding
			Type of Securities	Nos.	
1	2	3	4	5	6
SE L F					
Name: PAN: DIN: Address: Contact:	(Emp Category)	(Date of Appointment)	(Type of security)		
(Relative Information)					
Total			(Total Type of security)		

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

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

Open Interest of the Future contracts held at the time of becoming Promoter/appointment of Director/KMP/Others			Open Interest of the Option Contracts held at the time of becoming Promoter/appointment of Director/KMP/Others		
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
SELF					
(self-Contract Specification)					
(Relative Contract Specification)					
TOTAL					
(Total Contract Specification)					

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

(Declaration)

Name:

Designation:

**Report by Kalyan Jewellers India Limited for violation related Code of Conduct
under SEBI(Prohibition of Insider Trading) Regulation, 2015
Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading)
Regulation, 2015**

S. No.	Particulars	Details
1.	Name of the Listed Company	
2.	Please tick the appropriate checkbox Reporting in capacity of: <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	
3.	A. Details of Designated Person (DP)	
	i. Name of DP	
	ii. PAN of DP	
	iii. Designation of DP	
	iv. Functional role of DP	
	v. Whether DP is Promoter or belongs to Promoter Group	
	B. Reporting is for immediate relative of DP	
	i. Name of the immediate relative of DP	
	ii. PAN of the immediate relative of DP	
	C. Details of transaction(s)	
	i. Name of the Scrip	
	ii. No of shares traded and value (Rs.)(Date-wise)	
	D. In case the value of trade(s) is more than Rs. 10 lacs in a calendar quarter	
	i. Date of intimation of trade(s) by concerned DP / director / promoter / promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	
	ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015	
4.	Details of violations observed under Code of Conduct	
5.	Action taken by Listed Company	
6.	Reasons recorded in writing for taking action stated above	
7.	Details of the previous instances of violations, if any, since last financial year	
8.	If any amount collected for Code of Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)	

9.	ii. Details of transfer/payment Incase of	
	Online:	
	Particulars	Details
	Name of the transferor	
	Bank Name, branch and Account number	
	UTR/Transaction reference Number	
	Transaction date	
	Transaction Amount (in Rs.)	
	In case of Demand Draft (DD):	
	Particulars	Details
	Bank Name and branch	
	DD Number	
DD Date		
DD amount (in Rs.)		
9.	Any other relevant information	

Yours faithfully,

For Kalyan Jewellers India Limited

Compliance

Officer PAN:

Email id:

Date:

Place: