Embassy Property Developments Private Limited

Code of Conduct to Regulate, Monitor and Report Trading in Securities of the Company

1. INTRODUCTION

The Code of Conduct to regulate, monitor and report trading in Securities of the Company was initially formulated by the Company in pursuance of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("Regulations") with effect from March 1, 2020. .

Pursuant to the amendments in the Regulations from time to time, the Code of Conduct to regulate, monitor and report trading in Securities of the Company (hereinafter referred to as "Code") was formulated by the Board of Directors of the Company to regulate, monitor and report trading in Securities of the Company by Designated Persons and their Immediate Relatives, effective from March 31, 2019. This Code has been further revised and the same is applicable with effect from March 1, 2020.

2. DEFINITIONS

In this Code, unless the context otherwise requires:

a) "Chinese Walls" means policies, procedures and physical arrangements designed to manage and safeguard UPSI (defined hereinafter) and prevent inadvertent transmission or communication thereof;

b) "Code" shall have the meaning ascribed to such term in Article 1 hereof;

c) "Company" means Embassy Property Developments Private Limited;

d) "Compliance Officer" means the Company Secretary and in his absence any other senior officer of the Company appointed by the Board of Directors from time to time for the purpose of this Code in pursuance of the Regulations;

e) "Designated Persons" means and includes:
   i. All Promoters, Directors and Key Managerial Personnel;
   ii. Personal secretaries of Key Managerial Personnel;
   iii. Employees of the Company comprising the top 2 tiers of the Company's management below the Managing Director of the Company i.e. Chief Financial Officer, Deputy General Manager, Senior General Manager, Head Operations, Company Secretary and any other employee as may be determined by the Board of Directors;
   iv. All the employees not covered above, who are working at the level of Manager or above in the following departments of the Company:
      I. Finance & Accounts Department; and
      II. Legal & Secretarial Department; and
      III. Any other persons, including members of the support staff of the

Company (such as, Information Technology department, Corporate Communications Department) as may be decided by the Board of Directors in consultation with the Compliance Officer, from time to time;

f) "Generally Available Information" means information that is accessible to the public on a non-discriminatory basis;

g) "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;

h) "Key Managerial Personnel" shall mean the person holding any of the positions of Managing Director, Whole Time Director, Manager, Chief Financial Officer and Company Secretary of the Company and any other officer designated as key managerial personnel by the Board of Directors as per the provisions of Section 2(51) of the Companies Act, 2013;

i) "Material Financial Relationship" means a relationship in which one person is a recipient of any kind of payment, such as by way of a loan or gift from a designated person during the immediately preceding twelve months, equivalent to at least 25% of the annual income of such designated person, but excludes relationships in which the payment is based on arm's length transactions;

j) "Promoter" shall have the meaning assigned to it under the Regulations;

k) "Regulations" shall have the meaning ascribed to such term in Article 1 hereof, which term shall include all amendments therein and replacements thereof;

l) "SEBI" means Securities and Exchange Board of India;

m) "SEBI Act" means Securities and Exchange Board of India Act, 1992;

n) "Securities" shall have the meaning ascribed to such term in the Regulations;

o) "Stock Exchange(s)" means recognized stock exchange(s) on which the Securities of the Company are listed;

p) "Takeover Code" means the SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, as amended from time to time;

q) "Threshold Limit" means the limit for Trading in Securities of the Company in any calendar quarter, as decided by the Board of Directors of the Company from time to

time. For the time being, the Threshold Limit for Trading in Securities of the Company in a calendar quarter is Rs. 10 Lakhs;

r) "Trading" means and includes subscribing, buying, selling, dealing, pledging or agreeing to subscribe, buy, sell or deal in or pledge any Securities of the Company, and "Trade" shall be construed accordingly;

s) "Trading Day" means a day on which the Stock Exchange(s) are open for trading;

t) "Trading Window" means the period during which Trading in Company's Securities can be carried out; and

u) "Unpublished Price Sensitive Information" or "UPSI" means any information, relating to the Company or its Securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the Securities and shall, ordinarily including but not restricted to, information relating to the following:
   i. Financial results;
   ii. Dividends;
   iii. Change in capital structure;
   iv. Mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions; and
   v. Changes in Key Managerial Personnel.

The words and expressions used but not defined herein shall have the meanings as ascribed to them under the Regulations.

3. RESPONSIBILITIES AND DUTIES OF COMPLIANCE OFFICER

a) The Compliance Officer shall be responsible under the overall supervision of the Board of Directors of the Company, for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of UPSI, monitoring of Trades as per the Code and implementation of the Code, maintaining records of the designated persons and their immediate relatives and any changes made in the list of Designated Persons and their Immediate Relatives and providing guidance and clarifications sought by Designated Persons regarding the Regulations and the Code.

b) The Compliance Officer shall report to the Board of Directors and shall provide reports to the Chairperson of the Audit Committee on a quarterly basis in respect of Trading in the Securities of the Company by the Designated Persons and their Immediate Relatives, the trading plans and pre-clearance applications approved and rejected by the Compliance Officer.

c) The Compliance Officer shall discharge other functions and duties as prescribed in

the Code and the Regulations.

4. GENERAL RESTRICTIONS

a) No Designated Person (including his/her Immediate Relatives) should trade in the Securities of the Company at any time while in possession of, or having access to, any Unpublished Price Sensitive Information. (UPSI).

b) Designated Persons are obliged to treat UPSI with due care and they have a duty to safeguard UPSI irrespective of the source of receipt of UPSI. Designated Persons shall use UPSI for the specified purpose(s) only and it must not be used for any personal gain. No Designated Person shall communicate, provide, or allow access, or procure or cause communication of any Unpublished Price Sensitive Information, relating to the Company or its Securities, to any person, except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

Determination of Legitimate Purpose

The term "legitimate purpose" includes sharing of UPSI in the ordinary course of business with Company's collaborators, lenders including prospective lenders, customers, suppliers, merchant bankers, legal advisors, auditors, credit rating agencies, insolvency professionals or other advisors, service providers or consultants; provided that such sharing of UPSI has not been carried out to evade or circumvent the prohibitions of the Regulations.

Whether sharing of UPSI for a particular instance tantamount to 'legitimate purpose' would entirely depend on the specific facts and circumstances of each case. Primarily, the following factors should be considered while sharing the UPSI:

i. whether sharing of such UPSI is in the ordinary course of business of the Company;
ii. whether sharing of such UPSI is in the interests of the Company or in furtherance of a genuine commercial purpose; and
iii. whether the nature of UPSI being shared is commensurate with the purpose for which access is sought to be provided to the recipient.

Any person who is in receipt of UPSI pursuant to a "legitimate purpose" shall be considered as an Insider for the purpose of these Regulations and due notice shall be given to such persons to maintain confidentiality of such UPSI in compliance with the Regulations.

5. PRESERVATION OF UPSI AND CHINESE WALL PROCEDURES

a) UPSI should be maintained within the Chinese Walls at all times. In the event any person (who is not a Designated Person) is required to be wall – crossed, i.e., brought over the Chinese Wall in order to obtain access to the UPSI for a specific

purpose, prior approval of the Company Secretary and Compliance Officer. The Company Secretary and Compliance Officer shall consider whether such person being wall – crossed, is being provided UPSI on a need – to – know basis. Further, information shared with such wall – crosser should be limited to the specific transaction or purpose for which their assistance is required.

b) All persons who have wall – crossed should be notified that he would be considered to be a Designated Person under this Code and consequently, required to comply with all applicable provisions of the Code and Regulations, till such information remains UPSI.

c) UPSI is to be handled on a "need to know" basis. It should be disclosed only to those who need the information to discharge their duties and possession of UPSI by them will not give rise to a conflict of interest or misuse of UPSI.

d) Files containing UPSI shall be kept secured with restricted access and computer files containing UPSI should be protected with the help of login, passwords, etc.

e) In case of any transaction(s) involving UPSI, the Managing Director shall identify the Designated Person(s) who shall have access to any inside information relating to such sensitive transaction(s). While dealing with such inside information, these Designated Persons shall, to the extent applicable, adhere to the provisions of this Clause 5.

6. PREVENTION OF MISUSE OF UPSI

All Designated Persons and their Immediate Relatives shall be subject to trading restrictions as stated below:

a) Trading Window

The Designated Persons and their Immediate Relatives shall trade in the Securities of the Company only when the Trading Window is open; provided that the Trading Window norms shall not be applicable for trades carried out in accordance with a trading plan approved under clause 9 hereof.

b) Prohibition on Trading in Securities of the Company

Designated Persons and their Immediate Relatives shall not Trade in the Securities of the Company: (i) during the Prohibited Period (as defined below) or (ii) at any time (even when the Trading Window is open) if in possession of UPSI.

c) "Prohibited Period" means :

i. a period from the end of every financial year till 48 hours after declaration of unaudited/ audited annual financial results;

ii. a period from the end of every quarter till 48 hours after declaration of unaudited/ audited quarterly financial results; and

iii. any period when the Compliance Officer otherwise has reasons to believe that Designated Persons can reasonably be expected to have possession of UPSI; Provided that where such UPSI is proposed to be considered at a meeting of the Board of Directors of the Company, such period shall, as far as practicable, commence at least 7 days before such meeting of the Board of Directors. The Compliance Officer shall determine the timing for re-opening the Trading Window taking into account various factors including UPSI in question becoming Generally Available Information and being capable of assimilation by the market, which in any event shall not be earlier than 48 hours after the information becomes Generally Available Information.

iv. The intimation about the Prohibited Period shall be given by the Compliance Officer, wherever required, through e-mail, circular and/ or posting on the website of the Company, etc.

7. PRE-CLEARANCE OF TRADES

All Designated Persons including their Immediate Relatives intending to Trade in the Securities of the Company up to the Threshold Limit fixed as aforesaid may do so without any clearance from the Compliance Officer.

While calculating the Threshold Limit, the cumulative value of the Securities of the Company Traded, whether in one transaction or series of transactions, during a calendar quarter by the Designated Person and his /her Immediate Relatives shall be taken into account.

Where the Trading Window of the Company is open, the Designated Persons including their Immediate Relatives intending to Trade in the Securities of the Company in excess of the Threshold Limit, shall pre-clear the transactions; provided that the pre-clearance of Trade is not required for a Trade executed as per a trading plan which has been approved under clause 9 hereof.

The procedure for pre-clearance of Trades is stated hereunder:

a) The Designated Person should make an application in the prescribed form, as per Form B, to the Compliance Officer indicating the estimated number and value of Securities of the Company that such Designated Person (or his / her Immediate Relative) intends to Trade in and such other details as may be required in this behalf. The application is to be filed along with statement of holding in Securities of the Company at the time of pre-clearance.

b) The Designated Person shall execute an undertaking in favour of the Company incorporating therein inter-alia, the following clauses, as may be applicable:

(i) that such Designated Person (including his/ her Immediate Relatives) does not have any access to or has not received and is not in possession of any

Unpublished Price Sensitive Information upto the time of signing the undertaking;

(ii) that in case such Designated Person (including his/ her Immediate Relatives) has access to or receives Unpublished Price Sensitive Information after the signing of the undertaking but before the execution of the transaction such Designated Person shall inform the Compliance Officer of the change in the position and that such Designated Person (including his/ her Immediate Relatives) would completely refrain from Trading in the Securities of the Company till the time such information becomes Generally Available Information;

(iii) that the Designated Person (including his / her Immediate Relatives) has not contravened the Code; and

(iv) that the Designated Person has made a full and true disclosure in the matter.

c) Prior to approving any Trades, the Compliance Officer shall have regard to whether the declaration given by the Designated Person, to the effect that he / she is not in possession of any Unpublished Price Sensitive Information, is reasonably capable of being rendered inaccurate.

d) The Designated Persons and their Immediate Relatives shall execute their transactions in respect of Securities of the Company within 7 Trading Days from the date of pre-clearance after which pre-clearance will lapse. Thereafter, a fresh pre-clearance will be needed for the Trades to be executed.

e) Where a Trade is not executed after obtaining pre-clearance from the Compliance Officer, the concerned person shall intimate the same to the Compliance Officer within 2 (two) Trading Days after the expiry of 7 (seven) Trading Days from the date of pre-clearance by the Compliance Officer, as per Annexure .

f) In case the Compliance Officer or his/her Immediate Relatives intend to Trade in the Securities of the Company in excess of the Threshold Limit, he/she shall obtain pre-clearance for the same from the Managing Director of the Company, as per the pre-clearance procedure under this Code.

g) Such pre-clearance shall not in any way be deemed to be confirmation of compliance with the Takeover Code, if applicable. The person seeking pre-clearance shall be solely responsible for compliance with the provisions of the Takeover Code, if applicable.

8. RESTRICTIONS ON CONTRA TRADE AND DERIVATIVE TRANSACTIONS

a) The Designated Persons and their Immediate Relatives shall not enter into a contra Trade during the next six months following a Trade; provided that the contra Trade

restrictions shall not be applicable to the following:

(i) Trades pursuant to exercise of stock options; and
(ii) Trades carried out in accordance with a trading plan approved under clause 9 hereof.

Example: If 'X' or any of his Immediate Relatives buy Securities of the Company on January 1, 2019, then 'X' and his Immediate Relatives shall not sell any Securities of the Company until July 1, 2019 and vice versa.

The Compliance Officer may grant relaxation from strict application of such restriction on an application made in this behalf by the concerned Designated Person and after recording in writing the reasons in this regard; provided that such relaxation does not violate the Regulations.

In case a contra Trade is executed, inadvertently or otherwise, in violation of the aforesaid restriction, the profits from such Trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the SEBI Act.

b) The Designated Persons and their Immediate Relatives shall not take any positions in derivative transactions in the Securities of the Company at any time.

9. TRADING PLANS

a) A Designated Person who may be perpetually in possession of UPSI, and his/her Immediate Relatives shall have an option to formulate a trading plan as per Form C and present it to the Compliance Officer for approval and public disclosure pursuant to which Trades may be carried out on their behalf in the Securities of the Company.

b) Such trading plan shall:

i) not entail commencement of Trading in Securities of the Company on behalf of the Designated Person and/or his/ her Immediate Relatives earlier than 6 months from the public disclosure of the trading plan;

ii) not entail Trading in Securities of the Company 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 Company and the 2nd Trading Day after the disclosure of such financial results;

iii) entail Trading in Securities of the Company for a minimum period of 12 months;

iv) not entail overlap of any period for which another trading plan is already in existence;

v) set out either the value of Trades to be effected in the Securities of the Company

or the number of Securities of the Company to be traded along with the nature of the Trade and the intervals at, or dates on which such Trades in the Securities of the Company shall be effected; and

vi) not entail Trading in Securities of the Company for market abuse.

c) The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of the Code or the Regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor implementation of the trading plan.

d) Upon approval of a trading plan, the Compliance Officer shall notify the trading plan to the Stock Exchanges.

e) The trading plan once approved shall be irrevocable and the Designated Person (including his/ her Immediate Relatives) shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any Trade in the Securities of the Company outside the scope of the trading plan;

Provided that the implementation of the trading plan shall not be commenced if any UPSI in possession of the Designated Person and/or Immediate Relatives at the time of formulation of the plan has not become Generally Available Information at the time of commencement of implementation and in such event the Compliance Officer shall confirm that the commencement ought to be deferred until such UPSI becomes Generally Available Information, in compliance with the Regulations.

10. DISCLOSURES AND REPORTING REQUIREMENTS

The disclosures required to be made by a person under this provision shall include details of Trades by such person's Immediate Relatives, wherever applicable.

I) Initial Disclosure

The Designated Persons shall make following disclosures to the Compliance Officer:

a) Within 30 days from the date on which the Regulations come into force, the details of Securities of the Company held by them and their Immediate Relatives, as per Form A.

b) Within 21 days from the date on which the Code come into force, one time disclosure about Educational Qualification, Past Employers, etc., wherever applicable.

c) Within 7 days of his / her appointment as or becoming a Designated Person:

(i) the details of Securities of the Company held by them and their Immediate Relatives, as per Form D;

(ii) One time disclosure about Educational Qualification, Past Employers, etc., wherever applicable.

d) The Designated Persons shall provide a one – time declaration containing the details of the names of educational institutions from which the Designated Persons have graduated and names of their past employers, if applicable.

II) Continual Disclosure

a) Every Designated Person shall disclose to the Compliance Officer, the number of Securities of the Company acquired or disposed of, within 2 Trading Days of such transaction, if the aggregate value of Securities of the Company Traded, whether in one transaction or a series of transactions over any calendar quarter, exceeds Rs. 10 lakhs or such other value as may be specified by SEBI in this regard. Such disclosure shall be made as per Form E.

b) The Designated Persons shall forward to the Compliance Officer,

(i) Quarterly statement of transactions in Securities of the Company as per Annexure – within a period of 15 days from the end of a calendar quarter. If there is no transaction in a particular quarter, the "Nil" statement is not required to be submitted.

(ii) An Annual statement of holdings in the Securities of the Company within 30 days of the close of financial year.

(iii) The details of Immediate Relatives and persons with whom such Designated Person shares a Material Financial Relationship, within 30 days of close of every financial year and within 15 days of any change in such information as submitted to the Company.

11. PENALTIES/ PUNISHMENTS

a) Any Designated Person who Trades in Securities of the Company or communicates any UPSI in contravention of this Code will be penalised and appropriate action will be taken against such Designated Person by the Company after giving reasonable opportunity of being heard in the matter. Such Designated Person shall also be subject to disciplinary action by the Company including wage freeze, suspension, recovery, clawback, in-eligibility for future participation in ESOPs, etc.

b) In case any violation of Regulations is observed, the Compliance Officer shall promptly inform the same to SEBI.

c) In addition to the aforesaid penalties/ punishments, the persons violating the Regulations will also be subject to any other action by SEBI as per SEBI Act.

12. MISCELLANEOUS

a) The gap between clearance of financial results by the Audit Committee and Board of Directors meeting for approval of such financial results should be as narrow as possible and preferably on the same day to avoid leakage of UPSI.

b) The Board of Directors of the Company shall have power to modify or replace this Code in part or full as may be thought fit from time to time in itsabsolute discretion.

c) The decision of the Board of Directors with regard to all matters relating to this Code will be final and binding on all concerned.

d) In case any provisions of this Code are contrary to or inconsistent with the provisions under the Regulations, the provisions of Regulations shall prevail.

FORM A

Initial disclosure to the company

[Regulation 7 (1) (a) read with Regulation 6 (2) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

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

Note:

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

ii. In case trading is done by immediate relative of the Promoter/ KMP/ Director, the details of securities held by such person should also be provided.

iii. "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.

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

Open Interest of the Future contracts held as on the date of regulation coming into force			Open Interest of the Option Contracts held as on the date of regulation coming into force		
Contract Specifica-tions	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifica-tions	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 C

Application for Pre-clearance

Application for Pre-clearance of Trades in Securities

To
The Compliance Officer,
Embassy Property Developments Private Limited
Bangalore

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and Code for Prevention of Insider Trading in Equity shares / securities of XYZ Ltd., I seek approval for purchase/sale/ subscription of the Securities (give description) of the Company as per the details given below:

1.	Name of the applicant	
2.	Designation	
3.	Relationship with the Applicant (Self/ Immediate Relative)	
4.	Number of securities held as on date	
5.	Folio No. / DP ID / Client ID No.	
6.	The proposal is for	Purchase of securities Subscription to securities Sale of securities Pledge
7.	Proposed date of trading in securities	
8.	Estimated number of securities proposed to be purchased/subscribed/sold/pledge	
9.	Current market price (as on date of application)	
10.	Whether the proposed transaction will be through stock exchange or	

	off-market trade	
11.	Folio No. / DP ID / Client ID No. where the securities will be credited / debited	

I enclose herewith the Undertaking signed by me.

Date	Signature
Place	Name & Designation

UNDERTAKING

With reference to my application for pre-clearance of trades in securities, I solemnly confirm and declare:

i. THAT I do not have access and /or have not received any "Unpublished Price Sensitive Information" up to the time of signing the undertaking.

ii. THAT in case I have access to or receive "Unpublished Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction, I shall inform the Compliance Officer of any change in my position and THAT I shall refrain from dealing in the securities of the Company till the time such information becomes public.

iii. THAT I have not contravened the Code for Prevention of Insider Trading in Equity shares / securities of Embassy Properties Developments Private Limited, as notified by the Company from time to time.

iv. THAT I am aware that, I shall be liable to face penal consequences as set forth in the Code including disciplinary action under the Code of the Company, in case the above declarations are found to be misleading or incorrect at any time.

v. THAT I have made a full and true disclosure in this regard to the best of my knowledge and belief.

vi. THAT I hereby undertake not to transact in securities in the sanctioned period in case trading window is declared closed subsequently.

vii. THAT I hereby undertaken not to make contra trade transactions in the securities of the company.

Pre-clearance may kindly be accorded in terms of provisions of the Code for Prevention of Insider Trading of the company.

Date	Signature
Place	Name & Designation

FOR OFFICE USE

Serial number of the application received	
Date & time of receipt of the Application	
Date & time of communication of the pre-clearance or otherwise	
Reasons for not giving pre-clearance	
Signature of the Compliance Officer /Authorised Officer	

Form D

Format for Trading Plan

To

The Compliance Officer

Embassy Property
Developments
Private Limited

Dear Sir,

I,_____, in my capacity as_____of the Company hereby submit the trading plan with respect to dealing in securities of the Company for a total period of 12 months from_____to_____.

DP ID/ Client ID / Folio No.	Type of security	No. of Securities held (as on date)	Nature of Trade (Buy/ Sell)	Proposed Date/time period of trade	No. /total amount of securities proposed to be traded

With respect to the above trading plan, I hereby undertake that I shall:

i. Not entail commencement of trading on behalf of the insider earlier than 6 months from the public disclosure of the plan.

ii. 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 Company and the second trading day after the disclosure of financial results for the said period;

iii. Not commence the trading as per above plan if the Unpublished Price Sensitive Information which is in my possession at present, do not comes into public domain till the time of commencement of trading plan & shall defer the commencement of trading plan till such information becomes generally available.

iv. Not tender any other trading plan for the period for which the above trading plan is already in force; and

v. Not entail trading in securities for market abuse.

Date	Signature
Place	Name & Designation

FORM B

Disclosure on becoming a director/ KMP/ Promoter/ Designated Person

[Regulation 7 (1) (b) read with Regulation 6 (2) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

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

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

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

Open Interest of the Future contracts held as on the date of regulation coming into force			Open Interest of the Option Contracts held as on the date of regulation coming into force		
Contract Specifica-tions	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifica-tions	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 E

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

Name of the company: Embassy Property Developments Private Ltd

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).

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 allot-ment advice/ acquisition of shares/ sale of shares specify		Date of intimation to com-pany	Mode of acquisition / disposal
		Type of security	No. and % of share-holding	Type of security	Number	Value	Transaction Type	Type of security	No. and % of share-holding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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

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

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

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

Date	**Signature**
Place	**Name & Designation**