

EPACK Durable Limited

(Formerly EPACK Durable Private Limited)

INSIDER TRADING PROHIBITION CODE

- ✦ Code of Conduct to Regulate, Monitor and Report Trading in Securities of the Company;
- ✦ Policy & Procedures for Inquiry in case of leak of Unpublished Price Sensitive Information;
- ✦ Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information & Policy for determination of “Legitimate Purpose”

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

1. Introduction

Securities and Exchange Board of India (hereinafter referred to as "**SEBI**") has notified the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as the "**SEBI PIT Regulations**"), as amended from time to time, all listed companies are required to implement a Code of Conduct to regulate, monitor and report trading by its designated persons and immediate relatives of designated persons towards achieving the compliance with the aforementioned regulations.

This Code of Conduct may be known as "EPACK Code of Conduct for Prohibition of Insider Trading" (herein after referred to as the "Code"). The Code has been designed to enhance the standards of governance and comply with the stated regulation.

"Insider trading" may occur when any person undertakes Trading in Securities of the Company while in possession of inside information of the Company. Inside information is such information of the Company which is considered to be both "price sensitive" and "not generally available" to public i.e. Unpublished. Insider Trading is an offence punishable under extant laws in India. Insider Trading is prohibited and could result in serious sanctions, including dismissal from the employment of the Company of the concerned persons.

The Company endeavours to preserve the confidentiality of Unpublished Price Sensitive Information ("UPSI") and to prevent misuse of such information. The Company is committed to deal with its Stakeholders with transparency and fairness, ensuring adherence to all laws and regulations and achieving highest standards of corporate governance.

2. Purpose

This code embodies the Code of Conduct to regulate, monitor and report trading by Designated Persons and their immediate relatives, as adopted by the Company for Prevention of Insider Trading. The Code is prescribed to ensure that the Designated Persons and/or their immediate relatives do not trade in the Securities of the Company when in possession of UPSI, and to prevent any speculative dealings, knowingly or unknowingly, by the Designated Persons or their immediate relatives.

The Company has no tolerance for any form of Insider Trading or similar unlawful security related trade practices.

3. Scope & Applicability

This Code is applicable to all Insiders which includes Designated Persons and their immediate relatives. Every Insider must review this code.

4. Interpretation

Words and expressions not defined in this Policy shall have the same meaning as contained in the SEBI (Prohibition of Insider Trading) Regulations, 2015 (SEBI PIT Regulations), Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and the rules and regulations made thereunder.

5. Definitions/terms used in the Code:

5.1 Insiders include:

- 1) Designated Persons comprising:-
 - a. Promoters of the Company
 - b. Directors of the Company
 - c. KMP of the Company
 - d. Employees who are two level below the level of Managing Director & CEO
 - e. Directors of Material Subsidiary
 - f. KMP of Material Subsidiary
 - g. Executive Assistant and Personal assistant of Executive Directors and Promoters
 - h. Employees of following department
 - Secretarial and Legal
 - IT & HR
 - Finance Department
 - i. Such other persons which in the opinion of the Compliance Officer is in possession of UPSI;
 - j. Immediate Relatives of the Designated Persons as defined above;
- 2) Connected Person as defined in SEBI PIT Regulations;
- 3) Any person who is in possession of or having access to UPSI;
- 4) Any other person who may be included in the ambit of definition of Insider as per applicable SEBI PIT Regulations;

5.2 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;

Note: If spouse is financially independent and doesn't consult an Insider while taking trading decisions, the spouse won't be exempted from the definition of immediate relative. A spouse is presumed to be an "Immediate Relative", unless rebutted.

5.3 Unpublished Price Sensitive Information (UPSI)

Means any information, relating to 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:-

- ✓ financial results;
- ✓ dividends;
- ✓ change in capital structure;
- ✓ mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
- ✓ changes in Key Managerial Personnel (KMP);

5.4 Trading:

Means and includes subscribing, redeeming, switching, buying, selling, dealing, or agreeing to subscribe, redeem, switch, buy, sell, deal in or pledge any Securities of the Company, and "Trade" shall be construed accordingly. Further, as per guidance note issued by SEBI dated August 24, 2015 Exercise of Employee Stock option plans (ESOPs) shall not be considered

to be “trading” except for the purposes of Chapter III of the SEBI PIT Regulations;

5.5 Insider Trading

“Insider Trading” means, principally, the act of Trading in Securities while possessing UPSI or having access to UPSI, which information if published and made generally available, would impact the price of the Securities in the market.

It is generally understood that Insider Trading includes the following:

- ✓ Trading by Insiders/ employees/ Designated Persons and/or their respective Immediate Relatives, while in possession of, or having access to, UPSI, regardless of how one came in possession of or had access to such information; or
- ✓ Communicating, providing, allowing access or tipping UPSI to others, including recommending any Trade in Securities of the Company, while in possession of, or having access to, such UPSI.

Note: Trading by Portfolio Managers (or any other intermediary) on behalf of the Insiders is also considered as Insider Trading and hence the Designated Persons are expected to take due precaution while trading in Securities through Portfolio Managers.

When any person has traded in securities while in possession of UPSI, such trades will be presumed to have been motivated by the knowledge and awareness of such unpublished price sensitive information in such person’s possession.

6. Procedures which have been put in place by EPACK Durable Limited to prevent Insider Trading

The following procedures have been established, and will be maintained and enforced, by the Company to prevent Insider Trading. Every Designated Person is required to follow these procedures:-

6.1 Preservation of “Price Sensitive Information”

- ✓ **To maintain utmost confidentiality:**

While dealing with UPSI, Designated Persons are obliged to treat UPSI with due care and have a duty to safeguard UPSI irrespective of source of receipt of UPSI. Designated Persons shall use UPSI for the specified purpose only and not for any personal gain/ avoiding any loss/ breach of applicable law.

Any disclosure or exchange of UPSI will be strictly on a need-to-know basis only and that no communication of UPSI shall take places, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligation.

- ✓ **Due Notice of Confidentiality:**

Designated Person shall provide due notice to each person with whom they share UPSI, pursuant to Legitimate purposes, that recipient shall maintain confidentiality of such UPSI in compliance with these regulations.

6.2 Limitations on Access to UPSI

The following procedures are designed to maintain confidentiality of UPSI:

- ✓ Designated Persons should take all steps and precautions necessary to restrict access to, and secure, UPSI by, among other things:-
 - a) maintaining the confidentiality of UPSI;
 - b) conducting their business/ professions and personal/ social activities so as not to risk inadvertent disclosure of UPSI;
 - c) reviewing confidential documents in public places should be restricted so as to prevent access to UPSI by unauthorized persons.
- ✓ Restricting access of documents and files (including computer files) containing UPSI and shall be shared only with persons on a need-to-know basis (including maintaining control over the distribution of documents and drafts of documents);
- ✓ 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.
- ✓ Promptly removing and cleaning up all confidential documents and other materials containing UPSI from conference rooms following the conclusion of any meetings;
- ✓ Disposing of all hard copies of confidential documents and other papers containing UPSI, after there is no longer any business or other legally required need, preferably through shredders ;
- ✓ Avoiding any discussion pertaining to UPSI in places where the information could be overheard by others, such as in elevators, restrooms, hallways, restaurants, airplanes or taxicabs, etc.;
- ✓ Persons in possession of, or having access to, UPSI, to the extent feasible, should conduct their business and other activities in areas separate from other Company activities, so as to avoid any leakages of UPSI.

6.3 Chinese Walls

- ✓ In terms of the Code, Designated Persons are considered as persons having access or expected to have access to UPSI.
- ✓ To prevent the misuse of UPSI, the Company has adopted following norms for Chinese wall procedures, which separates those departments which routinely have access to UPSI, considered as 'Inside Areas' e.g. IT, Accounts & Finance, Legal & Secretarial etc. and other departments are considered as 'Public Areas':
 - i. The Designated Person(s) in the Inside Areas are not allowed to communicate any UPSI to anyone in the Public Areas, except in furtherance of legitimate purpose as determined under The Code of Practice & Procedure for Fair Disclosure of Unpublished Price Sensitive Information.
 - ii. The determination of various departments as Inside Areas will be determined by the Compliance Officer or Chief Financial Officer in consultation with the Managing Director & CEO.
 - iii. Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password etc.
- ✓ Wherever there is a requirement of sharing UPSI by any Designated Person with another Employee/external third parties, etc., in furtherance of legitimate purposes, performance of duties or discharge of his/ her/ its legal obligations, the person to whom

such information is proposed to be shared, shall be “wall-crossed” through wall-crossing procedure set out below.

6.4 Procedure for wall-crossing

- ✓ In the event any 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 Compliance Officer must be sought. The Compliance Officer shall consider whether the person being wall – crossed, is being provided UPSI on a need – to – know basis. Further, UPSI shared with such wall – crosser should be limited to the specific transaction or purpose for which such person’s assistance is required.
- ✓ Persons who are wall – crossed / receive UPSI should be notified that they would be deemed to be ‘Designated Person’ and ‘Insider’ under this Code and that consequently, such persons will be considered as brought “inside” on sensitive transaction and required to comply with all applicable provisions of the Code and the SEBI Regulations, till such information remains UPSI.
- ✓ Appropriate records of all wall crossings will be maintained. Further, the Compliance Officer will be informed of all instances wherein a person has been wall-crossed (at the time of such wall – crossing), in accordance with the procedure set out above, so as to enable the Compliance Officer to maintain appropriate records in this regard.

6.5 Intimation of Duties & Responsibilities to the recipient of UPSI

Any recipient of UPSI shall be deemed to be ‘Insider’ for purposes of this Code. Accordingly, such persons will: (a) execute agreements to undertake confidentiality and non-disclosure obligations; (b) keep the information so received confidential; (c) utilise the UPSI only for the specified purpose; and (d) otherwise not Trade in Securities of the Company when in possession of, or having access to, UPSI.

6.6 Digital Database of recipient of UPSI

As required under Regulation 3(2) of the SEBI PIT Regulations, Compliance Officer as may be authorized by the Board, shall maintain a structured digital database of such persons or entities as the case may be with whom UPSI is shared, along with the following information pertaining to the recipients;

- ✓ Name of such recipient of UPSI;
- ✓ Postal Address and E-mail ID of such recipient
- ✓ Permanent Account Number (PAN) or any other identifier authorized by law, if PAN is not available

Such database shall be maintained in accordance with the SEBI PIT Regulations from time to time, including through adequate internal controls and checks such as time stamping and audit trials to ensure non-tampering of such database.

6.7 Internal Control System

There shall be adequate and effective system of internal controls to ensure compliance with the requirements given in this Code and SEBI PIT Regulations to prevent Insider Trading. The internal controls shall include:-

- ✓ Identifying persons who have access to, or are expected to have access to UPSI, as Designated Persons;
- ✓ Identifying UPSI and maintaining its confidentiality as required under applicable

- laws;
- ✓ Putting in place adequate restrictions on communication, or procurement of UPSI;
- ✓ Maintaining a list of all persons with whom UPSI is shared and making them aware of their confidentiality and other obligations under the Code;
- ✓ Periodic review the measures and internal controls implemented to evaluate their effectiveness.

6.8 **Trading Plan**

An Insider shall be entitled to formulate a Trading Plan in compliance with SEBI PIT Regulations for dealing in Securities of the Company and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan as provided in format enclosed as-**TP format**

6.9 **Pre-Clearance of Trades by Designated Persons**

- ✓ To provide assistance in preventing inadvertent violations of applicable SEBI PIT Regulations, any trading in Company's Securities (which includes without limitation, purchase or sale of Company's Securities) if the value of the Securities, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of ₹ 10 lacs, by the Designated Persons, **must be pre-cleared.**
- ✓ In case of stock options (ESOPs), exercise of options is allowed without pre- clearance. However, the sale of shares allotted on exercise of stock options would require pre-clearance.
- ✓ The pre-clearance needs to be approved and obtained as under:
 - All Pre-clearances needs to be applied to the Compliance Officer;
 - The Pre-clearances will be approved by Compliance Officer of the Company.
- ✓ The Designated Persons may trade in the Company's Securities only after obtaining pre-clearance of the proposed transactions from the Compliance Officer by submitting an application as per **Annexure I** and declaring that they are not in possession of any price sensitive information.
- ✓ Any oral request from the Designated Persons under this Code and/or oral confirmation for trading in Securities of the Company is not acceptable and shall not be regarded as a valid request or approval for trading in Securities of the Company.
- ✓ The approval/rejection would be conveyed through e-mail. If a request to trade is refused, the Compliance Officer may provide a written statement of the reasons, to the extent possible, for withholding consent.
- ✓ Unless the concerned Designated Person receives a formal communication from the Compliance Officer granting clearance to trade, no approval shall be deemed to have been granted and the Designated Person cannot trade in Securities of the Company.
- ✓ While granting permission, the Compliance Officer may impose certain conditions or restrictions, as may be necessary.
- ✓ Designated Person can trade only upto the number of Securities for which the approval is granted by the Compliance Officer. Any trade which is in excess of number of Securities for which approval has been granted or undertaking trade in different kind from what has been approved, is not permissible. The same will require a fresh approval as provided in the Code.

As an example, if approval has been granted to employee "A" for buying 100 shares, then subject to other conditions of the Code, "A" can buy maximum upto 100 shares and only for buying shares.

- ✓ The pre-clearance, once approved, shall be valid for a period of 7 days from the date of approval;
- ✓ The Designated Person shall file within 2 (two) working days of the execution of the deal, the details of such deal, with the Compliance Officer in the prescribed form as per **Annexure II**;
- ✓ If the trade, as approved, is not executed within 7 days, the Designated Person must pre-clear the transaction again, if he wish to undertake trade. The Designated Person shall also be required to provide reasons to the Compliance officer in case no trades are executed or the trades executed are for lower quantity than the quantity for which the approval was sought.
- ✓ The Designated Persons shall not enter into a Contra-Trade i.e. an opposite trade/transaction (sell or buy) any number of Securities during the next 6 (six) months following the previous transaction. Provided that this shall not be applicable for trades pursuant to exercise of stock options;
- ✓ The restriction of contra Trade will not apply in respect of subscription to shares/convertibles in Follow-on Public Offer (FPO); Offer for Sale (OFS); Rights Issue or tendering of Shares in open offer; share buy-back or delisting offer, exit offers etc. The restriction of contra Trade will also not apply to Trades carried out in accordance with a Trading Plan as may be approved. However, the Contra Trade restrictions shall be applicable in case shares acquired through Initial Public Offering (IPO).
- ✓ 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 SEBI PIT Regulations. The Designated Person can make an application for waiver of restriction on undertaking Contra Trade Transaction in the format provided as **Annexure III**.
- ✓ 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 Act. Also Compliance officer shall inform the stock exchange(s) where the concerned securities are traded, in such form and such manner as may be specified by SEBI from time to time
- ✓ The Designated Person shall also not take positions in derivative transactions in the Securities of the company at any time;
- ✓ In case the Compliance Officer of the Company intends to trade in the Securities of the Company, he/she shall seek pre-clearance of trade from the Managing Director & CEO of the Company. All other provisions of the Code will mutatis-mutandis apply in respect of transactions by the Compliance Officer;

6.10 Trading Window

- ✓ Designated persons may execute trades subject to compliance with SEBI PIT regulations. Towards this end, a notional trading window shall be used as an instrument of monitoring trading by the Designated persons. The trading window shall be closed when the Compliance Officer determines that a Designated person or class of Designated persons can reasonably be expected to have possession of UPSI. Such closure shall be imposed in relation to such securities to which such UPSI relates. Designated persons and their immediate relatives shall not trade in securities when the trading window is closed.
- ✓ The timing for re-opening of the trading window shall be determined by the Compliance Officer taking into account various factors including the UPSI in question becoming generally available 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.
- ✓ The Trading Window shall be closed from the end of every quarter till 48 hours after the declaration of financial results.
- ✓ Additionally, the Compliance Officer can specify commencement of closing of Trading Window at the time of:
 - Declaration of dividends (interim and final);
 - Issue of Securities by way of public/rights/bonus issue etc;
 - Any major expansion plans or execution of new projects;
 - Amalgamation, mergers, takeovers and buy back;
 - Disposal of whole or substantially whole of the undertaking;
 - Any changes in policies, plans or operations of the Company;

Further any other period as may be notified from time to time by the Compliance Officer will also be considered as a Trading window closed period.

- ✓ In addition to exemptions provided under SEBI PIT Regulations under during which trading window restrictions shall not apply, the trading window restrictions shall not apply in respect of pledge of shares for a bonafide purpose such as raising of funds, subject to pre-clearance by the Compliance Officer and compliance with the respective regulations made by the Board and in case trades were pursuant to a trading plan.
- ✓ All Designated Persons shall conduct all their Trading in the Securities of the Company only after obtaining prior approval and in a valid Trading Window and shall not trade in any transaction involving the purchase and sale of the Securities of the Company during the periods when Trading Window is closed, or during any other period as may be specified by the Company from time to time.
- ✓ When the Trading Window is open, any trading by Designated Persons shall be subject to pre-clearance by the Compliance Officer.
- ✓ As per guidance note issued by SEBI dated August 24, 2015, exercise of ESOPs shall not be considered to be trading. Hence exercise of ESOPs can be done at the time when Trading Window of the Company is closed.

6.11 Miscellaneous

- ✓ The gap between clearance of financial results by the Audit Committee and Board meeting for approval of such financial results should be as narrow as possible and preferably on the same day to avoid leakage of UPSI;
- ✓ In case any provisions of this Code are contrary to or inconsistent with the provisions under the SEBI PIT Regulations, the provisions of SEBI PIT Regulations shall prevail.

7. Duties of Compliance Officer & Reporting Mechanism

- ✓ The Board of Directors has appointed the Company Secretary of the Company, as the Compliance Officer under the Code, who shall report to the Chairman of the Audit Committee, Managing Director and to Board of Directors.
- ✓ The Compliance Officer shall, under the supervision of the Board, be responsible 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 any changes made in the list of Designated Persons and providing guidance and clarifications sought regarding the SEBI Regulations and the Code;
- ✓ The Compliance Officer shall submit such reports to the Board and in particular, Audit Committee of the Board, including reports in relation to Trading by Designated Persons, every quarter, to enable them to review compliance with the provisions of this Code and SEBI Regulations and to verify that the systems for internal controls are adequate and are operating effectively;
- ✓ The Compliance Officer shall maintain records of all the declarations/ disclosures given by the Designated Persons, for a minimum period of five years.
- ✓ The Compliance Officer shall be authorised to make necessary disclosures with the Stock Exchanges and other relevant statutory authorities in compliance with the SEBI PIT Regulations.
- ✓ Prior to approving any Trades, the Compliance Officer shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any UPSI. He/She shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.
- ✓ The Compliance Officer shall discharge other functions and duties as prescribed in the Code or the SEBI PIT Regulations.
- ✓ Such other duties as may be delegated by the Insider Trading Monitoring Committee from time to time.

8. Reporting Requirements for Transactions in Securities

8.1 Initial Disclosures by Promoter/Promoter Group , Directors , KMPs , Senior Management & Designated Persons

- ✓ Every person on appointment as a KMP, Senior Management or a director of the Company or upon becoming a Promoter or member of the Promoter Group shall within

7 days of appointment or becoming a Promoter or a member of Promoter Group disclose details of the Securities held in the Company to the Compliance officer in **Form B as detailed in Annexure IV:**

- ✓ All holdings in Securities of the Company by Designated Persons upon being identified as a Designated Person within 7 days as detailed in **Annexure V.**

8.2 Continual Disclosures by Promoter, Directors and Designated Persons

- ✓ Promoters, Directors and Designated Persons shall within two trading days of transaction disclose to the Company the number of Securities acquired or disposed of, 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 ₹ 10 lacs or such other value as may be specified by the Compliance Officer **in Form C as detailed in Annexure VI:**

8.3 Annual Disclosures by Designated Persons

- ✓ Annual disclosure thereof containing the below details in **Annexure VII** within a period of 30 days from the closure of each financial year:
 - a) Name of Immediate Relatives and persons with whom such Designated Person(s) shares a Material Financial Relationship;
 - b) PAN or any other identifier authorized by law of (a)
 - c) Phone, mobile numbers of persons mentioned in (a)

Note: "Material Financial Relationship" shall mean a relationship as 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."

8.4 One Time Disclosure by Designated Persons

- ✓ One-time disclosure of names of educational institutions from which Designated Persons have studied and names of their past employers **in Annexure VIII**

8.5 Disclosure by Connected Persons

- ✓ The Compliance officer may, at its discretion require any other Insider to make disclosures of holdings and trading in Securities of the Company in such form and at such frequency as may be deemed necessary in order to monitor compliance with these SEBI Regulations in **Form D as detailed in Annexure IX**

The Compliance officer may from time to time review and modify the formats for submitting disclosures, as may be appropriate.

Disclosure Requirements

S.NO	Periodicity of Disclosure	Disclosure Requirement/Compliance	Duration within which disclosure is to be made as per SEBI PIT regulations
1	Every person on appointment as a KMP or Director or upon becoming Promoter or Member of Promoter Group	Number of Securities held (Format as per Annexure IV)	Within 7 days of such appointment or becoming a Promoter or Member of Promoter Group or KMP or Director
2	Pre-clearance of Trades	Approval from Compliance Officer required prior to undertaking trading in Securities (Format as per Annexure-I). Unless approval accorded, Designated Person cannot trade	Prior to undertaking any Trading in Securities of Company.
3	Disclosure by Promoter, Employee and Director of the Company or Designated Persons if the value of transactions over any calendar quarter aggregates Rs. 10 lakhs or more.	Details of Securities acquired or disposed off (Format as per Annexure VI)	Within 2 Trading Days of such transaction
4	Annual Disclosure by all Promoters, KMP, Directors and Designated Persons	Number of Securities held (Format as per Annexure VII)	Annual disclosure of number of Securities held as on March 31, shall be made within 15 days i.e by April 15

9. Responsibility

It is the responsibility of every Insider to whom the Code is applicable, to follow and comply with the provisions of the Code. When in doubt, the Insiders may seek assistance of the Compliance Officer for any clarification on any provisions of the Code or other related applicable regulations issued by Securities and Exchange Board of India.

10. Protection of employees against retaliation and victimization

- ✓ Any suspected violation of leak of UPSI or violation of this Code can be reported as per "POLICY FOR PROCEDURE OF INQUIRY IN CASE OF LEAK OF UPSI" forming part of this Code .
- ✓ Retaliation for reporting suspected violation is strictly prohibited under this Policy.
- ✓ Employees who reports any alleged violation of insider trading laws in accordance with the Informant Mechanism introduced vide SEBI (Prohibition of Insider Trading) (Third Amendment) Regulations, 2019 dated September 17, 2019, will be protected against any discharge, termination, demotion, suspension, threats, harassment, directly or indirectly or discrimination.

11. Consequence of Non-Compliance with this Code

11.1 Disciplinary Action

Failure to comply with this Code is a disciplinary issue and may also constitute an offence in certain cases. Any employee including their Immediate Relatives who violates the provisions of this Code shall be liable for penal/disciplinary/remedial action. All Breaches of this Code shall be reported to the Managing Director of the Company. The above actions of Company will be without prejudice to any civil or criminal action that the regulatory authorities may initiate against such an employee.

11.2 Penalties prescribed by the Statutory Authorities

If any Insider contravenes any of the provisions of the Insider Trading Code / SEBI Regulations, such Insider will be liable for appropriate penal actions in accordance with the provisions of the SEBI Act, 1992.

Relevant extract of SEBI Act, 1992 is as under:

Penalty for insider trading.

15G. If any insider who,—

- (i) either on his own behalf or on behalf of any other person, deals in securities of a body corporate listed on any stock exchange on the basis of any unpublished price-sensitive information; or*
- (ii) communicates any unpublished price-sensitive information to any person, with or without his request for such information except as required in the ordinary course of business or under any law; or*
- (iii) counsels, or procures for any other person to deal in any securities of any body corporate on the basis of unpublished price-sensitive information,*

shall be liable to a penalty which shall not be less than ten lakh rupees but which may extend to twenty-five crore rupees or three times the amount of profits made out of insider trading, whichever is higher.

12. Review

This policy shall be subject to review by the Board as may be deemed necessary or to meet any regulatory requirements.

13. Amendment

In case of any amendment (s), clarification (s), circular (s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s), etc. shall prevail upon the provisions in this Policy and this Policy shall stand amended accordingly.

14. Version Control

Version	Description	Date
Version 1	Insider Trading Prohibition Code: -Code of Conduct to Regulate, Monitor and Report Trading in Securities of the Company;	November 09, 2023

	<p>-Policy & Procedures for Inquiry in case of leak of Unpublished Price Sensitive Information;</p> <p>-Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information & Policy for determination of “Legitimate Purpose”</p>	
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15. Effective Date

This Policy was approved and adopted by the Board on November 09, 2023

Disclaimer

THIS POLICY IS ONLY INTERNAL CODE OF CONDUCT AND ONE OF THE MEASURES TO AVOID INSIDER TRADING. EVERY INSIDER IS REQUIRED TO FAMILIARISE HIMSELF WITH SEBI PIT REGULATIONS AS IT WILL BE THE RESPONSIBILITY OF EACH INSIDER (AND HIS RELATIVES) TO ENSURE COMPLIANCE OF THIS CODE, SEBI REGULATION AND US SECURITIES LAWS AND OTHER RELATED STATUTES FULLY.

POLICY FOR PROCEDURE OF INQUIRY IN CASE OF LEAK OF UPSI

1. Legal Framework

Regulation 9A (5) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“**SEBI PIT Regulations**”) specifies that every listed entity shall have a written policy and procedure for inquiry in case of leak of UPSI or suspected leak of UPSI and for initiation of appropriate inquiry on becoming aware of leak or suspected leak and promptly inform Securities and Exchange Board of India of such leaks, inquiries and results of such inquiries.

2. Applicability

This policy shall be applicable to all Designated Person and their Immediate Relatives and all persons in possession or access to UPSI. This policy shall be effective from _____.

3. Objective of Policy

This Policy deals with formulation of procedures for inquiry in case of leak of UPSI or suspected leak of UPSI and for initiation of appropriate inquiry, reporting and penalizing the guilty of violating this policy.

4. Definitions & Interpretation

“**Leak of UPSI**” means communication of information which is UPSI by any person, who is in possession of UPSI, to any other person, directly or indirectly, overtly or covertly or in any manner whatsoever, except for Legitimate Purpose, performance of duties or legal obligations.

The capitalized words not specifically defined in this Policy shall have the same meaning as defined in this Code for Prevention of Insider Trading and Code of Corporate Disclosure Practices or under Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

5. Procedure for inquiry in case of Leak or suspected Leak of UPSI

5.1 The Compliance Officer or the Chairman of the Audit Committee on becoming aware suo moto or on receipt of a written communication of leak or suspected leak of UPSI from:

- i. Any person including Employee(s) of the Company;
- ii. Regulators; or
- iii. Promoter; shall follow the below mentioned procedure in order to inquire and/or investigate the matter.

5.2 Preliminary Inquiry: The object is to ascertain the truth of the allegations contained in the information or complaint, if any, and to collect necessary available material in support of the allegations, and thereafter to decide whether there is justification to embark further investigation.

The person (s) appointed/authorized by the Compliance Officer shall submit inquiry report to the Compliance Officer within 7 working days from the date of appointment /authorization. The inquiry report shall be submitted to the Chairman of the Audit Committee.

5.3 Intimation of Leak or suspected leak of UPSI: If in the opinion of the Chairman of the Audit Committee/Chief Financial Officer and Compliance Officer, the preliminary inquiry report requires further investigation, the same shall be submitted to:

1. Managing Director/Board
2. Inquiry Committee

The Compliance Officer shall intimate SEBI about the Leak or suspected Leak of UPSI.

5.4 Constitution of Inquiry Committee:

The Inquiry Committee shall consist of minimum 3 Members which shall include the following persons or any persons nominated by Managing Directors/Chief Financial Officer/Compliance Officer-

- Managing Director
- Chief Financial Officer
- Head of Legal Department
- Head of Human Resources Department

In case of conflict of interest in any referred case, the member of the committee shall recuse himself/herself from the inquiry.

5.5 Initiation of Investigation by Inquiry Committee:

The Inquiry Committee shall conduct investigation upon receipt of report of preliminary inquiry and complete the said investigation within 7 working days.

The Inquiry Committee's investigation report shall be submitted to the Chairman of Audit Committee/ Board immediately. The Company shall promptly intimate SEBI of the results of such inquiries.

6. Power of the Inquiry Committee

The Inquiry Committee while conducting inquiry shall exercise the following powers:

- (a) Call any employee or individuals for seeking clarification or information on the leak
- (b) Call persons/members of committees or individuals involved in generation of original financial data/consolidation of data for financial results/preparation of presentation, Board Notes and dissemination of information on public domain.
- (c) Call any persons or connected persons who had access to UPSI
- (d) Engage any external investigators or experts
- (e) Take necessary actions including sending the delinquent on leave, restrict physical access to the office premise, freeze access to systems, emails etc. during the pendency of the investigation.
- (f) Keep the identity of the delinquent confidential till the completion of inquiry unless

essentially required for the purpose of investigation.

- (g) Intimate the delinquent of the allegations and provide him/her an opportunity of being heard.
- (h) Do all such acts, deeds, matters and things as are necessary for the purpose of conduct of internal investigation.

7. Disciplinary Action

The disciplinary action against Delinquent may be taken within 15 days from receipt of investigation report by Chairman of Audit Committee/ Board.

The disciplinary action(s) may include wage freeze, suspension, recovery, claw back, termination etc. as may be decided by the Audit Committee/Board.

8. Amendment

The Board of the Company, subject to applicable laws, rules & Regulations, may amend/ substitute any provision(s) with a new provision(s) or replace this entire Policy with a new Policy.

In any circumstance where the terms of this Policy differ from any law, rule, regulation etc. for the time being in force, the law, rule, regulation etc. shall take precedence over this Policy.

The Company Secretary or Managing Director of the Company is authorized to make such modifications in the Code time to time, as may be required to ensure compliance of the provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (as amended from time to time).

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURES OF UNPUBLISHED PRICE SENSITIVE INFORMATION

This following intends to formulate the policy for fair disclosure of UPSI and the Board of Directors shall adhere to it in letter and in spirit.

Principles of fair Disclosure and Conduct

- ✓ Prompt public disclosure of UPSI that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available;
- ✓ Uniform and universal dissemination of UPSI information to avoid selective disclosure;
- ✓ Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- ✓ Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- ✓ Developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
- ✓ Ensuring that information shared with analysts and research personnel is not UPSI;
- ✓ Handling of all UPSI on a need-to-know basis.

Policy for determination of 'legitimate purpose'

- ✓ In terms of the SEBI PIT Regulations, the term "legitimate purpose" is clarified to include sharing of UPSI in the ordinary course of business by an insider with Company's partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing of UPSI has not been carried out to evade or circumvent the prohibitions of the SEBI Regulations;
- ✓ The SEBI PIT Regulations require the Board to formulate a policy for determination of 'legitimate purpose', in line with the guidance provided in the SEBI Regulations. The assessment of whether sharing of UPSI for a particular instance would tantamount to 'legitimate purpose' would entirely depend on the specific facts and circumstances of each case. Accordingly, this Policy only sets out the principles that should be considered while assessing if the purpose for which UPSI is proposed to be shared is "legitimate";
- ✓ Primarily, the following factors should be considered:
 - whether sharing of such information is in the ordinary course of business of the Company;
 - whether information is sought to be shared to evade or circumvent the prohibitions of the Regulations;
 - whether sharing the information is in the best interests of the Company or in furtherance of a genuine commercial purpose;
 - whether the information is required to be shared for enabling the Company to discharge its legal obligations;
 - whether the nature of information being shared is commensurate to the purpose for which access is sought to be provided to the recipient.
- ✓ It is clarified that in the event there exist multiple purposes for sharing UPSI, each

purposes will be evaluated on its own merits, in line with the aforementioned principles;

- ✓ The recipient of UPSI shall be informed of the following, by way of written intimation and/ or contractual agreement, such as, confidentiality agreement or non – disclosure agreement, that:
 - the information being shared is UPSI and that the Company is the exclusive owner of such UPSI;
 - upon receipt of UPSI, the recipient would be deemed to be an Insider and subject to the provisions of the SEBI Regulations,
 - the recipient must maintain confidentiality of the UPSI at all times,
 - the recipient may use the UPSI only for the approved purposes for which it was disclosed;
 - the recipient should provide a written undertaking that he/she/it shall not undertake Trades in the securities of the Company while in possession of the UPSI;
 - the recipient must extend all cooperation to the Company, as may be required in this regard, and;
 - the recipient must also adopt a code of conduct in terms of Regulation 9 of the SEBI Regulations, to inter alia ensure that it safeguards the UPSI in line with the SEBI Regulations;
- ✓ The information should be shared by the Company, from time to time, in the ordinary course of its business activities with its advisers and service providers, viz., auditors, merchant bankers and legal advisers/consultants of the Company, in line with the aforementioned principles;
- ✓ Additionally, the Board, or the Compliance Officer or any person authorised by the Board in this regard, shall be responsible for maintaining structured digital database, in compliance with the SEBI Regulations, comprising necessary details of all recipients of UPSI, who receive UPSI in compliance with the SEBI Regulations, including, name, address, email, Permanent Account Number (PAN), or any other identifier authorised by law (where PAN is not available) and such other documents as may be necessary, in the manner that may be prescribed by the Board or SEBI. In this regard, adequate systems and controls shall be put in place to ensure compliance with the SEBI Regulations towards sharing of UPSI for legitimate purposes.

Amendment of this Policy

The Board reserves the right to amend or modify this policy in whole or in part, as it may deem appropriate, to ensure compliance with the SEBI Regulations.

APPLICATION FOR TRADING PLAN

To,
The Compliance Officer
EPACK Durable Limited

Date: _____

1. Name of the Applicant: _____ PAN _____

2. No. of securities held in the Company as on date: _____

3. Approval sought Self Immediate Relative (IR)
 for:

4. Trading plan belongs for a period of _____ months i.e. for a period commencing from _____ and ending on _____

5. Details of the proposed trade:

S. No.	Nature of transaction (Sale/Purchase)	Date of transaction/period/interval for transaction	Value of trade/ No. of securities transacted	Conditions /Remarks

Undertaking:

- a) I will not commence trading earlier than six months from the public disclosure of the plan.
- b) I do not have overlapping trading plan for the same period.
- c) In the event that I am in possession/knowledge of any information that is construed as “Unpublished Price Sensitive Information” as defined in the Policy, at the time of formulation and approval of this plan but which is not made public at the time of trading as per the approved time schedule in the said plan, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public;
- d) I have not contravened the provisions of the Insider Trading Policy as notified by the Company from time to time;
- e) I have made full and true disclosure in the matter.
- f) I undertake to abide by this trading plan once approved and shall furnish such declarations/ disclosures as may be deemed necessary by compliance officer for the monitoring of this plan.
- g) I shall not use this trading plan as a tool for market abuse

Signature:

Date:

For use of Compliance Officer:

Application recd. date	Approval Date	Approval No.	Compliance Officer's signature

Approval granted for Trading Plan for a period of ___months commencing from _____ up till _____

Notification to Stock Exchange _____

Signature of Compliance Officer:

APPLICATION FOR PRE - DEALING APPROVAL

Date: _____

To,
The Compliance Officer,
EPACK Durable Limited

APPLICATION FOR PRE-DEALING APPROVAL IN SECURITIES OF THE COMPANY

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct for Prevention of Insider Trading, I seek approval for _____ [TYPE OF TRADE] of the Securities of the Company as per the details given below:

NAME : _____
EMPL NO.: _____
DESIGNATION : _____
DEPARTMENT: _____
LOCATION : _____
PAN Number: _____

*Name of Proposed Buyer/Seller	Nature of transaction (Buy/ sell/ subscribe)	No. of Securities to be Bought/Sold	Date of purchase /allotment	DP/BEN ID of the account / folio no. where the securities will be credited/debited

* applicable for off market transaction

I enclose herewith the form of Undertaking

ANNEXURE 1A**UNDERTAKING ACCOMPANIED WITH THE APPLICATION FOR PRE-DEALING APPROVAL**

To,
The Compliance Officer,
EPACK Durable Limited

I, _____, resident of _____, hereby declare that I am _____ (Employee/Director/Promoter/KMP) of EPACK Durable Limited. I am currently designated as _____.

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 Conduct for Prevention of Insider Trading (the "Code") up to the time of signing this Undertaking.

In case I have access to or I receive any Price Sensitive Information after signing this Undertaking but before execution of the transaction, I shall inform the Compliance Officer of the change in my position and I would, and ensure that my Dependents would completely refrain from Dealing in the Securities of the Company till the time such Price Sensitive Information becomes public. I declare that I have not contravened the Code as notified by the Company from time to time.

I undertake to disclose to the Company and to the stock exchange the execution of the transaction within 2 (two) trading days of such execution.

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.

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

Name: _____

CONFIRMATION OF TRANSACTION EXECUTED/NOT EXECUTED PURSUANT TO PRE-CLEARANCE

To,
The Compliance Officer,
EPACK Durable Limited

I _____, hereby inform you that I/my immediate relative

• **have not executed the trade in Securities of the Bank, pursuant to pre-clearance approval dated _____ due to _____ (reason)**

OR

• **have executed the trade in securities of the Bank, as mentioned below pursuant to pre-clearance approval dated _____:**

Name of the holder	Relationship with Designated Person	No. of Securities dealt with	Bought / Sold/ Subscribed	Date	DP ID/Client ID / Folio No.	Price/Securities (INR)	Total Value of trade

I declare that the above information is correct and that no provisions of the Share Dealing Code of the Bank and/or applicable laws/regulations have been contravened the above said transactions(s).

Date : _____

Name : _____

Designation: _____

Employee No.: _____

Application for Waiver of Restriction on undertaking Contra Trade Transactions

Date:

To,
The Compliance Officer
EPACK Durable Limited

Dear Sir/Mam,

I request you to grant me waiver from:

- a) the restriction of undertaking an 'opposite transaction' of sale of securities;
- b) the minimum holding period of 6 months;

to SALE _____ (Quantity of shares) shares of EPACK Durable Limited.; as required under clause 6.9 of the Code with respect to the following securities held by me or my relative:

Name	Relation	Folio No, / DP ID / Client IDNo.	Type of Security	No. of Securities	Date of Acqn.

The reasons for seeking this waiver are given below:

I hereby state that I do not have any information that could be construed as "Unpublished Price Sensitive Information" as defined in the Code or the Insider Trading Regulations up to the time of signing this undertaking on the basis of which, the proposed transaction is to be executed;

Thanking You,
Yours
faithfully,

Name :
Designation :

FORM B

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (1) (b) read with Regulation 6(2) - Disclosure on becoming a Key Managerial Personnel/Director/Promoter/Member of the promoter group]

Name of the Company: EPACK Durable Limited

ISIN of the company: INE0G5901015

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter or member of the promoter group of alisted company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).						Details of Open Interest (OI) in derivatives on the securities of the company held on appointment of KMP or Director or upon becoming a Promoter or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).					
Name, PAN, CIN/DIN & Address with contact nos.	Category of Person (KMP / Director or Promoter or member of the promoter group/ Immediate relative to/others, etc.)	Date of appointment of KMP/Director / OR Date of becoming Promoter/ member of the promoter group	Securities held at the time of appointment of KMP/Director or upon becoming Promoter or member of the promoter group		% of shareholding	Open Interest of the Future contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group			Open Interest of the Option Contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group		
			Type of securities (For eg. - Shares, Warrants, Convertible Debentures, Rights entitlements, etc.)	No.		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
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.						Note: In case of Options, notional value shall be calculated based on premium plus strike price of options.					

Name & Signature: _____

Designation: _____

Date: _____

Place: _____

Annexure V

To
The Compliance Officer
EPACK Durable Limited

Dear Sir,

Sub: Statement of Holdings of Securities

I, _____ (Name), _____ (designation), R/o _____,
confirm the following detail in respect of securities held by me:

i) Statement of Holdings of Designated Person

No. of shares held on 1 st April _____	No. of shares bought / sold during the financial year	Date of purchase / sale of shares during the financial year	No. of shares held as on 31 st March, _____	Folio No./ DP ID/ Client ID

ii) Statement of Holdings of Immediate Relative of Designated Person

Name of immediate Relative	Relationship	No. of shares held on 1 st April _____	No. of shares bought / sold during the financial year	Date of purchase / sale of shares during the financial year	No. of shares held as on 31 st March, _____	Folio No./ DP ID/ Client ID

Signature:

Name:

Place:

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

Name of the company: EPACK Durable Limited

ISIN of the company: INE0G5901015

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

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

Note: (i) "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.
(ii) Value of transaction excludes taxes/brokerage/any other charges

Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or Director of a listed company and immediate relatives of such persons and other such persons 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)	
16	17	18	19	20	21	22

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

Name & Signature: _____

Designation: _____

Date: _____

Place: _____

FORM FOR ANNUAL DISCLOSURE BY DESIGNATED PERSONS

Date: _____

Disclosure for the year ended	_____ DATE UPTO
Name of the Designated Person	
PAN Number	
DIN/CIN Number	
Employee Number , if applicable	
Company on whose Rolls placed	
Contact address with contact details and Email ID	Address : Mobile NO :
Connection with the Designated person or Company, as applicable	

A. Details of Securities Held by Employee and Immediate Relative

Name & PAN	Relationship	Type of Securities	Folio No. / DPID / Client ID	Securities held as at beginning of the year	Type of Trade	Quantity Traded	Date of Trade	Mode of Acquisition *	Securities held as at end of the year

I confirm that:

- i. I was not in possession of unpublished price sensitive information at the time of trading in Securities of the Company;
- ii. The aforesaid trades were executed when the Trading Window was open and disclosures wherever required has been made by me to the Company from time to time;
- iii. I have duly pre-cleared trades from the Compliance Officer;
- iv. I have held Securities purchased by me, directly or indirectly through my immediate relatives, for more than 6 months. If the Securities were not held for 6 months, I have taken due approval from the Compliance Officer for the same;
- v. I undertake to fully adhere to the standards and requirements specified by SEBI, from time to time, in relation to SEBI (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto; and
- vi. All information given above is true to the best of my knowledge and belief.

ANNEXURE 6**DISCLOSURE OF PARTICULARS BY PROMOTER / MEMBER OF PROMOTER GROUP / KEY MANAGERIAL PERSONNEL / DIRECTOR/ DESIGNATED PERSON****PART A- Details required for making entry into the Register of Designated Persons**

Date : _____

To,
The Compliance Officer
EPACK Durable Limited
61B, Udyog Vihar, Surajpur, Kasna Road,
Greater Noida, Gautam Buddh Nagar-201306

Dear Sir,

My Personal details are as under:

NAME OF PROMOTER/MEMBER OF PROMOTER GROUP/KEY MANAGERIAL PERSONNEL (KMP)/DIRECTOR /DESIGNATED PERSON:	
#EMPL NO.	
#GRADE:	
#DEPARTMENT	
FOLIO NO.: / DP ID. & CLIENT ID.:	
#MOBILE NO.:	
PAN/OTHER ID. NO.	
DATE OF APPOINTMENT	

Pursuant to the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct for Prevention of Insider Trading, I hereby declare that I have the following Immediate Relative(s):

S.No.	Name of the Immediate Relative	Relationship with Director/KMP/Designated Person	PAN/Other	Folio No. / DP Id. & Client Id.	Details of Security/(ies) Held	Address, Phone & Mobile Nos.

Details of Material Financial Relationship

S.No.	Name of Person with whom I share a Material Financial Relationship	PAN / Other id. No.:	Folio No. / DP Id & Client Id	Phone Nos. & Mobile No.

Details of my Previous Employers

S.No.	Name of the Company	Designation	Date From	Date To

Details of my Education

S.No.	Name of the Institution	Place	Qualification	Date From	Date To

I hereby undertake to inform changes, if any, in the above details from time-to-time. I hereby declare that the above details are true, correct and complete in all respects.

Name : _____

Note:

1. "immediate relative" means a spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities
2. "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 from a designated person during the immediately preceding twelve months, equivalent to at least 25% of the annual income of such designated person but shall exclude relationships in which the payment is based on arm's length transactions.

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 of the company: **EPACK Durable Limited**

ISIN of the company: INE0G5901015

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

Name, PAN No., CIN/DIN & address with contact nos.	Connection with the Company	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/acquisition of shares/sale of shares specify		Date of intimation to the Company	Mode of acquisition (market purchase/public rights/preferential offer / off market/ Inter-se transfer etc.
		Type of security (For e.g. - Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For e.g. - Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/Sale/Pledge / Revoke / Invoke)	Type of security (For e.g. - Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	From	To		
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)	(11)	(12)	(13)	(14)

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 other Connected Person as identified by the Company

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

Name:

Signature:

Date:

Place: