

Apoorva Leasing Finance and Investment Company Limited

CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING

1. This Code of Conduct may be known as “**APOORVA LEASING FINANCE AND INVESTMENT COMPANY LIMITED Code of Conduct for Prevention of Insider Trading**”, hereinafter referred to as the “Code of Conduct”, duly modified/substituted and approved by the Board of Directors pursuant to revised SEBI (Prohibition of Insider Trading) Regulations, 2015 notified by SEBI vide Notification No. LAD-NRO/GN/2014-15/21/85.dated 15th January, 2015.
2. This Code of Conduct has been made pursuant to Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended and may be modified by the Board of Directors of the Company from time to time.

3. Definitions

For the purpose of this Code of Conduct:

- a. “**Act**” means the Securities and Exchange Board of India Act, 1992 (15 of 1992).
- b. “**Stock Exchange**” means a stock exchange which is recognized by the Central Government or SEBI under Section 4 of Securities Contracts (Regulations) Act, 1956 (42 of 1956).
- c. “**Regulations**” means the SEBI (Prohibition of Insider trading) Regulations, 2015 as amended from time to time.
- d. “**Company**” means APOORVA LEASING FINANCE AND INVESTMENT COMPANY LIMITED , having its Registered and Corporate Office at New Delhi & Noida respectively.
- e. “**Board**” means the Board of Directors of Apoorva Leasing finance and Investment Company Limited.
- f. “**Compliance Officer**” means the Company Secretary who shall report to the Chairman & Managing Director (CMD). In the absence of the Company Secretary, any senior officer, designated so and reporting to the board of directors or head of the organization in case board is not there, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board of directors of the listed company or the head of an organization, as the case may be.

Explanation— For the purpose of this regulation, “financially literate” shall mean a person who has the ability to read and understand basic financial statements i.e. balance sheet, profit and loss account, and statement of cash flows

- g. “**Connected Person**” means
 - (i) any person who is or has during the six months prior to the concerned act been associated with a company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the company or holds any position including a professional or business relationship between himself and the company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.
 - (ii) Without prejudice to the generality of the foregoing, the persons falling within the following

categories shall be deemed to be connected persons unless the contrary is established,

- (a). an immediate relative of connected persons specified in clause (i); or
- (b). a holding company or associate company or subsidiary company; or
- (c). an intermediary as specified in section 12 of the Act or an employee or director thereof; or
- (d). an investment company, trustee company, asset management company or an employee or director thereof; or
- (e). an official of a stock exchange or of clearing house or corporation; or
- (f). a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
- (g). a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
- (h). an official or an employee of a self-regulatory organization recognised or authorized by the Board; or
- (i). a banker of the company; or
- (j). a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten per cent. of the holding or interest;

h. **“Director”** means Directors on the Board of the Company.

i. **“Designated person”** would include the following categories of employees, for the purpose of this Code –

- (i) all Directors (Non-Board), Presidents & Vice Presidents of the Company and their Dependent family members.
- (ii) all Directors of the Companies under the same management and their Dependent family members.
- (iii) officers in the rank of General Manager and above working in Accounts, Finance, Secretarial and legal departments at the Corporate Office and their Dependent family members and
- (iv) Employees in the cadre of Assistant/Associate Vice President and above;.
- (v) Permanent invitees/invitees to the board meeting and committee meetings
- (vi) Members of executive committee of the Company not being directors
- (vii) Personal assistant/secretary to all the above persons;
- (viii) Employee in the Secretarial, Legal, finance, accounts Department
- (ix) And such other persons as may be notified by the Compliance Officer as per direction of the Board.

j. **“Dependant family members”** for this purpose means dependant parents, dependent children, dependant spouse and such other family members of the Specified Persons as may be notified by him/her.

k. **“Dealing in securities”** means an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in the securities of the Company either as principal or as an agent.

l. **“Generally Available Information”** means Information that is accessible to the public on a non-discriminatory basis.

m. **“Immediate Relative”** means a spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities.

n. **“Insider”** means any person who is:

- i) a connected person; or
- ii) In possession of or having access to unpublished price sensitive information;
- iii) any person who is in receipt of unpublished price sensitive information for legitimate purpose;

- o. “**KMP**” means Key Managerial Person, and includes-
- i. the Chief Executive Officer or the managing director or whole-time director or the Manager;
 - ii. the Company Secretary;
 - iii. the Chief Financial Officer; and
 - iv. Such other officer as may be appointed by the Board of Directors of the Company as Key Managerial Person
- p. “**Legitimate purpose**” shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partner(s), collaborator(s), lender(s), customer(s), supplier(s), merchant banker(s), legal adviser(s), auditors, insolvency professional(s) or other adviser(s) or consultant(s), provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations
- q. “**Need to Know basis**” means that Unpublished Price Sensitive Information should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.
- r. “**Promoter and Promoter Group**” shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof;
- s. “**Securities**” shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 or any modification thereof except units of a mutual fund;
- t. “**Trading**” means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and “**Trade**” shall be construed accordingly.
- u. “**Trading day**” means a day on which the recognized stock exchanges are open for trading;
- v. “**Trading Window**” shall refer to specified period during which the trading in securities of the Company is permitted. During the closure of Trading Window, trading in Company’s securities is prohibited for designated persons and is restricted for other employees.
- w. “**Unpublished Price Sensitive Information**” means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: –
- Financial Results (quarterly, half-yearly and annual).
 - Dividends (interim and final).
 - Change in Capital Structure.
 - mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
 - changes in key managerial personnel.
 - Any information which, if disclosed, in the opinion of the person disclosing the same is likely to materially affects the prices of the securities of the Company.

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

4. Responsibilities of Compliance Officer

- a. The Company Secretary/ any other Person authorized by the Board of the Company shall be its Compliance officer. The Compliance officer shall report to the Board of Directors/ Audit Committee/ Stakeholder committee (by whatever name called).
- b. The Compliance officer shall be responsible for setting the policies, procedures, monitoring adherence to the rules and regulation for preservation of Price Sensitive Information, monitoring the trades and implementation of code of conduct under the overall supervision of the Code of Conduct of the Company.
- c. The Compliance officer shall be responsible for pre-clearing of transactions of designated employees and the dependents of such employees.
- d. The Compliance officer shall maintain Register of Designated employees and also record any changes amongst them.
- e. The Compliance Officer shall assist all the designated persons in clarifying any issues relating to the Compliance of SEBI (Prohibition of Insider Trading) Regulation, and also the code of Conduct of the Company.

5. Preservation of “Price Sensitive Information”

- a. No Designated person/Insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to the company, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performances of duties or discharge of legal obligations.

All Designated persons shall maintain confidentiality of all Unpublished Price Sensitive Information (“UPSI”) coming into their possession or control and shall not, inter alia:

- (a) pass on UPSI to any person directly or indirectly by way of making a recommendation for purchase or sale of securities of the Company, or
- (b) disclose UPSI to their family members, friends, business associates or any other individual, or
- (c) discuss UPSI in public places, or
- (d) disclose UPSI to any other employee who does not need to know the information for discharging his or her professional duties, or
- (e) recommend to anyone that they may undertake trading in Securities of the Company while being in possession, control or knowledge of UPSI, or
- (f) be seen or perceived to be trading in Securities of the Company on the basis of UPSI.

b. Limited access to confidential information

The Directors, Designated Persons, Connected Persons and concerned Advisers or Consultants or Retainers of the Company shall keep the files containing confidential Price Sensitive Information duly secured and computer files must be kept with adequate security of login and password, etc.

C. Receipt of UPSI for legitimate purpose

Receipt of Unpublished Price Sensitive Information for legitimate purpose shall be considered as insider for the purpose of this code. Accordingly, the person who shares UPSI shall give proper notice to the recipient of UPSI to maintain confidentiality of such UPSI in compliance with SEBI (PIT) Regulations, 2015.

6. Trading Plan

(a) An insider shall be entitled to formulate a trading plan and present it to the compliance officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.

(b) Such trading plan shall:–

- a) not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
- b) not entail trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced by the issuer of the securities and the second trading day after the disclosure of such financial results;
- c) entail trading for a period of not less than twelve months;
- d) not entail overlap of any period for which another trading plan is already in existence;
- e) set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
- f) Not entail trading in securities for market abuse.

(c) The Compliance Officer shall review the trading plan to assess whether the plan has the potential for violation of the PIT Regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan. However, pre-clearance of trades shall not be required for a trade executed as per an approved trading plan. Moreover, trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

(d) The trading plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan. However, the implementation of the trading plan shall not be commenced if any unpublished price sensitive information in possession of the insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation and in such event the compliance officer shall confirm that the commencement ought to be deferred until such unpublished price sensitive information becomes generally available information.

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

7. Trading Window and prohibition on dealing during Window closure

(i). The Company shall specify a trading period, to be called “Trading Window”, for trading in the Company’s Securities. When the Trading Window is closed, all Designated Persons (including their immediate relatives) and all promoters including member of promoter group shall not trade in the Company’s securities in such period.

(ii) The trading window shall be, *inter alia*, closed at the time of:

- a) financial results*;
- b) dividends;
- c) change in capital structure;
- d) mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
- e) Changes in key managerial personnel.

Trading restriction period can be made available from the end of every quarter till 48 hours after the declaration of financial results

- (iii) The time for re-opening of Trading Window shall be determined by the Compliance Officer taking into account various factors including the Unpublished Price Sensitive Information in question becoming generally available and being capable of assimilation by the market, which in any event shall not be earlier than 48 hours after the information referred to above becomes public/generally available.
- (iv) The trading/dealings in Company's securities by all Designated Persons (including their immediate relatives) shall be conducted during the period when the trading window is open subject to pre-clearance by Compliance Officer, or as per approved trading plan and shall not deal in any transaction involving the purchase or sale of the Company's Securities during the periods when Trading Window is closed, or during any other period as may be specified by the Compliance Officer from time to time.

In case of ESOPs, exercise of option may be allowed in the period when the trading window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when the trading window is closed.

8. Pre-clearance of Trades

All Designated who intends to trade in the Securities either in his own name or in the name of their Immediate Relatives exceeding Rs. 10,00,000/- in value or 25,000 shares or 1% of total shareholding or voting rights, whichever is lower per transaction shall make:

- i. An application in Form -1 to the Compliance Officer for pre-clearance of the transaction indicating the estimated number of securities to deal in, the details of depository with which the security account opened and mode in which security held; along with the following undertaking:
 - a. that he/she does not have any access or has not received "Unpublished price sensitive information" upto the time of signing the undertaking.
 - b. that incase he/she has access to or receives "Unpublished price sensitive information" after signing of the undertaking but before the execution of the transaction, he/ she shall inform the Compliance Officer of the change in his/her position and that he/she would completely refrain from dealing in the securities of the Company till the time such information becomes public.
 - c. that he/she has not contravened the code of conduct for prevention of insider trading as notified by the Company from time to time.
 - d. that he/she has made a full and true disclosure in the matter.
- ii. Only after receiving the clearance, the transaction should be carried out.
- iii. The execution of the transaction in respect of the shares/securities of the Company shall be completed within one week of approval of pre-clearance given in Form -2 by the Company/Compliance Officer. If the transaction is not executed within one week after the approval is given, the Insider must pre-clear the transaction again.
- iv. The Compliance officer shall grant approval within 2 working days from the date of receipt of the application.
- v. All directors/ officers/ designated persons who buy or sell any number of shares of the Company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction. Any contra trade be executed, inadvertently or otherwise, the profits from such trade shall be liable to be disgorged for remittance to the Board for credit to Investor Protection and Education Fund administered by SEBI. All directors/ officers/ designated persons shall also not take positions in derivative transactions in the shares of the Company at any time.
- vi. In the case of subscription in the primary market (initial public offers), the above mentioned entities shall hold their investments for a minimum period of 30 days. The holding period would

commence when the securities are actually allotted.”

- vii. In case of sale of securities is necessitated by personal emergency, holding period may be waived by the compliance officer after recording in writing his/her reasons in this regard.

9. Reporting Requirement

A. Initial Disclosure

- i. Every person on appointment as key managerial personnel or a director of the company or upon becoming a promoter or member of the promoter group shall disclose his holding of securities of the company as on the date of appointment or becoming a promoter, to the company within seven days of such appointment or becoming a promoter in Form B

B. Continual Disclosure

- i. Every promoter, member of the promoter group, Designated person and director of every company shall disclose to the company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of ten lakh rupees or such other value as may be specified in Form C
- ii. company shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.

C. Disclosures by other connected persons.

Company may at its discretion require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the company in Form-D at such frequency as may be determined by the company in order to monitor compliance with these regulations.

D. Annual Disclosure

Designated persons of the Company shall submit to the Company in Form 3, Annual statement, indicating the details of the shares/securities of the Company held by him/her and his/her dependent family members, as at the end of every financial year within one month from the date of completion of such financial year.

10. Maintenance of Structured Digital Database

The Company shall maintain a structured digital database containing the names of such persons or entities as the case may be with whom information is shared under this code read with PIT Regulations, along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available.

The said digital database shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.

11. Penalty/Punishment

Any Director/Designated person and their dependent family members who trades in securities or communicates any information for trading in securities, in contravention of the code of conduct, may be penalised and the Company may take appropriate action, based on a report submitted by the ‘Compliance Officer’ to the CMD.

Any Director/Designated person and their dependent family members who violates the code of conduct shall also be subject to disciplinary action by the Company, which may include salary freeze, suspension, ineligible for future participation in employee stock option,

The action by the Company will not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Form-1 (PCT-ALF)

To
The Compliance Officer
Apoorva Leasing Finance and investment Company Ltd..

Pre-clearance of trade in Company's Securities.

Sir / Madam,

I have been identified by the Company as Designated person/ Director for the purpose Insider Trading Code. I intend to Buy/Sell _____ no of equity shares/securities / debentures / other securities of the Company on _____20_____ at a proposed price of Rs. _____. Please grant approval for the same.

I am holding Shares/securities in Physical/ Demat mode.

Client Id _____
Name of Depository _____ Branch _____
(Shares/securities are held in Demat form.)

In respect of above dealing, I undertake that :

- a. I have no access or nor do I have any information that could be constructed as "Unpublished Price Sensitive Information" upto the time of signing the undertaking.
- b. In the event I have access to or received "Price Sensitive Information" after the signing of this undertaking but before the execution of the transaction for which approval is sought, I shall inform the Compliance officer of the change in his position and shall completely refrain from dealing in the securities of the Company till the time such information becomes public.
- c. I have not contravened the code of conduct for prevention of insider trading as notified by the Company from time to time.
- d. I have made a full and true disclosure in the matter

Please acknowledge the receipt of this application.

Thanking you,

Signature
Name :

Place :
Date :

FORM A

SEBI (Prohibition of Insider Trading) Regulations, 2015[Regulation 7 (1) (a) read with Regulation 6 (2) – Initial disclosure to the company]

Name of the company: _____

ISIN of the company: _____

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

Name, PAN, 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 Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
6	7	8	9	10	11

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

Name & Signature:

Designation:

Date:

Place

FORM B

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: _____

ISIN of the company: _____

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 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		% Shareholding
			Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements, etc.)	No.	
1	2	3	4	5	6

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 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).

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		
Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
7	8	9	10	11	12

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

Name & Signature: _____

Designation: _____

Date: _____

Place: _____

FORM C

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

Name of the company: _____
 ISIN of the company: _____

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 no.s	Category of Person (Promoters/ KMP / Directors / Immediate relative to / others etc)	Securities held prior to acquisition / disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/acquisition of shares/sale of shares specify		Date of intimation to company	Mode of acquisition / disposal (on market/public/rights/preferential offer / off market/ Inter-se transfer, ESOPs etc.)	Exchange on which The trade was executed
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of share holding	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No	Value	Transaction Type (Buy / Sale/ Pledge / Revoke/ Invo ke)	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of share holding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

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 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 D (Indicative format)

**SEBI (Prohibition of Insider Trading) Regulations, 2015 Regulation 7(3) – Transactions by
Other connected persons as identified by the company**

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

Name, PAN, CIN/DIN, & address with contact of other connected persons as identified by the company	Connection with company	Securities held prior to acquisition / disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/acquisition of shares/sale of shares specify		Date of intimation to company	Mode of acquisition / disposal (on market/public/rights/preferential offer / off market/ Inter-se transfer, ESOPs etc.)	Exchange on which the trade was executed
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of share holding	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No	Value	Transaction Type (Buy / Sale/ Pledge / Revoke/ Invoke)	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No. and % of share holding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

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 on the securities of the company by other connected persons as identified by the company

Trading in derivatives (Specify type of contract, Futures or Options etc.)						Exchange on which the trade was executed
Type of Contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lotsize)	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:

Place:

Date:

Form-2("PCO-ALF")

PRE – CLEARENCE ORDER

This is to inform you that your request for dealing in _____ (no.) of shares/securities of the Company as mentioned in your application is approved. Please note that the said transaction must be completed on or before _____ (date) that is within one week from today.

For Apoorva Leasing finance and Investment Company Ltd.

(Company secretary & Compliance Officer)

Date :

Place :

FORM 3

[ANNUAL DISCLOSURE]

To

**The Compliance officer,
Apoorva Leasing Finance and Investment Company Ltd.
C-1/9, Sector-31, Gautam Budh Nagar, Noida, U.P - 201301**

I. STATEMENT OF SHAREHOLDINGS OF DIRECTORS / DESIGNATED EMPLOYEES:

Name	Designation & Department	No. of Shares Held on 1st April 20__	No. of Shares Bought During the Year	No. of Shares Sold During the Year	No. of Shares held on 31 st March, 20__	Folio No / DP ID/ Client ID

II. DETAILS OF SHARES HELD BY DEPENDENT FAMILY MEMBERS OF DIRECTORS / DESIGNATED EMPLOYEES:

Name	Relationship	No. of Shares Held on 1st April 20__	No. of Shares Bought During the Year	No. of Shares Sold During the Year	No. of Shares held on 31 st March, 20__	Folio No / DP ID/ Client ID

I / We declare that the shares sold have been held by me / us for 30 days.

I / We further declare that the above disclosure is true and correct and is in accordance with the previous disclosures given to the Company.

(Signature)

Name :

Date :

Designation & Department :

Annexure “A”

The details by Compliance Officer

Initial Disclosure				
Sr. No.	Date of Disclosure to Company	Name and Designation	No. of Shares	Particulars

Continual Disclosure				
Sr. No.	Date of Disclosure to Company	Name and Designation	No. of Shares	Particulars

Annual Disclosure				
Sr. No.	Date of Disclosure to Company	Name and Designation	No. of Shares	Particulars

Annexure "B"

To,
Managing Director
Apoorva Leasing Finance and investment Company Ltd.
C-1/9, Sector-31, Noida, U.P - 201301

Statement of movements during the Month of, 20____

Sr. No.	Name	Designation	Holding beginning of the Month	Purchase during the period	Sale during the period	Holding end of the Month
PROMOTERS/DIRECTORS						
1.		Promoter/Director				
2.		Promoter				
3.		Director				
4.		Director				
5.		Director				
6.		Director				
7.		Director				
DESIGNATED EMPLOYEES						
8.		Employee				
9.		Employee				
10.		Employee				
11.		Employee				
12.		Employee				
13.		Employee				
14.		Employee				
		Secretary & compliance Officer				
15.						
DEEMED CONNECTED PERSONS						
16.		Statutory Auditor				
17.		Internal Auditor				
		Registrar & Share				
18.		Transfer Agent				

SCHEDULE A

[sub- regulation (1) of regulation 8]

Principles of Fair Disclosure for purposes of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

1. Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
3. Designation of a senior officer as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.
7. 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.
8. Handling of all unpublished price sensitive information on a need-to-know basis.