



CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY ITS EMPLOYEES AND OTHER CONNECTED PERSONS

Approved on: January 11, 2021

Registered Office: INDIGO Paints Limited (Formerly INDIGO Paints Pvt Ltd)

Indigo Tower, Street-5, Pallod Farm-2, Baner Road, Pune - 411045

T: +91 20 6681 4300, Email: info@indigopaints.com, Website: www.indigopaints.com, CIN: L24114PN2000PLC014669





Introduction

Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended by the Securities & Exchange Board of India (Prohibition of Insider Trading) (Amendment) Regulations, 2018 (“the Regulations”) require the board of directors of every listed company to, inter alia, ensure that the Chief Executive Officer or Managing Director shall formulate a code of conduct, with their approval, to regulate, monitor and report Trading by its Designated Persons (as defined hereinafter) and immediate relatives of Designated Persons by adopting the minimum standards set out in Schedule B to the Regulations.

In compliance with the aforesaid Regulations, the board of directors of Indigo Paints Limited (“the Company”) has approved this code of conduct to regulate, monitor and report Trading by Designated Persons, as formulated by the Chairman and Managing Director of the Company which shall be effective from the date the SEBI (Prohibition of Insider Trading) Regulations, 2015 taking effect with respect to the Company.

This Code is adopted by the board of directors of the Company (“Board”) on January 11, 2021.

The Company endeavors to preserve the confidentiality of Unpublished Price Sensitive Information (as defined hereinafter) and to prevent misuse of such information. The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations, as modified from time to time.

1. APPLICABILITY

This Code (as defined hereinafter) shall be applicable to all Designated Persons and relatives of Designated Persons.

2. DEFINITIONS

- 2.1 “Chinese Wall” means the limit up to which information may be revealed by an Insider in furtherance of the Insider’s legitimate purposes, performance of duties or discharge of his legal obligations.
- 2.2 “Code” means code of conduct to regulate, monitor and report Trading by Designated Persons and immediate relatives of Designated Persons as modified from time to time.
- 2.3 “Compliance Officer” for the purpose of the Regulations and this Code means the Company Secretary of the Company.
- 2.4 “Designated Employees” of the Company shall include:
 - i. All employees of the Company of the rank of Deputy General Managers and above;
 - ii. All employees in the finance and accounts department, secretarial and legal department,

Registered Office: INDIGO Paints Limited (Formerly INDIGO Paints Pvt Ltd)

Indigo Tower, Street-5, Pallod Farm-2, Baner Road, Pune - 411045

T: +91 20 6681 4300, Email: info@indigopaints.com, Website: www.indigopaints.com, CIN: L24114PN2000PLC014669





- iii. taxation department, corporate strategy department except management trainees; and
 - iv. Any employee of the Company, not falling under the above class but who has access to Unpublished Price Sensitive Information.
- 2.5 "Designated Person" means -
- i. Board and promoters;
 - ii. Key managerial personnel as defined in the Companies Act, 2013;
 - iii. Designated Employees of the Company; and
 - iv. Connected Person as defined in the Regulations
- 2.6 "Immediate Relative" shall have the same meaning as defined in the Regulations.
- 2.7 "Insider" shall have the same meaning as defined under the Regulations and / or as decided by the Compliance Officer, in consultation with the Chairman and Managing Director of the Company, as and when required.
- 2.8 "Securities" shall have the same meaning as defined in the Regulations.
- 2.9 "Specified Persons" means all Directors, Connected Persons, Insiders, Employees, Promoters and their Immediate Relatives.
- 2.10 "Takeover Regulations" means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;
- 2.11 "Trading" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any Securities, and "trade" shall be construed accordingly.
- 2.12 "Unpublished Price Sensitive Information" or "UPSI" means any information, relating to a company or its Securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the Securities and shall, ordinarily including but not restricted to, information relating to the following: -
- i. financial results;
 - ii. dividends;
 - iii. change in capital structure;
 - iv. mergers, de-mergers, acquisitions, delisting's, disposals and expansion of business and such other transactions;
 - v. changes in key managerial personnel;
 - vi. such other information as determined by the Board/Chief Executive Officer/ Chief Financial Officer from time to time.

Words and expressions used but not defined in this Code shall have the same meaning assigned to them in the Regulations, 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), the Companies Act, 2013 (18 of

Registered Office: INDIGO Paints Limited (Formerly INDIGO Paints Pvt Ltd)

Indigo Tower, Street-5, Pallod Farm-2, Baner Road, Pune - 411045

T: +91 20 6681 4300, Email: info@indigopaints.com, Website: www.indigopaints.com, CIN: L24114PN2000PLC014669





2013) and the rules made thereunder and amendments to such regulations and rules shall have the meanings respectively assigned to them in those legislations.

3. DUTIES OF THE COMPLIANCE OFFICER

- 3.1 The Compliance Officer 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 and shall have access to all information and documents relating to the Securities of the Company for the aforesaid purpose.
- 3.2 Grant of pre-Trading approvals to the Designated Persons for Trading in the Company's Securities by them / their Immediate Relatives and monitoring of such Trading.
- 3.3 The Compliance Officer shall maintain a record (either manual or in electronic form) of the Designated Persons and their Immediate Relatives and changes thereto from time-to-time.
- 3.4 The Compliance Officer shall assist all the Specified Persons in addressing any clarifications regarding the Regulations and this Code.
- 3.5 The Compliance Officer shall place a report to the Board and the Audit Committee on annual basis on the following:
 - i. Status of compliance of the Code;
 - ii. Status of compliance of the code of fair disclosure; and
 - iii. Details of Trading in Securities of the Company by Designated Persons.

4. VIOLATION(S), IF ANY, OF THE CODE PRESERVATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION ("UPSI")

- 4.1 Unpublished Price Sensitive Information may be communicated, provided, or allowed access to or procured, in connection with a transaction that would:
 - i. in furtherance of legitimate purposes, performance of duties or discharge of legal obligations pursuant to appropriate confidentiality and non-disclosure agreements being executed; or
 - ii. in the event the Board of Directors direct or cause the public disclosure of UPSI in the best interest of the Company; or
 - iii. within a group of persons if such persons have been identified and secluded within a "Chinese Wall" or information barrier by the Compliance Officer from the rest of the Company for a
 - iv. particular purpose or for a specified period of time in furtherance of legitimate purposes, performance of duties or discharge of legal obligations, and are subjected to, among other conditions, additional confidentiality obligations,

Registered Office: INDIGO Paints Limited (Formerly INDIGO Paints Pvt Ltd)

Indigo Tower, Street-5, Pallod Farm-2, Baner Road, Pune - 411045

T: +91 20 6681 4300, Email: info@indigopaints.com, Website: www.indigopaints.com, CIN: L24114PN2000PLC014669





information barriers designed to prevent exchanges of UPSI outside the “Chinese Wall”, and the execution of an undertaking by such persons to abstain and / or forego Trading during such execution or till the UPSI no longer constitutes UPSI.

- 4.2 UPSI shall be handled strictly on a “need to know” basis. This means that the UPSI shall be disclosed only to those persons who need to know the same in furtherance of a legitimate purpose, the course of performance or discharge of their duty and whose possession of UPSI will not in any manner give rise to a conflict of interest or likelihood of misuse of the information.
- 4.3 Files containing Unpublished Price Sensitive Information or any such related confidential information shall be kept secure. Computer files must have adequate security of login and password etc. Files containing confidential information should be deleted / destroyed on its expiry.

5. TRADING BY INSIDERS – RULES & RESTRICTIONS

- 5.1 No Insider shall trade in Securities of the Company that are listed or proposed to be listed when in possession of Unpublished Price Sensitive Information provided that the Insider may defend his action by giving valid reasons of the circumstances like:
 - i. the transaction is an off-market inter-se transfer between promoters who were in possession of the same Unpublished Price Sensitive Information without being in breach of the applicable provisions and both parties had made a conscious and informed trade decision;
 - ii. in the case of non-individual Insiders: –
 - (a) the individuals who were in possession of such Unpublished Price Sensitive Information were different from the individuals taking Trading decisions and such decision-making individuals were not in possession of such Unpublished Price Sensitive Information when they took the decision to trade; and
 - (b) appropriate and adequate arrangements were in place to ensure that these regulations are not violated and no Unpublished Price Sensitive Information was communicated by the individuals possessing the information to the individuals taking Trading decisions and there is no evidence of such arrangements having been breached;
 - iii. the trades were pursuant to a trading plan.
- 5.2 In the case of Connected Persons the onus of establishing, that they were not in possession of Unpublished Price Sensitive Information, shall be on such Connected Persons and in other cases, the onus would be on the Board.
- 5.3 No Designated Person shall at any time, enter into and take positions in derivative transactions in the Securities of the Company.
- 5.4 Irrespective of the fact that the Trading window is open, Designated Persons shall not, within six months of buying or selling any number of Securities of the Company, enter

Registered Office: INDIGO Paints Limited (Formerly INDIGO Paints Pvt Ltd)

Indigo Tower, Street-5, Pallod Farm-2, Baner Road, Pune - 411045

T: +91 20 6681 4300, Email: info@indigopaints.com, Website: www.indigopaints.com, CIN: L24114PN2000PLC014669





into an opposite transaction i.e. sell or buy, as the case may be, in any number of the Securities of the Company, except as provided under the Code. The Compliance Officer can grant relaxation from strict application of the above restriction after recording the reasons in this regard provided that such relaxation does not violate the Regulations. It may however, be noted that in terms of the Regulations, no such purchase/ sale will be permitted when the Trading window is closed. Notwithstanding the above, should the Designated Persons execute an opposite transaction, inadvertently or otherwise, in violation of the restrictions set out above, the profits from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the SEBI Act, 1992

- 5.5 The provisions of this Code shall be applicable for Trading either as first named shareholder or joint holder.
- 5.6 Creation of pledge is allowed when the Trading window is closed.
- 5.7 Trading restrictions under this Code are also applicable to Designated Persons who engage portfolio managers and it shall be responsibility of Designated Person to ensure that the portfolio managers complies with this Code.
- 5.8 In case of doubt, the Designated Person shall check with the Compliance Officer or the officer designated by him/her from time-to-time whether the provisions relating to preclearance are applicable to any proposed transaction in the Company's Securities.

6. ESOPS OF THE COMPANY

- 6.1 Exercising of ESOPs of the Company by its employees may be made at any time in accordance with the Company's ESOP scheme irrespective of trading window restrictions.
- 6.2 No prior approval is required for exercising options under ESOPs Scheme of the Company. However, pre-clearance should be obtained by Designated Persons for sale of such shares.
- 6.3 There would be no minimum holding period requirement applicable for equity shares allotted pursuant to the ESOP scheme of the Company.

7. TRADING PLAN

- 7.1 Insider may formulate a trading plan and present the same to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his/her behalf in accordance with such plan.
- 7.2 The following are the requirements of the trading plans:
 - i. Trading can be done after six months of commencement / public disclosure of the trading plan.
 - ii. Trading plan shall not entail Trading for the period between twentieth Trading day prior to 31st March of every year and the second Trading day after the disclosure of financial results.

Registered Office: INDIGO Paints Limited (Formerly INDIGO Paints Pvt Ltd)

Indigo Tower, Street-5, Pallod Farm-2, Baner Road, Pune - 411045

T: +91 20 6681 4300, Email: info@indigopaints.com, Website: www.indigopaints.com, CIN: L24114PN2000PLC014669





- iii. The trading plan shall not be for less than 12 months.
 - iv. The trading plan shall not entail overlap of any period for which another trading plan is in existence.
 - v. Insider shall 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.
- 7.3 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.
- 7.4 Provided that 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 its 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.
- 7.5 Further, the Designated Person(s) and/or Insider shall also not be allowed to deal in Securities of the Company, if the date of Trading in Securities of the Company, as per the approved trading plan, coincides with the date of closure of Trading window announced by the Compliance Officer.

8. TRADING WINDOW

- 8.1 The Trading window shall be closed from the end of every quarter and shall remain closed upto 48 hours after the declaration / publication of financial results.
- 8.2 The Compliance Officer shall also close the Trading window when he determines that a Designated Person or class of Designated Persons can reasonably be expected to have possession of UPSI. In respect of declaration of financial results, the Trading Window can be closed from the end of every quarter till 48 hours after the declaration of financial results which shall in any case remain closed at least from a date that is seven days prior to date of declaration of financial results till 48 hours after the declaration of financial results. In other cases, the trading window shall be opened 48 hours after the UPSI becomes generally available. The gap between clearance of accounts by audit committee and board meeting should be as narrow as possible and preferably on the same day to avoid leakage of material information.
- 8.3 The Designated Persons and their immediate relatives can trade Company shares only when the trading window is open.
- 8.4 The trading window shall be closed when Compliance Officer determines that Designated Person or a class of Designated Person are expected to be in possession of Unpublished Price Sensitive Information.
- 8.5 The Compliance Officer shall take all reasonable steps to ensure that the Designated Persons and/or Insiders are informed in advance, about the date of closing and opening of the trading window.





- 8.6 The timing for re-opening of the 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 forty-eight hours after the information becomes generally available.
- 8.7 Trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

9. PRE-CLEARANCE OF TRADES

- 9.1 Designated Persons may trade in the Securities of the Company when the trading window is open, after obtaining approval of the Compliance Officer by submitting an application as per Annexure 1 and an undertaking as per Annexure 2.
- 9.2 The Compliance Officer shall not approve any proposed trade by Designated Person if the Compliance Officer determines that such Designated Person is in possession of UPSI even though the trading window is open.
- 9.3 The Compliance Officer may, after being satisfied that the application and undertaking are true and accurate, approve Trading by a Designated Person, on the condition that the trade so approved shall be executed within seven Trading days following the date of approval.
- 9.4 The Designated Person shall, within two days of the execution of the trade, submit the details of such trade to the Compliance Officer as per Annexure 3. In case the transaction is not undertaken, a report to that effect shall be filed in the said form.
- 9.5 If the pre-cleared trade is not executed within seven Trading days after the approval is given, the Designated Person must secure pre-clearance of the transaction again.
- 9.6 A Designated Person who trades in Securities without complying with the preclearance procedure as envisaged in these Rules or gives false undertakings and/or makes misrepresentations in the undertakings executed by him/her while complying with the preclearance procedure shall be subjected to the penalties as envisaged in these Rules.
- 9.7 Nothing in this rule shall apply to any 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 less than Rs. 9,50,000 (Rupees Nine Lakh Fifty Thousand) (a "de minimis trade") provided the Designated Person is not in possession of UPSI while executing the de minimis trade.
- 9.8 Pre-clearance of trades shall not be required for a trade executed as per an approved trading plan.





10. REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES

10.1 General:

- i. The disclosures to be made by any person under this Code shall include those relating to Trading by such person's immediate relatives, and by any other person for whom such person takes Trading decisions.
- ii. The disclosures of Trading in Securities shall also include Trading in derivatives of Securities and the traded value of the derivatives shall be taken into account for the purpose of this Code.
- iii. The disclosures made under this Code shall be maintained for a period of five years.

10.2 Initial Disclosures:

- i. Every promoter, member of the promoter group, key managerial personnel and director, of the Company, within thirty days of these regulations taking effect, shall disclose his holding of Securities of the Company as on the date of these Regulations taking effect, to the Company within thirty days of these Regulations taking effect as per Form A set out in Annexure 4.
- ii. Every person on appointment as a 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 as per Form B set out in Annexure 4.

10.3 Continual Disclosures:

- i. Every promoter, member of the promoter group, Designated Person and the directors of the Company shall disclose to the Company the number of such Securities acquired or disposed of within two Trading days of such transactions 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 Nine lakh Fifty Thousand rupees as per Form C set out in Annexure 6.
- ii. The disclosure shall be made within two working days of the receipt of intimation of allotment of shares, or the acquisition or sale of shares or voting rights, as the case may be.
- iii. The Compliance Officer 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.





10.4 Additional Disclosures

The Compliance Officer 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 as per Form D set out in Annexure 7 and at such frequency as may be determined by the Compliance Officer in order to monitor compliance with the Code.

11. INTERNAL CONTROL

The Chairman and Managing Director of the Company shall put in place adequate and effective system of internal controls to ensure compliance with the requirements given in the Regulations as well as with this Code.

- 11.1 All the Unpublished Price Sensitive Information shall be identified and its confidentiality shall be maintained as per this Code and the Regulations.
- 11.2 Adequate restrictions shall be placed on communication or procurement of Unpublished Price Sensitive Information as required by these Regulations.
- 11.3 List of all employees and other persons with whom Unpublished Price Sensitive Information is shared shall be maintained and confidentiality agreement shall be signed or notice shall be served to all such employees and persons.
- 11.4 All other relevant requirements specified under the Regulations shall be complied with.
- 11.5 This Code shall be circulated by the human resource department amongst all the existing employees of the Company and in case of new joining at the time of his / her joining, irrespective of their functional role in the Company. This Code shall be circulated amongst the Designated Persons.
- 11.6 If an inquiry is initiated by the Company in case of reported leakage or suspected leak of UPSI, the Intermediaries and Fiduciaries engaged by the Company shall co-operate with the Company in connection with such inquiry conducted by the Company.
- 11.7 The Compliance Officer shall review the process to evaluate effectiveness of the internal controls at the end of every half year.
- 11.8 Notwithstanding anything contained hereinabove, the Audit Committee shall also review the compliance with the provisions of this Code and the Regulations at least once in a financial year and shall verify that the systems for internal control are adequate and are operating effectively.

12. PENALTY FOR CONTRAVENTION OF THE CODE

Every Designated Person shall be individually responsible for complying with the applicable provisions of this Code (including to the extent the provisions hereof are applicable to their Immediate Relatives).

Registered Office: INDIGO Paints Limited (Formerly INDIGO Paints Pvt Ltd)

Indigo Tower, Street-5, Pallod Farm-2, Baner Road, Pune - 411045

T: +91 20 6681 4300, Email: info@indigopaints.com, Website: www.indigopaints.com, CIN: L24114PN2000PLC014669





Any violation of this Code shall, in addition to any other penal action that may be taken by the Company pursuant to law, also be subject to disciplinary action which in respect of an employee may include wage freeze, suspension, recovery, claw back or termination of employment.

Action taken by the Company for violation of the Code against any person will not preclude SEBI from taking any action for violation of the Regulations or any other applicable laws/rules/regulations.

In case it is observed by the Company/Compliance Officer that there has been a violation of the Regulations, the Compliance Officer shall inform SEBI promptly.

13. AMENDMENT / MODIFICATION

The Board may, subject to applicable laws, amend/substitute any provision(s) with a new provision(s) or replace the Code entirely with a new Code.

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

The Code and any subsequent amendment(s) thereto, shall be promptly intimated to the Stock Exchanges.





INDIGO

Be surprised!

Annexure 1

APPLICATION FOR PRE-TRADING APPROVAL

To,
The Compliance Officer,
Indigo Paints Limited.

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Insider Trading Policy, I seek approval to purchase / sell / subscribe _____ equity shares of the Company as per details given below:

1. Name of the applicant :
2. Designation :
3. Number of Securities held as on date :
4. Folio No. / DP ID / Client ID No :
5. The proposal is for :
(a) Purchase of Securities
(b) Subscription to Securities
(c) Sale of Securities
6. Proposed date of Trading in Securities :
7. Estimated number of Securities proposed to be purchased/subscribed/sold :
8. Current market price (as on date of application) :
9. Whether the proposed transaction will be through stock exchange or off-market trade :
10. Folio No. / DP ID / Client ID No. where the Securities will be credited / debited :

I enclose herewith the Undertaking signed by me.

Signature: _____

Name:

Date:

Registered Office: INDIGO Paints Limited (Formerly INDIGO Paints Pvt Ltd)

Indigo Tower, Street-5, Pallod Farm-2, Baner Road, Pune - 411045

T: +91 20 6681 4300, Email: info@indigopaints.com, Website: www.indigopaints.com, CIN: L24114PN2000PLC014669





INDIGO

Be surprised!

Annexure 2

**UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION
FOR PRECLEARANCE**

To,
The Compliance Officer,
Indigo Paints Limited

I, _____, _____ of the Company
residing at _____, am desirous of Trading in
_____ shares of the Company as mentioned in my application dated _____ for
pre-clearance of the transaction.

I further declare that I am not in possession of any unpublished price sensitive information up
to the time of signing this Undertaking.

In the event that I have access to or receive any unpublished price sensitive information after
the signing of this undertaking but before executing the transaction for which approval is
sought, I shall inform the Compliance Officer of the same and shall completely refrain from
Trading in the Securities of the Company until such information becomes public.

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

In the event of this transaction being in violation of the Rules or the applicable laws, (a) I will,
unconditionally, release, hold harmless and indemnify to the fullest extent, the Company and
its directors and officers, (the 'indemnified persons') for all losses, damages, fines, expenses,
suffered by the indemnified persons, (b) I will compensate the indemnified persons for all
expenses incurred in any investigation, defence, or public relations activity in relation to this
transaction and (c) I authorize the Company to recover from me, the profits arising from this
transaction and remit the same to the SEBI for credit of the Investor Protection and Education
Fund administered by the SEBI.

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

If approval is granted, I shall execute the trade within seven days of the receipt of approval
failing which I shall seek pre-clearance afresh.

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

Signature: _____

Name:

Date:

Registered Office: INDIGO Paints Limited (Formerly INDIGO Paints Pvt Ltd)

Indigo Tower, Street-5, Pallod Farm-2, Baner Road, Pune - 411045

T: +91 20 6681 4300, Email: info@indigopaints.com, Website: www.indigopaints.com, CIN: L24114PN2000PLC014669





INDIGO

Be surprised!

Annexure 3

DISCLOSURE OF TRANSACTIONS

(To be submitted within 2 days of transaction / Trading in Securities of the Company)

To,

The Compliance Officer,
Indigo Paints Limited.

I hereby inform that I

- have not bought / sold/ subscribed any Securities of the Company
- have bought/sold/subscribed to _____ Securities as mentioned below on ____ (date)
(strike out whichever is not applicable)

Name of holder	No. of Securities traded	Bought / sold / subscribed	DP D/Client ID/Folio No.	Price (Rs.)

I declare that the above information is correct and that no provisions of the Company's Rules and/or applicable laws/regulations have been contravened for effecting the above said transactions(s).

Signature: _____

Name:

Date:

Registered Office: INDIGO Paints Limited (Formerly INDIGO Paints Pvt Ltd)

Indigo Tower, Street-5, Pallod Farm-2, Baner Road, Pune - 411045

T: +91 20 6681 4300, Email: info@indigopaints.com, Website: www.indigopaints.com, CIN: L24114PN2000PLC014669





INDIGO

Be surprised!

Annexure 4

Form A

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

To,

The Compliance Officer,

Indigo Paints Limited

(ISIN: _____)

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

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

Signature:

Designation:

Name:

Date:

Registered Office: INDIGO Paints Limited (Formerly INDIGO Paints Pvt Ltd)

Indigo Tower, Street-5, Pallod Farm-2, Baner Road, Pune - 411045

T: +91 20 6681 4300, Email: info@indigopaints.com, Website: www.indigopaints.com, CIN: L24114PN2000PLC014669





INDIGO

Be surprised!

Annexure 5

Form B

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

To,
The Compliance Officer,
Indigo Paints Limited
(ISIN: _____)

Details of Securities held on appointment of Key Managerial Personnel or Director or upon becoming a Promoter of Listed Company and other such persons as mentioned in Regulation 6(2) of SEBI Regulations.

Name, PAN No., CIN / DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors /immediate relatives/others etc.)	Date of appointment of Director /KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP		% of Share holding	Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option Contracts held as on the date of regulation coming into force	
			Type of security (For e.g. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms

Registered Office: INDIGO Paints Limited (Formerly INDIGO Paints Pvt Ltd)

Indigo Tower, Street-5, Pallod Farm-2, Baner Road, Pune - 411045

T: +91 20 6681 4300, Email: info@indigopaints.com, Website: www.indigopaints.com, CIN: L24114PN2000PLC014669





Signature:
Designation: Name: Date:

Registered Office: INDIGO Paints Limited (Formerly INDIGO Paints Pvt Ltd)

Indigo Tower, Street-5, Pallod Farm-2, Banor Road, Pune - 411045

T: +91 20 6681 4300, Email: info@indigopaints.com, Website: www.indigopaints.com, CIN: L24114PN2000PLC014669





Annexure 6

Form C

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

To,
The Compliance Officer,
Indigo Paints Limited
(ISIN: _____)

Details of change in holding of Securities of Promoter, Employee or director of a Listed Company and other such persons as mentioned in Regulation 6(2)

Name, PAN No., CIN/DIN, & address of Promoter/ Employee /Directors with contact nos..	Category of Person (Promoters/KMP/Directors / Immediate relatives/ 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 (market purchase/ preferential offer/ off market/ Inter-se transfer etc.	Exchange on which the trade was Executed
		Type of security (For eg. Shares, Warrants,	No. & % of shareholding	Type of security (For eg. Shares, Warrants,	No.	Value	Transaction type (Buy / sale/place/voke/invoke	No. & % of shareholding	Notional value in Rupee terms	From	To			

Registered Office: INDIGO Paints Limited (Formerly INDIGO Paints Pvt Ltd)

Indigo Tower, Street-5, Pallod Farm-2, Baner Road, Pune - 411045

T: +91 20 6681 4300, Email: info@indigopaints.com, Website: www.indigopaints.com, CIN: L24114PN2000PLC014669





		Convertible Debentures etc.)		Convertible Debenture										

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

Details of Trading in derivatives of the Company by Promoter, Employee or director of a Listed Company and other such persons as mentioned in Regulation 6(2)

Trading in derivatives (Specify type of contract, futures or options etc)						Exchange on which the trade was executed
Type of Contract	Contract Specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
N.A.	N.A.	N.A.	N.A.	N.A.	N.A.	N.A.

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

Signature:
Designation:
Name:
Date:

Registered Office: INDIGO Paints Limited (Formerly INDIGO Paints Pvt Ltd)

Indigo Tower, Street-5, Pallod Farm-2, Banor Road, Pune - 411045

T: +91 20 6681 4300, Email: info@indigopaints.com, Website: www.indigopaints.com, CIN: L24114PN2000PLC014669





Annexure 7
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

PAN No., CIN/DIN, & address of Connected Persons, as identified by the company with contact no's	Connection with the company	Securities held prior to acquisition/disposal		Securities acquired/disposed		% of shareholding		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to Company	Mode of acquisition (market purchase/ public rights/ preferential offer/ off market/ Inter-se transfer etc.)	Trading in derivatives (Specify type of contract, Futures or Options etc.)				Exchange	
		Type of security	No.	Type of security	No.	Pre transaction	Post transaction	From	To			Buy		Sell			
												Value	No. of Units	Value	No. of Units		

Registered Office: INDIGO Paints Limited (Formerly INDIGO Paints Pvt Ltd)

Indigo Tower, Street-5, Pallod Farm-2, Baner Road, Pune - 411045

T: +91 20 6681 4300, Email: info@indigopaints.com, Website: www.indigopaints.com, CIN: L24114PN2000PLC014669





Signature:
Designation:
Name:
Date:

Registered Office: INDIGO Paints Limited (Formerly INDIGO Paints Pvt Ltd)

Indigo Tower, Street-5, Pallod Farm-2, Baner Road, Pune - 411045

T: +91 20 6681 4300, Email: info@indigopaints.com, Website: www.indigopaints.com, CIN: L24114PN2000PLC014669

