

To,
BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai - 400001

Date: 31ST March, 2019

Ref: Symbol-OBCL; Scrip Code- 541206,

ISIN: INE426Z01016

Dear Sir/Madam,

Subject: Intimation regarding amending the Code of Internal Procedures & Conduct for Prevention of Insider Trading under the SEBI (Prohibition of Insider Trading) Regulations, 2015

As per captioned subject, We Orissa Bengal Carrier Ltd. (the "company") would like to inform you that the Board of Directors of company, through circular resolution dated 31ST March 2019 approved the amendments in its earlier Insider Trading Code, also renamed as "Code of Practices & Procedures and Code of Conduct to regulate, monitor and report trading in securities and Fair Disclosure of Unpublished Price Sensitive Information"(Revised Code) in accordance and in compliance with the SEBI(Prohibition of Insider Trading)(Amendment) Regulations 2018 and 2019.

The revised Code is enclosed herewith for your ready reference.

It will be effective from April 01, 2019 and will be made available on company's website at www.obclimited.com under Investor Information with effect from April 01, 2019.

This is for your information and record.

Yours Faithfully,
ORISSA BENGAL CARRIER LTD.



AAKASH KUMAR SAHU
Company Secretary
Date-31ST March, 2019
Place-Raipur



✉ admin@obclimited.com

🌐 www.obclimited.com

CIN No. : L63090CT1994PLC008732

Corp. Office : A-1, 3rd Floor, C.G. Elite Complex, Opp Mandi Gate
Pandri Main Road, Raipur 492001 (C.G.)

☎ 0771-2281310- (9 Lines)

Regd. Office : Jeevan Bima Marg, Pandri, Raipur 492001 (C.G.)

Ph. : 0771-4054518




ORISSA BENGAL CARRIER LTD.
**“CODE OF PRACTICES AND PROCEDURES
AND
CODE OF CONDUCT”
TO REGULATE, MONITOR AND REPORT
TRADING IN SECURITIES
AND
“FAIR DISCLOSURE OF
UNPUBLISHED PRICE SENSITIVE INFORMATION”**


(“Revised Insider Trading Code”)

**In accordance with SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018
&
SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2019**

(Applicable w.e.f. 01.04.2019)

(Earlier Code of Internal Procedures & Conduct for Prevention of Insider Trading as per SEBI (Prohibition of Insider Trading) Regulations, 2015)


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PART I
PRELIMINARY

(1) The Code of Practices and Procedures and Code of Conduct to Regulate, Monitor And Report Trading In Securities And Fair Disclosure Of Unpublished Price Sensitive Information (hereinafter referred to as “**Revised Insider Trading Code**”) is made to regulate, monitor and report the trading by the Insiders.

1.1 Pursuant to the amendments in The SEBI (Prohibition of Insider Trading) Regulations, 2015 vide The SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 effective from 1st April, 2019, the Company is required to make a policy for determination of “**Legitimate Purposes**” as a part of “**Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information**” formulated under Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“PIT Regulations”).

1.2 Accordingly, the Board of Directors of Orissa Bengal Carrier Ltd. (herein after referred to as “The Company”) has approved the amendments in the Revised Insider Trading code, incorporating a Policy for determination of “Legitimate Purposes” by Circular Resolution dated 31st March, 2019 which will be effective w.e.f. 01st April, 2019.

1.3 The Revised Insider Trading Code has been made in accordance with and Pursuant to the Securities and Exchange Board of India (SEBI) (Prohibition of Insider Trading) (Amendment) Regulations, 2018 and SEBI (PIT) (Amendment) Regulations, 2019 which would be effective from 01st April, 2019.

(2) **Definitions:** For the purpose of this Code –

(a) “**Act**” means the Securities and Exchange Board of India Act, 1992 and any amendments thereto.

(b) “**Board**” means the Securities and Exchange Board of India.

“**Board of Directors**” means the Board of Directors of **ORISSA BENGAL CARRIER LTD.**

“**Code**” or “**Code of Conduct**” shall mean the Code Of Practices And Procedures And Code Of Conduct To Regulate, Monitor And Report Trading In Securities And Fair Disclosure Of Unpublished Price Sensitive Information / (and earlier Code of Internal Procedures & Conduct for Prevention of Insider Trading) for Regulating, Monitoring and Reporting of trading by insiders of **ORISSA BENGAL CARRIER LTD.** as amended from time to time.

“**Company**” means **ORISSA BENGAL CARRIER LTD.**

“**Companies Act**” means the Companies Act, 2013 & Rules made thereunder and any amendments thereto.

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- (c) **“Compliance Officer”** means 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.”

- (d) **“Connected Person”** means:

- i. any person who is or has during six months prior to the concerned act been associated with the 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 any employees of the Company or holds any position including 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,
 - an immediate relative of connected persons specified in clause (i) or
 - holding company or associate company or subsidiary company; or
 - an intermediary as specified in Section 12 of the Act or an employee or directors thereof; or
 - an investment company, trustee company, assets management company or an employee or director thereof; or
 - an official of a stock exchange or of clearing house or corporation; or
 - a member of board of trustees of a mutual fund or a member of the board of directors of the assets management company of a mutual fund or is an employee thereof; or
 - 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

-
- an official or an employee of a self- regulatory organization recognized or authorized by the Board; or
 - a banker of the Company; or
 - a concern, firm, trust, Hindu undivided Family, company or association of persons wherein a director of the Company or his immediate relative or banker of the Company, has more than ten percent, of the holding or interest;

“Designated Employees” shall include:

- a. Every employees in the grade of Assistant General Manager and above;
- b. Every employee in the Finance, Accounts, Marketing, Research, Technical, Human Resource, Secretarial and Legal department as may be determined and informed by the Company Secretary & Compliance Officer; and
- c. Any other employee as may be determined and informed by the Company Secretary &/or Compliance Officer from time to time.

“Designated Person” means Directors, Key Managerial Personnel and designated employees and Connected Persons designated on the basis of their Functional Role in the Company.

“Employees” means every Employee and Designated employee of the company including the Directors in the Employment of the Company

- e) **“Generally available information”** means information that is accessible to the public on a non-discriminatory basis.
- f) **“Immediate relative”** means a spouse of a person, and include parents, 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 of the Company.
- g) **“Insider”** means any person who is a connected person; or in possession of or having access to unpublished price sensitive information;
- h) **“Promoter”** shall have the meaning assigned to it under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.
- ha) **“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;
- hb) **“proposed to be listed” shall include securities of an unlisted company:**

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- (i) if such unlisted company has filed offer documents or other documents, as the case may be, with the Board, stock exchange(s) or registrar of companies in connection with the listing; or
- (ii) if such unlisted company is getting listed pursuant to any merger or amalgamation and has filed a copy of such scheme of merger or amalgamation under the Companies Act, 2013 ”
- i) **“Securities”** shall have the meaning assigned to it under the Securities Contracts (Regulations) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund.
- j) **“Specified”** means specified by SEBI in writing.
- k) **“Takeover Regulations”** means SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.
- l) **“Trading”** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and “trade” shall be construed accordingly.
- m) **“Trading Day”** means a day on which recognized Sock Exchanges are open for trading.
- n) **“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 following:-
- (i) Financial Results;
 - (ii) Dividends;
 - (iii) Change in capital structure;
 - (iv) Mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
 - (v) Changes in Key Managerial Personnel; and

2.2 All other words and phrases not defined in this Revised Insider Trading Code will have the meaning as assigned and defined in the SEBI Act, 1992, Securities Contracts (Regulations) Act, 1956, The Depositories Act, 1996 or The Companies Act, 2013 and Rules and Regulations made thereunder and any amendment thereto.

PART - II
RESTRICTIONS ON COMMUNICATION AND TRADING BY INSIDERS

3) COMMUNICATION AND PROCUREMENT OF UNPUBLISHED “PRICE SENSITIVE INFORMATION

- 3.1** No insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to the company or securities listed or proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- 3.2** No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to the company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- 3.3** Notwithstanding anything contained in this regulation, unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction pursuant to Regulation 3 of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

4) TRADING WHEN IN POSSESSION OF UNPUBLISHED PRICE SENSITIVE INFORMATION.

4.(1) No insider shall trade in securities that are listed or proposed to be listed on a stock exchange when in possession of unpublished price sensitive information:

Explanation –When a person who has traded in securities has been in possession of unpublished price sensitive information, his trades would be presumed to have been motivated by the knowledge and awareness of such information in his possession.

Provided that the insider may prove his innocence by demonstrating the circumstances including the following: –

- (i) the transaction is an off-market *inter-se* transfer between insiders who were in possession of the same unpublished price sensitive information without being in breach of regulation 3 and both parties had made a conscious and informed trade decision.

Provided that such unpublished price sensitive information was not obtained under sub-regulation (3) of regulation 3 of these regulations.

Provided further that such off-market trades shall be reported by the insiders to the company within two working days. Every company shall notify the particulars of such trades to the stock exchange on which the securities are listed within two trading days from receipt of the disclosure or from becoming aware of such information.;

(ii) the transaction was carried out through the block deal window mechanism between persons who were in possession of the unpublished price sensitive information without being in breach of regulation 3 and both parties had made a conscious and informed trade decision;

Provided that such unpublished price sensitive information was not obtained by either person under sub-regulation (3) of regulation 3 of these regulations.

(iii) the transaction in question was carried out pursuant to a statutory or regulatory obligation to carry out a bona fide transaction.

(iv) the transaction in question was undertaken pursuant to the exercise of stock options in respect of which the exercise price was pre-determined in compliance with applicable regulations.

(v) 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;

(vi) the trades were pursuant to a trading plan set up in accordance with regulation 5.

NOTE: When a person who has traded in securities has been in possession of unpublished price sensitive information, his trades would be presumed to have been motivated by the knowledge and awareness of such information in his possession. The reasons for which he trades or the purposes to which he applies the proceeds of the transactions are not intended to be relevant for determining whether a person has violated the regulation. He traded when in possession of unpublished price sensitive information is what would need to be demonstrated at the outset to bring a charge. Once this is established, it would be open to the insider to prove his innocence by demonstrating the circumstances mentioned in the proviso, failing which he would have violated the prohibition.

(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.

(3) The Board may specify such standards and requirements, from time to time, as it may deem necessary for the purpose of these regulations.

4) PREVENTION OF MISUSE OF “UNPUBLISHED PRICE SENSITIVE INFORMATION

Promoters and member of the promoters group, employees and connected persons

designated on the basis of their functional role (“designated persons”) in the Company shall be governed by an internal code of conduct governing dealing in securities.

5. Trading Plan :

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

As per Annexure- F

5.1 Trading Plan shall:

- ✓ Not entail commencement of trading on behalf of the insider earlier than 6 months from public disclosure of the plan;
- ✓ Not entail trading for the period between the 20th 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;
- ✓ Entail trading for a period of not less than 12 months;
- ✓ Not entail overlap of any period for which another trading plan is already in existence;
- ✓ Set out either the value of trades to be effected or the number of securities to be traded along with the nature of trade and the intervals at, or dates on which such trades shall be effected; and
- ✓ Not entail trading in securities for market abuse.

5.2 The Compliance officer shall consider the trading Plan made as above and shall approve it forthwith. However, he/she shall be entitled to take express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per provision of the Regulations.

The compliance officer shall review the trading plan to assess whether the plan would have any potential for violation of these 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.

Provided that pre-clearance of trades shall not be required for a trade executed as per an approved trading plan.

Provided further that trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

5.3 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 at the time of formulation of the plan, the insider is in possession of any unpublished price sensitive information and the said information has not become generally available at the time of commencement of implementation. The commencement of plan shall be deferred until such unpublished price sensitive information becomes generally available information. Further the insider shall not be allowed to deal in securities of the company, if the date of trading in the securities of the company, as per the approved Trading Plan, coincides with the date of closure of trading window announced by the Compliance officer.

5.4 Upon approval of Trading Plan, the Compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

PART- III

DISCLOSURES OF TRADING BY INSIDERS

(6) GENERAL PROVISIONS:

- (1) Every public disclosure under this part shall be made in such form as may be specified.
- (2) The disclosures to be made by any person under this Part shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.
- (3) 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 purposes of this Part:

Provided that trading in derivatives of securities is permitted by any law for the time being in force.

- (4) The disclosures made under this Part shall be maintained by the company, **for a minimum period of five years**, in such form as may be specified.

7) DISCLOSURES BY CERTAIN PERSONS:

(1) Initial Disclosures:

- (a) Every Promoter, member of the Promoter Group, Key Managerial Personnel, Director and Designated Employee of the Company shall disclose his equity shareholding in the Company as on date of this code taking effect to the Company within 30 days of this code taking effect in **Form No. A**

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- (b) Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter and member of promoter group shall disclose his equity shareholding in the Company as on the date of the appointment or becoming a Promoter and member of promoter group, to the Compliance Officer within 7 days of such appointment or becoming a Promoter and member of promoter group in **Form No. B**

(2) Continual Disclosures:

- (a) Every Promoter, and member of Promoter Group, Designated Person and Director of the Company shall disclose to the Compliance Officer in **Form No. C** the number of equity shares acquired or disposed of within two trading days of such transaction, if the value of the equity shares traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in **excess of Rs. Ten Lacs or such other value as may be specified;**
- (b) The Company shall notify the particulars of such Trading to BSE Ltd. within two trading days of receipt of the disclosure or from becoming aware of such information.

(3) Disclosures by other connected persons:

The other connected persons to whom this Code is applicable is holding equity shares of the Company, shall disclose their shareholding within 30 days from the date of this code taking effect in **Form No. D** and Trading made by them within 7 days in **Form No E** if the value of the equity shares traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in **excess of Rs. Ten Lacs or such other value as may be specified.**

- 8) Compliance of the Trading Restrictions:** Every Promoter, member of the Promoter Group, Key Managerial Personnel, Director and Designated Employee of the Company shall be subject to Trading restrictions in the following manner:-

- (a) **The Trading window:** The Trading Window will be closed before 7 days of the happening of the following events and shall remain closed 48 hours after the publication of the price sensitivity information i.e.
- (i) Declaration of Financial Results (Quarterly, Half Yearly & Annual)
 - (ii) Declaration of Dividends (Interim & Final)
 - (iii) Issue of securities by way of Public/ Rights /Bonus etc.
 - (iv) Any major expansion plan or execution of new project
 - (v) Amalgamation, Mergers, takeovers or any buy back.
 - (vi) Disposal of the whole or substantially the whole of the undertaking.

(Vii) Any major change in policies, plans or operation of the Company

(b) Restriction on Trading during the Closure of Trading Window:

Every promoter, member of the Promoter Group, key managerial personnel, director and designated employee and connected persons of the company shall not deal in the securities of the Company during the Closure of the Trading Window.

(c) Pre-clearance of Trading Plans:

- i. Every Promoter, member of the Promoter Group, Key Managerial Personnel, Director and Designated Employee of the Company and the Persons deemed to be connected persons as per this Code intending to buy/sell equity shares of the Company will have to submit the trading plan(s) in the **Form No. F** at least 6 months prior to the start of the trading to the Compliance Officer of the Company for the prior approval.
- ii. Only after receiving the prior approval, the transaction should be carried out strictly as per the Trading plan(s) approved by the Compliance Officer of the Company.
- iii. The Compliance Officer will disclose the Trading plan(s) approved by him to the BSE Limited immediately.
- iv. The Trading plan(s) once approved by the Compliance Officer of the Company shall be irrevocable and the concern person shall have to mandatorily carry out the Trades within the time limit as approved by the Compliance Officer of the Company. No Trade(s) shall be executed during the closure of the Trading window.

9) Violation of the Code:

- (a) Every Promoter, member of the Promoter Group, Key Managerial Personnel, Director and Designated Employee of the Company and the persons deemed to be connected persons as per this Code who violates any of the provisions of this Code will be penalized and appropriate action will be taken against them by the Company after giving reasonable opportunity to them to show cause. They shall also be subject to disciplinary action including wage freeze, Suspension, in-eligibility for future participation in E.S.O.P. etc.
- (b) If the Insider deals in the equity shares of the Company, violating the Code, the Compliance Officer will confidentially maintain the list of the same.
- (c) In addition to the action which may be taken by the Company, the persons violating this Code will also be subject to any penal action by SEBI as per SEBI Act and the Company shall inform the same to the SEBI promptly.

- 10) The Compliance Officer of the Company shall report to the Board of Directors and the Chairman of the Audit Committee of the Company about the compliance of the Code on quarterly basis.

11) Code of Practice & Procedure for Fair Disclosure:

Pursuant to Regulation 8 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 read with the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 and Schedule A of the Regulations, Orissa Bengal Carrier Ltd. is required to formulate a code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“Fair Disclosure Code”).

A code of practices and procedures for fair disclosure of unpublished price sensitive information for adhering each of the principles is set out below:

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. The Compliance Officer of the Company shall act 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 rumors 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. Unpublished Price Sensitive Information (UPSI) may be disclosed to person who needs such information for furtherance of legitimate purpose for performance of duties of legal obligation of the Company.
9. **For sharing of information for legitimate purpose Company is formed following policy:**
 - UPSI is in the nature of information relating to the Company, directly or indirectly, of precise nature that can have an impact on the prices of the securities of the Company if made public.
 - Till the UPSI becomes a generally available information, UPSI can be shared only on a need-to-know basis and for legitimate purpose as provided hereunder and not to evade or circumvent the prohibitions of the Regulations.
 - Sharing of relevant UPSI with consultants, advisors engaged by the Company in relation to the subject matter of the proposed deal/ assignment in relation to UPSI;

o Sharing of relevant UPSI with intermediaries/ fiduciaries viz. merchant bankers, legal advisors, auditors in order to avail professional services from them in relation to the subject matter of the UPSI;

o Sharing of relevant UPSI with persons for legitimate business purposes (e.g. attorneys, investment bankers or accountants);

o Sharing of relevant UPSI with persons who have expressly agreed in writing to keep the information confidential, such as potential customers, other developers, joint venture partners and vendors, and not to transact in the company's securities on the basis of such information.

o Sharing of relevant UPSI with persons who have expressly agreed in writing to keep the information confidential, such as potential customers, other developers, joint venture partners and vendors, and not to transact in the Company's securities on the basis of such information.

□ The Compliance Officer who is acting as a chief investor relations officer shall maintain following records with respect to UPSI shares for legitimate purpose:

i. What is the purpose behind sharing UPSI?

ii. Who had shared UPSI and he was authorised for the same?

iii. Whether non-disclosure agreement/ disclosures were signed while sharing UPSI?

iv. Whether the person who had shared UPSI had informed to Compliance Officer regarding sharing of UPSI?

FORM "A"

**SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (a) read with Regulation 6 (2) – Initial disclosure to the company]
Pursuant to clause no. 11(1) (a) of the code**

Name of the company: _____

ISIN of the company: _____

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

Name, PAN, CIN/DIN & address with contact no's	Category of Person Promoters/member of promoter group/ 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, member of Promoter Group, 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 Specification	Number of units (contracts *lot size)	Notional value in Rupees terms	Contract Specification	Number of units (contracts *lot size)	Notional value in Rupees 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
Director/KMP/Promoter]
Pursuant to clause no. 11(1)(b) of the code**

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 / member of Promoter Group of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN & Address with contact nos.	Category of Person (Promoters/ Member of Promoter group KMP / Directors/ immediate relative to/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 Shareholding
			Type of security (For eg. – Shares, Warrants, Convertible Debentures 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.

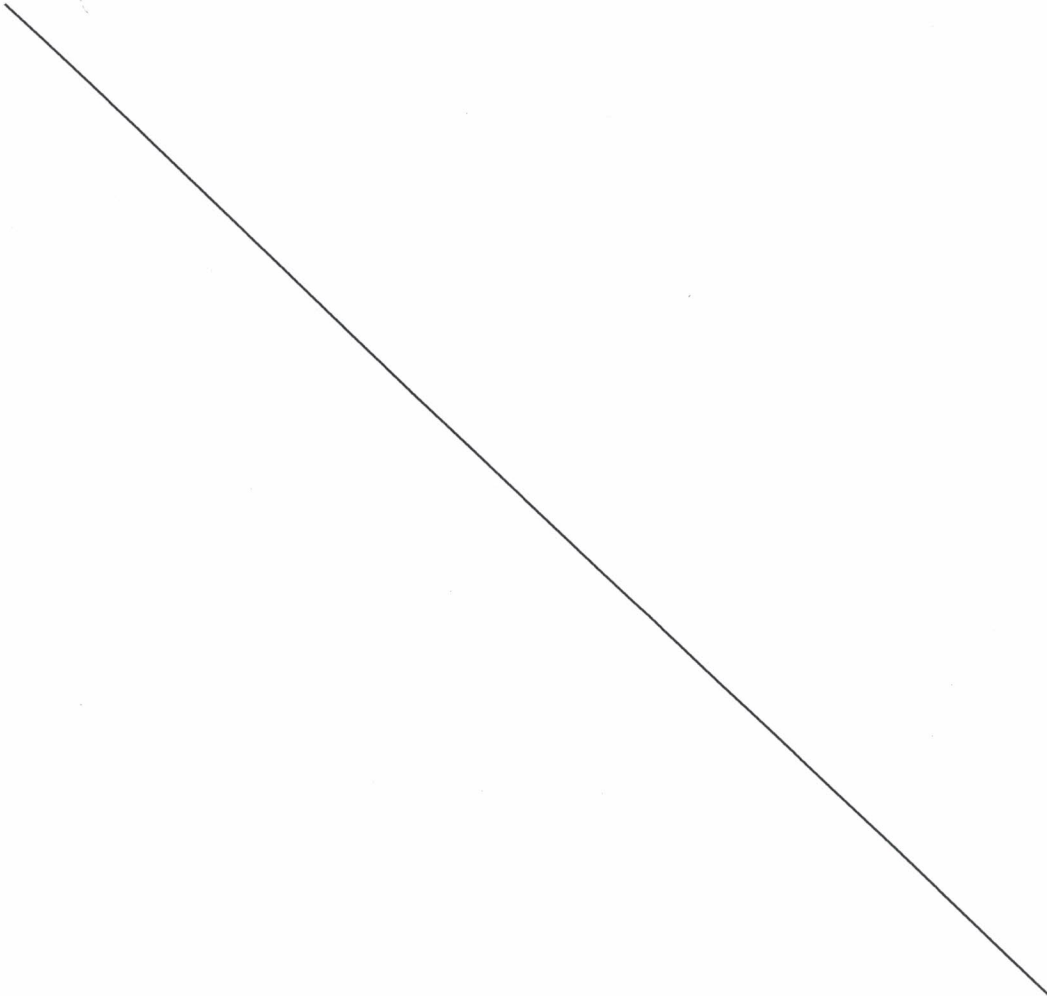
Details of Open Interest (OI) in derivatives of the company held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of a listed company and other such persons as mentioned in Regulation 6 (2)

Open Interest of the Future contracts held at the time of becoming Promoter/appointment of Director/KMP			Open Interest of the Option contracts held at the time of becoming Promoter/appointment of Director/KMP		
Contract Specification	Number of units (contracts *lot size)	Notional value in Rupees terms	Contract Specification	Number of units (contracts *lot size)	Notional value in Rupees 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:

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FORM C

SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (2) read with Regulation 6(2)& – Continual disclosure] director/KMP/Promoter Pursuant to clause no. 11(2) of the code

Name of the company: _____

ISIN of the company: _____

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

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoters/ KMP/ Directors / immediate relative to/others etc.	Securities held prior to acquisitions/ disposal	Securities acquired /Disposed	Securities Held post acquisitions/ 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.)
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		Type of security (for eg. Shares, Warrants, Convertible Debenture etc.)	No. and % of such Share holding	Type of security (for eg. Shares, Warrants, Convertible Debenture etc.)	No.	Value	Transaction Type (Buy/Sale/Pledge / Revoke / Invoke	Type of security (for eg. Shares, Warrants, Convertible Debenture etc.)	No. and % of such 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 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
Types of Contract	Contract Specifications	Buy		Sell		
		Notional Value	Number of units (contract*lot size)	Notional Value	Number of units (contract*lot size)	
15	16	17	18	19	20	21

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

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 nos.	Category of Person (Promoters/ KMP/ Directors / immediate relative to/others etc.	Securities held prior to acquisitions/ disposal		Securities acquired /Disposed				Securities Held post acquisitions/ 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.)
		Type of security (for eg. Shares, Warrants, Convertible Debenture etc.)	No. and % of such Share holding	Type of security (for eg. Shares, Warrants, Convertible Debenture etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge / Revoke / Invoke	Type of security (for eg. Shares, Warrants, Convertible Debenture etc.)	No. and % of such 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 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
Types of Contract	Contract Specifications	Buy		Sell		
		Notional Value	Number of units (contract*lot size)	Notional Value	Number of units (contract*lot size)	
15	16	17	18	19	20	21

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

Name & Signature:

Designation:

Date:

Place:

FORM "E"

**FORM FOR THE CONTINUAL DISCLOSURE BY OTHER CONNECTED PERSONS
PURSUANT TO CLAUSE NO. 11(3) OF THE CODE**

To,

Date _____

The Compliance Officer,
ORISSA BENGAL CARRIER LTD,
Regd. Off. : Jiwani Bima Marg
Pandri Raipur (CG)-492001

Dear Sir,

Sub: Dealing in the equity shares of the Company

I _____ hereby inform that, I have acquired or disposed off on day of
____ 201____, _____ equity shares of the Company of the market value of Rs.
_____ during the period from ____ to ____ which is in excess of the monetary
limit prescribed Clause 9(3) of the Code of Conduct for prevention of Insider Trading.

Further, I am connected with your Company in the capacity of _____ or related with Mr.
_____ Promoter / Director / Key Managerial Personnel / Designated Employee of your
Company.

This is for your information and necessary actions.

Thanking you.

Signature:

Name:

FORM "F"

**APPLICATION BY PROMTER/ DIRECTOR/ KEY MANAGERIAL PERSONNEL /
DESIGNATED EMPLOYEE / OTHE CONNECTED PERSONS PURSUANT TO CLAUSE NO.
9.1 & 12(c) OF THE CODE FOR PRE-APPROVAL OF TRADING PLAN**

To,
The Compliance Officer,
ORISSA BENGAL CARRIER LTD.,
Jiwan Bima Marg
Pandri Raipur (CG)-CT 492001
Dear Sir,

From:
Name:
Designation:

Date: _____

Sub: Application for Pre-approval of Trading Plan

I _____ hereby inform that, I have gone through the Code of Conduct for prevention of Insider Trading and I seek you pre approval of the trading plan which I will execute as per the details given hereunder within twelve months after expiry of six months from the date of this application, if pre-approved by you.

Name of Promoter / Director / KMP / Designated Employee / Company / Connected person	Nature of Relationship	No. of Shares held as on Date of this application	No. of Shares to be purchased or disposed off.	Probable period for purchase or disposal.	Folio No./ DP ID, if any

I also declare that, I am not in possession of unpublished price sensitive information as defined in the Code. I further declare that, I will not deal in the equity shares of the Company during the closure of Trading Window as per the requirements of the Code.

I further confirm that, the violation of any of the provisions of the Code would subject me the penal provisions as per the Code.

I request you to approve my above referred Trading Plan at the earliest.

Signature _____