



SANDU PHARMACEUTICALS LIMITED

CIN:L24233GA1985PLC001587

Regd. Office: Plot Nos. 25, 26, 29 & 30, Pilerne Industrial Estate, Marra, Saligao, Bardez, Goa 403511.

Tel: +91 832 2407474 / 6715000, E-mail: sandupharma@sandu.in, Website: www.sandu.in

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSONS IN SECURITIES OF SANDU PHARMACEUTICALS LIMITED

PURPOSE

As per the requirement of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("Regulations") this internal Code is designed to prohibit a Designated Person and his/her Immediate relative, Insider, Connected Persons who have access to or in possession of Unpublished Price Sensitive Information, from trading in Company's shares. The Code has been framed in line with the minimum standards for code of conduct specified in Schedule-B of the Regulations.

DEFINITIONS

Compliance Officer means the Compliance Officer (who is financially literate and is well versed with Legal and Compliance requirements), appointed by the Company pursuant to Regulation 6(1) of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements), 2015 namely the Company Secretary of the Company. In the absence of the Company Secretary, for any reason, any senior officer reporting to the Managing Director, who is financially literate and is well versed with Legal and Compliance requirements.

Connected Person means a person as defined in Regulation 2(d) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

Designated Persons shall mean:

- a. Promoters and Members of the Promoter Group
- b. Directors of the Company
- c. All employees three tiers below Board Level
- d. Employees in the Corporate Finance Department as designated by the Chief Financial Officer
- e. Employees in the Secretarial Department as designated by the Company Secretary
- f. Employees in the Information Technology Department as designated by the functional head jointly with the Compliance Officer
- g. Executive assistants / confidential secretaries to persons mentioned under (a) to (c) supra
- h. Any other Insider / Connected person as may be specified by the Compliance Officer or Managing Director from time to time.

Immediate Relative means a person as defined in Regulation 2(f) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

Insider means a person as defined in Regulation 2(g) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

Unpublished Price Sensitive Information (UPS) shall mean the information as defined in Regulation 2(n) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.



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SEBI means “Securities and Exchange Board of India”

Trading Window Open Period refers to the period during which the Company's securities can be traded by the Designated Persons as provided in this Code.

Trading Window Closure Period refers to the period during which the Designated Persons of the Company shall not deal with the shares of the Company.

Words and expressions used herein and not defined in this Code shall have the meanings respectively assigned to them in Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, Securities and Exchange Board of India Act, 1992 (SEBI), the Securities Contract (Regulation) Act, 1956 (“SCRA”), the Depositories Act, 1996 or the Companies Act, 2013 (“the Act”) and Rules and Regulations made there under.

Singular references to “Designated Person” and other singular expressions in this Code include plural; masculine expressions include feminine and neuter, and vice versa and it also includes entities / Bodies Corporate.

ROLE OF COMPLIANCE OFFICER

The Compliance Officer shall be responsible for:

- Compliance of policies, procedures, maintenance of records / list of designated persons including updating of changes to the list from time to time, monitoring adherence to the rules for reservation of UPSI.
- Monitoring of trades and implementation of this Code under the overall supervision of the Board of Directors of the Company.
- Reviewing the trading plan and assessing the potential of the plan for violation of the Regulations, if any.
- Approving and monitoring the implementation of the plan.
- On approval of the plan, notify the trading plan to the stock exchanges where the securities are listed.

PRESERVATION, COMMUNICATION AND PROCUREMENT OF UPSI

- Designated Persons shall maintain confidentiality of all UPSI. Designated Persons shall not pass on such information to any person directly or indirectly.
- UPSI is to be handled within and outside the Company on a "need to know" basis and no UPSI shall be communicated to any person except in furtherance of the legitimate purposes, performance of duties or discharge of legal obligations.

- Legitimate purposes shall include sharing of UPSI in ordinary course of business by an insider with collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants. Legitimate purposes would mean actions including but not limited to sharing of UPSI in any mode, as a part of business operations and in the normal course of business.

Provided that sharing of information for the above-said purposes shall not be carried out with a motive to evade or circumvent the prohibitions of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Any person who is in receipt of the UPSI for legitimate purposes shall be considered as an “insider” and due notice shall be given to such person to maintain confidentiality of the UPSI.

No Designated Person shall procure from or cause the communication by any insider, of UPSI, relating to the Company or its securities, either directly or indirectly except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

- Any person including auditors, accountancy firms, law firms, analysts, consultant firms etc., assisting or advising the Company, who is expected to have access to UPSI in the course of business operations shall be advised to formulate a Code of conduct to regulate, monitor and report trading by its employees / Connected persons towards achieving compliance of these regulations, adopting the minimum standards set out in the Regulations and Schedule C of the Regulations without diluting any provisions. They will also be subjected to the trading window provisions of this Code.
- Any person who is in receipt of any inside information shall abide by this Code of Conduct by acting in good faith and maintain confidentiality of any information in his/her possession.

DATABASE MANAGEMENT

The Board of Directors shall ensure that a structured digital database is maintained containing the nature of Unpublished Price Sensitive Information and the names of such persons who have shared the information and also the names of such persons with whom information is shared under the Regulations. Minimum information of such persons / entities including but not limited to Permanent Account Number, immediate relatives, material financial relationship, contact numbers, educational institutions, details of past employers, in case of non-availability of Permanent Account Number, then any other identity authorized by law, shall be maintained in the Database.

The database shall be maintained as per the requirements of applicable rules / regulations with the adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.



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Information as contained in the database shall be maintained for a minimum period of 8 years after completion of relevant transaction and in the event of receipt of any information from SEBI regarding any investigation or enforcement proceedings, the relevant information in the Structured Digital Database shall be preserved till the completion of such proceedings

RESTRICTIONS FOR TRADING BY THE DESIGNATED PERSONS

All Designated Persons and their immediate relatives shall be subject to the trading restrictions enumerated below:

- Advise any person to trade in the Securities while being possession, control or knowledge of UPSI. Advise means but not limited to recommendations, opinions, suggestions, ideas etc.
- The Company shall in consultation with the management specify a trading window closure period during such period the Designated Persons and their immediate relatives shall not deal with the shares of the Company.
- The timing for closing and re-opening of the trading window shall be determined by Compliance Officer after taking into account of various factors. Generally, the trading window shall be closed from the end of every quarter till 48 hours after the declaration of financial results.
- The trading window shall also be closed when the Compliance Officer is of the opinion that a Designated Person or class of Designated Persons is reasonably expected to be in possession of UPSI.
- The trading window restrictions mentioned above shall not apply in respect of:
 - a. Transactions specified in clauses (i) to (iv) and (vi) of the proviso to Regulation 4(1) of Regulations and in respect of a pledge of shares for a bonafide purpose such as raising of funds, subject to pre-clearance by the compliance officer and compliance with the respective regulations made by SEBI from time to time.
 - b. Transactions which are undertaken in accordance with respective regulations made by SEBI such as acquisition by conversion of warrants or debentures, subscribing to rights issue, further public issue, preferential allotment or rendering of shares in a buy-back offer, open offer, delisting offer or transactions which are undertaken through such other mechanism as may be specified by SEBI from time to time.



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PRE-CLEARANCE OF TRADES

- All Designated Persons on their behalf and on behalf of their immediate relative(s) who intend to deal in the securities of the Company during the period when the trading window is open, should obtain pre-clearance for the transaction(s) if the value of the transaction, either to be conducted through a single transaction or a series of transactions, is exceeding or expected to exceed Rs.10 Lakhs in value (market value) in a calendar quarter.
- No Designated Person shall make an application for pre-clearance of any proposed trade if such Designated Person is in possession of UPSI even if the trading window is not closed. It is clarified that it is the responsibility of the Designated Persons to obtain approvals in respect of trades proposed to be conducted by them.
- An application may be made in the Form No 3 or 3E, to the Compliance Officer indicating the estimated number of securities that the Designated Person intends to deal in, the details as to the depository with which he has a security account, number of securities held by him in PHYSICAL and DEMAT mode and such other details as may be required by the Compliance Officer / Company in this regard.
- Compliance Officer shall either clear the requested deal or decline to clear the same within 7 days of receipt of the request in the prescribed form. In case the request for pre-clearance is not approved, the reasons for the same shall be recorded by the Compliance Officer.
- The pre-clearance given by the Company is valid for seven trading days only. If the trade is not done within that period a fresh clearance is required.
- In the event the period between the date of the approval and commencement of closure of Trading Window is less than 7 trading days then the said transaction shall be executed within such lesser period.
- An undertaking shall be executed in favour of the Company by such Designated Person confirming that:
 1. That the Designated Person does not have any access or has not received upto the time of signing the undertaking any "Unpublished Price Sensitive Information"
 2. That in case the Designated Person has access to or receives Unpublished Price Sensitive Information after the 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 is published.
 3. That he/she has not contravened this Code.
 4. That he / she has made a full and true disclosure while applying for clearance to trade.

- In case the Compliance Officer or any of his / her immediate relative wishes to trade in the securities of the Company, he / she should get the trade pre-cleared by the Managing Director of the Company and all provisions of the pre-clearance as would be applicable to a Designated Person shall be applicable to the Compliance Officer.
- Designated Person(s) and their immediate relatives who buy or sell any number of securities, after obtaining pre-clearance, shall not enter into an opposite transaction viz., sell or buy as the case may be for a period of six months following the previous transaction. Further, they shall also not take any position in derivative transactions in the securities at any time. The Compliance Officer is empowered to grant relaxations from strict application of such restriction for reasons to be recorded in writing, provided that such relaxation shall not violate the Regulations and this code.

Disclosures to be made for a transaction after grant of pre-clearance

Upon receipt of pre-clearance for trading in securities of the Company exceeding the value of Rs. 10 Lakhs (whether in one transaction or a series of transactions), the Designated Person shall disclose the details of such transactions to the Company in Form C or such other format as may be prescribed from time to time under Regulation 7 of SEBI (Prohibition of Insider Trading) Regulations, 2015 within two (2) trading days of such transaction to the Company.

Particulars of such trading shall be reported by the Company to the Stock Exchanges on which securities are listed within two (2) trading days of receipt of the disclosure or becoming aware of such information.

The disclosures shall also include trading in derivatives and the traded value of the derivatives shall also be taken into account for this purpose.

Provided that if a person opts not to trade after securing pre-clearance, he shall report the same to the Company within two (2) days from the expiry of the period of pre-clearance in Form 4PT.

TRADING PLANS

Any Insider who may be perpetually in possession of UPSI is entitled to formulate a trading plan enabling him / her to trade in securities. The Compliance Officer shall review the trading plan to assess whether the plan potentially violates the Regulations and subject to his approval thereon make public disclosure of the trading plan to the Stock Exchanges where the securities are listed.

The trading plan drawn up by an insider shall comply with and be subject to the provisions of Regulation 5 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time.



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DISCLOSURES

Initial Disclosure

Every person on becoming a Designated Person shall disclose through Form No 2 or 2E, his / her / their holding of securities of the Company as on date of the appointment or becoming a Promoter or Member of Promoter Group, to the Company / Compliance Officer within seven (7) days of such appointment or becoming a Promoter or a Member of Promoter Group.

In the event a new immediate relative comes into being or any existing immediate relative ceasing to be Dependent, the concerned Designated Person shall forthwith give a notice in writing of such changes to the Compliance Officer.

General Declaration

Every person on becoming a Designated Person shall disclose the names and Permanent Account Number or any other identifier authorized by law of the following persons to the Company in Form 1 / 1E on date of the appointment or becoming a Promoter or member of Promoter Group and thereafter on an annual basis and as and when the information changes:

- a. Immediate relatives
- b. Persons with whom such designated person (s) shares a Material Financial Relationship
- c. Phone, mobile and cell numbers which are used by them

Provided that it shall be sufficient if the names of the educational institutions from which the Designated Persons have graduated and the names of their past employers are disclosed only once.

Continual Disclosures

Quarterly

Continual Disclosure of securities of the Company held by a Promoter / Promoter Group Member, Designated Person or Director of the Company during the quarter shall be made within 15 days from the end of quarter in Form 4 or 4E to the Company.

Annual

Annual Declaration in Form No 5 or 5E shall be made to the Compliance Officer within 30 days of close of a Financial Year.

The Compliance Officer shall maintain records of all the declarations received in the prescribed forms for a minimum period of five years.



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Reporting Requirements

The Compliance Officer shall place before the Board / Audit Committee of the Company, on a quarterly basis, all the details of the holding / dealing in the Company's securities by Designated Persons. The above report will also include reporting of pre-clearances not granted, decisions taken not to trade after securing pre-clearances with reasons thereof etc.

INSTITUTIONAL MECHANISM FOR PREVENTION OF INSIDER TRADING (INTERNAL CONTROLS)

The Managing Director shall ensure that adequate and effective system of internal controls to ensure compliance with the requirements given in the Regulations to prevent insider trading.

Internal controls shall include the following:

- All employees who have access to UPSI are identified as Designated Person. The details of such Designated Person shall be included in the structured digital database maintained by the Company as required under the Regulations. A person shall continue to be identified as a Designated Person for as long as he is in possession of UPSI.
- All UPSI shall be identified, and its confidentiality shall be maintained as per the requirements of the Regulations.
- Adequate restrictions shall be placed on communication or procurement of UPSI as required by the Regulation.
- Departments like Finance, Information Technology, Secretarial, etc., which handle price sensitive information shall be isolated from other common places which have public access with a view to prevent leakage of information.
- List of employees and other persons with whom UPSI is shared shall be maintained and confidentiality agreements shall be signed, or notice shall be served to all such employees and persons.
- Periodic process review to evaluate effectiveness of the internal controls.



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PROCEDURE FOR DISCLOSURE AND INQUIRY IN CASE OF LEAK OR SUSPECTED LEAK OF UPSI

Protected Disclosure shall mean written communication made in good faith by any person disclosing information regarding the leak or suspected leak of UPSI. Also, Protected Disclosure shall mean an incident wherein there is no written communication made by any person however the leak or suspected leak of UPSI is known publicly.

Procedure for disclosure:

- All Protected Disclosures should be addressed to the Chief Financial Officer of the Company. The contact details of the Chief Financial Officer are as under:

Chief Financial Officer
Sandu Pharmaceuticals Limited
Plot No 25,26,29 & 30 Pilerne Industrial Estate,Marra,Saligao
Bardez Goa 403511

If the protected disclosure involves the Chief Financial Officer / Managing Director, the same shall be sent to the attention of Audit Committee Chairman.

Chairman-Audit Committee,
c/o Compliance Officer/Company Secretary,
Sandu Pharmaceuticals Limited
Plot No 25,26,29 & 30 Pilerne Industrial
Estate,Marra,Saligao Bardez
Goa 403511

In case of leak or suspected leak of UPSI on which no written communication has been received, then the Chief Financial Officer / Chairman of the Audit Committee, as the situation demands have the power to suo-moto take cognizance of the fact.

- Protected Disclosures should preferably be reported in writing so as to ensure a clear understanding of the issues raised and should either be typed or written in a legible handwriting in English or in the local language of the place in which the office / establishment is located.
- The Protected Disclosure should be forwarded to the Chief Financial Officer under a covering letter which shall bear the identity of the person issuing the Protected Disclosure.



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- Identity of the person issuing the Protected Disclosure must be disclosed in the covering letter. Anonymous disclosures will not be entertained.
- The Chief Financial Officer shall detach the covering letter and discuss the Protected Disclosure with concerned persons as deemed fit, and or forward the Protected Disclosure for investigation / inquiry.
- Protected Disclosures should be factual and not speculative or in the nature of a conclusion and should contain as much specific information as possible to allow for proper assessment of the nature and extent of the concern and indicate the urgency of a preliminary investigative procedure.
- If initial inquiries done by the Chief Financial Officer indicate that the Protected Disclosure has no basis, or it is not a matter on which an investigation is to be pursued under this Policy, it may be dismissed at this stage and the decision should be reduced in writing and documented.
- Where initial inquiries indicate that further investigation is necessary, this will be carried through either by the Chief Financial Officer alone, or by a Committee Constituted by the Chief Financial Officer in consultation with the Managing Director. In a scenario wherein Managing Director / Chief Financial Officer is not able to constitute the Committee, then Audit Committee of Board of Directors shall constitute the Committee. The Committee can consist of Members of the Board and / or executives of the Company or any external person who possess necessary expertise.
- The investigation would be conducted in a fair manner, as a neutral fact-finding process and without presumption of guilt. A written report of the findings would be forwarded to the Chairman of the Audit Committee / Board of Directors.

Procedure for Investigation

- All Protected Disclosures reported under this Policy will be thoroughly investigated by the Chief Financial Officer (CFO) / Committee. In case of suo-moto action by the Chief Financial Officer or the Chairman of the Audit Committee, the investigation will start thereon.
- CFO / Committee is required to conduct the process towards fact-finding and analysis. Technical and other resources may be drawn upon as necessary to augment the investigation. The CFO / Committee has a duty of fairness, objectivity, thoroughness, ethical behaviour, and observance of legal and professional standards.
- The decision to investigate taken by the Chief Financial Officer / Committee is by itself not an accusation and is to be treated as a neutral fact-finding process. The outcome of the investigation may not support the conclusion that an improper or unethical act was committed.
- The identity of a Subject will be kept confidential to the extent possible given the legitimate

needs of law and the investigation.

- Subjects will normally be informed of the allegations at the outset of a formal investigation and have opportunities for providing their inputs during the investigation.
- Subjects shall have a duty to co-operate with the Chief Financial Officer/ Committee or any of the Investigators during investigation to the extent that such co-operation sought does not merely require them to admit guilt.
- Subjects have a responsibility not to interfere with the investigation. Evidence shall not be withheld, destroyed or tampered with and witnesses shall not be influenced, coerced, coached, threatened or intimidated by the Subjects. Unless there are compelling reasons not to do so, Subjects will be given the opportunity to respond to material findings contained in an investigation report. No allegation of wrongdoing against a Subject shall be considered as maintainable unless there is good evidence in support of the allegation.
- Subjects have a right to be informed of the outcome of the investigation. If allegations are not sustained, the Subject should be consulted as to whether public disclosure of the investigation results would be in the best interest of the Subject and the Company.
- The investigation shall be completed normally within 30 days of the receipt of the Protected Disclosure / taking suo-moto note of such incident. However, the Chief Financial Officer or the Committee shall have the powers to grant or extend time limit wherever it is necessary.
- On submission of report, the Chief Financial Officer or the Committee shall discuss the matter with Audit Committee who shall either:
 - a. In case the Protected Disclosure / suo-moto note of incident involving leakage or suspected leakage of UPSI, is proved, accept the findings of the Chief Financial Officer / Committee / Investigators, take such Disciplinary Action as he / she / they may think fit and take preventive measures to avoid re-occurrence of the matter; This shall be done in consultation with the Managing Director, if possible.
 - b. In case the Protected Disclosure / suo-moto note of incident involving leakage or suspected leakage of UPSI is not proved, close the matter;
 - c. Depending upon the seriousness of the matter, Chief Financial Officer may refer the matter to the Chairman of Audit Committee / Board of Directors with proposed disciplinary action / counter measures like suspension / termination of service / complaint to police etc., as the situation may warrant. The decision of the Audit Committee / Board of Directors is final and binding.

And report to the Board promptly about such leaks, inquiries/investigations and results of the inquiries / investigations.



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PENALTY FOR CONTRAVENTION OF THE CODE

Designated Person(s) who violate this Code shall also be subject to disciplinary action by the Company, which would be determined by the Managing Director. The penalty may include wage freeze, suspension, Recovery, Claw Back, termination, ineligibility for future participation in employee stock option plans, etc.

Should a contra trade be executed, inadvertently or otherwise, in violation of the restriction imposed in this Code, the profits from such trade shall be liable to be disgorged for remittance to the SEBI for credit to Investor Education and Protection Fund.

Any amount collected as penalty / fine for contravention of the Company's Code of Conduct shall be remitted to the SEBI for credit to the Investor Protection and Education Fund administered by the SEBI.

Further, any incident of contravention of the Code and outcome of the investigation shall be communicated to the Stock Exchanges where the securities are traded.

The action by the Company shall not preclude SEBI from taking any action in case of violation of the Regulations.

SUBMISSION OF INFORMATION TO THE STOCK EXCHANGES ON VIOLATION OF INSIDER TRADING REGULATIONS

In case it is observed by the Company that there has been a violation of the Regulations, the Company shall promptly inform the Stock Exchange(s) where the concerned securities are traded, in such form and such manner as may be specified by SEBI from time to time.

SUBMISSION OF INFORMATION TO SEBI ON ALLEGED VIOLATION OF THE INSIDER TRADING LAWS

An informant may submit information to SEBI on alleged violation of insider trading laws by complying with the procedures laid down under Chapter IIIA of the Regulations.

Explanation: The term "Informant" shall have the meaning ascribed to it under the Regulations (as amended from time to time).

The Regulations and the procedure laid down therein can be accessed on the website of SEBI at www.sebi.gov.in.

PROTECTION AGAINST RETALIATION AND VICTIMISATION

The Company undertakes to provide suitable protection against any discharge, termination, demotion, suspension, threats, harassment, directly or indirectly or discrimination to any employee of the Company who files a Voluntary Information Disclosure Form, irrespective of whether the information is considered or rejected by SEBI or he or she is eligible for a Reward under the Regulations, by reason of:



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- a. Filing a Voluntary Information Disclosure Form under the Regulations;
- b. testifying in, participating in, or otherwise assisting or aiding SEBI in any investigation, inquiry, audit, examination or proceeding instituted or about to be instituted for an alleged violation of insider trading laws or in any manner aiding the enforcement action taken by SEBI;
- c. breaching any confidentiality agreement or provisions of any terms and conditions of employment or engagement solely to prevent any employee from cooperating with SEBI in any manner.

COMMUNICATION

This Code will be uploaded in the Intranet and website of the Company. The Code will be disseminated to all Designated Persons who shall abide by the same. The responsibility for complying with the provisions of the Regulations shall vest with each Designated Person including any violation by their immediate relatives.

The Compliance Officer can be contacted for any clarification/assistance.

CLARITY

This Policy has to be read in tandem with the Code for Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("UPSI").

AMENDMENTS TO THE CODE AS EFFECTED BY SECURITIES EXCHANGE BOARD OF INDIA'S ("SEBI") NOTIFICATIONS

SEBI periodically issues Notifications / Circulars to amend the Regulations. The Company in compliance with the same suitably amends the Code if/as required. Such Notifications / Circulars in Original Text can be accessed at the SEBI website i.e., www.sebi.gov.in -> Legal -> Regulations.

AMENDMENTS TO THE POLICY

The Managing Director is authorized to make minor modifications to this Code which will remove ambiguities, enhance clarity on the provisions of the Code etc.

In case of any major changes to the Policy, the Board of Directors shall amend this policy, as may be required to be in line with the changes, amendments and modifications if any in the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Further, in case of any amendment, clarification, circular, notification etc. issued by a competent authority, which is not consistent with the provisions laid down under this Policy, the provisions of such amendment, clarification, circular, notification, etc. shall prevail and this policy shall stand amended accordingly, without any further action, on and from the date on which such amendment, clarification, circular, notification comes in to effect.



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Form1*

General Declaration from all Promoters/Promoter Group Members/Directors/Key Managerial Persons / Designated Persons (as specified by the Company)

To
The Compliance Officer,
Sandu Pharmaceuticals Limited
Plot No 25,26,29& 30
Pilerne Industrial Estate,Marra
Saligao Bardez Goa 403511

I, _____s/oord/o _____
residing at _____ hereby declared that:

- I shall maintain the confidentiality of all Price Sensitive Information, coming to my knowledge, whether directly or indirectly, and I shall not pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sale of securities of the Company.
- I shall disclose price sensitive information only on a“ need to know” basis to the extent it is required to discharge my duties and in the best interest of the Company.
- Before disclosure of price sensitive information I shall confirm with the Chief Financial Officer and / or Managing Director as to whether the information qualifies for legitimate purpose.
- I shall conduct all the dealings in the securities of the Company only when the trading window is open.
- I shall not purchase, sell or otherwise deal or trade in the Company’s securities during the periods when the trading window is closed, or during any other period as may be specified by the Company from time to time.
- I shall get pre-clearance as per the procedure laid down by the Company, for any transaction involving securities above the threshold limit fixed by the Company from time to time.
- I shall provide details of dealings in securities on quarterly basis and also annually besides providing such information that the Company may call upon me to provide from time to time.
- I shall provide the names and relationships of my dependent relatives initially and from time to time, whenever there is any change in the enclosed list.
- I understand that the regulations relating to, trading window, pre-clearance, periodic reporting of transactions in the Company’s securities shall apply in respect of my dependent relatives also and I undertake to furnish the information in this regard.
- I shall strictly abide by the Code of Conduct for prevention of insider trading as notified by the



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Company from time to time. I fully understand that in case of contravention, I may be penalized and appropriate action will be taken by the Company. I also understand that on contravention of Code of Conduct, I may be liable to disciplinary

Action by the Company, and this action does not preclude Securities and Exchange Board of India from taking any action against me.

- I hereby confirm that I have read and understood the policies “Code of Conduct To Regulate, Monitor And Report Trading By Insiders In Securities” and “Code for Practices and Procedures for Fair disclosure of Unpublished Price Sensitive Information” which are available in the website of the Company.

Additional details for the purpose of maintenance of Digital Database by the Company:

Name		
DIN, if available		
PAN		
Aadhar No		
Details of persons with whom UPSI is shared [Add additional fields if required in separate sheet]	Spouse Name	
	Aadhar No & PAN	
	Son Name	
	Aadhar No & PAN	
	Daughter Name	
	Aadhar No & PAN	
	Father Name	
	Aadhar No & PAN	
	Mother Name	
	Aadhar No & PAN	
	Brother Name	
	Aadhar No & PAN	
Sister Name		
Aadhar No & PAN		
Mobile Number		
Phone Number		
Alternate Contact Number		
Educational Qualifications		
Qualified from (Institution)		
Details of previous employment (from starting till joining Sandu Pharmaceuticals Limited)		
#Persons with whom material Financial relationship is held		

The term “Material Financial Relationship” shall mean a relationship in which one person is a



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SANDU PHARMACEUTICALS LIMITED

CIN:L24233GA1985PLC001587

Regd. Office: Plot Nos. 25, 26, 29 & 30, Pilerne Industrial Estate, Marra, Saligao, Bardez, Goa 403511.

Tel: +91 832 2407474 / 6715000, E-mail: sandupharma@sandu.in, Website: www.sandu.in

recipient of any kind of payment such as by way of a loan or gift from a Designated Person during the immediately preceding twelve months, equivalent to at least 25% of the annual income of such Designated Person but shall exclude relationships in which the payment is based on arm's length transactions

Signature:

Date:

*or any other electronic format



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Form2*

Statement of Holdings in the Company as on _____

To

The Compliance Officer,
Sandu Pharmaceuticals Limited
Plot No 25,26,29& 30
Pilerne Industrial Estate,Marra
Saligao Bardez Goa 403511

Name of the Promoter/Promoter Group Member/Director /Key Managerial Persons/Designated Person	
Category (Promoter/ Promoter Group Member/Director/Key Managerial Persons / Employee / Designated Person)	
Employee No. (if employee)	
Department(if employee)	
Designation(if employee)	
Date of joining/appointment/becoming a Promoter/Promoter Group Member	

S.No	Name	Relationship	Type of Security	No of Securities held	% of Securities held
1	Self	NA			
2	Relatives				
2.1					
2.2					
2.3					
2.4					
2.5					
2.6					

Signature:

Date:

*or any other electronic format



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Form-3*

Form for Pre-Clearance of Trading in Securities

1	Name of the Director/Designated Person	
2	Employee No.(if an employee)	
3	Department(if an employee)	
4	Present holding in Company's securities:(Self an dependent relatives)	
	a)Numberof Shares	
	b)Value	
5	Date of last transaction	
6	Mode of Proposed transaction	
7	Whether the proposed transaction is in the self-name or in the name of the dependent(s)	
8	Name of the dependent(s), if the transaction is in the name(s) of the dependent(s)	
9	Name of the deposit or participant with whom the transacting person hasan account	
10	DP ID No./Client ID or Folio No.	
11	Date of proposed transaction	
12	Nature of proposed transaction	
13	Number of Shares involved	
14	Amount involved	
15	Net holding after the transaction	
	a)Number of Shares	
	b)Value	
16	Purpose of transaction	

Undertaking by the applicant:

1. I confirm that I am not in the possession of or have no access to any Unpublished Price Sensitive Information about the Company as on this date.
2. I further undertake that on receipt of / access to such information I shall inform the Compliance Officer of the change in my position and that I shall completely refrain from dealing in the securities of the Company before the expiry of 24 hours from time such information become public.
3. I have not contravened the Code of Conduct to regulate, monitor and report trading by Designated Persons as notified by the Company from time to time.
4. I have not entered into any purchase / sale (as applicable) transaction in the securities of the Company in the last six months prior to the proposed transaction.
5. I undertake to submit the necessary forms with two (2) days of execution of the transaction or report the reasons for not executing the transaction, if the transaction is not undertaken.



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

7. I agree to abide by all the terms and conditions specified.

8. I shall furnish any other information/explanation when called upon.

9. Theaforementionedparticularsarefullandtruetothebestofmyknowledge

Signature of the Applicant

Date:



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(For Internal use only) CLEARANCE BY COMPLIANCE OFFICER

I here by give clearance for the transaction for which pre-clearance has been sought, subject to adherence to the following conditions by the applicant.

Conditions:

- The transactions shall be effect with a period of one week from the date of clearance viz., on or before _____.
- On expiry of one week, the applicant has to submit fresh request for pre-clearance of the transaction.
- The applicant shall not enter into a contra / opposite transaction i.e., buy / sell (as applicable) the securities of the Company for a period of 6 months following this transaction.
- This clearance shall automatically stand withdrawn if subsequently the trading window is declared closed during period of the sanction therein.
- The applicant shall furnish such other information or execute such other undertaking as may be required by the compliance officer in this regard.

Date:

Signature and Seal

*or any other electronic format



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*

Form 4*

Quarterly Statement of Trading in Securities for the period _____ to _____

To
The Compliance Officer,
Sandu Pharmaceuticals Limited
Plot No 25,26,29& 30
Pilerne Industrial Estate,Marra
Saligao Bardez Goa 403511

[Also provide details of Dependent Persons/Connected Persons (ifany)]

Name	Relationship	No of Shares held on _____	No of Shares bought during _____ to _____	No of Share sold during _____ to _____	No of Shares held on _____	Client ID/ Folio No
	Self					
Relatives						

Signature:

Date:

Note: This information is to be furnished in respect of the Employee / Director as well as his / her relatives within 15 days from the end of each calendar quarter.

*or any other electronic format



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*

Form5*

Annual Statement of Holdings for the period _____ to _____

To
The Compliance Officer,
Sandu Pharmaceuticals Limited
Plot No 25,26,29& 30
Pilerne Industrial Estate, Marra
Saligao Bardez Goa 403511

[Also provide details of Dependent Persons/Connected Persons (if any)]

Name	Relationship	Type of Securities	No of Securities held	% of Securities held
Relatives				

Signature:

Date:

Note: This form shall be submitted within a period of 30 days from the end of each Financial Year.

*or any other electronic format

FORMS FOR DESIGNATED PERSONS WHO ARE NOT INDIVIDUALS



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*

Form1E*

General Declaration from all Designated Persons who are not individuals (as specified by the Company)

To
The Compliance Officer,
Sandu Pharmaceuticals Limited
Plot No 25,26,29& 30
Pilerne Industrial Estate,Marra
Saligao Bardez Goa 403511

We, _____ represented by _____ having the registered office at _____ and designated person in the Company hereby declared that:

- We shall maintain the confidentiality of all Price Sensitive Information, coming to our knowledge, whether directly or indirectly, and we shall not pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sale of securities of the Company.
- We shall disclose price sensitive information only on a “need to know” basis to the extent it is required to discharge our duties and in the best interest of the Company.
- Before disclosure of price sensitive information, we shall confirm with the Chief Financial Officer and / or Managing Director as to whether the information qualifies for legitimate purpose.
- We shall conduct all the dealings in the securities of the Company only when the trading window is open. We also understand that the trading window will be closed from the end of the quarter and will re-open only after expiry of 48 Hours after declaration of results.
- We shall not purchase, sell or otherwise deal or trade in the Company’s securities during the periods when the trading window is closed, or during any other period as may be specified by the Company from time to time.
- We shall get pre-clearance as per the procedure laid down by the Company for any transaction involving securities above the threshold limit fixed by the Company from time to time.
- We shall provide details of dealings in securities on quarterly basis and also annually besides providing such information that the Company may call upon us to provide from time to time.
- We shall provide the names and other details of the persons with whom Unpublished Price Sensitive Information (UPSI) is shared and changes in the same will be updated as when the



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need arise.

- We shall strictly abide by the Code of Conduct for prevention of Insider Trading as notified by the Company from time to time. We fully understand that in case of contravention, we may be penalized, and appropriate action will be taken by the Company. We also understand that on contravention of Code of Conduct, we may be

liable to disciplinary action by the Company, and this action does not preclude Securities and Exchange Board of India from taking any action against us.

- We hereby confirm that We have read and understood the policies “Code of Conduct to Regulate, Monitor and Report Trading by Insiders in Securities” and “Code for Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information” which are available in the website of the Company.

Additional details for the purpose of maintenance of Digital Database by the Company:

Organization Name		
Type of Organization(Company/HUF/Trust /Bank)		
Registration Number		
Registered Address		
GSTIN, if available		
Contact Person		
Contact Person Phone Number		
Details of persons with whom UPSI is shared [Add additional fields if required in separate sheet]	Name1	
	PAN 1	
	Aadhar/Passport1	
	Contact No1	
	Name2	
	PAN 2	
	Aadhar/Passport2	
Contact No2		
Is Non-Disclosure Agreement signed?If yes, kindly mention the validity period		

Signature with seal: Date:

*or any other electronic format



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Form 2E*

Statement of Holdings in the Company as on _____

To
The Compliance Officer,
Sandu Pharmaceuticals Limited
Plot No 25,26,29& 30
Pilerne Industrial Estate,Marra
Saligao Bardez Goa 403511

Name of the Entity	
Registration Number	
Date of first association with the Company	

S.No	Name	Relationship	Type of Security	No of Securities held	% of Securities held
1	Company/ Entity	Own			
2	Subsidiary/Holding/ Associate Company/ Entity				

Signature with seal: Date:

*or any other electronic format



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Form 3E*

Form for Pre-clearance of Trading in Securities

1	Name of the Entity	
2	Registration No.	
3	Present holding in Company's securities:	
	a)Number of Shares	
	b)Value	
4	Date of last transaction	
5	Mode of Proposed transaction	
6	Name of the depository participant With whom the transacting person has an account	
7	DPID No./Client ID or Folio No.	
8	Date of proposed transaction	
9	Nature of proposed transaction	
10	Number of Shares involved	
11	Amount involved	
12	Net holding after the transaction	
	a)Number of Shares	
	b)Value	
13	Purpose of transaction	

Undertaking by the applicant:

1. We confirm that we are not in possession of or have no access to any unpublished price sensitive information about the company as on this date.
2. We further undertake that on receipt of/ access to such information we shall inform the Compliance Officer of the change in our position and that we shall completely refrain from dealing in the securities of the Company before the expiry of 24 hours from time such information become public.
3. We have not contravened the Code of Conduct to regulate, monitor and report trading by Insiders as notified by the Company from time to time.
4. We have not entered into any purchase / sale (as applicable) transaction in the securities of the company in the last six months prior to the proposed transaction.
5. We undertake to submit the necessary forms with two (2) days of execution of the transaction or report the reasons for not executing the transaction, if the transaction is not undertaken.
6. We hereby undertake not to transact in securities in the sanctioned period in case trading



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window is declared closed subsequently.

7. We agree to abide by all the terms and conditions specified.
8. We shall furnish any other information/explanation when called upon.
9. The afore mentioned particulars are full and true to the best of my knowledge.

Date:

Signature of the Applicant with seal



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CLEARANCE BY COMPLIANCE OFFICER

I hereby give clearance for the transaction for which pre-clearance has been sought, subject to adherence to the following conditions by the applicant.

Conditions:

- The transaction shall be effect with a period of one week from the date of clearance viz., on or before.
- On expiry of one week, the applicant has to submit fresh request for pre-clearance of the transaction.
- The applicant shall not enter into a contra / opposite transaction i.e., buy / sell (as applicable) the securities of the Company for a period of 6 months following this transaction.
- This clearance shall automatically stand withdrawn if subsequently the trading window is declared closed during period of the sanction therein.
- The applicant shall furnish such other information or execute such other undertaking as may be required by the compliance officer in this regard.

Signature with seal: Date:

*or any other electronic format



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Form 4E*

Quarterly Statement of Trading in Securities for the period _____ to _____

To
The Compliance Officer,
Sandu Pharmaceuticals Limited
Plot No 25,26,29& 30
Pilerne Industrial Estate,Marra
Saligao Bardez Goa 403511

[Also provide,details of Connected Persons(if any)]

Name	Relationship	No of Shares held on _____	No of Shares bought during _____ to _____	No of Share sold during _____ to _____	No of Shares held on _____	Client ID/ Folio No
Company / Entity (Designated Person)	Own					
Holding / Associate /Subsidiary Company / Entity						

Signature with seal:

Date:

Note:This information is to be furnished within15 days from the end of each calendar quarter.

*or any other electronic format



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Form 5E

Annual Statement of Holdings for the period _____ to _____

To
The Compliance Officer,
Sandu Pharmaceuticals Limited
Plot No 25,26,29& 30
Pilerne Industrial Estate,Marra
Saligao Bardez Goa 403511

[Also provide,details of Connected Persons (ifany)]

Name	Relationship	Type of Securities	No of Securities held	% of Securities held
Company / Entity (Designated Person)	Own			
Subsidiary/Holding/ Associate Company/ Entity				

Signature with seal:

Date:

Note:This form shall be submitted within a period of 30days from the end of each Financial Year.

*or any other electronic format



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Form 4 PT

Report of Decision not to Trade after Securing Pre-Clearance [common for individual and others]

1	Name of the designated person	
2	Date of pre-clearance	
3	Serial No.of pre-clearance	
4	Type of securities which was proposed to be traded	
5	Nature of proposed transaction	
6	No.or value of securities which was proposed to be traded	
7	Reason for not executing trade after securing pre-clearance	
8	Holding of securities as on date	
	Type of securities held	
	Number of securities	
	Value of securities held	

I here by declare that the particulars furnished above are true and correct.

Place:

Date:

Signature of the Designated Person

BOARD'SAPPROVAL:

This policy was amended based on circular received from SEBI (Prohibition of Insider Trading Regulations),2015 dated 25thJune 2024 and approved by the Board of Directors at its meeting held on 14TH November 2024.

Policy effective as on 14.11.2024

