

Date: October 08, 2025

To,

National Stock Exchange of India Limited

Exchange Plaza, C-1, Block G,
Bandra Kurla Complex,
Bandra (East), Mumbai – 400051
Maharashtra, India.

Symbol: FABTECH

BSE Limited

Listing Department
Floor 25, P J Towers,
Dalal Street, Mumbai – 400001
Maharashtra, India.

Scrip Code: 544558

Dear Sir/Madam,

Subject: Intimation under Regulation 8(1) and 8(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 - Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

We enclose, in terms of Regulation 8(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended ('SEBI PIT Regulations'), the 'Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information' of the Company framed as per Regulation 8(1) of SEBI PIT Regulations.

In compliance with the aforesaid regulation, the above policy is also being uploaded on the Company's website at <https://fabtechnologies.com/policies/>

This is submitted for your information and records.

Thank you.

**Yours faithfully,
For Fabtech Technologies Limited**

NEETU
SUNIL
BUCHASIA

Digitally signed by
NEETU SUNIL
BUCHASIA
Date: 2025.10.08
11:53:07 +05'30'

Neetu Sunil Buchasia
Company Secretary and Compliance Officer
ICSI Membership No.: A61496

FABTECH TECHNOLOGIES LIMITED

(FORMERLY KNOWN AS FABTECH TECHNOLOGIES PRIVATE LIMITED)

**CODE OF CONDUCT FOR REGULATING, MONITORING & REPORTING OF
TRADES AND PREVENTION OF INSIDER TRADING**

1. Preamble:

Regulation 9 of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("PIT Regulations") requires, inter alia, the board of directors of every listed company to 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 and immediate relatives of designated persons towards achieving compliance with these regulations and enforce a code of internal procedures and conduct based on the Model Code in accordance with the PIT Regulations. Further, Regulation 7 of the PIT Regulations requires every promoter, member of the promoter group, key managerial personnel, directors and employee of listed companies to disclose their shareholdings and changes to such shareholding to the respective companies.

In compliance with the above requirements, the Company has introduced a Code of Conduct for Regulating, Monitoring & Reporting of Trades and Prevention of Insider Trading (hereinafter referred to as the "Code of Conduct" or "Code").

2. Definitions:

"Act" shall mean the Companies Act, 2013 and rules framed thereunder, notified by the Ministry of Corporate Affairs, Government of India, as amended from time to time;

"Board" means the Board of Directors of the Company.

"Directors" shall mean all the members of the Board of Directors of the Company, including the Independent Directors

"Company" means Fabtech Technologies Limited (formerly known as Fabtech Technologies Private Limited).

"Code" or **"Code of Conduct"** shall mean Code of Conduct for Regulating, Monitoring & Reporting of Trades and Prevention of Insider Trading of the Company as amended from time to time.

"Compliance Officer" means the Company Secretary appointed by the Company and designated for the purpose of the Code, by the Board.;

"Connected Person" shall mean the persons as defined under Regulation 2(d) of the PIT Regulations.

"PIT Regulations" means Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time.

"Designated Person" shall mean a person occupying any of the following position in the company:

- (i) Promoters and promoter group of the Company;
- (ii) All Directors on the Board;
- (iii) All Key Managerial Personnel;
- (iv) All Senior Managerial Personnel;
- (v) All Employees (above manager grade) in the Finance & Accounts, Legal, Secretarial & Compliance, Investor Relations, Communications and Media Communications departments;
- (vi) Any other Employee who on the basis of their role and function in the Company, is reasonably expected to have access to UPSI(s) relating to the Company, as may be decided by the Chairman / Managing Director / Whole-Time Director / Joint Managing Director / Compliance Officer, from time to time;

"Dealing in Securities" shall mean an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in the securities of the Company either as principal or agent but shall not include a gift of securities to immediate relatives or within the promoter group;

"Generally Available Information" generally available information" means information that is accessible to the public on a non-discriminatory basis and shall not include unverified event or information reported in print or electronic media;

"Insider" As defined under Clause 2 (g) of the PIT Regulations, shall mean any person who is a Connected Person; or in possession of or having access to UPSI;

"Insider Trading" shall mean actions where insiders use UPSI to arrive at securities trading/dealing (including buying as well as selling) decisions;

"Immediate relative" shall mean a spouse of a person and includes parent, sibling and child of such person or of the spouse, any of whom is either dependent financially on such person or consults such person in taking decisions relating to trading in securities;

"Need-to-Know" shall mean that the UPSI should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information;

"Promoter" shall have the meaning assigned to it under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended or any modification thereof;

"Security" shall have the meaning assigned to it under the Securities Contracts (Regulations) Act, 1956 or any modification thereof except units of a mutual fund;

"Stock Exchange" shall mean the National Stock Exchange of India or Bombay Stock Exchange (BSE) or any other stock exchange which is recognized by the Central Government or SEBI under the Securities Contracts (Regulation) Act, 1956 and any amendments thereto;

"Trading" means and includes subscribing, redeeming, switching, buying, selling, dealing, or agreeing to subscribe, redeem, switch, buy, sell, deal in any securities, and "trade" shall be construed accordingly;

"Trading Day" means a day on which recognized Stock Exchanges are open for Trading;

"Trading Window" means a trading period for Trading in Company's Securities as specified by the Company from time to time;

"Unpublished Price Sensitive Information"/ "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 following:

- (i) Financial Results;
- (ii) Dividends;
- (iii) Change in capital structure; like bonus, right issue, FPO, Buy back etc.
- (iv) Mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions; and
- (v) Changes in Key Managerial Personnel.
- (vi) Any other critical information which is not available at public domain.

3. Role Of the Compliance Officer:

- i. The Compliance Officer shall be responsible for setting forth policies, procedures, monitoring adherence to the PIT Regulations, preclearing of Designated Persons, monitoring of trades and the implementation of the Code of Conduct under the overall supervision of the Board of Directors.
- ii. The Compliance Officer shall maintain a record of the Designated Employees and any changes therein.
- iii. The Compliance Officer shall assist all the Designated Employees in addressing any clarifications regarding the PIT Regulations and the Company's Code of Conduct.
- iv. The Compliance Officer may in consultation and as directed by the Board, specify prohibited period from time to time and immediately make an announcement notify the 'No-Trading Period'.
- v. Process the pre-clearance of trade as per approval matrix.
- vi. Clarify issues regarding the Code and redress the grievances of the Designated Persons.
- vii. Identify and notify the list of Designated Persons on the basis of specific transactions, as required under the Code.
- viii. Notify the trading plan to the stock exchanges where the securities are listed, on approval of the plan.

- ix. The Compliance Officer shall be authorised to make necessary disclosures with the Stock Exchanges and other relevant statutory authorities in compliance with the PIT Regulations.
- x. The Compliance Officer shall discharge other functions and duties as prescribed in the Code or the PIT Regulations.

4. Prohibition of certain dealings in securities:

Designated Persons and their Immediate Relatives shall not:

- a) trade in securities of the Company when the trading window is closed.
- b) trade in securities, directly or indirectly, either on his behalf, or on behalf of any other person, while in possession of UPSI, except in compliance with the provisions of this Code and PIT Regulations.
Provided that, exercise of stock options / stock appreciation rights under the Company's Share Based Employee Benefit Schemes, shall not be considered as trading or purchase of securities, except for disclosure requirements.
- c) enter into trade for short term consideration, (e.g. intra-day trading) including contra-trade in the securities.
- d) deal in derivatives related to the securities at any time. It is clarified that, any trade in index futures or such other derivative where the scrip of Company is part of it, is not restricted under the terms of this clause of this Code or under the other provisions herein.
- e) advise any person to trade or not to trade in the securities when in possession of any UPSI.

5. Preservation of "Price Sensitive Information"

- i. The Insider shall maintain confidentiality of all 'Unpublished Price Sensitive Information'. 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. Further, 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.
- ii. Such persons shall also not pass on such information to any person directly or indirectly by means such as making a recommendation for the purchase or sale of securities etc.
- iii. 'Unpublished Price Sensitive Information' shall be handled on a 'need to know' basis. Such information should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.

- iv. Any person in receipt of unpublished price sensitive information pursuant to a “legitimate purpose” shall be considered an “insider” and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with the PIT Regulations.
- v. UPSI may be communicated, provided, allowed access to or procured, in connection with a transaction which entails:
 - an obligation to make an open offer under the Takeover Regulations where the Board of the Company is of informed opinion that the proposed transaction is in the best interests of the Company; or
 - not attracting the obligation to make an open offer under the Takeover Regulations but where the Board of the Company is of informed opinion that the proposed transaction is in the best interests of the Company and the information that constitute UPSI is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the Board may determine.

However, the Board shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the limited purpose and shall not otherwise trade in securities of the Company when in possession of UPSI.

6. Communication or procurement of UPSI

- i. No Insider shall communicate, provide, or allow access to any UPSI, 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.
- ii. No person shall procure from or cause the communication by any Insider of UPSI, 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.
- iii. Notwithstanding anything contained herein, UPSI may be communicated, provided, allowed access to or procured, in connection with a transaction pursuant to Regulation 3 of the PIT Regulations.

7. Prohibition on dealing, communication or counselling on matters relating to insider trading

No insider when in possession of unpublished price sensitive information shall:

- a) either on his behalf, or on behalf of any other person, deal in securities on the company; or
- b) communicate or counsel directly or indirectly, any unpublished information to/from any person.

8. Restrictions and procedures for directors, officers and designated persons while dealing in securities of the Company

Designated Persons may deal in Securities subject to compliance with the PIT Regulations and this Policy.

1. Prohibition in dealing in securities other than during a valid trading window:

All Designated Persons shall conduct all their dealings in the securities of the Company only in a valid trading window within the threshold limit prescribed hereunder and shall not deal in any transactions involving the purchase or sale of the Company's securities during the period when the trading window is closed.

2. Valid trading window for dealing in securities of the company:

- a. The Compliance Officer shall notify opening of a 'trading window' during which the Designated Persons may trade in the Company's securities after securing pre-clearance from the Compliance Officer in accordance with this Policy;
- b. Designated Persons and their immediate relatives shall not trade in the Company's securities when the trading window is closed. However, eligible Employees of the company may exercise employee stock options, if any, when the trading window is closed;
- c. Additionally, the trading window shall be closed in particular for a Designated Person or class of Designated Persons when the Compliance Officer determines that a Designated Person or class of Designated Persons can reasonably be expected to have possession of UPSI, for such periods as determined by the Compliance Officer. Designated Person or class of Designated Persons will receive a notification on such special blackout periods.
- d. Prohibited period means:
 - The period beginning with the day when the intimation of the Board/Committee meeting is given to the Stock Exchanges to consider any price sensitive information till such time which shall in any event not be earlier than 48 hours after the time the Unpublished Price Sensitive Information is made public; and
 - Such other period as may be specified by the Compliance Officer from time to time in consultation with the Chairman and/or Managing Director.

9. Procedures for dealing in the securities of the company

1. Pre-Clearance of Trading in Securities of the Company:

All Designated Persons who intend to deal in securities of the Company in their own name or in the name of their dependent family members (above the minimum Threshold Limit), shall obtain pre-clearance of the transactions as per the pre-dealing procedure as described hereunder. However, no Designated Person shall apply for pre-clearance of any proposed trade if such person is in possession of UPSI even if the trading window is not closed.

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

2. Procedure for Pre-clearance of Trade

- a. An application for pre-clearance of trade shall be made in specified format to the Compliance Officer, as provided under 'Form D attached as Annexure 4'.
- b. An undertaking in 'Form E attached as Annexure 5' shall be executed in favour of the Company by such persons incorporating, inter-alia, the following clauses, as may be applicable:
 - Designated Person does not have any access or has not received 'Unpublished Price Sensitive Information';
 - He/she has access to or receives "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 position and that he/she would completely refrain from dealing in the securities of the Company till the time such information becomes public;
 - That he or she has not contravened the Policy as notified by the Company from time to time; and
 - That he or she has made a full and true disclosure in the matter.
- c. The Compliance Officer shall consider the application made as above and shall issue the order as specified.

3. Threshold limit

The pre-clearance shall not be necessary, if the aggregate trade value of shares to be traded in a quarter in one or more transactions does not exceed Rs. 10,00,000/- (Ten Lacs).

4. Validity of Pre-clearance period

Designated Persons shall execute their order in respect of securities of the Company within Seven Trading Days after the approval of pre-clearance is given and shall file within two trading days of execution of the trade, the details of such trade, with the Compliance Officer. If the order is not executed within the time specified, he/she shall obtain pre-clearance again.

5. Restricted Period

All Designated Employees who buy or sell any number of securities of the Company shall not enter into any contra trade/opposite trade i.e., sell or buy any number of securities during the next six months following the prior transaction for purchase or sale of securities, as the case maybe. In case of any contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

Provided that this shall not be applicable to for trades pursuant to exercise of stock options.

- The Compliance Officer may grant relaxation from strict application of such restriction in the Code above for reasons to be recorded in writing providing that such relaxation does not violate the PIT Regulations.
- All Designated Employees shall take pre-clearance from the Compliance Officer before creating, revoking or invoking lien/Pledge on securities of the Company for such value as prescribed in this clause.

10. Trading Plans:

1. PIT Regulations enable an Insider to frame a Trading Plan. If any Insider wishes to formulate a Trading Plan for trading in Debentures, they may do so and present it to the Compliance Officer for approval in 'Form F attached as Annexure 6' and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan. The Compliance Officer will assess the Trading Plan and evaluate whether the plan is in violation of the PIT Regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.
2. Trading Plan shall:
 - a. not entail commencement of trading on behalf of the Insider earlier than six months from the public disclosure of the Plan.
 - b. not entail trading for the period between twentieth trading day prior to the last day of any financial period for which results are required to be announced by the Company of the securities and the second trading day after the disclosure of such financial results;
 - c. entail trading for a period of not less than twelve months;
 - d. not entail overlap of any period for which another trading plan is already in existence;
 - e. set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected;
 - f. not entail trading in securities for market abuse.
3. 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.

Pre-clearance of trades shall not be required for a trade executed as per an approved trading plan and that trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

4. The trading plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.

However, the implementation of the trading plan shall not be commenced if any UPSI in possession of the insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation and in such event the commencement of the plan shall be deferred until such UPSI becomes Generally Available Information.

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

11. Disclosures of trading by Insiders

1. General Provisions:

- a. Every public disclosure herein shall be made in such form as may be specified.
- b. 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.
- c. 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 set-out herein. Provided that Trading in derivatives of securities is permitted by any law for the time being in force.
- d. 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.

2. Disclosures by certain persons:

- a. Initial Disclosures: Every person on appointment as key managerial personnel or a director of the company or upon becoming a promoter or member of the promoter group shall disclose his holding of securities of the company as on the date of appointment or becoming a promoter, to the company in 'Form A' attached as Annexure 1 within seven days of such appointment or becoming a promoter.
- b. Continual Disclosures: Every promoter, member of the promoter group, designated person and director of every company shall disclose to the company in 'Form B' attached as Annexure 2 the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over

any calendar quarter, aggregates to a traded value in excess of ten lakh rupees or such other value as may be specified.

3. Disclosure by the Company

- a. The Company shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.
- b. However, the disclosure of the incremental transactions after any disclosure by the Company, shall be made when the transactions effected after the prior disclosure cross the threshold specified above.

4. Disclosure by Connected Persons

The Compliance officer may, at its discretion require any other Insider to make disclosures of holdings and trading in Securities of the Company in such form and at such frequency as may be deemed necessary in order to monitor compliance with these PIT Regulations in 'Form C' attached as Annexure 3.

12. Inquiry in case of leakage of UPSI

- a. The Company has formulated written policies and procedures for inquiry, in case of an alleged leak or misuse of UPSI.
- b. Employees can raise concerns against any alleged leak, or suspected attempt to leak UPSI, or unethical use of UPSI, in accordance with informant mechanism introduced by SEBI, or as per the procedure prescribed under Company's Whistle Blower Policy.
- c. Retaliation for reporting suspected violations, is strictly prohibited under the Code and the Company's Whistle Blower Policy. An employee who reports alleged violations of insider trading laws will be protected against any direct or indirect, discharge, discrimination, termination, demotion, suspension, threats, harassment.

13. Penalty for contravention of the Policy:

Every Employees and Designated Person shall be individually responsible for complying with the applicable provisions of this Policy (including to the extent the provisions hereof are applicable to their immediate relatives).

- a. The persons who violate this Policy 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 Employee may include wage freeze, suspension or termination of employment.

- b. Action taken by the Company for violation of the Policy against any person will not preclude SEBI from taking any action for violation of the Regulations or any other applicable laws/rules/regulations.
- c. In case it is observed by the Compliance Officer that there has been a violation of the Policy by any person, he/she shall forthwith inform the Compensation Committee of the Company about the violation. The penal action will be initiated on obtaining suitable directions from the Compensation Committee.

The Compliance Officer shall simultaneously inform SEBI about such violation. The person, against whom information has been furnished by the Company/Compliance Officer to SEBI for violations of the Policy, shall provide all information and render necessary co-operation as may be required by the Company/Compliance Officer or SEBI in this connection.

14. Disclosure of Code:

This Code (along with code of fair disclosure) will be uploaded on the website of the Company at www.fabtechnologies.com. The Code will be disseminated to all Designated Persons who shall abide by the same. The responsibility for complying with the provisions of the PIT Regulations shall vest with each Designated Person including any violation by their immediate relatives.

ANNEXURE 1

FORM A

SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7(1)(b) read with Regulation 6(2) – Disclosure on becoming a Key Managerial Personnel / Director / Promoter / Member of the promoter group – Initial disclosures]

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

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN / DIN & Address with contact nos.	Category of Person (KMP /Directors/ Promoters / member of the promoter group / immediate relative / others etc.)	Date of appointment of KMP/ Director / OR Date of becoming Promoter / member of the promoter group	Securities held at the time of appointment of KMP / Director / upon becoming Promoter / member of the promoter group		% of Shareholding
			Type of security (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements, etc.)	No.	

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

Details of Open Interest (OI) in derivatives on the securities of the company held on appointment of Key Managerial Personnel (KMP) or Director or upon

becoming a Promoter or member of promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6 (2)

Open Interest of the Future contracts held at the time of appointment of Director/KMP or upon becoming Promoter / member of the promoter group			Open Interest of the Option contracts held at the time of appointment of Director/KMP or upon becoming promoter / member of the promoter group		
Contract 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

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

Name & Signature:

Designation:

Date:

Place:

ANNEXURE 2

FORM B

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

Name of the company: _____

ISIN of the company: _____

Details of change in holding of Securities of Promoter/ members of the promoter group/ Designated Person/ Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2)

Name, PAN, CIN/ DIN, & address with contact nos.	Category of Person (Promoter/ Promoter Group/ Designated Person/ Director / immediate relative	Securities held to prior 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	Exchange on which the trade was executed
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	to/other s etc.	Type of securi ty (for eg. Share s, Warra nts, Conve rtible Deben ture etc.)	No. and % of such Sharehol ding	Type of securit y (for eg. Shares, Warrant s, Convert ible Debent ure etc.)	No.	Val ue	Tran sacti on Type (Buy/ Sale/ Pled ge / Revo ke / Invok e	Type of securit y (for eg. Shares, Warrant s, Convert ible Debent ure etc.)	No. and % of such Sharehol ding	Fro m	To		etc.)	

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

Value of transaction excludes taxes/brokerage/any other charges

Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or Director of a listed company and immediate relative of such persons and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc.)							Exchange on which the trade was executed
Types of Contract	Contract Specification s	Buy		Sell			
		Notional Value	Number of units	Notional Value	Number of units		

			(contract*lot size)		(contract *lot size)	

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

Name & Signature:

Designation:

Date:

Place:

ANNEXURE 3

FORM C (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, & addresses with contact nos. of other connected persons as identified by the company	Connection with company	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.	No. and % of such Shareholding	Type of security (for eg. Shares,	No.	Value	Transaction Type (Buy/	Type of security (for eg. Shares,	No. and % of such Shareholding	From	To			

		Share s, Warran ts, Conve rtible Deben ture etc.)		Warrant s, Convert ible Debent ure etc.)			Sale/ Pledg e / Revo ke / Invok e	Warran ts, Conver tible Debent ure etc.)					

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
Type of Contract	Contract Specification	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	

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

Name:

Signature:

Place:

ANNEXURE 4

FORM D

APPLICATION FOR PRE-CLEARANCE

To,
The Compliance Officer,
Fabtech Technologies Limited
715, Janki Centre, Off Veera Desai Road,
Andheri West, Mumbai, 400053.

From:
Name:

Dear Sir,

Date: _____

Sub: Application for Pre-Clearance

I _____ hereby inform that, I have gone through the Code of Conduct for prevention of Insider Trading and I seek your 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.

1.	Name of the applicant		
2.	Designation		
3.	Nature of the securities and the number of securities held as on date		
4.	Application for		
5.	Relation with Employee		
6.	PAN		
7.	Folio No. / DP ID / Client ID No.)		
8.	The proposal is for		i. Purchase of securities ii. Subscription to securities iii. Sale of securities
9.	Proposed date of trading in securities		
10.	Estimated number of securities proposed to be acquired/subscribed/sold, etc.		
11.	Price at which the transaction is proposed		
12.	Current market price (as on date of application)		
13.	Whether the proposed transaction will be through stock		

	exchange or off-market deal		
14	Folio No. / DP ID / Client ID No. where the securities will be credited / debited		

I enclose the Undertaking as envisaged in the Internal Code of Conduct for Prevention of Insider Trading in the Listed/Proposed to be Listed Securities of the Company (Code) for your records.

I confirm that, I have read the Code and I am not in possession of UPSI 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 assure that the above information and disclosures are complete and true in the matter.

In light of the above, I request you to approve my above referred Trading Plan at the earliest.

Signature_____

ANNEXURE 5

FORM E

UNDERTAKING FOR PRE-CLEARANCE

To,
The Compliance Officer,
Fabtech Technologies Limited
715, Janki Centre, Off Veera Desai Road,
Andheri West, Mumbai, 400053.

From:
Name:

Pursuant to the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended and the Company's Internal Code of Conduct for Regulating, Monitoring and Reporting of Trades by Insiders under the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("**Code**"), I, _____, of the Company residing at _____,

_____ am desirous of Trading in the securities of the Company as mentioned in my application dated _____ for pre-clearance of the transaction.

I am issuing this undertaking pursuant to Clause 10 of the Code. I hereby confirm and undertake:

1. I, _____, holding a position / designation of _____ in the Company, as (Designated person / Specified Person) do hereby undertake to adhere to the terms, conditions and restrictions contained in the Code, as are currently in force.
2. I understand that any misrepresentation and/or false undertaking given herein may attract penalties as laid down under the Code.
3. That, I do not have access to, or have not had access to Unpublished Price Sensitive Information (UPSI) by virtue of my position or connection in the Company or otherwise, up to the time of signing this Undertaking.

OR

By virtue of my position in the Company I have access to Unpublished Price Sensitive Information (UPSI) or I may be deemed to be perpetually in possession of UPSI. Hence, I have submitted a Trading Plan to you on _____. I am now proposing to trade in the Securities of the Company as per my application dated _____ in compliance of the Trading Plan.

4. That, I shall obtain the pre-clearance of the Compliance Officer, before dealing in the Securities of the Company.

5. That, I will only sell/purchase the Securities of the Company for the reasons as mentioned in the application and will not buy/sell the Securities of the Company during the period Trading Window is closed.
6. That, in case I have access to or receive or am in possession of UPSI after the signing of the Undertaking but before the execution of the transaction, I shall inform the Compliance Officer.

OR

That I have access to and in possession of UPSI by virtue of my office as Director / KMP/Promoter or Member of Promoter group/ Connected Person/ Designated Person/Specified Person and that I would completely refrain from dealing in the Securities of the Company until 48 hours after such information becomes public.

7. That, I have not contravened the rules and other provisions contained in the Code currently in force.
8. That, I have made full and true disclosure in the matter.
9. That, I hereby indemnify the Company as below.
 - (a) To hold the Company and the Compliance Officer faultless in the event of any investigation against me for insider trading by any regulatory authority.
 - (b) To make good to the Company and the Compliance Officer all economic losses, fines or penalty if any, imposed on the Company as a result of any investigation by any regulatory authority / authorities into any of the transactions entered into by me in dealing with the Securities of the Company.
 - (c) To compensate the Company and the Compliance Officer for and towards all legal expenses incurred in defending itself in such investigations, including advocates' fees.
10. That, I shall be liable for punitive action and/or Company imposed sanctions for contravention of the Code apart from any action that may be taken against me by any regulatory authorities if it is proved that I have violated the SEBI (Prohibition of Insider Trading) Regulations, 2015.
11. That, I shall be bound by the Laws of India, in respect of this Undertaking and shall be subject to the jurisdiction of the Courts at Chennai only.

Name:

Signature:

ANNEXURE 6

FORM F

APPLICATION FOR PRE-APPROVAL OF TRADING PLAN

To,
The Compliance Officer,
Fabtech Technologies Limited
715, Janki Centre, Off Veera Desai Road,
Andheri West, Mumbai, 400053.

From:
Name:

Dear Sir,

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 your 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 UPSI 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 undertake that this trading plan is in compliance with regulation 5 (2) of SEBI (Prohibition of Insider Trading) Regulations, 2015

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

I assure that the above information and disclosures are complete and true in the matter.

In light of the above, I request you to approve my above referred Trading Plan at the earliest.

Signature _____
Name: