



ALPINE HOUSING DEVELOPMENT CORPORATION LIMITED

Code of Conduct for Prevention of Insider Trading

1. Pursuant to Securities and Exchange Board of India (Prohibition on Insider Trading) Regulations, 2015, as amended in December 2018, to put in place a framework for prohibition of Insider trading in securities & strengthen the legal framework, and as amended from time to time, The Board of Directors in their meeting held on March 28, 2019 approved and adopted the Code of conduct for Prevention of Insider Trading for Alpine Housing Development Corporation Limited (Herein after referred to as AHDCL) which came into force with immediate effect.

2. Applicability:

This Code is applicable to the Designated Persons of AHDCL and other Connected Persons as mentioned in this code.

3. Definitions:

- a. **“Act”** means the Securities and Exchange Board of India Act, 1992 (15 of 1992) and related amendments
- b. **“Board”** means the Board of Directors of the Company.
- c. **“Company”** means Alpine Housing Development Corporation Limited.
- d. **“Compliance Officer”** means the Compliance Officer appointed by AHDCL pursuant to Regulation 2 of the SEBI (Prohibition of Insider Trading) Regulations 2015, as amended 2018
- e. **“Connected Person”** means:
 - i. Any person who is or has during the six months prior to the concerned act been associated with a company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or being a director, officer or an employee of the Company or holds any position including a professional or business relationship between himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to Unpublished Price Sensitive Information or is reasonably expected to allow such access.
 - ii. Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established:
 - i. An immediate relative of connected persons specified in clause (i); or
 - ii. A holding company or associate company or subsidiary company; or
 - iii. An intermediary as specified in Section 12 of the Act or an employee or director thereof; or
 - iv. An investment company, trustee company, asset management company or an employee or director thereof; or
 - v. an official of a stock exchange or of clearing house or corporation; or
 - vi. a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
 - vii. a member of the Board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
 - viii. an official or an employee of a self-regulatory organization recognized or authorized by the Board; or
 - ix. a banker of the Company; or
 - x. a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of the Company or his immediate relative or banker of the Company, has more than ten per cent, of the holding or interest.
- f. **“Dealing in Securities”** means act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in Securities either as principal or agent.

g. **“Designated Persons(s)”** shall include:

- i. Promoters and their Immediate Relatives;
- ii. Directors of the Company;
- iii. Key Managerial Personnel of the Company
- iv. Every employee in the grade of Manager and above;
- v. every employee in the finance, accounts, secretarial, MIS and legal department as may be determined and informed by the Compliance Officer;
- vi. Permanent invitees to the meetings of the Board of Directors of the Company and committees of the Board of Directors of the Company (if any); and
- vii. Such other persons as may be notified by the Compliance Officer from time to time on the basis of their role in the Company and their access to Unpublished Price Sensitive Information.

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

i. **“Employee”** means every employee of the Company including the Directors (whether a whole time director or not) in the employment of the Company.

j. **“Generally available information”** means information that is accessible to the public on a non-discriminatory basis, information published on the websites of stock exchanges would ordinarily be considered as generally available.

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

l. **“Insider”** means any person who:

- i. A Connected Person; or
- ii. In possession of or having access to Unpublished Price Sensitive Information.

m. **“Insider Trading Regulations”** shall mean the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.

n. **“Key Managerial Person”** means person as defined in Section 2(51) of the Companies Act, 2013.

o. **“Promoter”** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.

p. **“Securities”** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund.

q. **“Takeover regulations”** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.

r. **“Trading”** means and includes subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell, deal in any securities, and “trade” shall be construed accordingly.

s. **“Trading Day”** means a day on which the recognized stock exchanges are open for trading.

t. **“Unpublished Price Sensitive Information”** means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to information relating to the following:

- i. Periodical Financial results
- ii. Intended declaration of Dividends (both interim & Final)
- iii. Change in capital structure
- iv. Amalgamation , Mergers, de-mergers, acquisitions, disposals and expansion of business
- v. Changes in key managerial personnel and
- vi. Material events in accordance with the listing agreement;

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

u. **Preservation and sharing of “Unpublished Price Sensitive Information”:**

A. All information shall be handled within the Company on a need-to-know basis and no Unpublished Price Sensitive Information shall be communicated to any person except in furtherance of the Insider’s legitimate purposes, performance of duties or discharge of his legal obligations.

B. Provided that Unpublished Price Sensitive Information 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 Directors 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 Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the Company and the information that constitute Unpublished Price Sensitive Information is disseminated or is to be made generally available at least two Trading Days prior to the proposed transaction being effected in such form as the Board of Directors may determine.

However, the Board of Directors shall require all such parties to whom Unpublished Price Sensitive Information is either provided, made available or provided access, to execute agreements to obligate confidentiality and nondisclosure on the part of such parties of such information and keep all information so received confidential, except for the limited purpose for which the information was disclosed and shall not otherwise trade in listed Securities or Securities proposed to be listed when in possession of Unpublished Price Sensitive Information.

v. Need to know:

- In clause above, “need to know” basis means that Unpublished Price Sensitive Information should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.
- All non-public information directly received by any Employee should immediately be reported to the Compliance Officer.

4. Maintenance of a structured digital data base

The Board of Directors shall ensure that a structured digital data base is maintained , containing the following

Names of persons or entities with whom information is shared

Permanent Account number, or other identifier

Time stamp and other internal controls and checks and audit trails to ensure non tampering of the data base

5. Institutional mechanism for prevention of insider trading

The Managing Director or CEO of the Listed company, intermediary or Fiduciary shall put in place a system of internal controls to ensure compliance with the requirement of the regulations to prevent Insider Trading

INTERNAL CONTROLS

All employees who have access to unpublished price sensitive information to be identified as ‘designated employee’
All unpublished price sensitive information shall be identified and confidentiality maintained as per the requirement of these regulations

Restrictions shall be placed on communication or procurement of unpublished price sensitive information

Lists of employees and other persons with whom such information is shares shall be maintained and they shall sign confidentiality agreements , or notice shall be served to all such employees and persons

All other relevant requirements specified under these regulations shall be complied with

The Audit Committee shall review compliance with the provisions of the regulations at least once a year.

Written policy shall be formulated by the Board of directors for enquiry in case of leak of unpublished price sensitive information or suspected leak, and initiate appropriate inquiries

The Listed company shall formulate a whistle blower policy and make employees aware of such policy to enable employees to report instances of leak of unpublished price sensitive information

Chapter 1

PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

6. Disclosure of price sensitive information

Prompt public disclosure of unpublished price sensitive information , by disclosure in public domain made as soon as credible and concrete information comes into being to make such information generally available .

Uniform and universal dissemination of unpublished price sensitive information in order for it to be accessible to the public at large, to avoid selective disclosure .

Prompt dissemination and disclosure in the public domain and made available generally , of unpublished price sensitive information , that gets disclosed selectively , due to inadvertence or otherwise .

Appropriate and fair response shall be made by the company , to queries on news reports and requests for verification of market rumors , by regulatory authorities.

Transcripts or records of proceedings on financial information and meetings shall be made available on the website of the company.

The Company Secretary shall be designated as the chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information .

The company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information

Unpublished price sensitive information shall be handled on a “need to know” basis . Hence unpublished price sensitive information should be disclosed only to those within AHDCL who need the information to discharge their duty and / or functions.

Chapter 2

CODE OF CONDUCT FOR LISTED COMPANIES ON MINIMUM STANDARDS TO REGULATE , MONITOR AND REPORT TRADING BY DESIGNATED PERSONS (with respect to trading in their own securities)

7. Compliance Officer:

- a. The Company Secretary shall be the compliance officer for the purpose of the code and shall provide reports to the Board of Directors of the Company and in particular, shall provide reports to the Chairman of the Audit Committee, if any, or to the Chairman of the Board of Directors at such frequency as may be stipulated by the Board of Directors, but not less than once in a year.
- b. The Compliance Officer shall assist all Designated Persons/Connected person in addressing any clarifications regarding the Insider Trading Regulations and the Company's Code of Conduct.
- c. Designated persons and immediate relatives of designated persons in the organization shall be governed by an internal code of conduct governing dealing in securities.
- d. The Compliance Officer shall be responsible for compliance of the policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades, preclearance of trades, addressing any clarifications/ difficulties regarding the regulations and / or the code and the implementation of the code, under the overall supervision of the Board of Directors.
- d. The compliance officer shall maintain a record of all the declarations in the appropriate form given by the designated persons for a minimum period of three years.

8. TRADING WINDOW.

Other than the period(s) for which the Trading Window is closed as prescribed hereunder, the same shall remain open for Trading in the Securities of the Company.

Unless otherwise specified by the Compliance Officer, the Trading Window for Trading in Securities of the Company shall be closed for the Designated Persons and their Immediate Relatives when the Compliance Officer determines that a Designated Person or class of Designated Persons are reasonably expected to have possession of UPSI, including but not limited to the following purposes-

- a. declaration of financial results,
- b. declaration of dividends,
- c. change in capital structure,
- d. Mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions, and
- e. changes in key managerial personnel.
- f. such other information as determined by the Board of Directors/Chief Executive Officer/Chief Operating Officer/Chief Financial Officer from time to time

In respect of declaration of financial results, the Trading Window shall remain closed from a date that is 7 days prior to the end of the respective quarter, half- year, or financial year, as the case may be, till 48 hours after the declaration of the financial results.

As regards declaration of dividend and other matters referred to in (c) to (e) above or any other matters as the Board or MD/CEO decide then, the Managing Director/ Chief Executive Officer shall, well before initiation of such activity/ project, form a core team of Employees who would work on such assignment. The Managing Director/ Chief Executive Officer shall also designate a senior Employee who would be in-charge of the project. Such team members will execute an undertaking not to deal in the Securities of the Company till the UPSI regarding the activity /project is made generally available or the activity/project is abandoned and the Trading Window would be regarded as closed for them. Such core team may share information related to the activity/project with any Designated Person only for the furtherance of legitimate purposes and on a need to know basis for any advice or guidance required from such

Connected Person, provided that such person are bound by confidentiality and undertake not to breach the Regulations. Further, where the activity/project relates to a listed company, the name of such listed company will be deemed to be included in the "restricted list" which is confidentially maintained by the Compliance Officer. The Compliance Officer shall use the restricted list as the basis for approving or rejecting applications for pre-trading.

The Trading Window shall be opened 48 (Forty-Eight) hours after the information referred to above becomes generally available. The gap between clearance of accounts by audit committee and the Board meeting should be as narrow as possible and preferably on the same day to avoid leakage of material information.

All the Designated Persons shall strictly conduct all their Trading in the Securities of the Company only when the Trading Window is open and no Designated Person or their Immediate Relatives shall trade in the Securities of the Company during the period the Trading Window is closed or during any other similar period as may be specified by the Compliance Officer from time-to-time.

9. PRE-CLEARANCE OF TRADES

i. Trading by designated persons shall be subject to preclearance by the compliance officer , Pre-clearance for trades is mandatory for all designated persons

ii. All designated who intend to trade in the securities of the company shall obtain pre-clearance for the trade as per the procedure described hereunder

iii. Prior to approving any trades the compliance officer shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any unpublished price sensitive information .

iv. An application in **Form 1** annexed to the code may be made to the compliance officer indicating that the designated person intends to deal in the securities of the company.

v. The Designated Person shall execute his/her order in respect of securities of the Company within seven trading days after the pre-clearance is given. If the order is not executed within seven trading days after the pre-clearance is given, such pre-clearance shall lapse and the Designated Person should obtain a fresh pre-clearance.

vi. The Designated Person who trades in the securities of the Company shall not execute a contra or opposite trade within a period of not less than six months .

vii. In case trading in Securities is necessitated by personal emergency of the Designated Person, he may seek waiver of the holding period by making an application to the Compliance Officer (or the Chairman and Managing Director, in the case of the Compliance Officer is the Designated Person) in **Form II**. The Compliance Officer (or the Chairman and Managing Director, as the case may be) may waive the holding period after recording in writing, the reasons in this regard.

10. TRADING PLANS

A Designated Person may formulate a Trading Plan pursuant to which trades may be carried out on his behalf in accordance with such plan.

The Trading Plan shall be presented to the Compliance Officer for review and approval.

Upon approval, the Compliance Officer shall notify the Trading Plan to the stock exchanges on which the Company is listed.

The Trading Plan shall adhere to the following:

It shall entail commencement of trading on behalf of the Designated Person after the expiry of 6 months from the public disclosure of the plan

It shall not entail trading for the period between 20 trading days prior to the last day of any financial period for which the financial results (quarterly, half-yearly and annual) are to be declared and 48 hours after the declaration of such financial results.

It shall entail trading for a period of at least 12 months

It shall not overlap with any existing Trading Plan, i.e. multiple trading plans during the same period is not permitted.

It shall set-out either the value of trades to be effected or the number of securities to be traded along with the nature of trade, intervals at or dates on which such trades shall be effected.

The Trading Plan once approved, has to be mandatorily implemented. No deviation from the trading plan or execution of trades outside the scope of trading plan is permitted.

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

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

11. REPORTING REQUIREMENTS

A. Promoters, Directors and Key Managerial Personnel:

Every promoter, director and key managerial personnel of the Company shall be required to forward to the Compliance Officer, the following details in respect of the Securities held by them and their respective Immediate Relatives:

- a. All Securities of AHDCL held as on April 01, 2019 within thirty days thereof in **Form A**.
- b. All securities of AHDCL held by them on appointment as director or key managerial personnel of the Company or upon becoming a promoter of the Company within 7 days thereof in Form B.
- c. Half yearly statement of all Securities of AHDCL held as on March 31 and September 30 of every year within 30 days from close of March 31 and September 30 as the case may be in **Form III**.

B. Designated Persons

- i. All Designated Persons shall be required to forward to the Compliance Officer, the following details in respect of the Securities held by them and their respective Immediate Relatives:
- ii. All Securities of AHDCL held as on April 01, 2019 within thirty days thereof in **Form A**.
- iii. All Securities of AHDCL held on the date of joining within 30 working days from the date of joining in **Form B**.
- iv. Half yearly statement of all Securities of AHDCL held as on March 31 and September 30 of every year within 30 days from close of March 31 and September 30 as the case may be in **Form III**.
- v. Designated persons shall be required to disclose on an annual basis
 - names
 - Permanent Account Number
 - phone, mobile and cell number , of the following persons

a. immediate relatives

b. persons with whom the designated person shares a material financial relationship

In addition , the names of educational institutions from which designated persons have graduated And names of past employers shall also be disclosed on a one time basis.

C. All Employees

Every promoter, director, employee (including their Immediate Relatives) shall be required to intimate the Compliance Officer in case of any change in Securities of AHDCL if the value of securities traded, whether in one transaction or a series of transaction over any calendar quarter, exceeds Rs 10 Lakhs within two trading days of such change in **Form C**.

The Compliance Officer shall place before the Audit Committee of the Board of Directors, on a half yearly basis the details of the Trading in Securities by the Designated Persons.

12. PENALTY FOR CONTRAVENTION OF THE CODE

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

The persons who violate this Code shall, in addition to any other penal action that may be taken by the Company pursuant to law, also be subject to disciplinary action, which in respect of a Designated Person, who is also an Employee of the Company may include wage freeze, suspension, recovery, clawback or termination of employment.

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

Under Section 15G of the SEBI Act, any Insider who indulges in insider trading in contravention of Regulation 3 is liable to a penalty which shall not be less than Rs. 10 lakhs but which may extend to Rs.25 crores or three times the amount of profits made out of insider trading, whichever is higher. Under Section 24 of the SEBI Act, anyone who contravenes the Regulations is punishable with imprisonment for a maximum period of ten years or with fine, which may extend to twenty- five crore rupees or with both. Further, in case any person fails to pay the penalty imposed by the adjudicating officer or fails to comply with any of his directions or orders, he shall be punishable with imprisonment for a term which shall not be less than one month but which may extend to ten years, or with fine, which may extend to twenty-five crore rupees or with both. An extract of Sections 15G and 24 is given in Appendix B.

In case it is observed by the Compliance Officer that there has been a violation of the Regulations by any person, he/she shall forthwith inform the Audit Committee of the Company about the violation. The penal action will be initiated on obtaining suitable directions from the Audit Committee in consultation with Board. The Compliance Officer, on behalf of the Company, 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 Regulations/Code, shall provide all information and render necessary co- operation as may be required by the Company/Compliance Officer or SEBI in this connection.

The Compliance Officer shall always abide by the provisions of the Regulations and the Code.

Where there is a violation by the Compliance Officer, the Chief Executive Officer or the Managing Director of the Company shall perform the functions of the Compliance Officer.

13. INFORMATION TO SEBI IN CASE OF VIOLATION OF THE REGULATIONS

In case any violation of the Regulation or the Code is observed, SEBI shall promptly be informed of the same.

14. PROCESS FOR SENSITIVE TRANSACTION

The Listed company shall put in place

i. Process for how and when people are brought “inside” on “sensitive transaction”. This will be directly dependant on ‘need to know’ basis.

ii. Individuals to be made aware of the following:

 duties and responsibilities attached to receipt of inside information

 Liabilities that attaches to misuse or unwarranted use of such information

As outlined in this code.

CLARIFICATIONS:

For all queries concerning this Code, please contact the Compliance Officer.

Chapter 3

CODE OF CONDUCT FOR INTERMEDIARIES AND FIDUCIARIES TO REGULATE, MONITOR AND REPORT TRADING , BY DESIGNATED PERSONS.(with respect to trading in other securities)

The compliance Officer shall report to the Board of Directors, and shall also provide reports to the Chairman of the Audit Committee at such frequency as may be stipulated by the Board of Directors, but not less than once a year. All information shall be handled within the organization on a 'need to know' basis and no unpublished price sensitive information shall be communicated to any person except in furtherance of legitimate purposes, performance of duties or discharge of legal obligation.

Designated persons and immediate relatives of designated persons in the organization shall be governed by an internal code of conduct governing dealing in securities.

Designated persons may execute trades subject to compliance with these regulations. Trading by designated persons shall be subject to pre-clearance by the compliance officer.

The compliance officer shall maintain a list of such securities as a "restricted List" which shall be used as the basis for approving or rejecting applications for pre-clearance of trades.

Prior to approving any trades, the compliance officer shall seek declarations to the effect that the applicant for pre-clearance is not in possession of any unpublished price sensitive information. He shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.

The code of conduct shall specify a reasonable time frame, not more than seven trading days, within which trades that have been pre cleared have to be executed by the designated persons, failing which fresh pre-clearance would be needed for the trades to be executed.

i. The code of conduct shall specify the period, not less than six months, within which the designated person who is a connected person of the listed company and is permitted to trade in the securities of the listed company, shall not execute a contra trade.

ii. The compliance officer is empowered to grant relaxation from the strict application of such restriction for reasons to be recorded in writing, provided the relaxation does not violate these restrictions.

iii. If a contra trade is executed, inadvertently or otherwise in violation of such restriction, the profits from such trade shall be liable to be disgorged for remittance to the Board, for credit to the Investor education Fund administered by the Board.

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

Board of directors to set out formats for reporting/applications, towards

Application for pre-clearance to the compliance Officer.

Report trades executed, Report decision not to trade after securing pre-clearance

Reporting level of holdings in securities

Forms A, B, C, and Forms I, II, III, have been set out for the purpose.

Contravention of the Code:

Sanctions and disciplinary actions stipulated for contravention include wage freeze, suspension, recovery, claw back may be imposed, by the intermediary or Fiduciary required to formulate a code of conduct.

If the intermediary or fiduciary observes a violation of the code, SEBI shall be promptly informed.

All designated persons shall be required to disclose to the intermediary or fiduciary on an annual basis, as and when information changes of the following:

Immediate relatives

Persons with whom the designated persons share a material relationship.

Phone, mobile number, cell number used by them

In addition –names of educational institutions from which designated persons have studied

--names of past employers

Shall be disclosed on an one time basis

Intermediaries and Fiduciaries shall have a process for how and when people are brought 'inside' on sensitive transactions

Individuals should be made aware of duties and responsibilities attached to the receipt of inside information and liability that attaches to misuse or unwarranted use of such information.

Alpine Housing Development Corporation Limited Code of conduct for prevention of Insider trading

FORM I
(PRE-CLEARANCE FOR TRADES)
APPLICATION TO DEAL

To
The Compliance Officer
From
Name of the Employee Employee Code Branch/Department

With reference to the Alpine Housing development Corporation Limited Code of Conduct for Prevention of Insider Trading, I hereby give notice that I / my affected relative Mr/ Ms _____ propose to carry out the following transaction:-

Name of the Security (ies)	Type of Security	Transaction Sale / Purchase	Quantity of Security (ies)	Indicative Price / Premium (for offline trade only)	Name of the Exchange

In this connection, I do hereby represent and undertake as follows:-

That I / my affected relative am/is aware of the SEBI (Prohibition of Insider Trading) Regulations 2015, as amended 2018, and the AHDCL Code of Conduct for Prevention of Insider Trading and procedures made there under and have not contravened the Regulations and the Code /procedures laid down by the Company for prevention of insider trading as notified by the Company from time to time.

That I/ my affected relative do not have access to nor in possession of any "Unpublished Price Sensitive Information" as defined in the Regulations as amended up to the time of signing the undertaking in respect of the aforesaid securities.

That in case I/ my affected relative receive access to or come in possession of " Unpublished Price Sensitive Information" after the signing of the undertaking but before the execution of any transactions in securities of the Company, I shall inform the Compliance Officer of the change in position and that I/ my affected relative would completely refrain from trading in the securities of the company till the time such information becomes public.

I/ affected relative am/is not selling any shares, which I// affected relative have purchased/acquired in the last 6 months.

I/ / affected relative am/is not purchasing any shares, which I// affected relative have sold / disposed off in the last 6 months.

That I have made a full and true disclosure in the matter.

Date:
Place

(Signature)

AUTHORISATION TO DEAL

The above transaction has been authorised. Your dealing must be completed within 7 trading days from today _____(insert date).

Date
Place

Signature

Alpine Housing Development Corporation Limited Code of Conduct for prevention of Insider Trading
FORM NO II
APPLICATION FOR WAIVER OF MINIMUM HOLDING PERIOD

Date: __

To

The Compliance Officer

Alpine Housing Development Corporation Limited

From:

Name	
Employee Code	
Designation	
Department	

I request you to grant me waiver from the minimum holding period of 6 months as required under the Code with respect to_(nos.)__(description of the Securities) of AHDCL held by me / name of Immediate Relative (singly/jointly) acquired on_____ [Date(s)].

I / name of Immediate Relative desire to sell the above securities on account of____(give reasons*).

I declare that the above details are true, correct and complete in all respects. Signature: _

*Use additional sheets if required.

For Office Use

With reference to the above application, I approve/reject the selling of____(No. & description of securities) of AHDCL.

Date:

Signature of Compliance Officer:

Alpine Housing Development Corporation Limited

Alpine Housing Development Corporation Limited Code of Conduct for Prevention of Insider Trading
FORM NO III
Half yearly statement of holding of securities of Alpine Housing Development Corporation Limited

To
The Compliance Officer
Alpine Housing Development Corporation Limited

Half Yearly Statement of holding of Securities of Alpine Housing Development Corporation Limited

Name	
Employee Code	
Designation	
DP ID:	
Client ID:	

Please note that as of 31st March / 30th September, I / Immediate Relatives hold securities in the Company as under:

No. of securities held as at 31 st March/ 30 th September	Details of shares purchased during the half year ended 31 st March / 30 th September	Details of shares sold during the half year ended 31 st March / 30 th September	No: of securities held as at 31 st March/ 30 th September (taking into the sales/purchases)

I hereby declare that the information above is true and correct to the best of my knowledge.

Date :
Place :

Signature:
Name :
Designation :

FORM A

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (as amended December 2018)
[Regulation 7 (1) (a) read with Regulation 6 (2)]

Name of the Company:

ISIN of the Company:

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

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/KMP /Director/ immediate relatives/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding	Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option Contracts held as on the date of regulation coming into force	
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts* lot size)	Notional value in Rupee terms	Number of units (contract* lot size)	Notional Value in Rupee terms
1	2	3	4	5	6	7		

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

Signature:

Designation: Date:

Place:

FORM B

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (as amended December 2018)
[Regulation 7 (1) (b) read with Regulation 6 (2)]

Name of the Company:

ISIN of the Company:

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

Name, PAN No., CIN/DIN & Address with contact nos.	Category of Person (Promoters/ KMP /Director/ immediate relatives/ others etc)	Date of appointment of Director/ KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/ appointment of Director/ KMP		% of Shareholding	Open Interest of the Future contracts held at the time of becoming Promoter/ appointment of Director/ KMP		Open Interest of the Option Contracts held at the time of becoming Promoter/ appointment of Director/ KMP	
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts* lot size)	Notional value in Rupee terms	Number of units (contract* lot size)	Notional Value in Rupee terms
1	2	3	4	5	6	7	8		

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

Signature:

Designation:

Date:

Place:

FORM C

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (as amended December 2018)
[Regulation 7 (2) read with Regulation 6 (2)]

Name of the Company:

ISIN of the Company:

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

Name, PAN No., CIN/ DIN, & address of Promoter / Employee / Director with contract nos.	Category of Person (Promoters/ KMP/ Directors/ immediate relatives/ others etc.)	Securities held prior to acquisition/ disposal		Securities acquired/ Disposed		% of shareholding		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition (market purchase / public rights/ preferential offer/ off market/ Inter-se transfer etc.)	Trading in derivatives (Specify type of contracts, Futures or Options etc)				Exchange on which the trade was executed
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.	Pre transaction	Post transaction	From	To			Buy		Sell		
												Value	No. of units (contracts * lot size)	Value	No. of units (contracts * lot size)	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

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

Signature:

Designation:

Date:

Place: