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ASIAN GRANITO INDIA LIMITED

CODE OF CONDUCT FOR REGULATING, MONITORING AND REPORTING OF TRADING BY
DESIGNATED PERSONS

(EFFECTIVE FROM 1ST APRIL, 2019 AS AMENDED VIDE RESOLUTION PASSED BY THE BOARD OF
DIRECTORS ON 12TH FEBRUARY, 2019, 7TH FEBRUARY, 2025 AND 12TH NOVEMBER 2025)

1. INTRODUCTIONS

The Securities and Exchange Board of India (“SEBI”) notified the said Regulations on 15th January 2015, which became effective from 15th May 2015. The Regulations mandate every listed company to establish an adequate and effective internal control framework, and to formulate a Code of Conduct and Code of Fair Disclosure to prevent insider trading and ensure compliance.

In compliance with the aforesaid Regulations, Asian Granito India Limited (“the Company”) adopts this Code of Conduct to regulate, monitor, and report trading by the prescribed persons, in order to protect investors’ interest as approved by the Board in their meeting held on 8th April 2015. The said Code has been reviewed and amended from time to time to align with the amendments to the SEBI Regulations, and was last revised by the Board through resolutions passed on 22nd November 2017, 12th February 2019, 7th February 2025, and 12th November 2025.

2. DEFINITIONS

2.1 **Compliance Officer** means any **senior officer**, designated so and reporting to the board of directors or head of the organization in case board is not there, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board of directors of the listed company or the head of an organization, as the case may be.

2.2 **Designated Persons** means the following persons and employees of the Company designated on the basis of their functional role:

- a) Promoters
- b) All Directors (executive, non-executive, and independent);
- c) Key Managerial Personnel (KMPs);
- d) All employees in the rank of CEO, Senior Managerial Personnel, General Manager and above;
- e) All Employees of Finance, Accounts, Audit, IT, Legal, Secretarial, and Investor relations departments;
- f) Any other employee or person having access to or handling Unpublished Price Sensitive Information (UPSI); and
- g) Any other person as may be identified by the **Compliance Officer** based on their functional role or access to UPSI.

Note: Immediate relatives of the above Designated Persons are also subjected to same restrictions as Designated Persons.

2.3 **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 either dependent financially on such person, or consults such person in taking decisions relating to Trading in Securities.

2.4 “**Unpublished Price Sensitive Information (UPSI)**” means any information, relating directly or indirectly to the Company or its securities, that is **not generally available** and which, upon becoming generally available, is likely to **materially affect the price** of the securities and shall, ordinarily include but not restricted to, information relating to the following:

- i. Financial results;
- ii. Dividends;
- iii. Change in capital structure;
- iv. Mergers, de-mergers, acquisitions, delistings, disposals, or expansion of business, award or termination of order/contracts not in the normal course of business and such other transactions;
- v. Changes in key managerial personnel, other than due to superannuation or end of term, and resignation of a Statutory Auditor or Secretarial Auditor;
- vi. change in rating(s), other than ESG rating(s);
- vii. fund raising proposed to be undertaken;
- viii. agreements, by whatever name called, which may impact the management or control of the company;
- ix. fraud or defaults by the company, its promoter, director, key managerial personnel, or subsidiary or arrest of key managerial personnel, promoter or director of the company, whether occurred within India or abroad;
- x. resolution plan/ restructuring or one-time settlement in relation to loans/borrowings from banks/financial institutions;
- xi. admission of winding-up petition filed by any party /creditors and admission of application by the Tribunal filed by the corporate applicant or financial creditors for initiation of corporate insolvency resolution process against the company as a corporate debtor, approval of resolution plan or rejection thereof under the Insolvency and Bankruptcy Code, 2016;
- xii. initiation of forensic audit, by whatever name called, by the company or any other entity for detecting mis-statement in financials, misappropriation/ siphoning or diversion of funds and receipt of final forensic audit report;
- xiii. action(s) initiated or orders passed within India or abroad, by any regulatory, statutory, enforcement authority or judicial body against the company or its directors, key managerial personnel, promoter or subsidiary, in relation to the company;
- xiv. outcome of any litigation(s) or dispute(s) which may have an impact on the company;
- xv. giving of guarantees or indemnity or becoming a surety, by whatever named called, for any third party, by the company not in the normal course of business;
- xvi. granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.

Explanation 1- For the purpose of sub-clause (ix):

a. ‘**Fraud**’ shall have the same meaning as referred to in Regulation 2(1)(c) of Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003.

b. ‘**Default**’ shall have the same meaning as referred to in Clause 6 of paragraph A of Part A of Schedule III of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Explanation 2- For identification of events enumerated in this clause as unpublished price sensitive information, the guidelines for materiality referred at paragraph A of Part A of Schedule III of the Securities and Exchange Board of India (Listing Obligations and Disclosure

Requirements) Regulations, 2015 as may be specified by the Board from time to time and materiality as referred at paragraph B of Part A of Schedule III of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 shall be applicable.

The identification of events enumerated in this clause as UPSI shall be as per the Regulations.

All the words and expressions used and not defined in the Code shall have the same meanings assigned to them in the Regulations, Companies Act, 2013, SEBI Act 1992, Securities Contracts (Regulation) Act, 1956 or rules and regulations made thereunder and any other relevant legislation applicable to the Company as amended and prevailing from time to time.

3. PROHIBITION ON COMMUNICATION OR PROCUREMENT OF UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI)

- 3.1 Designated Persons and other Employees shall maintain the confidentiality of all Unpublished Price Sensitive Information. They shall not communicate, provide, or allow access to any Unpublished Price Sensitive Information, relating to the Company or Securities listed or proposed to be listed to any person including other Insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- 3.2 No person shall procure from or cause the communication by any Insider of Unpublished Price Sensitive Information, relating to the Company or Securities listed or proposed to be listed except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- 3.3 The policy for determination of “legitimate purposes” for sharing Unpublished Price Sensitive Information which forms the part of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information which is available on the website: https://aglasiangranito.com/code_of_conduct/code-of-conduct-for-fair-disclosure-new.PDF
- 3.4 The Company has put in place a structured mechanism and procedures for inquiry and investigation in cases of actual or suspected leakage of Unpublished Price Sensitive Information (UPSI). Any individual possessing information relating to such leakage or suspected leakage is encouraged to promptly report the matter, with complete details, to the Compliance Officer for appropriate review and action.
- 3.5 The Compliance Officer shall determine when and how any person is to be brought ‘inside’ on proposed or ongoing sensitive transactions and shall ensure that such persons are informed of their duties, responsibilities, and liabilities associated with the receipt and use of Inside Information.

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

Designated Persons shall not trade in Securities that are listed or proposed to be listed, when in possession of Unpublished Price Sensitive Information.

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

Provided that they may prove their innocence by demonstrating the circumstances including the following:

- i. the transaction is an off-market inter-se transfer between Insiders who were in possession of the same Unpublished Price Sensitive Information without being in breach of the provisions of the Regulations and both parties had made a conscious and informed trade decision;

Provided that such Unpublished Price Sensitive Information (UPSI) was not obtained under sub-regulation (3) of regulation 3 of SEBI (Prohibition of Insider Trading) Regulations, 2015.

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

- ii. the transaction was carried out through the block deal window mechanism between persons who were in possession of the Unpublished Price Sensitive Information without being in breach of the provisions of the Regulations and both parties had made a conscious and informed trade decision.

Provided that such Unpublished Price Sensitive Information was not obtained under sub-regulation (3) of regulation 3 of SEBI (Prohibition of Insider Trading) Regulations, 2015.

- iii. the transaction in question was carried out pursuant to a statutory or regulatory obligation to carry out a bona fide transaction
- iv. the transaction in question was undertaken pursuant to the exercise of stock options in respect of which the exercise price was predetermined in compliance with applicable regulations.

- v. in the case of non-individual Designated Person(s): –

(a) the individuals who were in possession of such Unpublished Price Sensitive Information were different from the individuals taking Trading decisions and such decision-making individuals were not in possession of such Unpublished Price Sensitive Information when they took the decision to trade; and

(b) appropriate and adequate arrangements were in place to ensure that this Code are not violated and no Unpublished Price Sensitive Information was communicated by the individuals possessing the information to the individuals taking Trading decisions and there is no evidence of such arrangements having been breached;

vi. the trades were executed pursuant to a Trading plan approved by the Compliance Officer.

5. TRADING PLANS

An Insider may formulate a trading plan in accordance with the provisions of Regulation 5 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and submit the same for prior approval of the Compliance Officer. The Compliance Officer shall review the trading plan to ensure compliance with the Regulations before granting approval.

Upon approval of the trading plan by the Compliance Officer, trades executed strictly in accordance with such approved trading plan shall not be subject to the restrictions relating to the closure of the Trading Window or other trading window norms, as prescribed under the Regulations.

6. TRADING WINDOW AND WINDOW CLOSURE

6.1 All the Designated Person(s) of the Company shall be governed by the Code for Trading in Securities. Designated Person(s) may execute trades subject to compliance with the Regulations. They shall not trade in Securities when the Trading Window is closed.

6.2 The Trading Period of the stock exchanges, called “Trading Window”, is available for trading in the Company’s Securities.

6.3 A Trading Window shall be closed during the following periods:

- 1) From 1st July/ 1st October/ 1st January/ 1st April of the financial year till forty-eight hours after the announcement of the financial results for the relevant period to the Stock Exchanges.
- 2) From the date of circulation of the agenda for the meeting of the Board of Directors, in which any material price sensitive and unpublished event identified by the CEO and in his absence by the CFO, are proposed and the Trading Window shall re-open forty eight hours after the notification of these information to the Stock Exchange.
- 3) Additionally, the Trading Window shall be closed when the Compliance Officer determines that a Designated Person or class of Designated Persons can reasonably be expected to have possession of Unpublished Price Sensitive Information.
- 4) The closure of the Trading Window for these events will be advised/ informed to all concerned by the Compliance Officer for the purpose of this Code.
- 5) For UPSI not emanating from within the Company, trading window may not be closed.

6.4 The Trading Window restrictions mentioned in Clause 6.1 shall not apply in respect of:

- (1) Transactions specified in sub-clauses (i) to (iv) and (vi) of Clause 4.
- (2) 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 the SEBI.
- (3) Transactions which are undertaken in accordance with respective regulations made by the SEBI such as acquisition by conversion of warrants or debentures, subscribing to rights issue, further public issue, preferential allotment or tendering of shares in a buyback offer, open offer, delisting offer or transactions which are undertaken through such other mechanism as may be specified by the SEBI from time to time.

In case of doubts on whether the information is unpublished and price sensitive, Designated Persons may seek clarification from Compliance Officer

7. PRE-CLEARANCE OF TRADES

All Designated Persons, who intends to trade in the Securities of the Company including trading in derivatives of securities of the Company, shall require prior clearance from the Compliance Officer in the manner mentioned below when the Trading Window is open and for exceeding the limits of Rs. 10 Lakhs (market value) whether in one transaction or series of transactions over a calendar quarter. However, no Designated Person shall be entitled to apply for pre-clearance of any proposed trade if he/she is in possession of Unpublished Price Sensitive Information even if the Trading Window is open and hence he shall not be allowed to trade.

Designated Person is entitled to apply for pre-clearance of any proposed trade even if he / she is in possession of Unpublished Price Sensitive Information irrespective of trading window restriction if trades are executed as per Clause 4 (i) to (iv), Clause 4 (vi) and Clause 6.4 (2) of this code. For Clause 4 (v), Designated Person can apply for pre-clearance only when trading window is open.

- i. For the purpose of preclearance, an application shall be made to the Compliance Officer in Form D attached herewith.
- ii. An undertaking in Form E shall be executed in favor of the Company by such Designated Person incorporating, inter alia, the following clauses, as may be applicable:
 - a. That he/she is not in possession of “Unpublished Price Sensitive Information” up to the time of signing the undertaking.
 - b. That in case the Designated Person 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 position and that he/she would completely refrain from dealing in the Securities of the Company till the time such information becomes public.
 - c. That he/she has not contravened the Code as notified by the Company from time to time.
 - d. That he/she has made a full and true disclosure in the matter.

Provided that clause (a) above will not be applicable for the trades executed as per Clause 4 and Clause 6.4 (2) of this Code.

- iii. All Designated Persons shall execute their order in respect of Securities of the Company within 7 days after the pre-clearance is given. The Designated Persons shall file within 2 (two) days of the execution of the trade, the relevant details of such trade with the Compliance Officer in the prescribed form. In case the transaction is not undertaken, a report to that effect shall be filed mentioning the reason of not undertaking the transaction.
- iv. If the order is not executed within 7 days after the approval is given, the Designated Person shall seek pre-clearance of the transaction again.
- v. All Designated Persons who buy or sell any number of shares of the Company shall not enter into contra trade i.e. sell or buy any number of shares during the next 6 months following the prior transaction. All Designated Persons shall also not take positions in derivative transactions in the shares of the Company at any time. In case of exigency, the Compliance Officer is empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing upon an application made by Designated Persons. If any contra trade is executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund administered by SEBI.

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

- vi. In case of Trading of Securities by the Compliance Officer, he/ she shall require prior clearance from the Chairman of the Company.
- vii. Pre-clearance of trades shall not be required for a trade executed as per an approved trading plan and trade executed pursuant to Clause 6.4(3).

8. TRADING BY PORTFOLIO MANAGERS

This Code is also applicable to insiders who engage Portfolio Managers to trade in shares and hence the insiders are expected to take due precaution to comply with this Code while trading in securities through Portfolio Managers by:

- i. Informing Portfolio Managers about closure of trading window.
- ii. Ensuring to seek pre-clearance, wherever applicable, when the Portfolio Manager proposes to trade in the Company's shares exceeding threshold limit and also make continual disclosures, wherever applicable, as provided in this Code.
- iii. Ensuring that the portfolio manager abides by the requirement of minimum holding period and not do contra trade as provided in this Code.
- iv. Prohibiting the Portfolio manager to trade in securities of the Company at his own discretion or when the Insider is in possession of Unpublished Price Sensitive Information.

Despite the above, if any trading is done by portfolio managers, it will be treated as trading done by the Insider, and therefore the insider will be held responsible for any such noncompliance and subject to such penalties as specified in this Code.

9. REPORTING REQUIREMENT FOR TRANSACTIONS IN SECURITIES

Designated Persons shall strictly comply with the following disclosure and compliance requirements under this Code:

- (1) **Initial Disclosure:** Submission of an initial disclosure to the Company in **Form A**, providing details of securities held as on the date of appointment or designation, within seven (7) days of such event.
- (2) **Annual Disclosure:** Submission of an annual disclosure of shareholding in the Company in **Form B**, within the timelines prescribed under the applicable regulations.
- (3) **Pre-clearance Application:** Prior application for pre-clearance of proposed dealings in the securities of the Company in **Form C**, where such pre-clearance is required under this Code.
- (4) **Pre-clearance Approval:** Grant of approval for pre-clearance of dealing in securities by the Compliance Officer in **Form D**, subject to satisfaction of the conditions prescribed under this Code.
- (5) **Disclosure of Transactions:** Disclosure of transactions or dealings in the securities of the Company in **Form E**, to be submitted within two (2) trading days of execution of the transaction.

10. DISCLOSURE FROM DESIGNATED PERSONS

Designated Persons (excluding the immediate relative) shall disclose names and Permanent Account Number or any other identifier authorized by law of the following persons to the Company 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.

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

11. PENALTY FOR CONTRAVENTION

- 11.1 Every Designated Person shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her Immediate Relatives).
- 11.2 Any Designated Person who trades in Securities or communicates any information for Trading in Securities, in contravention of this Code may be penalised and appropriate action may be taken as decided by the Company.
- 11.3 Designated Person who violates the Code shall be subject to disciplinary actions by the Company including wage freeze, suspension, termination, recovery etc. The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015. Any amount collected under this clause shall be remitted to SEBI for the credit to the Investor Protection and Education Fund administered by SEBI.

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

12. MISCELLANEOUS PROVISIONS

- 12.1 A copy of the Code is available on the website of the Company, www.aglasiangranito.com
- 12.2 Designated Persons and other employees are advised to acquaint themselves with their obligations under the Regulations. The Compliance Officer is available for clarification/ assistance that may be necessary.
- 12.3 The Company provides suitable protection against any discharge, termination, demotion, suspension, threats, harassment, directly or indirectly or discrimination against any employee who files a Voluntary Information Disclosure Form, irrespective of whether the information is considered or rejected by SEBI.
- 12.4 Every person, at the time of their recruitment in the Company, shall be briefed about this Code and a declaration shall be taken about their shareholding in the Company.
- 12.5 The Company, when entering into any contract with a party who shall be deemed to be an Insider under the Regulation, shall take an undertaking from the party that they shall not enter into Trading of Securities of the Company, if they are in possession of any Unpublished Price Sensitive Information.
- 12.6 Any act or deed not mentioned under the Code shall be in accordance with the Regulations.
- 12.7 The Audit Committee shall review the compliance of Code and the Regulations including the report thereon placed by the Compliance Officer at least on an annual basis.
- 12.8 In case of any statutory modification or amendment or alteration in the provisions of the Regulations, the newly modified/amended/alterd provisions of the Regulations shall be deemed to be implemented in the Code immediately with effect from the date of the statutory notification for modification / amendment / alteration etc. The amended code should be placed before the Board of Directors of the Company within reasonable time for approval / consideration.

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]**

Name of the company: Asian Granito India Limited

ISIN of the company: INE022I01019

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 / Director or Promoter or member of the promoter group/ Immediate relative to/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 or upon becoming Promoter or member of the promoter group		% Shareholding of
			Type of securities (For eg. - Shares, Warrants, Convertible Debentures, Rights entitlements, etc.)	No.	
1	2	3	4	5	6

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

Details of Open Interest (OI) in derivatives on the securities of the company held on appointment of 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).

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 specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
7	8	9	10	11	12

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

Name &
Signature:
Designation:
Date:
Place:

FORM-B

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

Name of the company: Asian Granito India Limited

ISIN of the company: INE022I01019

**Details of Securities held by Promoter, Member of Promoter Group, Designated Person
including KMP and Directors**

Name, PAN, CIN/ DIN & Address with contact nos.	Category of Person (KMP / Director or Promoter or member of the Promoter group/ Immediate relative to/others, etc.)	Securities held as on date of Regulation coming into force or Annually		% of Shareholding
		Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements, etc.)	No. of Shares	

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 by
Promoter, Member of Promoter Group, Designated Person including KMP and Directors**

Open Interest of the Future contracts held as on date of Regulation coming into force or Annually			Open Interest of the Option Contracts held as on date of Regulation coming into force or Annually		
Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract specification s	Number of units (contracts * lot size)	Notional value in Rupee terms

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

Name &
Signature:
Designation:
Date:
Place:

FORM-C

APPLICATION FOR PRE-CLEARANCE

(For use by Designated Persons in case of dealing in the securities of the Company)

To,
The Compliance Officer,
Asian Granito India Limited
(Through Division/Department Head)

Dear Sir,

I am desirous of dealing in the below-mentioned securities of the Company in my own name or on behalf of my dependent family member (write name of family member and relationship) and seek your approval to acquire/ purchase/ sell them.

1	Name, Address and PAN of Applicant	
2	Designation	
3	Employee Pay Roll No.	
4	Department and Location	
5	Number and Value of securities in the Company had as on date (with folio/ DP ID/ Client ID No.)	
6	Mode in which securities are held	Physical/Demat
7	The Proposal is for	(a) Acquisition in the open market (b) Subscription to the securities (c) Sale of securities (d) off-market inter-se transfer (e) between Insiders (f) block deal (g) statutory or regulatory obligation (h) exercise of stock options (i) Pledge of Shares
8	Proposed date of dealing in securities	
9	Nature of proposed dealing	Purchase/Sale of securities
10	Estimated number of securities proposed to be acquired/ subscribed/sold	
11	Price at which transaction is proposed	
12	Current Market Price (as on the date of application)	
13	Whether the proposed transaction will be through stock exchange or off market deal	
14	Proposed mode of dealing in securities	Physical /Demat
15	If Securities are held/proposed to be dealt in dematerialized form	
16	Name of the Depository DP ID Number Client ID number	

UNDERTAKING

In relation to the above Acquisition/ Purchase/ Sale, I undertake that:

- a) I have no access to nor do I have any information that could be construed as “Unpublished Price Sensitive Information” up to the time of signing this undertaking.
- b) In case, I get access to or receive any “Unpublished Price Sensitive Information” after signing this application but before the execution of the transaction, I shall inform you of the change in position and shall refrain from dealing in Shares till such information is made public.
- c) I have not contravened the Company’s Code of Conduct for Prevention of Insider Trading as notified by the company from time to time.
- d) I have made full and true disclosure in this application.

I hereby undertake that I shall execute my order in respect of securities of the Company within seven trading days after the approval of pre-clearance is given. If the order is not executed within seven trading days after the approval is given, I undertake to obtain pre-clearance of transaction again.

Hence, I request you to approve the proposed trading in the securities of the Company.

Thanking you,

Yours faithfully,

Signature of the Employee

Date:

Place:

FORM-D

FORMAT FOR APPROVAL OF PRE-CLEARANCE ORDER

To,

Name: _____

Designation: _____

Place: _____

This is to inform you that your request for trading in _____(numbers) shares of the Company as mentioned in your application dated _____ is approved. Please note that the said transaction must be completed on or before _____ (date) that is within 7 (seven) trading days from today and pursuant to this Code, you shall not enter in to the contra trade within the 6 months of such trade.

In case you do not execute the approved transaction /deal on or before the aforesaid date you would have to seek fresh pre-clearance before executing any transaction/deal in the securities of the Company. Further, you are required to file the details of the executed transactions in the attached format within 2 days from the date of transaction/deal. In case the transaction is not undertaken a "Nil" report shall be necessary.

Yours faithfully,
For ASIAN GRANITO INDIA LIMITED

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COMPLIANCE OFFICER

Date:

Place:

FORM-E

**FORMAT FOR DISCLOSURE OF TRANSACTIONS
(To be submitted within 2 days of transaction / trading in securities of the Company)**

To,
The Compliance Officer,
Asian Granito India Limited,
202, Dev Arc,
Opposite Iskon Temple,
Ahmedabad 380015

I hereby inform that I:-

- have not bought/sold/ subscribed any securities of the Company
- have bought/sold/subscribed to _____ securities as mentioned below on _____ (date).

Name, Address and PAN of the holder	No. of Securities Dealt with	Bought/ sold/ subscribed	DP ID/Client Id/ Folio No	Price (Rs.)

I undertake to preserve documents evidencing proof of above transaction for a period of 5 years and produce the same to the Compliance officer /SEBI when required.

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

I shall not enter in to the contra trade within 6 months of such trade.

Signature: _____
Name: _____
Designation: _____
Date: _____