



KNR CONSTRUCTIONS LIMITED
CODE FOR PREVENTION OF INSIDER TRADING IN THE SECURITIES OF THE
COMPANY

1. PREAMBLE

This “Code for Prevention of Insider Trading in the Securities of KNR Constructions Limited” has been framed pursuant to the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time.

This code has been framed to ensure that Insiders of the Company maintain confidentiality of Unpublished Price Sensitive Information (UPSI) and prevent misuse of such information by deriving any benefit through trading in the securities of the Company by having the possession of UPSI(s).

The said code also provides for timely reporting and adequate disclosure of price sensitive information by the Promoter(s), Director(s), Key Managerial Personnel, certain specified employees and other Connected Persons. Further, the code also endeavours to put in place an adequate and effective system of internal controls to ensure compliance with the requirements given in SEBI (Prohibition of Insider Trading) Regulations 2015 to prevent insider trading.

2. DEFINITIONS:

- a. **“Act”** means the Securities and Exchange Board of India Act, 1992, as may be amended from time to time.
- b. **“Audit Committee”** shall mean Committee of the Board of the Company constituted pursuant to Section 177 of the Companies Act, 2013 read with Regulation 18 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- c. **“Board”** means the Board of Directors of the Company.
- d. **“Company”** means KNR Constructions Limited (hereinafter referred as “KNRCL”).
- e. **“Code”** means this Code of Conduct for Prohibition of Insider Trading and to Regulate, Monitor and Report Trading by Designated Persons and their Immediate Relatives in the Securities, as amended by the Board from time to time.
- f. **“Compliance Officer”** means Company Secretary of the Company or in the absence of Company Secretary any such senior officer, designated so and reporting to the Board of Directors, 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information (‘UPSI’), monitoring of trades and the implementation of the Codes specified in these Regulations under the overall supervision of the Board.



For the purpose of this Code, “financially literate” shall mean a person who has the ability to read and understand basic financial statements i.e. balance sheet, profit and loss account, and statement of cash flows.

- g. "Connected Person"** means: any person who is or has been, during the six months prior to the concerned act, associated with a company, in any capacity, directly or indirectly:
- by reason of frequent communication with its officers or
 - by being in any contractual, fiduciary or employment relationship or
 - by being a director, officer or 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.
 - Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established:
 - an immediate relative of connected persons;
 - a holding company or associate company or subsidiary company;
 - an intermediary as specified in section 12 of the Act or an employee or director thereof;
 - an investment company, trustee company, asset management company or an employee or director thereof;
 - an official of a stock exchange or of clearing house or corporation;
 - 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 is an employee thereof;
 - 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;
 - an official or an employee of a self-regulatory organization recognized or authorized by the Board;
 - a banker of the company;
 - a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten per cent. of the holding or interest.
- h. "Contra Trade"** means a trade or transaction which involves buying or selling any number of shares of the Company and within 6 months trading or transacting in an opposite transaction involving sell or buy following the prior transaction.
- i. "Designated Persons"** The term “Designated Person” shall consist of:
- Promoters and Members of Promoter Group of the Company;
 - Directors of the Company & its Material Subsidiaries.
 - Key Managerial Personnel of the Company & its Material Subsidiaries.



- All Employees of the Company & its Subsidiaries in the cadre of Assistant General Manager & above;
 - All Employees in the Finance & Accounts Department, Corporate Planning Department, IT Department, Secretarial and Legal Department and any other departments of the Company & its Material Subsidiaries, if any on the basis of their functional role or access to UPSI;
 - Employees of Corporate Action/Project Specific Teams of the Company & its Material Subsidiaries.
 - Employees associated with Executive Directors and CEO's office of the Company & its Material Subsidiaries.
 - Chief Executive Officer/Managing Director and employees upto two levels below Chief Executive Officer/Managing Director of the Company and its Material Subsidiaries; and
 - Any support staff of the Company who have access to UPSI.
 - Immediate Relatives of all the above.
 - Any other employee designated by the Board in consultation with the Compliance Officer, either for a specific period of the time or for an indefinite period of time, based on such person's role, function, designation and seniority in the Company and the extent to which such person may have access to UPSI.
- j. **"Fiduciary"** shall mean professional firms such as auditors, accountancy firm, law firms, analysts, insolvency professional entities, consultants, banks etc., who assist or advice the Company from time to time and shall be collectively referred to as fiduciaries.
- k. **"Generally available information"** means information that is accessible to the public on a non-discriminatory basis.
- l. **"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;
- m. **"Insider"** means any person who is:
- Connected Person;
 - Designated Person or
 - any other person who is in possession of or having access to UPSI.
- n. **"Intermediaries"** shall include such persons as defined in Section 12 of the Securities and Exchange Board of India Act, 1992 viz., Stock Brokers, Sub-brokers, Share Transfer Agents, Banker to an Issue, Trustee of a Trust Deed, Registrar to an Issue, Merchant Banker, Underwriter, Portfolio Manager, Investment Adviser and such other persons associated with Securities Market and registered with SEBI.
- o. **"Key Managerial Personnel"** means key managerial personnel as defined in sub-section (51) of Section 2 of the Companies Act, 2013.



- p. **“Legitimate Purpose”** shall include sharing of UPSI in the ordinary course of business on a need-to-know basis for performing their duties or discharge of legal obligations by an Insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.
- q. **“Leak of UPSI”** shall refer to such act/circumstance(s) by virtue of which an UPSI is made available or becomes available, by any means or mode to any person, association, body, firm, agency, society, entity or to a group thereof, whether registered or otherwise before its official publication or announcement or formal circulation in public domain and which shall also include any purported attempt thereof.

Explanation: It covers the instances where the UPSI has been shared by a person to any person, association, body, firm, agency, society, entity or to a group thereof except in compliance with applicable law.

- r. **“Material subsidiary”** shall be as defined under the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended from time to time and shall mean a subsidiary of the Company whose income or net worth exceeds ten percent of the consolidated income or net worth respectively, of the Company and its subsidiaries in the immediately preceding accounting year.
- s. **“Material financial relationship”** shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift from a Designated Person during the immediately preceding twelve months, equivalent to at least 25% of the annual income of such Designated Person but shall exclude relationships in which the payment is based on arm’s length transactions.
- t. **“Officer”** shall have the meaning assigned to it under the Companies Act, 2013.
- u. **“Promoter / Promoter Group”** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof;
- v. **“Securities”** shall have the meaning assigned to it under the Securities Contracts (Regulations) Act, 1956, or any modification thereof except units of a Mutual Fund.
- w. **“Takeover regulations”** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;
- x. **“Trading”** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities either directly or through portfolio management services, and "trade" shall be construed accordingly.



- y. **“Trading day”** means a day on which the recognized stock exchanges are open for trading;
- z. **“Trading Window”** means the period during which Designated Persons and their Immediate Relatives can trade in the Company’s securities.
- aa. **“Trading Plan”** has the meaning ascribed to in Clause 5 of the SEBI (Prohibition of Insider Trading) Regulations, 2015.
- bb. **“Unpublished Price Sensitive Information”** means any information, relating to the 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:
 - financial results;
 - dividends;
 - change in capital structure;
 - mergers, de-mergers, acquisitions, de-listings, disposals and expansion of business and such other transactions; and
 - changes in key managerial personnel.
 - Such other information as communicated by the Compliance Officer.

3. APPLICABILITY:

This CODE shall be applicable on all Insiders including Designated Persons and Immediate Relative(s) of the Designated Persons as specified in the CODE.

4. CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UPSI:

To ensure fair disclosure of events and occurrences that could impact price discovery for securities issued by KNRCL in the market and in compliance with the SEBI Insider Trading Regulations, the Company has formulated “Code of Practices and Procedure for Fair Disclosure of Unpublished Price Sensitive Information” provided at **ANNEXURE - I**.

5. POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES:

To maintain confidentiality of UPSI shared by Insiders in the ordinary course of business and in compliance with the SEBI Insider Trading Regulations, a “Policy for determination of Legitimate Purposes” for sharing such UPSI with outsiders is provided at **ANNEXURE - II**.

6. RESTRICTIONS ON COMMUNICATION OF UPSI AND TRADING BY INSIDERS:

a. Communication or procurement of UPSI:

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, discharge of legal obligations or otherwise permitted under these Regulations.

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.

Any person in receipt of UPSI pursuant to a “legitimate purpose” shall be considered an “insider” for purposes of these Regulations and due notice be given to such persons to maintain confidentiality of such UPSI in compliance with the Regulations.

All Insiders need to ensure that details of the persons/entities, including Name and Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available, with whom UPSI is shared, is immediately provided to the Compliance Officer to enable maintenance of the structured digital database as required under SEBI Insider Trading Regulations.

b. Trading when in possession of UPSI

No insider shall either on his own behalf or on behalf of any other person, trade in securities of the Company that are listed or proposed to be listed on any stock exchange when in possession of any UPSI unless such trades were according to the trading plan set up as per Clause 10 or otherwise permitted under SEBI Insider Trading Regulations.

When a person trades in securities while in possession of UPSI, their trades would be presumed to have been motivated by the knowledge and awareness of such information in his possession.

In case of Connected Persons, the onus of establishing that they were not in possession of UPSI shall be on such Connected Persons.

7. TRADING WINDOW:

The trading window shall be closed when the Compliance Officer is of the view that a Designated Person can reasonably be expected to have possession of UPSI. In case of financial results, trading window shall be closed from the end of every quarter. The timing for re-opening of the trading window shall be determined by the Compliance Officer taking into account various factors including the UPSI in question becoming generally available and being capable of assimilation by the market, which in any event shall not be earlier than 48 hours after the information becomes generally available.

The Designated Persons and their Immediate Relatives shall not trade in securities when the trading window is closed.



The trading window restrictions mentioned above shall not apply in respect of –

- the transaction is an off-market inter-se transfer between promoters who were possession of the same UPSI and both parties had made a conscious and informed trade decision. Provided that such UPSI was not obtained under Regulation 3(3) of the Regulations. Provided further that such off-market trades shall be reported by the insiders to the Company within two working days and the Company shall notify the particulars of such trades to the Stock Exchange(s) on which the securities are listed, within two trading days from receipt of the disclosure or from becoming aware of such information;
- the transaction was carried out through the block deal window mechanism between persons who were in possession of the UPSI without being in breach of Regulation 3 of the Regulations and both parties had made a conscious and informed trade decision; Provided that such UPSI was not obtained by either person under Regulation 3(3) of the Regulations;
- the transaction in question was carried out pursuant to a statutory or regulatory obligation to carry out a bona fide transaction;
- the transaction in question was undertaken pursuant to the exercise of stock options in respect of which the exercise price was pre-determined in compliance with applicable regulations;
- the trades were executed pursuant to a trading plan;
- 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 Board;
- transactions which are undertaken in accordance with respective regulations made by the Board such as acquisition by conversion of warrants or debentures, subscribing to rights issue, further public issue, preferential allotment or tendering of shares in a buy-back offer, open offer, delisting offer.

8. TRADING PLAN:

Insiders can deal in the securities of the Company by formulating a Trading Plan in the manner set forth under Regulation 5 of the Regulations, as amended from time to time.

9. PRE-CLEARANCE OF TRADES:

A Designated Person or their Immediate Relative, who intends to trade in the securities of the Company during trading window open period and if the value of securities likely to be traded, whether in one transaction or a series of transaction over any calendar quarter, aggregates to a traded value in excess of Rs.10 lakhs shall obtain pre-clearance of the transaction from compliance officer of the company. The Designated Persons shall be required to submit application for pre-clearance along with Undertaking in the format specified in **ANNEXURE 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 UPSI. Compliance



Officer shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.

No Designated Person shall apply for pre-clearance of any proposed trade if such Designated Person is in possession of UPSI even if the trading window is not closed.

All Designated Persons shall execute their trades in respect of securities of the Company within 7 (seven) trading days after the pre-clearance is given by the Compliance Officer. If the trade is not executed within the aforementioned specified period fresh pre-clearance to be obtained by the Designated Persons. Any transaction done on the basis of pre-clearance shall be reported to the Compliance Officer within 2 working days in the format specified in **ANNEXURE IV**.

The preclearance of trade shall not be required if the trade has been executed as per the Trading Plan approved by the Compliance Officer.

10. CONTRA TRADE:

All Designated Persons who are permitted to trade in shares of the Company shall not execute a contra trade during the next 6 (six) months following the prior transaction, provided that this shall not be applicable for trades pursuant to exercise of stock options. In other words, if a Designated Person has bought shares of the Company, he can continue to buy the shares (within the threshold limit/ subject to pre-clearance) but cannot sell any number of shares for a period of 6 (six) months from the last date when he bought the shares. Similarly, if a Designated Person sells the shares of the Company, he can continue to sell the shares, if he holds further shares, but cannot buy any number of shares for a period of 6 (six) months from the last date when he sold the shares.

On application by the Designated Person the Compliance Officer may grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate the Regulations.

If any contra trade is executed by the Designated Persons, inadvertently or otherwise, in violation of above restriction, the profits from such trade shall be liable to be disgorged for remittance to the SEBI for crediting to the Investor Protection and Education Fund administered by SEBI under the Act.

11. REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES & FORMATS:

A. First Disclosure of holdings:

Every Promoter, Member of the Promoter Group, Key Managerial Personnel and Director of the Company shall disclose his holding of securities of the Company in **Form A** as on the date of these regulations taking effect, to the Company within thirty days of these regulations taking effect.



B. Initial Disclosures of holdings:

Every person on appointment as a 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/Member of Promoter Group, to the Company within seven days of such appointment or becoming a Promoter/Member of Promoter Group in **Form B**.

C. Continual Disclosures:

Every Promoter, Member of the Promoter Group, Designated Person and Director of the Company shall disclose to the Company 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 Rs. 10,00,000/- (Rupees Ten Lakh Only) in **Form C**.

It is clarified for the avoidance of doubts that the disclosure of the incremental transactions after any disclosure under this sub-regulation, shall be made when the transactions effected after the prior disclosure cross the threshold specified above.

The Company shall within a period of 2 (Two) trading days from the date of receipt of disclosure in Form C, or becoming aware of such information shall inform the particulars of such trading to the Stock Exchange(s) in **Form D**.

D. Other formats / disclosures, to monitor compliance with these Regulations would be as under:

- Reporting of holdings in securities by Designated Persons and their immediate relatives as on 31st March, on an annual basis by April 10 in **Form E**.
- Designated Persons shall be required to disclose in **Form F** names and Permanent Account Number or any other identifier authorized by law of themselves and the following persons to the Company on an annual basis within 10 days from the end of financial year and as and when the information changes:
 - i. immediate relatives;
 - ii. persons with whom such Designated Person(s) shares a material financial relationship;
 - iii. Phone, mobile and cell numbers which are used by them;

The term “material financial relationship” shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift from a Designated Person during the immediately preceding twelve months, equivalent to at least 25% of the annual income of such Designated Person but shall exclude relationships in which the payment is based on arm’s length transactions.



12. CONTRAVENTION OF CODE:

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).

Any instance of violation of this Code by the Designated Person shall be reported to the Audit Committee or any other Committee of the Board designated for this purpose by the Board of Directors of the Company and such Committee shall have the authority to take appropriate action against the Designated Person for violation of this Code.

Inquiry into an instance of leak or suspected leak of UPSI shall be initiated, in accordance with the investigation process provided under the Policy and Procedure for Enquiry in case of leak or suspected leak of UPSI framed by the Company. The details of the leaks, inquiries and the results of the enquiries shall be informed to the Board of Directors and Securities Exchange Board of India promptly as required under the law.

Any Insider who violates the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, cancellation of contract, recovery of profits, clawback, ineligibility for future participation in Employee Stock Option Plans, etc. Further, in case of any violation of the Code or Regulations by an Insider, the Company shall inform SEBI promptly.

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

13. AMENDMENTS TO THIS CODE:

This Code shall be subject to review and be amended from time to time, as may be deemed necessary and in accordance with any regulatory amendments. The Board of Directors shall be empowered to amend, modify and interpret these Rules and such Rules shall be effective from such date that the Board may notify in this behalf.

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

Pursuant to regulation 8 (1) of The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, further amended by the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018, (“the regulation”) KNR Constructions Limited (“the Company”), would follow the following practice and procedure for fair disclosure of Unpublished Price Sensitive Information (UPSI):

1. The Company shall make prompt public disclosure of Unpublished Price Sensitive Information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. The Company shall disclose Unpublished Price Sensitive Information in a universal and uniform manner to avoid selective disclosure of such information.
3. Company Secretary or any other person authorised by the Chairman & Managing Director shall deal with the dissemination of information and disclosure of Unpublished Price Sensitive Information.
4. The Company shall ensure prompt dissemination of Unpublished Price Sensitive Information that gets disclosed selectively, inadvertently or otherwise, so that such information is made generally available.
5. The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company shall ensure that information shared with analysts and research personnel is not Unpublished Price Sensitive Information.
7. The Company shall take reasonable steps, to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
8. The Company shall handle the Unpublished Price Sensitive Information on a "need to know" basis, i.e. no UPSI shall be communicated to any person except in furtherance of the legitimate purposes, performance of duties or discharge of his legal obligations.



ANNEXURE – II

POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES

The sharing of UPSI by an Insider shall be deemed to be for "Legitimate Purpose" if it satisfies the following criteria:

- i. The UPSI shall be shared strictly on 'need to know' basis.
- ii. Such sharing of UPSI shall be in the ordinary course of business such as performance of duties, discharge of legal obligations, etc. with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the SEBI Insider Trading Regulations and "Code for Prevention of Insider Trading in the Securities of KNRCL".
- iii. The Insider shall share the UPSI with the external agencies only in the interest of the Company and/or in compliance with the requirements of the law including SEBI Insider Trading Regulations.
- iv. Any person in receipt of UPSI pursuant to a legitimate purpose shall be considered an "Insider" and due notice shall be given to such person to maintain confidentiality of UPSI.
- v. All Insiders shall ensure non-disclosure or confidentiality agreements with the persons with whom UPSI is shared and the duties and responsibilities of such person with respect to such UPSI and the liabilities involved if such person misuses or uses such UPSI in breach of "Code for Prevention of Insider Trading in the Securities of KNRCL".



ANNEXURE – III

APPLICATION FOR PRE-CLEARANCE OF TRADES IN SECURITIES

Date: dd.mm.yyyy

To,
Compliance Officer
KNR Constructions Limited

Dear Madam/Sir,

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and code for Prevention of Insider Trading in Equity Shares of KNR Constructions Limited, I seek approval for Purchase/Sale/Subscription of the securities (given description) of the company as per the details given below:

1	Name of the Applicant	
2	Designation	
3	Relationship with the Applicant (Self/Immediate Relative)	
4	Number of Securities held as on Date	
5	Folio no./DP ID/Client ID No.	
6	The Proposal is for	
7	Proposed date of trading in Securities	
8	Estimated number of securities proposed to be purchased/subscribed/sold/pledged/gifted	
9	Current market Price (as on date of application)	
10	Whether the proposed transaction through stock exchange or off market trade	
11	Folio no./DP ID/Client ID No. where the securities will be credited/ debited	

I enclose herewith the Undertaking signed by me.

Date: dd.mm.yyyy

Place: _____

Signature:

Name:

Designation:



UNDERTAKING:

With reference to my application for pre-clearance of trades in securities, I solemnly confirm and declare:

- i. That I do not have access and/or have not received any “Unpublished Price Sensitive Information” up to the time of signing undertaking.
- ii. That in case I have access or receive “Unpublished Price Sensitive Information” after the signing of the undertaking but before the execution of the transaction, I shall inform the compliance officer of any change in my position and THAT I shall refrain from dealing in the securities of the company till the time such information becomes public.
- iii. that I undertake to submit the necessary report within two days of execution of the transaction/a ‘Nil’ report if the transaction is not undertaken.
- iv. That I have not contravened the code for Prevention of Insider Trading in equity shares, as notified by the company from time to time.
- v. That I am aware that, I shall be liable to face penal consequences as set forth in code including disciplinary action under the code of the company, in case the above declarations are found to be misleading or incorrect at any time.
- vi. That I have made a full and true disclosure in this regard to the best of my knowledge and belief.
- vii. That I hereby undertake not to transact in securities in the sanctioned period in case trading window is declared closed subsequently.
- viii. That I hereby undertake not to make contra trade transaction in the securities of the company for a minimum period of six months from the date of the transaction, for which pre-clearance has been taken unless such trade is executed as per approved trading plan.

Pre-clearance may kindly be accorded in terms of provision of the Code of Prevention of Inside Trading of the company.

Date: dd.mm.yyyy

Place: _____

Signature:

Name:

Designation:



FOR OFFICE USE

Serial number of the application received _____

Date & time of receipt of the application _____

Date & time of communication of the pre-clearance or otherwise _____

Reason for not giving pre-clearance _____

Signature of the Compliance Officer/Authorized Officer _____

ANNEXURE – IV

REPORTING OF TRANSACTION DONE ON THE BASIS OF PRE-CLEARANCE

Date: dd.mm.yyyy

To,
Compliance Officer
KNR Constructions Limited

Dear Madam/Sir,

I confirm that the share dealing/trading in securities for which approval was granted on (dd-mm-yyyy) was completed on (dd-mm-yyyy), by purchasing / selling _____(nos.) Equity Shares of the Company.

Date: dd.mm.yyyy

Place: _____

Signature:

Name:

Designation:

(Amended at the board meeting held on 29th May 2025)