

INSIDER CODE OF CONDUCT OF ORIENTAL NAGPUR BETUL HIGHWAY LIMITED (ONBHL)
(CODE OF CONDUCT FOR DEALING IN SECURITIES AND UNPUBLISHED PRICE
SENSITIVE INFORMATION (UPSI) OF ONBH BY THE DESIGNATED PERSONS AND
INSIDERS

1. Preamble

This code of conduct for dealing in securities and UPSI of ONBHL by the Designated Persons and Insiders (the “**Code**”) aims to outline the process and procedures to regulate, monitor and report the trading in Securities of Oriental Nagpur Betul Highway Limited (“**Company / ONBHL**”) by Insiders and Designated Persons. The purpose of the Code is also to ensure that ONBHL complies with applicable law, including the the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended (the “**Insider Trading Regulations**”) or such other laws, regulations, rules or guidelines prohibiting insider trading and governing disclosure of material and unpublished price sensitive information of the Company dealing with UPSI.

2. Definitions:

For the purpose of this Code all the words and phrases not specifically defined hereunder shall have the same meaning as assigned to them under the Insider Trading Regulations.

2.1 “**Act**” means the Securities and Exchange Board of India Act, 1992, as amended.

2.2 “**Board**” or “**Board of Directors**” means the Board of Directors of the Company.

2.3 “**Code**” or “**Code of Conduct**” shall mean the Code of Conduct for fair disclosure and dealing in units by the parties and regulating, monitoring and reporting of trading by Designated Persons & Insiders of the Company and their immediate relatives, as amended from time to time.

2.4 “**Compliance Officer**” means Compliance officer as per UPSI policy of the Company.

2.5 “**Connected Person**” shall mean the persons as defined under SEBI (Prohibition of Insider) Regulations, 2015.

2.6 “**Dealing in Securities**” means an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in the Securities of the Company i.e. Oriental Nagpur Betul Highway Limited;

2.7 “**Designated Person(s)**” shall mean the persons specified below:

- a) Directors & Key Managerial Personnel of the Company ;
- b) All employees and support staff of the accounts, finance, compliance and secretarial persons;
- c) All employees of the Company who have access to unpublished price sensitive information;
- d) All personnel/employees of the Sponsors, Project Manager, MM Manager, Project SPVs who have access to unpublished price sensitive information;

2.8 “**Generally available Information**” means information that is accessible to the public on a non –discriminatory basis.

2.9 “**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 Units.

2.10 “**Insider**” means any person who is,

- (a) Connected Person; or
- (b) Designated Person; or
- (c) in possession of or having access to unpublished price sensitive information.

2.11 “Key Managerial Person” means key managerial personnel of the Company as may be appointed from time to time, which shall include the Chief Executive Officer (“**CEO**”), the Chief Operating Officer (“**COO**”), the Chief Financial Officer (“**CFO**”) and the Compliance Officer (“**CO**”), as and when appointed.

2.12 “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 such Designated Person’s annual income but shall exclude relationships in which the payment is based on arm’s length transactions.

2.13 “Need-to-know basis” shall mean that UPSI should only be disclosed to, or procured by, such persons who need to share or access the UPSI in furtherance of legitimate purposes, performance of duties or discharge of legal obligations, and whose possession of such UPSI will not give rise to a conflict of interest or amount to the misuse of such UPSI.

2.14 “Promotor” 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:

2.15 “Promotor 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:

2.16 “Trading” means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any Securities, and “trade” shall be construed accordingly. As per explanation given under the Regulations, this definition is an inclusive definition and may include pledge, derivatives on the Securities of the Company as the case may be.

2.17 “Trading Day” means a day on which the recognized stock exchanges are open for trading;

2.18 “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.

2.19 “Unpublished Price Sensitive Information” (“UPSI”) means any information, relating to a Company or its Listed 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:

- a) financial results;
- b) distributions;
- c) change in capital structure;
- d) mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
- e) changes in key managerial personnel;
- f) material events in accordance with the LODR Regulations; and
- g) Details of any act of assets being acquired / sold / disposed.

3. Role of Compliance Officer:

- 3.1 The Compliance officer shall deal with dissemination of information and disclosure of unpublished price-sensitive information (“**UPSI**”), including making periodic disclosures in terms of the Policy for Determining Materiality of Information for Periodic Disclosures as adopted by the board of directors of the Company.
- 3.2. The Compliance Officer shall assist all Insiders in addressing any clarifications regarding the Regulations, and the Company’s Code of Conduct.
- 3.4 The Compliance officer shall report on insider trading 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 of the Company at such frequency as may be stipulated by the Board of Directors.

4. Code of Conduct to Regulate, Monitor and Report Trading in Securities:

4.1 Preservation of "Unpublished Price Sensitive Information"

- (i) All information shall be handled within the Company on a need -to-know basis.
- (ii) 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/her legal obligations
- (iii) The Insiders shall not pass on such information to any person, directly or indirectly by way of making a recommendation for the purchase or sale of Securities, which are listed on Stock Exchange(s).
- (iv) All non-public information directly received by any Designated Person from any source outside of the Company should immediately be reported to the concerned Head of the Department, who will have obligation to communicate the same to the Chairman of the Board or Compliance Officer as the case may be.

4.2 Trading when in possession of Unpublished Price Sensitive Information.

- (i) No insider shall trade in securities when in possession of Unpublished Price Sensitive Information and where a person has traded in securities has been in possession of Unpublished Price Sensitive Information, his/her trades would be presumed to have been motivated by the knowledge and awareness of such information in his/her possession.
- (ii) Trades may be permitted in certain cases as under, subject to compliance with the Insider Regulations –
 - a) off-market inter-se transfer between insiders in possession of the same Unpublished Price Sensitive Information and both parties had made a conscious and informed trade decision.
 - b) transaction carried out through the block deal window mechanism between persons who were in possession of the Unpublished Price Sensitive Information and both parties had made a conscious and informed trade decision;
 - c) transaction carried out pursuant to a statutory or regulatory obligation to carry out a bona fide transaction;
 - d) transaction undertaken pursuant to the exercise of stock options in respect of which the exercise price was pre-determined in compliance with applicable regulations.

4.3 Trading window

- (i) The Company through the Compliance Officer shall specify a trading period, to be called "Trading Window", for trading in Securities. The “Trading Window” may be closed as the

Compliance Officer in consultation with and/or as per the advice of the Chairman of the Board of the Company determines that a Designated Person or class of Designated Person(s) can reasonably be expected to have possession of Unpublished Price Sensitive Information.

- (ii) The trading window shall be, inter alia, closed from the end of every quarter till 48 hours after the declaration of financial results. The gap between clearance of accounts by audit committee and Board meeting should be as narrow as possible and preferably on the same day to avoid leakage of material information.
- (iii) When the trading window is closed, the Designated Persons and their Immediate Relatives shall not trade in the Company's securities in such period.
- (iv) The timing for re-opening of the Trading Window shall be determined by the Compliance Officer taking into account various factors including the Unpublished Price Sensitive Information in question becoming Generally Available and being capable of assimilation by the market, which in any event shall not be earlier than forty-eight hours after the information becomes Generally Available Information.

4.4 Pre-clearance of Trades

- (i) All Designated Person(s) and/or their Immediate Relatives, who intend to trade in the Securities of the Company, in compliance with this Code, when the Trading Window is open and the value of the proposed trades is Rs. 10,00,000/- (Rupees Ten Lakhs only) and above, shall require to pre-clear the transactions as per the pre-dealing procedure as described hereunder. The Compliance Officer is authorised to change the limit of market dealing of Rs.10,00,000/- (Rupees Ten Lacs only) from time to time.
- (ii) The procedure for pre-clearance shall be as under:-
 - a) An application shall be made in the form prescribed in **Annexure A** to the Compliance Officer indicating the details as required under the Form along with an Undertaking in favour of the Company.
 - b) The pre-clearance approval by the Compliance Officer, if any shall in the form prescribed in **Annexure B**.
 - c) All Designated Person(s) and their Immediate Relatives shall execute their trade in respect of the Company's Securities within one week from obtaining the approval of pre-clearance.
 - d) The Designated Person shall file within 2 (two) trading days of the execution of the trade, the details of such trade with the Compliance Officer in the form prescribed in **Annexure C**. Even in case the transaction is not undertaken, a report to that effect shall be filed with the Compliance officer in **Annexure C**.
 - e) If the trade is not executed or partly executed within one week after the approval is given, a fresh pre-clearance approval would be needed in accordance with this Code, for the trade to be executed.
- (iii) Pre-clearance shall not be required for trades executed in accordance with a duly approved trading plan. Pledging, invocation or release of pledge shall be permitted when the trading window is closed subject to obtaining pre-clearance irrespective of the number of securities involved.
- (iv) **Contra Trade:**

- a) Designated Person(s) and their Immediate Relatives shall not execute contra trade (opposite Transactions), during the period of 6 (six) months following the prior trade/ Transaction. However, the contra trade restriction shall not be applicable for trades pursuant to exercise of stock options.
- b) In the event, any such 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 under the Act.
- c) The Compliance Officer may grant relaxation from strict application of contra trade restriction for reasons to be recorded in writing provided that such relaxation does not violate these Regulations.

4.5 Trading Plan

- (i) A Designated Person or any Insider is entitled to formulate a trading plan for dealing in Securities of the Company and present it to the Compliance Officer/Board of the Company for availing approval and public disclosure pursuant to which trades may be carried out on his/her behalf in accordance with such plan.
- (ii) Such Trading Plan shall:
 - a) not entail commencement of trading on behalf of the Designated Person or Insider earlier than 6 (six) months from the public disclosure of the plan;
 - b) not entail trading for the period between the twentieth trading day prior to the last day of any financial period for which financial results are required to be announced by the Company and until 48 hours after the declaration of such financial results;
 - c) entail trading for a period of not less than 12 (twelve) months;
 - d) not entail overlap of any period for which another trading plan is already in existence;
 - e) set out either the value of trades to be effected or the number of Company to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
 - f) not entail trading in Securities for market abuse.
- (iii) The Compliance Officer shall consider the trading plan made as above and shall present to the Board for its approval forthwith. However, the Compliance Officer shall be entitled to take express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per provisions of the Regulations.
- (iv) Upon approval of the trading plan, the Compliance Officer shall notify the plan to the stock exchanges on which the Securities are listed.
- (v) No Insider shall trade in Securities when in possession of Unpublished Price Sensitive Information.
- (vi) Pre-clearances of trades, compliance with Trading Window norms and restrictions on contra trade shall not be applicable for trades which are carried out in accordance with an approved Trading Plan.

4.6 Prohibition of Trading by Insiders

An Insider shall not directly or indirectly,

- (i) Trade in Securities that are listed or proposed to be listed when in possession of UPSI.
- (ii) Trade in Securities of the Company except when the Trading Window is open and the Insider is not in possession of UPSI.

Provided that nothing contained above shall be applicable when

- a) A transaction that is an off-market inter-se transfer between Promoters who were in possession of the same UPSI without being in breach of these Rules and both parties had made a conscious and informed trade decision; and
- b) Trades pursuant to a Trading Plan set up in accordance with this code.

5. Disclosure Requirement:

5.1. Initial Disclosure

Every person on appointment as key managerial personnel or a Director of the Company shall disclose his/her holding of securities of the Company as on the date of appointment to the Company within seven days of such appointment in prescribed Form B i.e. **Annexure D**.

5.2 Continual Disclosure:

Every Designated Persons and Director of the Company shall disclose to the Company the number of such Securities acquired or disposed of (including off-market trades) within two trading days of such transaction if the number 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/- (Ten Lakhs Rupees) in prescribed Form C & Form D (**Annexure E & Annexure F**)

5.3 Disclosure to the Stock Exchange(s)

Within 2 days of the receipt of intimation under Clause 5.2, the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received.

5.4 Disclosures by other Connected Persons

The Compliance Officer may, require any other Connected Person to disclose the holdings and trading in Securities of the Company as per Form D set out in **Annexure F** at such frequency as he may determine.

5.5 Annual Disclosure

Designated Persons shall be required to disclose names and Permanent Account Number or any other identifier authorized by law of the following persons to the Company on an annual basis or confirm that there is no change since last disclosure made by them and as and when the information changes in the format as set out in **Annexure G**:

- a) Immediate Relatives
- b) Persons with whom such Designated Person(s) shares a “material financial relationship”; and
- c) Phone, mobile 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.

6. Policy on leak or suspected leak of UPSI

- (i) Upon becoming aware of any Leak or any allegations or suspicions of a Leak, the board of directors of the Company (the “**Board**”) shall, in consultation with the Compliance Officer, evaluate and determine if the matter merits any enquiry or investigation.
- (ii) In the event the Board decides that the matter warrants an investigation, it shall promptly constitute an enquiry committee, comprising such persons as the Board deems fit, or undertake a facts finding exercise in the matter on its own (the “**Enquiry**”).
- (iii) The Board/enquiry committee shall strive to conclude the Enquiry within 30 working days from its commencement and the Board may take appropriate steps basis the outcome of the enquiry.

7. Disclosure of UPSI for legitimate purposes

7.1 The term “legitimate purposes” shall be construed in accordance with the following principles:

- (i) Sharing of UPSI in the ordinary course of business by any insider with existing or proposed partners, lenders, security trustee, debenture trustee, customers, suppliers, merchant bankers, legal advisors, auditors, valuers, insolvency professionals or other advisors or consultants of any of the Company, the Promotor and the Trustee;
- (ii) Sharing of UPSI for any other genuine or reasonable purpose as may be determined by the Compliance Officer;
- (iii) Sharing of UPSI with a court of law or any governmental authority or a regulatory body on the basis of any order issued by them; and
- (iv) Sharing of UPSI for any other purpose as may be prescribed in any other applicable regulations, guidelines, circulars or notifications issued by SEBI from time to time or any other law for the time being in force, as may be amended from time to time.

7.2 The compliance department of the Company shall maintain a digital database of all persons with whom UPSI is shared for any legitimate purpose, in accordance with the provisions of Insider Trading Regulations.

8. Contravention of the Code

8.1 Every Designated Person/Insider shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her dependents).

8.2 Any person who Trades in Securities or communicates, provides or allows access to any UPSI for Trading in Securities in contravention of this Code may be penalized and appropriate action shall be taken against him/her by the Company. He/she may also be subject to disciplinary action, which may include termination of services / employment, suspension, wage freeze, withholding of promotions, recovery, etc. or other such action as the Company may deem fit. Any amount collected under this clause shall be remitted to the SEBI for credit to the Investor Protection and Education Fund administered by the SEBI under the Act.

8.3 If it is observed by the Company that there has been violation of the Regulations, it shall inform Stock Exchange on which the Securities are listed, in such form and manner as may be specified by the SEBI.

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

9. Conflict with Applicable Law & UPSI Policy

9.1 The Policy shall not contradict with the provisions of Securities and Exchange Board of India (Insider Trading) Regulations, 2015, as amended, to the extent applicable, and any applicable law. In case of any discrepancy, the provisions of Applicable Law shall prevail over the provisions of this Policy.

9.2 This Policy shall be adherence and implemented in conjunction with the existing code of conduct of the Company, to the extent applicable, and any applicable law.

10. Notwithstanding the above, this Policy will stand amended to the extent of any change in applicable law, including any amendment to the LODR Regulations, without any action from the Board of Directors of the Company.

Adopted by the board of directors of the Company on 9th February, 2024 in furtherance to the existing UPSI policy of the Trust adopted on May 22, 2019.

ANNEXURE A
FORMAT OF APPLICATION BY DESIGNATED PERSON FOR PRE-CLEARANCE

To
The Compliance Officer,
Oriental Nagpur Betul Highway Limited (ONBHL),
Unit No. 307A, 3rd Floor, Worldmark-2,
Aerocity, IGI Airport, New Delhi-110037

Dear Sir/ Madam,

Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Insider Code of ONBHL, I _____ (*Name of the applicant*) hereby seek approval to purchase/ sell/ subscribe Securities as per the details whereof are given below:

| | |
|--|---|
| Name of the applicant | |
| Designation | |
| Employee No. | |
| Name of the immediate relatives, if the transaction will be in the name of the immediate relatives | |
| Number of Securities held as on date | |
| Folio No./ DP ID/ Client ID | |
| Proposed date of Trading | (i) Purchase of Securities (ii) Subscription of Securities (iii) Sale of Securities |
| Estimated number of Securities proposed to be purchased/ subscribed/ sold | |
| Current Market price | |
| Estimated Consideration value | |
| Whether the proposed transaction will be through stock exchange or off-market trade | |
| Proposed date of dealing in Securities | |

I declare that the order for buying/selling shall be executed **within one week** after the approval is granted to me.

I further declare that if the order for buying/selling has not been executed **within one week after** the approval is granted to me, a revised approval will be taken in that behalf.

I enclose herewith the undertaking signed by me.

UNDERTAKING

In this connection I solemnly confirm and declare:

- (a) that I do not have access and/or have not received any UPSI up to the time of signing this undertaking;
- (b) that in case I have access to or receive UPSI 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 Securities till the time such information becomes public;
- (c) that I have not contravened the Insider Code of the Company.
- (d) that I shall hold the Securities for a minimum period of six months from the date of purchase / that

I have complied with the requirement of the minimum holding period of six months with respect to the Securities sold.

- (e) that I undertake to submit the necessary report within two trading days of execution of the transaction/a 'Nil' report, if the transaction is not undertaken.
- (f) that I am aware that, I shall be liable to face penal consequences as set forth in the Code including disciplinary action, wage freeze or suspension, in case the above declarations are found to be misleading or incorrect at any time.
- (g) that I hereby undertake not to transact in Securities in the sanctioned period in case trading window is declared closed subsequently.
- (h) that I hereby made a full and true disclosure in the matter.

Pre-clearance may kindly be accorded in terms of provisions of the Insider Code of Oriental Nagpur Betul Highway Limited.

Signature
Name:
Designation:
Department:
Telephone and e-mail:
Mobile No.:

Date:
Place:

ANNEXURE B
FORMAT FOR PRE- CLEARANCE ORDER

To,
Name : _____
Designation : _____
Place : _____

This is to inform you that your request for dealing in _____ (nos) Securities 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 seven (7) trading days from today.

This approval is being issued to you based on the undertaking issued by you.

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 **Oriental Nagpur Betul Highway Limited**
Compliance Officer

Date : _____

ANNEXURE – D

FORM B

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

Name of the Company: _____

ISIN of the Company: _____

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promotor or member of the Promotor Group and other such persons as mentioned in Regulation 6(2).

| Name, PAN No., CIN/DIN & address with contact nos. | Category of Person (Promoters/ KMP / Directors/ Immediate relatives/ Others etc.) | Securities held as on the date of regulation coming into force | | % Securities Holding |
|--|---|--|-----|----------------------|
| | | Type of *security (For eg. – Shares, Warrants, Convertible Debentures, Units etc.) | No. | |
| (1) | (2) | (3) | (4) | (5) |
| | | | | |

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

Details of Open Interest (OI) in derivatives on the securities of the Company held on appointment of Key Managerial Personnel (KMP) or Director of a 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 as on the date of regulation coming into Force | | Open Interest of the Future contracts held as on the date of regulation coming into force | |
|---|-------------------------------|---|-------------------------------|
| Number of Securities (contracts * lot size) | Notional value in Rupee terms | Number of Securities (contracts * lot size) | Notional value in Rupee terms |
| (6) | (7) | (8) | (9) |
| | | | |

Signature :
Name :
Designation :
Date :

ANNEXURE E

FORM C

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (2) read with Regulation 6(2) – Continual Disclosure]

Name of the Company:

ISIN of the ONBHL:

Details of change in holding of Securities of Promotor, Member of the Promotor Group, Designated Person and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

| Name, PAN, CIN/DIN, & address with contact nos. | Category of Person (Promoters/member of the Promoters group/designated person/Director s/immediate relative to/others etc.) | Securities held prior to acquisition/ disposal | | Securities acquired/ Disposed | | | | Securities held post acquisition/ disposal | | Date of allotment advice/ Acquisition of shares/ disposal of Securities specify | | Date of intimation to Company | Mode of acquisition/ disposal (on market/ public/ rights/ Preferential offer/ off market/ Inter - se transfer, ESOPs etc.) | Exchange on which the trade was execute |
|---|---|---|---------------------------------|---|-----|-------|--|---|---------------------------------|---|----|-------------------------------|--|---|
| | | Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements and Units etc.) | No. and % of Securities holding | Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement and Unit etc.) | No. | Value | Transaction Type (Purchase/Sale/ Pledge/ Revocation / Invocation/ Others please specify) | Type of securities (e.g. – Shares, Warrants, Convertible Debentures, Rights entitlement and Units etc.) | No. and % of Securities holding | From | To | | | |
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 |
| | | | | | | | | | | | | | | |

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

(ii) Value of transaction excludes taxes/brokerage/any other charges.

Details of trading in derivatives on the securities of the company by Promoters, member of the Promotor group, designated person or Director of the Company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

| Trading in derivatives (Specify type of contract, Futures or Options etc.) | | | | | | Exchange on which the trade was executed |
|--|-------------------------|----------------|---|----------------|--|--|
| Type of Contract | Contract Specifications | Buy | | Sell | | |
| | | Notional Value | Number of Securities (contracts * lot Size) | Notional Value | Number of units (contracts * lot size) | |
| 16 | 17 | 18 | 19 | 20 | 21 | 22 |
| | | | | | | |

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

Name & Signature:

Designation:

Date:

Place:

ANNEXURE F

FORM D

SEBI (Prohibition of Insider Trading) Regulations, 2015

Regulation 7(3) – Transactions by Other connected persons as identified by the Company

Name of the Company:

ISIN of the Company:

Details of trading in securities by other connected persons as identified by the Company:

| Name, PAN, CIN/ DIN, & address with contact nos. of other connected persons as identified by the Company | Connect ion with Company | Securities held prior to acquisition/ disposal | | Securities acquired/ Disposed | | | | Securities held post acquisition/ disposal | | Date of allotment advice/ Acquisition of shares/ disposal of Securities specify | | Date of intimation to Company | Mode of acquisition/ disposal (on market/ public/ rights/ Preferential offer/ off market/ Inter - se transfer, ESOPs etc.) | Exchan ge on which the trade was execute |
|--|--------------------------|--|---------------------------------|---|-----|-------|--|--|---------------------------------|---|----|-------------------------------|--|--|
| | | Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement and Units etc.) | No. and % of Securities holding | Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement and Unit etc.) | No. | Value | Transact ion Type (Purchas e/Sale/ Pledge/ Revocati on / Invocati on/ Others please specify) | Type of securities (e.g. – Shares, Warrants, Convertible Debentur es, Rights entitlement and Units etc.) | No. and % of Securities holding | From | To | | | |
| 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 |
| | | | | | | | | | | | | | | |

Note: (i) "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.
(ii) Value of transaction excludes taxes/brokerage/any other charges.

Details of trading in derivatives on the securities of the Company by other connected persons as identified by the Company:

| Trading in derivatives (Specify type of contract, Futures or Options etc.) | | | | | | Exchange on which the trade was executed |
|--|-------------------------|----------------|--|----------------|--|--|
| Type of Contract | Contract Specifications | Buy | | Sell | | |
| | | Notional Value | Number of units (contracts * lot Size) | Notional Value | Number of units (contracts * lot size) | |
| 16 | 17 | 18 | 19 | 20 | 21 | 22 |
| | | | | | | |

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

Name:

Signature:

Date:

Place:

ANNEXURE G

ANNUAL DISCLOSURE BY DESIGNATED PERSONS WITH REGARD TO THEIR IMMEDIATE RELATIVES AND PERSONS WITH WHOM THEY SHARE A 'MATERIAL FINANCIAL RELATIONSHIP'

Date:

To:
The Compliance Officer
Oriental Nagpur Betul Highway Limited,
Unit No. 307A, 3rd Floor, Worldmark-2,
Aerocity, IGI Airport, New Delhi-110037

| Name of the Designated Person | Department and Employee Number | Permanent Account Number | Phone / Mobile Number | Email ID |
|-------------------------------|--------------------------------|--------------------------|-----------------------|----------|
| | | | | |
| | | | | |

Note: Name of the educational institution from which Designated Person has graduated and the past employers are also required to be disclosed on one time basis.

| Name of Immediate Relative of Designated Person | Permanent Account Number | Phone / Mobile Number | Email ID |
|---|--------------------------|-----------------------|----------|
| | | | |
| | | | |

| Name of person with whom Designated Person shares "material financial relationship" | Permanent Account Number | Phone / Mobile Number | Email ID |
|---|--------------------------|-----------------------|----------|
| | | | |
| | | | |

Please confirm, if there is no change since the last disclosure made by them.

Yours truly,
Signature: _____

Name:
Employee No.:
Department:
Official Address:
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