

## ANNEXURE - I

### APPLICATION FOR PRE-CLEARANCE OF TRADE

Date: \_\_\_\_\_

To  
The Compliance Officer  
**Lords Chemicals Limited**  
1/1a Mahendra Ray Lane ,P S Pace  
7th Floor, Room No-705a, Kolkata,  
West Bengal, India, 700046

Dear Sir/Madam,

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct for prevention of Insider Trading, I seek approval for purchase/ sale/ subscription of the Securities of the Company as per the details provided below:

1.	Name of Designated Person/ Immediate Relatives	
2.	Designation	
3.	Number of Securities held as on date	
4.	Folio No./ DP ID / Client ID No.	
5.	The proposal is for	(a) Purchase of securities/ (b) Subscription to securities/ (c) Sale of securities
6.	Proposed date of dealing in securities	
7.	Estimated number of securities proposed to be acquired/subscribed/sold	
8.	Price at which the transaction is proposed (if off market)	
9.	Current market price (as on date of application)	
10.	Whether the proposed transaction will be through stock exchange or off-market deal	
11.	Folio No. / DP ID / Client ID No. where the securities will be credited/ debited (applicable for off market)	

I enclose herewith the Undertaking signed by me.

Thanking you,

Yours faithfully,

\_\_\_\_\_

## ANNEXURE - II

### FORMAT OF UNDERTAKING TO BE SUBMITTED ALONG WITH APPLICATION FOR PRE-CLEARANCE OF TRADE

Date:

To

The Compliance Officer

**Lords Chemicals Limited**

1/1a Mahendra Ray Lane ,P S Pace

7th Floor, Room No-705a, Kolkata,

West Bengal, India, 700046

Dear Sir/Madam,

I, \_\_\_\_\_ (Name of the Person giving declaration), residing at \_\_\_\_\_, am a Director / Designated Person of the Company. I hereby declare that –

- a. I do not have any access and neither have I received or possessed any Unpublished Price Sensitive Information (as defined in the Code) of the Company upto the time of signing the undertaking.
- b. In case I have access to and/ or receive any "Unpublished Price Sensitive Information" (UPSI) after the signing the Undertaking but before the execution of the transaction, I shall inform the Compliance Officer of the change in my position and that I would completely refrain from dealing in the Securities of the Company till the time such UPSI becomes public.
- c. I declare that I have not contravened any provision of the Code or the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.
- d. I am aware that I shall be liable to face penal consequences as set forth in the Code including disciplinary action thereunder, in case the above declarations are found to be misleading or incorrect in any respect.
- e. I hereby agree to indemnify and keep the Company and its Directors indemnified from and against all and any penalties/fines that may be imposed on them by the Securities and Exchange Board of India and/or any other statutory authorities as a result of contravention by me of the SEBI (Prohibition of Insider Trading) Regulations 2015 and the Code prescribed by the Company.
- f. I undertake to submit the necessary report within two days of execution of the transaction / a 'Nil' report if the transaction is not undertaken.
- g. If approval is granted, I shall execute the deal within seven days of the receipt of approval failing which I shall seek pre-clearance.
- h. I have made a full and true disclosure in the matter.

Thanking you,

Yours faithfully,

\_\_\_\_\_

## ANNEXURE - III

### FORMAT OF PRE-CLEARANCE APPROVAL LETTER BY THE COMPANY

Date: \_\_\_\_\_

Approval No: \_\_\_\_/\_\_\_\_

To,  
Mr. / Mrs. \_\_\_\_\_,  
\_\_\_\_\_ (Designation)

Sub: Pre-clearance approval / disapproval vide your application dated \_\_\_\_\_

With reference to your application dated \_\_\_\_ for seeking approval for undertaking transactions in Securities of the Company, pleased be informed that you are authorised / not authorised to execute the transaction(s) as detailed in your said application.

The approval is being issued based on the information stated in your application and declaration provided by you along with your application.

Your kind attention is drawn to the following provisions which you need to, inter-alia, strictly observe in terms of the above Regulations while dealing in the Securities.

1. The Transaction would have to be executed within seven trading days. If the same is not executed within seven trading days after the approval is given, you would have to seek fresh pre-clearance before executing any transaction.
2. Securities thus acquired should be held for six months i.e. securities which are acquired cannot be sold before six months. In the case of issue of securities by the Company, the holding period would commence when the Securities are actually allotted.

Any transaction with regard to the Securities under this approval should be communicated to the Company within two trading days of the conclusion of the transaction.

Thanking you,

Yours Faithfully,

**For LORDS CHEMICALS LIMITED**

**Compliance Officer**

## ANNEXURE – IV

### DISCLOSURE OF PRE-CLEARED TRANSACTIONS

**(To be submitted within 2 days of transaction / dealing in securities of the Company)**

Date: \_\_\_\_\_

The Compliance Officer

**Lords Chemicals Limited**

1/1a Mahendra Ray Lane ,P S Pace

7th Floor, Room No-705a, Kolkata,

West Bengal, India, 700046

Dear Sir/Madam,

I hereby inform that

- a) I have bought/ sold/ subscribed any securities of the Company as per the details given below on \_\_\_\_\_ (date):

Name of the Designated Person/ Immediate Relatives	Folio No./ DP ID / Client ID No.	Type of Securities	Nature of Dealing (Bought/ Sold/ Subscribed)	No. of Securities *	Price (in Rs.)

\*For each transaction, the particulars to be stated separately giving the contract price for each security.

- b) I further declare that the above dealing was not on the basis of any Unpublished Price Sensitive Information relating to the Company.
- c) In connection with the aforesaid transaction(s), I hereby undertake to preserve and produce to the Compliance officer / SEBI any of the following documents as and when required:
- Broker's contract note;
  - Proof of payment to/from brokers;
  - Extract of bank pass book / statement (to be submitted in case of demat transactions).
  - Copy of delivery instruction slip (applicable in case of sale transaction).
- d) I agree to hold the above securities for a minimum period of six months. In case there is any urgent need to sell these securities within the said period, I shall approach the Compliance Officer for necessary approval.
- e) 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).

Thanking you,

Yours faithfully,

**ANNEXURE – V**

**INITIAL DISCLOSURE BY DIRECTORS / DESIGNATED PERSONS**

**FORM B**

**SEBI (Prohibition of Insider Trading) Regulations, 2015**

**[Regulation 7 (1) (b) read with Regulation 6(2) – Disclosure on becoming a Director/ KMP/Promoter/ Member of the Promoter Group]**

**Name of the company: Lords Chemicals Limited**

ISIN of the company: **INE554C01014**

**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 (Director/ KMP 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 Director/ KMP or upon becoming promoter or member of the promoter group		% of Shareholding
			Type of security (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, 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 Key **Managerial Personnel (KMP)** or **Director** or upon becoming a **Promoter** or member of Promoters group of a listed company and 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:

## ANNEXURE – VI (CONTINUAL DISCLOSURE)

### FORM C

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

Name of the company: **Lords Chemicals Limited**

ISIN of the company: **INE554C01014**

**Details of change in holding of Securities of Promoter, Member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).**

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoter/member of the Promoter group/designated person/Directors/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 shares, 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 executed
		Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of shareholding	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No.	Value	Transaction Type (Purchase/sale /Pledge /Invocation/Others – please specify	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of shareholding	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 Promoter, member of the promoter group, designated person or Director of a listed 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 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:

Designation:

Date:

Place:



## ANNEXURE – VII (DISCLOSURE BY OTHER CONNECTED PERSONS)

### 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: **Lords Chemicals Limited**

ISIN of the company: **INE554C01014**

#### Details of trading in securities by other connected persons as identified by the company

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoter/member of the Promoter group/designated person/Directors/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 shares, 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 executed
		Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of shareholding	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No.	Value	Transaction Type (Purchase/sale /Pledge /Invocation/Others – please specify	Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of shareholding	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 Promoter, member of the promoter group, designated person or Director of a listed 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 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:

Designation:

Date:

Place: