



## CODE OF CONDUCT FOR PROHIBITION OF INSIDER TRADING

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### 1. Introduction

Pursuant to Securities and Exchange Board of India (Prohibition on Insider Trading) Regulations, 2015, as amended from time to time, The Board of Directors have adopted the Code of conduct for KUNDAN MINERALS AND METALS LIMITED (Hereinafter referred as the Company) for Prevention of Insider Trading which came into force from immediate effect.

### 2. Applicability

This Code is applicable to the Designated Persons of KUNDAN MINERALS AND METALS LIMITED and other Connected Persons as mentioned in this code.

### 3. Definitions

- A. “Act” means the Securities and Exchange Board of India Act, 1992 (15 of 1992).
- B. “Board” means the Board of Directors of the Company.
- C. “Company” means KUNDAN MINERALS AND METALS LIMITED.
- D. “Compliance Officer” means Company Secretary or such other senior officer as may be designated by the Board and reporting to the Board of Directors, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under this Code and the SEBI (Prohibition of Insider Trading) Regulations, 2015 (as may be amended from time to time), 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information, monitoring of trades and the implementation of the codes specifies under this Code and the SEBI (Prohibition of Insider Trading) Regulations, 2015 (as may be amended from time to time under the overall supervision of the Board of Directors of the Company).

## **KUNDAN MINERALS AND METALS LIMITED** (Formely Known as Eastern Sugar & Industries Limited)

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Email : [info@kundanmineralsandmetals.com](mailto:info@kundanmineralsandmetals.com) CIN: L24205BR1964PLC006630

**Regd. Off:** PO. Hanuman Sugar Mills, Motihari, P.S.-Motihari, East Champaran, Bihar-845401

**Corp. Off.:** Flat No 4, 2<sup>nd</sup> Floor 3, Scindia House Connaught Place, New Delhi-110001



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E. “Connected Person” means:

- i. Any person who is or has during the six months prior to the concerned act been associated with a company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or being a director, officer or an employee of the Company or holds any position including a professional or business relationship between himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to Unpublished Price Sensitive Information or is reasonably expected to allow such access.
- ii. Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established,
  - a. An immediate relative of connected persons specified in clause (i); or
  - b. A holding company or associate company or subsidiary company; or
  - c. An intermediary as specified in Section 12 of the Act or an employee or director thereof; or
  - d. An investment company, trustee company, asset management company or an employee or director thereof; or
  - e. an official of a stock exchange or of clearing house or corporation; or
  - f. a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
  - g. a member of the Board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
  - h. an official or an employee of a self-regulatory organization recognized or authorized by the Board; or
  - i. a banker of the Company; or
  - j. a concern, firm, trust, hindu undivided family, company or association of persons wherein a director of the Company or his immediate relative or banker of the Company, has more than ten per cent, of the holding or interest.

F. “Dealing in Securities” means act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in Securities either as principal or agent.

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- G. Designated Persons(s) shall include:
- i. Promoters and their Immediate Relatives;
  - ii. Directors of the Company;
  - iii. Key Managerial Personnel of the Company
  - iv. Every Employee in the grade of Assistant General Managers and above;
  - v. every Employee in the finance, accounts, secretarial, MIS and legal departments as may be determined and informed by the Compliance Officer;
  - vi. Permanent invitees to the meetings of the Board of Directors of the Company and committees of the Board of Directors of the Company (if any); and
  - vii. Such other persons as may be notified by the Compliance Officer from time to time on the basis of their role in the Company and their access to Unpublished Price Sensitive Information.
- H. “Director” means a member of the Board of Directors of the Company.
- I. “Employee” means every employee of the Company including the Directors (whether a whole time director or not) in the employment of the Company.
- J. “Generally available information” means information that is accessible to the public on a non-discriminatory basis, such as information published on the websites of stock exchanges
- K. “Immediate Relative” means a spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is dependent financially on such person, or consults such person in taking decisions relating to trading in securities.
- L. “Insider” means any person who,
- i. A Connected Person; or
  - ii. In possession of or having access to Unpublished Price Sensitive Information.
- M. “Insider Trading Regulations” shall mean the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.

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- N. “Key Managerial Person” means person as defined in Section 2(51) of the Companies Act, 2013.
- O. “Promoter” shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof:
- P. “Securities” shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund;
- Q. “Takeover regulations” means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;
- R. “Trading” means and includes subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell, deal in any securities, and “trade” shall be construed accordingly
- S. “Trading Day” means a day on which the recognized stock exchanges are open for trading;
- T. “Unpublished Price Sensitive Information” means: any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to information relating to the following:
1. Financial results;
  2. Dividends;
  3. Change in capital structure;
  4. Mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
  5. Changes in key managerial personnel; and
  6. Material events in accordance with the listing agreement.

Further, any words or expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts

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(Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation.

4. Compliance Officer:

- A. 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 at such frequency as may be stipulated by the Board of Directors.
- B. The Compliance Officer shall assist all Designated Persons/Connected person in addressing any clarifications regarding the Insider Trading Regulations and the Company's Code of Conduct.

5. Prevention of "Unpublished Price Sensitive Information":

- A. All information shall be handled within the Company on a need-to-know basis and no Unpublished Price Sensitive Information shall be communicated to any person except in furtherance of the Insider's legitimate purposes, performance of duties or discharge of his legal obligations.
- B. Provided that Unpublished Price Sensitive Information may be communicated, provided, allowed access to or procured, in connection with a transaction which entails:
  - an obligation to make an open offer under the Takeover Regulations where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the company; or
  - not attracting the obligation to make an open offer under the Takeover Regulations but where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the Company and the information that constitute Unpublished Price Sensitive Information is disseminated or is to be made generally available atleast two Trading Days prior to the proposed transaction being

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effected in such form as the Board of Directors may determine.

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

C. Need to know:

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

6. Limited Access to Confidential Information:

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password, etc., and the security details should be maintained confidentially.

7. Trading Restrictions:

Designated Person and Connected Persons designated on the basis of their functional role in the Company shall be governed by this Code.

8. Trading Plan:

- A. An insider shall be entitled to formulate a trading plan and present it to the compliance officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.

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- B. The Compliance Officer shall ensure that such Trading Plan shall:
- i. not entail commencement of Trading on behalf of the Insider earlier than one hundred and twenty calendar days from the public disclosure of the Trading Plan;
  - ii. not entail overlap of any period for which another trading plan is already in existence; and
  - iii. set out following parameters for each trade to be executed:
    - (i) either the value of trade to be effected or the number of securities to be traded;
    - (ii) nature of the trade;
    - (iii) either specific date or time period not exceeding five consecutive trading days;
    - (iv) price limit, that is an upper price limit for a buy trade and a lower price limit for a sell trade, subject to the range as specified below:
      - a. for a buy trade: the upper price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent higher than such closing price;
      - b. for a sell trade: the lower price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent lower than such closing price.

Explanation:

- (i) While the parameters in sub-clauses (i), (ii) and (iii) shall be mandatorily mentioned for each trade, the parameter in sub-clause (iv) shall be optional.
  - (ii) The price limit in sub-clause (iv) shall be rounded off to the nearest numeral.
  - (iii) Insider may make adjustments, with the approval of the compliance officer, in the number of securities and price limit in the event of corporate actions related to bonus issue and stock split occurring after the approval of trading plan and the same shall be notified on the stock exchanges on which securities are listed.
  - iv. not entail trading in securities for market abuse.
- C. The Compliance Officer shall consider the Trading Plan made as above and shall approve it forthwith. However, he shall be entitled to take express undertakings as may be

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necessary to enable such assessment and to approve and monitor the implementation of the Trading Plan as per provisions of the Insider Trading Regulations. Further, that the pre-clearance of trades shall not be required for a trade executed as per an approved trading plan and the trading window norms shall also not be applicable for trades carried out in accordance with an approved trading plan.

- D. The Trading Plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the Trading Plan, without being entitled to either execute any Trade in the Securities outside the scope of the Trading Plan or to deviate from it except due to permanent incapacity or bankruptcy or operation of law.

However, the implementation of the trading plan shall not be commenced if any unpublished price sensitive information in possession of the insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation. Further, if the insider has set a price limit for a trade, than the insider shall execute such trade only if the execution price of the security is within such limit. If price of the security is outside the price limit set by the insider, the trade shall not be executed.

Explanation: In case of non-implementation (full/partial) of trading plan due to either reasons enumerated in point D or due to failure to execute the trade due to inadequate liquidity in the scrip, the following procedure shall be adopted by the insider:

- (i) The insider shall intimate non-implementation (full/partial) of trading plan to the compliance officer within two trading days of end of tenure of the trading plan with reasons thereof and supporting documents, if any.
  - (ii) Upon receipt of information from the insider, the compliance officer, shall place such information along with his recommendation to accept or reject the submissions of the insider, before the Audit Committee in the immediate next meeting. The Audit Committee shall decide whether such non-implementation (full/partial) was bona fide or not.
  - (iii) The decision of the Audit Committee shall be notified by the compliance officer on the same day to the stock exchanges on which the securities are listed.
- In case the Audit Committee does not accept the submissions made by the insider, then the compliance officer shall take action as per the Code of Conduct.

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- E. The compliance officer shall approve or reject the trading plan within two trading days of receipt of the trading plan and notify the approved plan to the stock exchanges on which the securities are listed, on the day of approval.

9. Trading window:

- A. The Designated Persons and his/her Immediate Relatives and all Connected Persons shall trade in the Securities of the Company only during a specific trading period, ('Trading Window'), available for trading in the Company's Securities.
- B. The Compliance Officer shall close the Trading Window during the time any of the following information is unpublished and is likely to materially affect the price of the Securities of the Company:
- a) Financial results;
  - b) Dividends;
  - c) Change in the capital structure;
  - d) mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
  - e) change in the Key Managerial Personnel;
  - f) material events in accordance with the listing regulations;
  - g) such other information as may be specified by the Compliance Officer.
- C. The Trading Window shall be, inter alia, 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 and Such closure shall be imposed in relation to such securities to which such unpublished price sensitive information relates. Designated persons and their immediate relatives shall not trade in securities when the trading window is closed.
- D. Trading restriction period shall be made applicable 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.

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- E. All Designated Persons and their Immediate Relatives and all Connected Persons shall conduct all their Trading in the Securities of the Company only in a valid trading window and shall not deal in any transaction involving the purchase or sale of the Company's Securities during the periods when the Trading Window is closed, as referred to in Clauses above or during any other period as may be specified by the Company from time to time.
- F. In case of Employee Stock Options, the exercise of option may be allowed in the period when the Trading Window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when a trading window is closed.
- G. The Compliance Officer shall intimate the closure of Trading Window to all the Designated Persons and Connected Persons of the Company when he determines that a Designated Person or class of Designated Persons or Connected Persons can reasonably be expected to have possession of Unpublished Price Sensitive Information. Such closure shall be imposed in relation to such securities to which such Unpublished Price Sensitive Information relates.
- H. The Compliance Officer after taking into account various factors including the Unpublished Price Sensitive Information in question becoming generally available and being capable of assimilation by the market shall decide the timing for reopening of the trading window, which in any event shall not be earlier than forty-eight hours after the information becomes generally available.

10. Pre-clearance of trades:

All Designated Persons, who intend to deal in the Securities of the Company when the Trading Window is open and in any other listed Security or Securities proposed to be listed, if the value of the proposed trades exceeds the Threshold as set out by the board of directors, shall obtain a pre-clearance of the trading by them in such Securities from the Compliance Officer in the manner detailed below.

- A. The pre-dealing procedure shall be hereunder:
  - i. Any application may be made in the prescribed Form (Form A as provided in Annexure 1) to the Compliance Officer indicating the estimated number of Securities that the

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Designated Person intends to deal in, the details of the depository participant with which the Designated Person has an account, the details of the account maintained by the Designated Person with such Depository, the details of the Securities which are proposed to be Traded and such other details as may be required by any rule made by the Company in this behalf.

- ii. The said application should be accompanied with an undertaking (as provided in Annexure 2). The said undertaking shall be executed in favor of the Company by such Designated Person incorporating, inter alia, the following clauses, in addition to clauses mentioned in Annexure 2, as may be applicable:
  - a. That the Designated Person does not have any access or has not received “Price Sensitive Information” up to the time of signing the undertaking.
  - b. That in case the Designated Person has access to or receives “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 position and that he/she would completely refrain from dealing in the Securities till the time such information becomes public.
  - c. That he/she has not contravened the Code for Insider Trading as may be notified by the Company from time to time.
  - d. That he/she has made a full and true disclosure in the matter.
    - iii. The Compliance Officer shall give its decision substantially in form provided in Annexure 3.
    - iv. All Designated Persons shall execute their order in respect of Securities within one week or such period after the approval of pre-clearance is given by the Compliance Officer.
    - v. The Designated Person shall file within 2 (two) days of execution of the deal,

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the details of such deal with the Compliance Officer in the prescribed form (Form B as set out in Annexure 4). In case the transaction is not undertaken, a 'Nil' report to that effect shall also be filed.

- vi. If the order is not executed within seven days after the approval is given, the employee/director must pre-clear the transaction again.
- vii. All Designated Persons who buy or sell any number of Securities pursuant to this Clause shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six 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 any contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Securities and exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

In case of subscription in the primary market (initial public offers), the above-mentioned entities shall hold their investments for a minimum period of 30 days. The holding period would commence when the securities are actually allotted.

- viii. The Compliance Officer shall maintain a grey list of Securities which shall be the basis for the approving or rejecting applications for preclearance of Trades.
- ix. The Compliance officer may waive off the holding period in case of sale of securities in personal emergency after recording reasons for the same. However, no such sale will be permitted when the Trading window is closed.

#### 11. Other Restriction:

- A. The disclosure to be made by any person under this Code shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes Trading decisions.

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- B. The disclosures of Trading in Securities shall also include Trading in derivatives of Securities and the traded value of the derivatives shall be taken into account for purposes of this Code.

## 12. Disclosure Requirements:

### A. Initial Disclosure:

i) 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 listed Securities or Securities Proposed to be listed as on the date of appointment or becoming a promoter, to the Company within seven days of such appointment or becoming a promoter in the prescribed Form (Form D as provided in Annexure 5).

### B. Continual Disclosure:

i) Every promoter, member of the promoter group, designated person, employee 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 in the prescribed Form (Form E as provided in Annexure 6) 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. Ten Lakhs.

ii) The disclosure in Form C shall be made within 2 trading days of receipt of the disclosure or from becoming aware of such information.

### C. Disclosure by other Connected Person:

Transactions by every other Connected Person in the prescribed Form (Form F as provided in Annexure 7) as indicated by the Company under Regulation 7(3).

Every connected person shall make disclosures of holdings and trading in securities of the Company at such frequency as may be determined by the Company in order to monitor compliance with these regulations. The Compliance officer shall report to the

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Board of Directors for the purpose of the code and in particular, shall provide reports to the Chairman of audit Committee and to the Chairman of the board annually.

**13. Disclosure by the Company to Stock Exchange(s):**

- i. Within 2 trading days of the receipt of intimation under clause B above, the Compliance Officer shall disclose to all stock exchanges on which the Securities of the Company is listed, the information received.
- ii. The Compliance Officer shall maintain records of all the declarations in the appropriate form given by the Designated Persons for a minimum period of five years.

**14. Penalty for Contravention of code:**

- (i) Every Designated Person or Connected Person (as applicable) shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her dependants).
- (ii) Any person who trade in Securities or communicates any information for Trading in Securities, in contravention of this code may be penalised and appropriate action may be taken by the Company.
- (iii) Any person who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligibility for future participation in employee stock option plans, etc.
- (iv) The action by KUNDAN MINERALS AND METALS LIMITED shall not preclude SEBI from taking any action for violation of this regulation.
- (v) In case of any violation of the Regulation or the code is observed, SEBI may be informed of the same by the Company.

*\* This code and any amendment thereto shall be available on the website of the Company.*

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Annexure 1

FORM A

Date:

To,  
The Compliance Officer,  
KUNDAN MINERALS AND METALS LIMITED,  
PO. HANUMAN SUGAR MILLS, MOTIHARI,  
P.S.-MOTIHARI, EAST CHAMPARAN, Bihar,  
India, 845401.

Dear Sir/Madam,

Application for Pre-dealing approval in Securities

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 to purchase/ sale/ subscription of Securities as per details given below:

Sr No	Particulars	Remarks
1	Name of the applicant	
2	Designation	

**KUNDAN MINERALS AND METALS LIMITED**  
(Formely Known as Eastern Sugar & Industries Limited)

Email : info@kundanmineralsandmetals.com CIN: L24205BR1964PLC006630

Regd. Off: PO. Hanuman Sugar Mills, Motihari, P.S.-Motihari, East Champaran, Bihar-845401

Corp. Off.: Flat No 4, 2<sup>nd</sup> Floor 3, Scindia House Connaught Place, New Delhi-110001



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3	Name of Security and SCRIP Code of the Security	
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	
8	Price at which transaction is proposed	
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.	

I enclose herewith the form of undertaking signed by me. Yours faithfully,

(Signature of Designated Person)

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ANNEXURE 2

FORMAT OF UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR  
PRE-CLEARANCE

UNDERTAKING

To,  
The Compliance Officer,  
KUNDAN MINERALS AND METALS LIMITED,  
PO. HANUMAN SUGAR MILLS, MOTIHARI, P.S.-  
MOTIHARI, EAST CHAMPARAN, Bihar, India, 845401

I, \_\_\_\_\_ of the Company  
residing \_\_\_\_\_ at  
\_\_\_\_\_, am desirous of dealing in \_\_\_\_\* Securities as  
mentioned in  
my application, dated \_\_\_\_ (“Application”), for pre-clearance of the transaction.

I further declare that I was not in possession of or otherwise privy to any Unpublished Price Sensitive Information (as defined in the Company’s Code of Conduct for Prevention of Insider Trading (the Code) on the date of the Application and am not in possession of or otherwise privy to any Unpublished Price Sensitive Information upto the time of signing this undertaking.

In the event that I have access to or received any information that could be constructed as “Unpublished Price Sensitive Information” as defined in the Code, after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform

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the Compliance Officer of the same and shall completely refrain from dealing in the Securities until such information becomes public.

I declare that I have not contravened the provisions of the Code as notified by the Company from time to time. I undertake to submit the necessary report within four days of execution of the transaction/ a 'Nil' report, if the transaction is not undertaken.

If approval is granted, I shall execute the deal within 7 days of the receipt of approval failing which I shall seek pre- clearance. I declare that I have made full and true disclosure in the matter.

Date:

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

\*Indicate number of shares

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ANNEXURE 3

FORMAT FOR PRE-CLEARANCE ORDER

To, Name: \_\_\_\_\_

Designation: \_\_\_\_\_

Place: \_\_\_\_\_

This is to inform you that your request for dealing in \_\_\_\_\_ (nos) 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 days from today.

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, KUNDAN MINERALS AND METALS LIMITED

Compliance

Officer

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

Encl: Format for submission of details of transaction.

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FORM B

FORMAT FOR DISCLOSURE OF TRANSACTION

(To be submitted within 2 days of transaction / dealing in Securities)

To,  
The Compliance Officer,  
KUNDAN MINERALS  
AND METALS LIMITED,  
PO. HANUMAN SUGAR  
MILLS, MOTIHARI, P.S.-  
MOTIHARI, EAST  
CHAMPARAN, Bihar,  
India, 845401

I hereby inform that I

- Have not bought / sold / subscribed any Securities.
- Have bought/ sold/ subscribed to the Securities as mentioned below on • \_\_ (date)

Name Of Holder	No. Of Securities Traded	Bought/Sold/Subscribed	DP ID/ Client ID/Folio No.	Price (Rs.)

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In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 8 years and produce to the Compliance Officer/ SEBI any of following documents:

1. Broker's contract note.
2. Proof of payment to/ from brokers.
3. Extract of bank passbook/ statement (to be submitted in case of demat transactions).
4. Copy of Delivery instruction slip (applicable in case of sale transaction).

I agree that I shall not be entitled carry out a contra transaction to the transaction detailed in this letter for a period of six months hereafter. In case there is any urgent need to carry out such transaction, I shall approach the Compliance Officer for necessary approval. However, I understand that the decision of the Compliance Office shall be final and binding. 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).

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

Signature:

\_\_\_\_\_  
Name:

Designation:

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**FORM D****SEBI (Prohibition of Insider trading) Regulation,2015****[Regulation 7(1)(b) read with regulation 6(2)- Disclosure on becoming a Director/KMP/Promoter]**

Name of the Company: KUNDAN MINERALS AND METALS LIMITED

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

Name, PAN, CIN/DIN & address with contact No.	Category of Person (Promoter/KMP/Directors/Immediate/Relatives/ Others,etc.)	Date of Appointment of Director/KMP or Date of becoming Promoter	Securities held at the time of becoming Promoter/ Appointment of Director/KMP		% of Shareholding
			Type of Security (for eg – Shares, warrants, convertible Debenture 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) Regulation,2015.

Details of Open Interest (OI) in Derivatives of the Company held on appointment of Key Managerial Personnel (KMP) of Director or upon becoming a promoter of a listed company and other persons as mentioned in Regulation 6(2) if applicable.

Open interest of the Future Contracts held at the time of	Open interest of the Option Contracts held at the time of
---	---

Contract specification	Number of Units (Contracts* Lot size)	Notional value in Rupee Term	Contract specification	Number of Units (Contracts* Lot size)	Notional value in Rupee Term
7	8	9	10	11	12

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



		s)											
1	2	3	4	5	6	7	8	9	10	11	12	13	14







		warrants, convertible debentures)		warrants, convertible debentures)				es, warrants, convertibl					
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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

Details of Trading in derivatives of the Company by Promoter, Employee of Director of a listed Company and other Such persons as mentioned in Regulation 6(2), if applicable

Trading in derivatives (specify type of Contract, Futures or options etc)						Exchange on which the trade was executed
Type of Contract	Contract Specification	Buy		Sell		
		Notional Value	Number of units (Contract*lot size)	Notional Value	Number of units (Contract*lot size)	
15	16	17	18	19	20	21

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