



URBAN ENVIRO WASTE MANAGEMENT LIMITED

CODE OF FAIR DISCLOSURE AND CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING, 2015

(As approved by the Board of Directors of the Company in its 10th Meeting for the FY 2023-24 held on 08.03.2024)

CHAPTER – I

PRELIMINARY

Short title and commencement

1.1 This Code shall be called the Code of Fair Disclosure and Code of Conduct for prevention of Insider Trading, 2015 (hereinafter may be referred as “the code“)

1.2 The Code came into effect from 15.05.2015 as amended from time to time.

Definitions.

2.1 In the Code, unless the context otherwise requires, the following words, expressions and derivations therefrom shall have the meanings assigned to them as under:–

- (a) “**Act**” means the Securities and Exchange Board of India Act, 1992 (15 of 1992);
- (b) “**Board**” means the Securities and Exchange Board of India (herein may be referred as SEBI)
- (c) “**Code**” means this “Code of Fair disclosure and Code of Conduct for Prevention of Insider Trading, 2015”, as modified from time to time.
- (d) “**Company**” means Urban Enviro Waste Management Limited (hereinafter may be referred as URBAN).
- (e) “**Compliance officer**” means Company Secretary of Urban Enviro Waste Management Limited
- (f) “**Connected person**” includes-
 - (i) any person who is or has, during the six months prior to the concerned act, been associated with URBAN, 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 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between himself and the company whether temporary/permanent, that allows such person, directly/indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.
 - (ii) an immediate relative of connected persons specified in clause (i);
 - (iii) 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 percent of the holding or interest;
 - (iv) such other person as may be defined in the regulations.

- (g) **“Designated Person”** shall include a person occupying any of the following position in the Company:
- i. Promoters
 - ii. Chairman-Cum- Managing Director and All Directors
 - iii. All Executive Directors
 - iv. All employees in the rank of General Managers.
 - v. All senior executives working in the offices of CMD/Directors /ExecutiveDirectors/General Managers
 - vi. Company Secretary and supporting staff who have access to unpublishedprice sensitive information.
 - vii. Fiduciary includes all professional firms such as auditors, accountancy firm, law firms, analyst, insolvency professional entities, consultants, banks etc. assisting or advising URBAN.
- (h) **"Generally available information"** means information that is accessible to the public on a non- discriminatory basis;
- (i) **“Immediate relative”** means a spouse of a connected 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;
- (j) **"Insider"** means any person who is:
- i) a connected person; or
 - ii) in possession of or having access to unpublished price sensitive information;
- (k) **“Key Managerial Persons (KMP)”** means Chairman-cum-Managing Director, CFO and Company Secretary of URBAN or as may be defined by the Board of Directors of URBAN from time to time.
- (l) **"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;
- (m) **"Regulations”** means the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time. (herein referred as “the regulations”)
- (n) **"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;
- (p) **"Trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;
- (q) **“Trading day”** means a day on which the recognized stock exchanges are open for trading;
- (r) **"Unpublished price sensitive information"** means any information, relating to URBAN or its securities, directly or indirectly, that is not generally available and 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: –

- (i) financial results;
- (ii) dividends;
- (iii) change in capital structure;
- (iv) mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions; and
- (v) changes in key managerial personnel;

2.2 Words and expressions used and not defined here or in the regulations but defined in the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (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 there under shall have the meanings respectively assigned to them in those legislations.

CHAPTER – II

RESTRICTIONS ON COMMUNICATION AND TRADING BY INSIDERS

Prohibition on communication or procurement of unpublished price sensitive information

3.1 Except as provided in the code or the regulations, no insider shall communicate, provide, or allow access to any unpublished price sensitive information relating to URBAN or its securities, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

3.2 No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to URBAN, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

3.3 Policy for determination of “Legitimate Purpose”

“Legitimate Purpose” shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with Government Agencies/Authorities, partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, and such other persons as may be prescribed by the Chairman-cum-Managing Director from time to time, provided that such sharing has not been carried out to evade or circumvent the prohibitions of this Code.

While deciding the legitimate purpose following shall be taken into consideration:

1. Nature of information being shared.
2. Person to whom the information is being given.
3. Whether information may be categorized under unpublished price sensitive information.
4. Whether confidentiality clause is added in the information.
5. Whether it is necessary to share such information with other persons.

3.4 Any person in receipt of unpublished price sensitive information pursuant to a “legitimate purpose” shall be considered an “insider” for purposes of these regulations and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with these regulations.

Trading when in possession of unpublished price sensitive information

4.1 Except as provided in the code or the regulations, no insider shall trade in securities of URBAN when in possession of unpublished price sensitive information.

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

Trading Plans

5.1 (a) An insider, if so desires, may formulate a trading plan for trading in the securities of URBAN 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.

(b) Compliance Officer shall make public disclosure of such trading plan.

5.2 The trading plan shall:–

- (i) not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan; (e.g. Trading can be done only after 6 months after the public disclosure of plan.)
- (ii) not entail trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced by URBAN and the second trading day after the disclosure of such financial results; (e.g. Insider can trade only 20 trading days prior to the last day of any financial period for which results are required to be announced by URBAN and after 2 days of announcement of financial results of each half year.)
- (iii) entail trading for a period of not less than twelve months; (e.g. It is not desirable to have frequent announcements of trading plans. Insider presenting trading plan on 1st of January can start trading from 1st July till 30th June of the next year. However, it would be required to submit a trading plan on 1st January of every year for trading in future.)
- (iv) not entail overlap of any period for which another trading plan is already in existence;
- (v) set out either the value of trades to be affected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be affected;
- (vi) not entail trading in securities for market abuse.

5.3 The trading plan once approved by the compliance officer shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.

Provided that 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. In such event, the compliance officer shall confirm that the commencement ought to be deferred until such unpublished price sensitive information becomes generally available information so as to avoid a violation of the code and the regulations.

5.4 After approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges (NSE) on which the securities of URBAN are listed. The format of Trading Plan and format for public disclosure has been annexed as Form E.

CHAPTER – III

DISCLOSURES OF TRADING BY INSIDERS

General provision

- 6.1** Every public disclosure under the code shall be made in **Forms** annexed hereto.
- 6.2** The disclosures to be made by any person shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.
- 6.3** The disclosures of trading in securities shall also include trading in derivatives of securities, if any, and the traded value of the derivatives shall be taken into account for purposes of threshold value of the permissible limit of the trade.
- 6.4** The disclosures shall be maintained by URBAN for a minimum period of five years.

7.1 Initial Disclosures.

- (a) Every promoter, key managerial personnel and director of URBAN shall disclose his holding of securities of the company to the company within **30 days** after the code come into force.
- (b) Every person on appointment as key managerial personnel or a director of URBAN or upon becoming a promoter shall disclose his holding of securities of the company as on the date of appointment or becoming a promoter, to the company within **7 days** of such appointment or becoming a promoter.

Disclosure in respect of (a) and (b) shall be submitted in **Form-A and Form-B** annexed hereto.

7.2 Continual Disclosures.

- (a) Every promoter, designated person and director of URBAN 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 **Fifty lakh rupees**. Disclosure regarding the same shall be submitted in **Form-C** annexed hereto.
- (b) The Compliance Officer shall notify the particulars of such trading to the stock exchange (NSE) within two trading days of receipt of the disclosure or from becoming aware of such information.

7.3 Disclosures by other connected persons

URBAN may require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the company in **Form-D** on half yearly basis in order to monitor compliance with these regulations.

7.4 Annual Disclosure

Designated persons shall disclose names and Permanent Account Number or **any other identifier** authorized by law, of the following persons to the company on an annual basis and as and when the information changes in **Form- H**:

- (a) immediate relatives
- (b) persons with whom such designated person(s) shares a material financial relationship
- (c) Phone, mobile and cell numbers which are used by them

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

Explanation—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 during the immediately preceding twelve months, equivalent to at least 25% of such payer’s annual income but shall exclude relationships in which the payment is based on arm’s length transactions.”

CHAPTER – IV

CODE OF FAIR DISCLOSURE

Company Secretary (Compliance Officer) shall be Chief Investor Relations Officer and deal with dissemination of information and disclosure of unpublished price sensitive information.

URBAN shall-

- (1) promptly make 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) uniformly and universally disseminate the unpublished price sensitive to avoid selective disclosure,
- (3) promptly disseminate the unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise and shall make such information generally available,
- (4) appropriately and fairly respond to the queries on news reports and shall request for verification of market rumors by regulatory authorities,
- (5) ensure that information shared with analysts and research personnel is not unpublished price sensitive information,
- (6) make transcripts or records of proceedings of meetings with analysts and other investor relations conferences and put it on its website, in order to ensure official confirmation and documentation of disclosures made and
- (7) handle all unpublished price sensitive information on a need-to-know basis.
- (8) ensure that the Compliance Officer maintains a structured digital database containing the nature of unpublished price sensitive information and names of such persons or entities as the case may be with whom unpublished price sensitive information is shared under this regulation along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such databases shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database
- (8A) The structured digital database maintained under sub clause (8) shall be preserved for a period of not less than eight years after completion of the relevant transactions and in the event of receipt of any information from the SEBI regarding any investigation or enforcement proceedings, the relevant information in the structured digital

database shall be preserved till the completion of such proceedings.

- (9) serve necessary notice, as may be required, upon designated persons and persons considered having unpublished price sensitive information.

CHAPTER – V

Standards for Code of Conduct to Regulate, Monitor and Report Trading by Designated person

- (1) The compliance officer shall report to the Board of directors and in particular, shall provide reports to the Chairman of the Audit Committee or to the Chairman of the Board of Directors if there is no chairman of audit committee, on half yearly basis. The Board shall be informed regarding compliances of the code on half yearly basis.
- (2) URBAN will not communicate unpublished price sensitive information to any person except in furtherance of the legitimate purposes, performance of duties or discharge of legal obligations.
- (3) The company will follow Chinese Wall Policy to prevent the misuse of confidential information. A “Chinese Wall” policy separates people into two groups, one, the Insiders (referred as the “Designated Persons”) possessing the unpublished price sensitive information and second, the Outsiders (i.e. the Public or a person below designated person). As per “Chinese Wall” policy, the designated person (termed as person of Insider Area) is not allowed to communicate the unpublished price sensitive information to other person in organization (termed as person of Public Area). In order to comply with the policy, the Compliance Officer shall take declaration in the form of an Undertaking from the designated person (**Form-G**) on half yearly basis, to ensure that, they have not communicated any price sensitive information to any outsider. There will be a wall between all the departments of the company in sharing the price sensitive information.
- (4) Designated persons and immediate relatives of designated persons in the company shall be governed by this internal code of conduct governing dealing in securities of the company.
- (5) If a designated person, having possession of the price sensitive information, intends to communicate the same in order to fulfill his legal obligations, then, he must ensure that any provisions of the applicable acts/laws/regulations or guidelines of the Government are not violated and the information is not used for trading purpose in securities of URBAN. He shall make a disclosure in this regard to the compliance officer.
- (6) As present, URBAN is having only one kind of security (i.e. equity shares), the trading in the shares shall be covered under the code. The compliance officer is entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any unpublished price sensitive information before approving any trade.

(B) TRADING WINDOW

- (1) Designated persons and immediate relatives of designated person may execute trades subject to compliance with the code and the regulations. The company shall maintain a register giving details of trades. The register shall be termed as the notional trading window for the purpose of monitoring trading by designated persons.
- (2) The trading window shall generally be closed commencing from not later than end of every half year till 48 hours after the declaration of financial results. Compliance Officer may also determine other dates for closing window.
- (3) Designated persons and their immediate relatives shall not trade in securities when the trading window is

closed.

- (4) 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.
- (5) The trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.
- (6) When the trading window is open, trading by designated persons shall be subject to pre-clearance (in **Form F**) by the compliance officer, if the value of the proposed trades is above Rupees 10 lakh. The pre-clearance of trades shall not be required for a trade executed as per the approved trading plan.
- (7) Trades that have been pre-cleared have to be executed by the designated person within 7 days of Pre-clearance, failing which fresh pre-clearance would be needed for the trades to be executed.
- (8) A designated person who is permitted to trade shall not execute a contra trade within 6 months. However, 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.
- (9) If a 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 the Board for credit to the Investor Protection and Education Fund administered by the Board under the Act.
- (10) The designated persons shall make applications for pre-clearance, trades executed, reporting of decisions not to trade after securing pre-clearance, and for reporting level of holdings in securities at such intervals as may be determined as being necessary to monitor compliance with these regulations in the forms annexed with this code.
- (11) In case it is observed that there has been a violation of the code/ regulations, the Board shall be informed promptly.

CHAPTER – VI

Violation of provisions

- (i) URBAN will ensure having a proper and effective mechanism in the form of internal control for prevention of insider trading.
- (ii) Chairman cum Managing Director may take necessary disciplinary action as per extant rules of the company for violation of the code which may include wage freeze, suspension, recovery, clawback etc.
- (iii) Any amount collected from the insider for non-compliance of these code shall be remitted to the SEBI for credit to the Investor Protection and Education Fund administered by the SEBI under the Act.
- (iv) Any contravention of the Code or SEBI (Prohibition of Insider Trading) Regulations, 2015 shall be dealt with by SEBI in accordance with the Act. If there has been a violation of these code/regulations, the compliance officer shall promptly inform the stock exchange(s) where the securities of URBAN are traded, in such form and such manner as may be specified by the SEBI from time to time.
- (v) Any provisions contained in the Code shall, to the extent to which it is repugnant to the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 or any other law for the time being in force, be void.
- (vi) Specimen formats are enclosed. In Case the periodical information is Nil, a Nil report should be submitted in the said format.

CHAPTER – VII

Policy and Procedure for Inquiry in case of Leak/suspected leak of Unpublished Price Sensitive Information

- (i) Chairman cum Managing Director will constitute a committee for inquiry of leakage/suspected leakage of unpublished price sensitive information (UPSI).
- (ii) Chairman cum Managing Director shall direct for inquiry of leakage/ may direct suspected leakage of UPSI.
- (iii) The Committee shall conduct an internal inquiry into the leakage/suspected leakage of UPSI to determine possible role of following persons in this regard:
 - a) Persons / members of committees involved in generation of the original data for the purpose of determination of key figures pertaining to financial figures.
 - b) Persons involved in the consolidation of the figures for the financial results.
 - c) Persons involved in the preparation of board notes and presentations.
 - d) Any other persons who had access to the information.
- (iv) The inquiry shall be completed within a period of 3 months from the date of order of inquiry.
- (v) The Committee shall submit its report to the Chairman cum Managing Director within 3 days from the completion thereof.
- (vi) In accordance with this code and company's rules, as applicable, appropriate action shall be taken against those persons who are found responsible for the leakage of UPSI.
- (vii) The Compliance officer shall submit the findings in the report of inquiry committee to the SEBI promptly.

Form-A.

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (1) (a) read with Regulation 6 (2) – Initial disclosure to the company]

Name of the company: _____

_____ ISIN of the company:

Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoters / KMP / Directors/immediate relative to/others etc.	Securities held as on the date of regulation coming in to Force		% of Shareholding
		Type of security (For eg. – Shares, Warrants, Convertible Debentures 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 of the company held by Promoter, Key Managerial Personnel (KMP), Director and 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 Option Contracts held as on the date of regulation coming into force		
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
6	7	8	9	10	11

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

Name & Signature:

Designation:

Date: Place:

FORM-B

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

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 Promoter or member of the promoter group of a listed company and other such persons as mentioned in Regulation 6(2)

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (KMP / Director or Promoter or member of the promoter group / Immediate relatives to/others etc.)	Date of appointment Of KMP/Director / OR Date of becoming Promoter/ member of the promoter group	Securities held at the time of appointment of KMP/Director or upon becoming Promoter or member of the promoter group		% of Shareholding
			Type of security (For e.g. – Shares, Warrants, Convertible Debentures Rights entitlements, etc.)	No.	
1	2	3	4	5	6

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

Details of Open Interest (OI) in derivatives on the securities of the company held on appointment of KMP or Director or upon becoming a Promoter or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).

Open Interest of the Future contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group			Open Interest of the Option Contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group		
Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
7	8	9	10	11	12

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

Name &
Signature:
Designation:
Date:
Place

FORM 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 company: _____

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/Director/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)	Exchange on which the trade was executed
		Type of security (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements etc.)	No. and % of shareholding	Type of security (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge / Revoke/ Invoke, Others-please specify)	Type of security (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements etc.)	No. and % of shareholding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

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

FORM D

**SEBI (Prohibition of Insider Trading) Regulations, 2015
Regulation 7(3) – Transactions by Other connected persons as identified by 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	Connection with company	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/acquisition of shares/sale 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 security (For eg. – Shares, Warrants, Convertible Debentures Rights entitlement, etc.)	No. and % of share holding	Type of security (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No.	Value	Transaction Type (Buy/Sale/Pledge / Revoke / Invoke)	Type of security (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

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:
Designation:
Date:
Place

Form-E

(Under clause 6.1)

*TRADING PLAN TO BE SUBMITTED FOR PUBLIC DISCLOSURE AND APPROVAL AND
SUBMISSION TO STOCK EXCHANGE*

**To
Company Secretary
Urban Enviro Waste Management Limited**

I....., (Name, designation & dept.) residing at
.....as required under the Code hereby submit the following information:-

1. Period of Trading plan: From.....To.....
2. Cool off Period of 6 months end on:
3. Number of Security seeking clearance
4. Value of trades to be effected:
5. Nature of Trade:
6. Intervals (or Date) on which trade shall be effected:

I declare and undertake that:

- (1) Trading plan once approved shall be irrevocable.
- (2) I shall mandatorily implement the plan once approved.
- (3) Implementation of this plan shall not commence if any unpublished price sensitive information in my possession at the time of presenting this plan has not become generally available till the time of commencement of implementation.
- (4) Trading plan would not mean absolute immunity from bringing proceeding for market abuse.
- (5) I have no access to, nor do I have any information, that could be construed as "Price Sensitive Information" as defined in the code up to the time of signing this undertaking.
- (6) In the event that I have access to or received any information that could be construed as "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 the compliance officer of the same and shall completely refrain from dealing in securities of the company until such information becomes public.
- (7) I have not contravened the provisions of the code for prohibition of Insider Trading, as notified by the company from time to time.
- (8) I have made full and true disclosure in the matter.

Signature:

Name:

Designation:

Dept. & EMP No.:

Date:

FORM-F

(Under Chapter V (B), Clause 7)

APPLICATION FOR PRE-CLEARANCE

To
Company Secretary
Urban Enviro Waste Management Limited

Through: Division / Department Head

With reference to the Code for prohibition of Insider Trading of shares/securities of URBAN, I seek on behalf of myself / my relatives, your approval to subscribe to / agree to subscribe to / purchase / sell /deal as an agent/principle in..... (nos.) shares/securities of the Company value of which is Rs.....on the basis of closing market price as on(NSE).

I do hereby confirm that I have no access to nor do I have any information that could be construed as “Price Sensitive Information” as defined in the code up to the time of application and I have not contravened the provisions of the Code and the regulations particularly the one related to the Price sensitive information.

Details of shareholdings held as on the date of application for pre-clearance:

1. No. of securities held:
2. Approx Market Value Rs.

Signature:

Name:

Designation:

Dept. & EMP No.

Note: Pre-clearance will be required only if the value of the proposed trades is above one lakh rupees

PRE-CLEARANCE ORDER

This is to inform you that your request No..... dated for dealing by yourself / your Dependents in(Nos.) securities of the Company, as mentioned in your above mentioned application, is approved. Please ensure that the said transaction must be completed in accordance with the code on or before (date), i.e., within 7 days from today, failing which you are required to obtain the pre-clearance again.

ForUrban Enviro Waste Management Limited

Date :

COMPANY SECRETARY

FORM-G

(As per Chapter V (A), Clause 3)

UNDERTAKING TO BE SUBMITTED UNDER CHINESE WALL POLICY ON HALF YEARLY BASIS BY DESIGNATED PERSONS

I,.....(Name, designation) residing at,
....., do hereby state that :-

1. I do have access to the information, that could be construed as “Price Sensitive Information” as defined in the code at the time of signing this undertaking.
2. I have not contravened the provisions of the code of conduct for prohibition of Insider Trading, as notified by the company from time to time.
3. If I have possession of the price sensitive information and I intend to communicate the same in order to fulfill my legal obligations, then, I must ensure that any provisions of the applicable acts/laws/regulations or guidelines of the Government are not violated and the information is not used for trading purpose in securities of URBAN. I do hereby confirm, that, I have not communicated any price sensitive information to any outsider.
4. I have made full and true disclosure in the matter.

Signature: Name: Designation:

Date:

Form-H

SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7.4 – Annual disclosure to the company]

Name of the company: _____

ISIN of the company: _____

Disclosure by Designated Persons and other identifiers as mentioned in Regulation 7.4

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoters / KMP / Directors / immediate relative to /others etc.	Securities held at the end of the year or as on the date of disclosure		% of Shareholding	Name of the Educational Institution from which designated person has graduated	Name of the past employer of the Designated persons
		Type of security (For eg. – Shares, Warrants,	No.			
1	2	3	4	5	6	7

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 of the company by above persons

Open Interest of the Future contracts held as on the date of regulation coming into force			Open Interest of the Option Contracts held as on the date of regulation coming into force		
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
8	9	10	11	12	13

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

Name & Signature: Designation:

Date:

Place:
