

STAR UNION DAI-ICHI LIFE INSURANCE
COMPANY LIMITED

CODE OF CONDUCT

UNDER

SECURITIES EXCHANGE BOARD OF INDIA
(PROHIBITION OF INSIDER TRADING) REGULATIONS,
2015



Star Union Dai-ichi
Life Insurance



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**CODE OF CONDUCT
FOR PROHIBITION OF TRADING BY INSIDERS**

1. Preface

Securities and Exchange Board of India (SEBI) vide Gazette notification no. LAD-NRO/GN/2014-15/21/85 dated 15th January 2015 has issued Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“**PIT Regulations**”). The same has been amended from time to time. Last such amendment was made vide SEBI (Prohibition of Insider Trading) (Second Amendment) Regulations, 2021.

As per the PIT Regulations, the Board of Directors of the listed company shall formulate a code of conduct to regulate, monitor and report trading by its designated persons and immediate relatives of designated persons with respect to trading in Company’s securities.

2. Objective

This Code is framed as per regulation 9 read with schedule B of the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended to regulate, monitor and report trading in securities of the Company by insiders.

3. Applicability

The Code shall be applicable to Designated Persons and immediate relatives of designated persons as described in the Code or as may be specified by the Board of Directors in consultation with the Compliance Officer.

4. Definition

In the Code, unless the context otherwise requires, the following words, expressions and derivations there from shall have the meanings assigned to them as under:-

4.1 “**Act**” means the Securities and Exchange Board of India Act, 1992;

4.2 “**Company**” means Star Union Dai-ichi Life Insurance Company Limited ;

4.3 “**Connected person**” means-

- (i) any person who is or has during the six months prior to the concerned act been associated with the 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 by being a director, officer or an employee of the Company

or holds any position including a professional or business relationship between himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.

(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) an official of a stock exchange or of clearing house or corporation; or
- c) 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
- d) an official or an employee of a self-regulatory organization recognised or authorized by the Board; or
- e) a banker of the Company; or
- f) 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 percent of the holding or interest;

4.4 “**Contra Trade**” means a trade or transaction which involves buying or selling any number of securities of the Company and within 6 months trading or transacting an opposite transaction involving sell or buy following the earlier transaction.

4.5 “**Designated Persons**” The following class of persons will be treated as Designated Persons for the purpose of the Code:

- (i) Promoters of the Company
- (ii) All the Directors of the Company
- (iii) **Employees based on functional role and access to UPSI** - All the officers of following verticals -
 - a) Key Management Person as defined under Companies Act, 2013 and IRDAI Guidelines
 - b) Finance and Accounts (VP & above)
 - c) Strategy (VP & above)
 - d) Company Secretary & his team members
 - e) MD & CEO’s Secretariat
 - f) Employees posted at Department of Information Technology (DIT) identified by the Chief Technology Officer

**The employees referred above in sub-clause (iii) are hereinafter referred to as “Designated Employees” for the purpose of the Code.*

- 4.6 “**Fiduciaries**” includes professional firms such as auditors, accountancy firms, law firms, analysts, insolvency professional entities, consultants, banks etc., assisting or advising the Company .
- 4.7 “**Generally available information**” means information that is accessible to the public on a non-discriminatory basis;
- 4.8 “**Immediate relative**” means any of the following who is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities-
- a) Spouse
 - b) Father
 - c) Mother
 - d) Brother
 - e) Sister
 - f) Son (including step-son)
 - g) Daughter (including step-daughter)
- 4.9 “**Insider**” means any person who is:
- i) a connected person; or
 - ii) in possession of or having access to unpublished price sensitive information;
- 4.10 “**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;
- 4.11 “**Promoter Group**” shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof;
- 4.12 “**Regulation**” means the “Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015”.
- 4.13 “**Securities**” shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 or any modification thereof which is/are listed at any stock exchange except units of a mutual fund;
- 4.14 “**Trading**” means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and “trade” shall be construed accordingly.
- 4.15 “**Trading day**” means a day on which the recognized stock exchanges are open for trading;

4.16 **“Unpublished price sensitive information (UPSİ)”** means any information, relating to the Company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities which is/are listed at any stock exchange and shall, ordinarily including but not restricted to, information relating to the following:

- (i) Financial results;
- (ii) Payment of Interest ;
- (iii) Mergers, de-mergers, acquisition, delistings, disposals and expansion of business and such other transactions;
- (iv) Changes in key managerial personnel as per Companies Act, 2013; and

Words and expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made there under shall have the meanings respectively assigned to them in those legislations.

5. Compliance Officer

Company Secretary of the Company shall be designated as the **Compliance Officer** under this Code who shall report to the Board of Directors of the Company.

6. Duties of Compliance Officer

- 6.1 The Compliance Officer shall maintain a record of the designated employees and changes, if any, from time to time.
- 6.2 The Compliance Officer shall be responsible for setting forth policies, procedures, monitoring and adherence to the rules for the preservation of “Unpublished Price Sensitive Information”, pre-clearance of trades of designated employees and their dependents (directly or through respective department heads as decided by the Company), monitoring of trades and the implementation of the Code of Conduct under the overall supervision of the Board of Directors of the Company.
- 6.3 The Compliance Officer may in consultation with Managing Director & CEO specify prohibited period from time to time and immediately make an announcement thereof to all concerned.
- 6.4 The Compliance Officer shall maintain a record of Prohibited Period specified from time to time.
- 6.5 The Compliance Officer shall maintain records of all the declarations submitted in the appropriate form given by the Directors and Designated Employees for a minimum period of three years.
- 6.6 The Compliance Officer shall assist all the Designated Employees in addressing any

clarification regarding the Regulations.

- 6.7 The Compliance Officer shall report on quarterly basis on compliance of the Code to the Board.
- 6.8 The Compliance Officer shall put in place adequate and effective system of internal controls to ensure compliance with the requirements of SEBI (PIT) Regulations to prevent insider trading.

7. Trading Restrictions

Trading Window is the period during which the purchase or sale of transactions is allowed by the Designated Persons and their immediate relatives subject to their satisfying the conditions laid down by the Code.

The period prior to declaration of price sensitive information is particularly sensitive for transactions in the Company's securities. This sensitivity is due to the fact that the Designated Persons will, during that period, often possess unpublished price sensitive information. During such sensitive times, the Designated Persons and their immediate relatives will have to forego the opportunity of trading in the Company's securities.

The Designated Persons and their immediate relatives shall not deal in the securities of the Company when the trading window is closed.

The Compliance Officer shall decide the period during which Trading Window shall be closed. Generally, the closure of Trading Window for securities of the Company shall be announced when any of the following events occurs -

- a) Declaration of Financial results (quarterly, half-yearly and annual)**
- b) Payment of Interest
- c) Any major expansion plans or execution of new projects
- d) Amalgamation, mergers, takeovers and buy-back
- e) Disposal of whole or substantially whole of the undertaking

**Trading window shall be closed from the end of every quarter till 48 hours after the declaration of financial results.

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.

The trading window shall also be applicable to any person having contractual or fiduciary

relation with the Company, such as auditors, accountancy firms, law firms, analysts, consultants etc. assisting or advising the Company. These insiders who are in possession of UPSI shall not trade even when trading window is not closed

8. Trading when in possession of unpublished price sensitive information

No insider shall trade in securities that are listed or proposed to be listed on a stock exchange when in possession of unpublished price sensitive information. 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.

Exemptions: Insider may prove his innocence by demonstrating the circumstances including the following: -

- (i) The transaction is an off-market inter se transfer between insiders who were in possession of the same unpublished price sensitive information without being in breach of Code of Conduct for Fair Disclosure of UPSI and both the parties had made a conscious and informed trade decision.

Provided that the off-market trades shall be reported by the insiders to the Compliance Officer within two working days. Further, the Company shall notify the particulars of such trades to the stock exchanges within two trading days from receipt of disclosure or from becoming aware of such information.

- (ii) The transaction was carried out through the block deal window mechanism between persons who were in possession of the unpublished price sensitive information without being in breach of Code of Conduct for Fair Disclosure of UPSI and both parties had made a conscious and informed trade decision.
- (iii) The transaction in question was carried out pursuant to a statutory or regulatory obligation to carry out a bona fide transaction.
- (iv) in the case of non-individual insiders:
 - a) the individuals who were in possession of such unpublished price sensitive information were different from the individuals taking trading decisions and such decision-making individuals were not in possession of such unpublished price sensitive information when they took the decision to trade; and
 - b) appropriate and adequate arrangements were in place to ensure that these regulations are not violated and no unpublished price sensitive information was communicated by the individuals possessing the information to the individuals taking trading decisions and there is no evidence of such arrangements having been breached;

- (v) The trades were pursuant to a trading plan set up in accordance with para 9 of this Code.

9. Trading Plans

9.1 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.

9.2 Such trading plan shall:-

- a. not entail commencement of trading on behalf of the insider earlier than 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 results are required to be announced by the issuer of the securities and the second trading day after the disclosure of such financial results;
- c. entail trading for a period of not less than 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 securities 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.

9.3 The compliance officer shall review the trading plan to assess whether the plan would have any potential for violation of these regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.

Provided that pre-clearance of trades shall not be required for a trade executed as per an approved trading plan.

Provided further that trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

9.4 The trading plan once approved 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 and 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.

- 9.5 Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

10. Pre-Clearance of Trades for dealing in securities

- 10.1. Designated Person can deal in the securities of the Company only when the trading window is open and Designated Person is not in the possession of any unpublished price sensitive information.
- 10.2. If the traded value of securities of the Company is less than or equal to Rs. 30,00,000 (Rupees Thirty Lakhs) in a calendar quarter no pre clearance is required.

However, if the traded value of securities is likely to be more than Rs. 30,00,000 (Rupees Thirty Lakhs) in a calendar quarter then pre-clearance from the Compliance Officer is required.

- 10.3. Pre-clearance of trades shall not be required for a trade executed as per an approved trading plan.
- 10.4. Designated Person has to apply for pre-clearance of trades to Compliance Officer in the **Form 1** and has to provide an undertaking to the effect that the applicant for pre-clearance is not in possession of any unpublished price sensitive information in **Form 2**.
- 10.5. The Compliance Officer may grant the pre-clearance in **Form 3** after -
- a) seeking such information as may be necessary from the applicant;
 - b) confirming the accuracy of declaration submitted by applicant that he is not in the possession of unpublished price sensitive information;
 - c) confirming that the applicant has not done any prior contra trade within the period of six months;

The pre-clearance shall be valid for a period of seven trading days and within which trades that have been pre-cleared have to be executed by the designated person, failing which fresh pre-clearance would be needed for the trades to be executed.

- 10.6. Designated Person shall inform the Compliance Officer in **Form 4** of execution of trade for which pre-clearance was sought within 2 trading days from the execution of trade.
- 10.7. In case the Designated Person decides not to execute the trade after securing pre-clearance, he/she shall inform the Compliance Officer of such decision along with reasons thereof immediately in **Form 4**.
- 10.8. **Prohibition on Contra Trade within six months:** A Designated Person who is permitted to trade (buy or sell) shall not execute a contra trade (sell or buy) any number of securities for the next six months. This restriction is not applicable for trades carried out in accordance with the approved trading plan.
- 10.9. In case a contra trade is executed within 6 months inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the SEBI for credit to the Investor Protection and Education Fund administered by the SEBI under the Act..

11. Disclosures of Trading by Insiders

11.1 Initial Disclosures

Every person on appointment as a **Director or Key Managerial Personnel** of the Company or upon becoming a Promoter or member of the Promoter group shall disclose their as well as their immediate relatives' holding of securities of the Company, if any as on the date of appointment, to the Company **within seven days** of such appointment in **Form 6**.

11.2 Continual Disclosures

- a) **To Company** - Every Promoter, member of the Promoter group, Director and Designated person of the Company shall disclose to the Company the number of such securities acquired or disposed of **within two trading days** of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of **Rs.30,00,000 (Rupees thirty Lakhs)** in **Form 7**;
- b) **To Stock Exchanges** - Compliance Officer shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure from the insider in **Form 7** or from becoming aware of such information.

Note: The disclosure of the incremental transactions after any aforesaid disclosure shall be made when the transactions effected after the prior disclosure cross the threshold limit of Rs.30,00,000 ((Rupees Thirty Lakhs).

11.3 Disclosures by other connected persons

Compliance Officer may at his discretion require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the Company in **Form 8** and at such frequency as may be determined by the Compliance Officer in order to monitor compliance with these regulations.

12. Disclosures by Directors & Designated Employees

12.1 Disclosure of Name & PAN etc. by Designated Employees

All designated persons shall be required to submit Names and Permanent Account Number (PAN) or any other identifier authorized by law (such as Aadhaar, Voter ID, Passport etc.) of the following to the Company in **Form 5**, on an annual basis and as and when the information changes, within 30 days:

- a. immediate relatives;
- b. persons with whom such designated person(s) shares a material financial relationship;
- c. Phone, and 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.

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.

12.2 Disclosure of holding of Company's Securities by Directors and Designated Employees

All the Directors and Designated Employees are required to submit Disclosure of holding of Company's Securities in their name and in name of their immediate relatives in **Form 9** on annual basis within 30 days from the end of financial year.

13. Other Internal Controls to prevent Insider Trading

13.1 The Compliance Officer is authorized to identify any employee who have access to unpublished price sensitive information as designated employee even if he is not covered under the definition of designated employee under the Code and all the provisions of the Code shall be applicable to such employee.

13.2 All the unpublished price sensitive information shall be identified by the Department Heads and its confidentiality shall be maintained as per the requirements of the Code.

13.3 Adequate restrictions shall be placed on communication or procurement of unpublished price sensitive information as required by these regulations.

13.4 Lists of all employees and other persons with whom unpublished price sensitive information is shared shall be maintained.

13.5 All other relevant requirements specified under these regulations shall be complied with.

13.6 Periodic process review to evaluate effectiveness of such internal controls.

14. Awareness among employees

The Compliance Officer with consultation with Human Resource Department shall develop mechanism to make employees aware of the duties and responsibilities attached to the receipt of Insider Information and the liability that attaches to misuse or unwarranted use of such information.

15. Penalty and punishment for contravention of code of conduct:

Any Designated Person and any other person considered as an Insider who deals in securities or communicates any price sensitive information, in violation / contravention of the Code may be penalized by the Company. The Company may take appropriate disciplinary action including wage freeze, suspension, ineligibility for future participation in employee stock option plans, promotion process, imposition of penalty etc. Any amount collected under this clause shall be remitted to the Investor Protection and Education Fund of SEBI

Such a person shall also be subject to any action that may be taken by SEBI for violation of the Code.

16. Whistle Blower Policy

The Company has a whistle-blower policy and has made employees aware of such policy to enable employees to report instances of leak of unpublished price sensitive information. The policy is also available on the website of the Company.

17. Information to the of the Board

The Board shall review compliance with the provisions of PIT regulations & this Code of Conduct at least once in a financial year and shall verify that the systems for internal control are adequate and are operating effectively.

18. Information to Stock Exchanges and SEBI in case of non-compliance

The Compliance Officer shall promptly inform all violations of Regulations observed by them to Stock Exchanges where the securities of the Company are traded and also to SEBI, in such form and manner as may be specified by the SEBI from time to time.

19. Disclosures

- 19.1 This code and any amendments thereto shall be made available on the website of the Company.
 - 19.2 The Compliance Officer shall make all required disclosures to stock exchanges within the stipulated time as required in this Code.
-

References:

1. Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
2. SEBI Circular dated 09.02.2021 on Revised Disclosure Formats under SEBI (Prohibition of Insider Trading) Regulations, 2015
3. SEBI (Listing Obligations & Disclosure Requirements) Regulations, 2015

FORM - 1
APPLICATION FOR PRE-CLEARANCE OF TRADE IN COMPANY'S SECURITIES
(If the traded value of securities is more than Rs. 30 lakhs)

Date:

To,

The Compliance Officer,
Star Union Dai-ichi Life Insurance Co. Ltd

Dear Sir/Madam,

Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Code of Conduct for Prohibition of Trading by Insiders of the Company, I seek your approval to subscribe to/ purchase / sale / deal as an agent / principal in securities of the Company in my name or on behalf of my immediate relatives as per the details given below:

Name of Director / Designated Employee	
Employee ID (in case of Designated Employees)	
Department	
Name of Relative & Relationship (if transaction on behalf of immediate relatives)	Name: _____ Relation: _____

Nature of Transaction (<i>Buy / Sell / Subscribe</i>)	
Type of Security	
No. of Securities	
Market Price	
Name of the Proposed Buyer/Seller (<i>for off-market trade</i>)	
Date by which trade is proposed to be executed	
Folio No./DP ID & Client ID No. along with the name of Depository	
Present Holding (No. of Securities)	

I enclose herewith the Declaration in Form-2 duly signed by me. I request you to kindly pre-clear the above transaction.

Yours faithfully,

(Signature)

For Office Use only

Form received on:

Verified on:

Verified by:

Signature of Verifying Officer

Approved / Declined

Compliance Officer

Form - 2
UNDERTAKING TO BE SUBMITTED ALONG WITH APPLICATION FOR PRE-CLEARANCE

Date:

To,

The Compliance Officer,
Star Union Dai-ichi Life Insurance Co. Ltd.

Dear Sir/Madam,

I, _____ a Director / Designated Employee of the Company in relation to my application dated _____ for pre-clearance of the trade hereby declare & undertake that:

- a. I have no access to nor I am in possession of any unpublished price sensitive information at the time of signing this undertaking.
- b. In the event that I have in case, I get access to or receive any "Price Sensitive Information" after signing this undertaking but before the execution of the transaction for which approval is sought, I shall inform the Compliance Officer of the same in writing and shall completely refrain from trading in securities of the Company until such information is made public.
- c. I have not contravened the Company's Code of Conduct for Prohibition of Trading by Insiders and Code for Fair Disclosure of Unpublished Price Sensitive Information.
- d. I hereby agree to indemnify and keep the Company and its Board indemnified from and against all and any penalties/fines that may be imposed on them by the SEBI and/or any other Statutory Authorities as a result of violation by me of the Regulation of the Codes prescribed by the Company.
- e. I hereby declare that I shall execute my order in respect of the securities for which pre-clearance is sought within one week after the approval is given. If the order is not executed within one week after the approval, I undertake to obtain fresh pre-clearance.
- f. I have not done any prior contra trade within the period of six months and shall not execute a contra trade for a period of 6 months from the date of current transaction.
- g. I have made full and true disclosure in the above matter.

(Signature)

Name of Director/Designated Employee: _____

Emp ID: _____

Department: _____

Form - 3
PRE-CLEARANCE ORDER

Ref No.:

Date:

To,

Dear Madam/Sir,

Ref: Your application dated _____ for pre-clearance of transaction for securities of the Company in your name / in the name of _____.

With reference to your application seeking pre-clearance of your transaction in securities of the Company, we hereby accord our approval to the proposed transaction.

You may kindly note that pursuant to said Code of Conduct, the aforesaid transaction shall be executed within one week from the date of receipt of this approval letter, failing which, an application seeking pre-clearance to the proposed transaction together with undertaking in the prescribed format, shall be made afresh.

As stipulated in the Code of Conduct, you shall not execute a contra trade for a period of 6 months from the date of current transaction i.e. the securities purchased shall be held for a minimum period of six months from the date of acquisition and securities sold shall not be repurchased within a minimum period of six months from the date of sale.

Thanking you,

Yours faithfully,

For Star Union Dai-ichi Life Insurance Co. Ltd.

Compliance Officer

Form - 4

CONFIRMATION OF EXECUTION OF TRADE/ INFORMATION REGARDING DECISION NOT
TO EXECUTE THE DEAL

From:

Name of Director/Designated Employee	
Employee ID	
PAN No.	
Department	
Location	

To,

The Compliance Officer
Star Union Dai-ichi Life Insurance Co. Ltd.

Dear Sir/Madam,

I hereby confirm that the execution of trade for which approval was granted on _____ was completed on _____. Copy of Contract note is enclosed.

OR

I like to inform you that due to the reasons mentioned here below, I will not be executing the trade for which pre-clearance was granted vide order no. _____ dated _____ -

(Strike out whichever is not applicable)

Place:

Date:

(Signature)

Encl.: Contract Note

For Office Use only

Form received on:

Verified on:

Compliance Officer:

Form 5
Disclosure by designated persons

Name of the Designated Person : _____

Designation : _____

Department : _____

Details of the immediate relative and persons with whom such designated person(s) shares a material financial relationship:

Name	Relationship	PAN/any other ID authorized by law	Contact no.

Detail of qualification and past employer of designated persons:

Name of institute	Qualification	Name of employer

Date : _____

Place: _____ Signature of the designated person

Note: This form shall be submitted at the time of joining, annually and as and when there is change of information

FORM - 6**DISCLOSURE OF HOLDING OF SECURITIES OF COMPANY ON APPOINTMENT**

(As on the date of appointment to be submitted within seven days of appointment)

To,
The Compliance Officer,
Star Union Dai-ichi Life
Insurance Co. Ltd.

Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Code of Conduct for Prohibition of Trading by Insiders of the Company, I am here below submitting the Initial Disclosure of my as well as my immediate relatives' holdings of Company's securities:

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/member of the Promoter group/KMP / Directors/immediate relative to/others etc.)	Date of appointment of Director /KMP OR Date of becoming Promoter/member of Promoter group	Securities held at the time of becoming Promoter or member of Promoter group/ appointment of Director/KMP		% of Share-holding	Open Interest of the Future contracts held at the time of becoming Promoter/member of Promoter group/appointment of Director/KMP			Open Interest of the Option Contracts held at the time of becoming Promoter/member of Promoter group/ appointment of Director/KMP		
			Type of security (Non Convertible Debenture)	No.		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

Add more rows if necessary.

Place:

Date:

(Signature)

Name: _____

Please submit the following additional details in case of employees:

Designation: _____

Emp Id.: _____

Department: _____

FORM - 7**CONTINUAL DISCLOSURE OF HOLDING OF SECURITIES OF THE COMPANY BY DESIGNATED PERSONS**

(Regulation 7(2) read with Regulation 6(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015)

Disclosure to be submitted with two trading days from the date of transaction or the date when aggregate transaction (purchase and sales) exceeds Rs. 30.00 lakhs in a quarter)

Name of the Company: Star Union Dai-ichi Life Insurance Co. Ltd.

ISIN of the Company:

Details of change in holding of Securities of Promoter, member of 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 No., CIN/DIN & address with contact nos.	Category of Person (Promoters/member of promoter group/designated person/Directors/immediate relatives/others etc)	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.)	Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
		Type of security (For eg. - Shares, Warrant, Convertible Debentures, Rights Entitlements etc.)	No. & % of shareholding	Type of security (For eg. - Shares, Warrants Convertible Debentures, Rights entitlement c.)	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. & % of shareholding	From	To			Type of contract	Contract Specification	Buy		Sell		
																Notional Value	No. of units (contracts * lot size)	Notional Value	No. of units (contracts * lot size)	

Place:

Date:

Name of Director/Designated Employee: _____

(Signature)

Please submit the following additional details in case of employees:

Designation: _____

Emp ID: _____

Department: _____

FORM - 8
CONTINUAL DISCLOSURE OF HOLDING OF SECURITIES OF COMPANY BY CONNECTED PERSONS

Name of the Company: Star Union Dai-ichi Life Insurance Co. Ltd.

ISIN of the Company:

Name, PAN No., CIN/DIN & address of connected persons, as identified by the Company with contact nos.	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.)	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed		
		Type of security (For eg. - Shares, Warrants, Convertible Debentures, Rights Entitlement etc.)	No. & % of share holding	Type of security (For eg. - Shares, Warrants, Convertible Debenture, Rights Entitlement etc.)	No.	Value	Transaction Type (Buy/Sale/Pledge/Revoked/Invoke)	Type of security (For eg.- Shares, Warrants, Convertible Debentures, Rights Entitlement etc.)	No. & % of shareholding	From	To			Type of contract	Contract Specification	Buy			Sell	
																Notional Value	No. of units (contracts* lot size)		Notional Value	No. of units (contracts* lot size)

Add more rows if necessary.

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

Place:

Date:

(Signature)

Form - 9

STATEMENT OF DISCLOSURE OF SECURITIES HELD IN THE COMPANY(To be submitted on annual basis within 30 days from the end of
financial year)

Name of Director/Designated Employee	
PF No.	
PAN No.	
Department	
Location	
For the financial year ended	

Details of securities held by me:

Folio No./ DP ID Client ID	No. of securities held

Details of securities held by Immediate Relative(s):

Particulars		Particulars of Shareholding	
Name of Relative	Relation	Folio No./ DP ID Client I.D.	No. of securities held

Place:

Date:

(Signature)

For Office Use only

Form received on:

Verified on:

Compliance Officer: