

**CODE OF INTERNAL PROCEDURES AND CONDUCT FOR REGULATING,
MONITORING AND REPORTING OF TRADING BY INSIDERS**

(Envisaged under Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time)

Objective

The Company desires to preserve the confidentiality of Unpublished Price Sensitive Information and to prevent misuse of such information.

The Company is committed to transparency and fairness in dealing with all shareholders and in ensuring adherence to all laws and regulations. Further, the Company wishes to have a process for how and when people are bought inside on sensitive transactions and how they are made aware of the duties and responsibilities attached to receipt on the inside information including the liability that attaches to misuse or unwarranted use of such inside information.

Every Insider has a duty to safeguard the confidentiality of all such information obtained in the course of his or her work at the Company. No Insider may use his or her position or knowledge of the Company to gain personal benefit or to provide benefit to any third party.

To achieve these objectives, Company hereby notifies that this Code of Conduct is to be followed by every Insiders.

1. Definitions

1.1 “**Act**” means the Securities and Exchange Board of India Act, 1992.

1.2 “**Board**” means the Board of Directors of the Company.

1.3 “**Code**” or “**Code of Conduct**” shall mean this Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of trading by Insiders of Camlin Fine Sciences Limited as amended from time to time.

1.4 “**Company**” means Camlin Fine Sciences Limited.

1.5 “**Compliance Officer**” means Company Secretary or such other senior officer, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations designated so and reporting to the Board 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board of the Company.

1.6 “**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 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) above; 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 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 recognised or authorized by the SEBI; 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.

1.7 “**Designated Employee(s)**” shall include in relation to the Company and its Material Subsidiaries:

- (i) Managing and Whole-time Directors;
- (ii) Key Managerial Person;
- (iii) every Employee in the grade of General Managers and above;
- (iv) Employee in the grade of Sr. Manager and above in finance, accounts, taxation, secretarial, legal and IT department; and
- (v) any other employee as may be determined and informed by the Compliance Officer from time to time.

1.8 “**Designated Person(s)**” means collectively the Designated Employees, the Promoters, the Fiduciaries and their Immediate Relatives.

- 1.9 “**Director**” means a member of the Board in relation to the Company and its Material Subsidiaries.
- 1.10 “**Employee**” means every employee of the Company including the Directors in the employment of the Company.
- 1.11 “**Fiduciaries**” means professional firms such as auditors, law firms, analysts, accountancy firm, banks, consultants, insolvency professionals etc. which are assisting or advising the Company.
- 1.12 “**Generally available Information**” means information that is accessible to the public on a non-discriminatory basis.
- 1.13 “**Immediate Relative**” means a spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities.
- 1.14 “**Insider**” means any person who is,
(i) a Connected Person;
(ii) Designated Person (s); or
(ii) in possession of or having access to unpublished price sensitive information.
- 1.15 “**Key Managerial Person**” means person as defined in Section 2(51) of the Companies Act, 2013.
- 1.16 “**Material Subsidiary**” means a subsidiary of the Company whose income or net-worth exceeds ten percent of the consolidated income or net-worth respectively, of the Company and its subsidiaries in the immediately preceding financial year and the term Material Subsidiaries shall be construed accordingly.
- 1.17 “**Promoter**” shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof.
- 1.18 “**Securities**” shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund.
- 1.19 “**Takeover regulations**” means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto.

- 1.20 "**Trading**" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly.
- 1.21 "**Trading Day**" means a day on which the recognized stock exchanges are open for trading.
- 1.22 "**Unpublished Price Sensitive Information**" means: 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:
- (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.
- 1.23 "**Regulations**" shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendments thereto.

Words and expressions used and not defined herein but defined in the Regulations, 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 thereunder shall have the meanings respectively assigned to them in those legislation.

2. Role of Compliance Officer

- 2.1 The Compliance Officer shall report on trading of Insider and Designated Persons to the Board of the Company and in particular, shall provide reports to the Chairman of the Audit Committee, and to the Chairman of the Board at the meeting held after every calendar quarter.
- 2.2 The Compliance Officer shall assist all employees in addressing any clarifications regarding the Regulations and the Company's Code of Conduct.
- 2.3 To specify prohibited period from time to time and immediately make an announcement thereof in consultation with the Managing Director and as directed by the Board and also to maintain a record of prohibited period specified from time to time.
- 2.4 To maintain records of all the declarations submitted in the appropriate form given by the Insider for a minimum period of five years.

In case the Compliance Officer is not available either on account of his being on leave or for any other reason whatsoever for a period of 7 days or more, the Managing Director shall delegate the authority of Compliance Officer to any executive as he may deem fit and appropriate, who shall act as Compliance Officer during the period of his absence.

3. Preservation of “Unpublished Price Sensitive Information”

3.1 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 legitimate purposes, performance of duties or discharge of his legal obligations.

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 the Company is of informed opinion that sharing of such information 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 the Company is of informed opinion that sharing of such information is in the best interests of the Company and the information that constitute Unpublished Price Sensitive Information is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the Board may determine to be adequate and fair to cover all relevant and material facts.

The Board shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the limited purpose and shall not otherwise trade in Securities of the Company when in possession of Unpublished Price Sensitive Information.

The Board shall ensure that a structured digital database is maintained containing the names of such persons or entities as the case may be with whom information is shared under this clause 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.

3.2 Need to Know:

- (i) “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 head of the department.

3.3 Limited access to confidential information:

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

4. Prevention of misuse of “Unpublished Price Sensitive Information”

Insider shall be governed by this Code of Conduct governing dealing in Securities.

4.1 Trading Plan:

An Insider shall be entitled to formulate a trading plan for dealing in securities of the Company 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.

4.2 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;
- (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 the issuer of the securities and the second trading day after the disclosure of such financial results;
- (iii) entail trading for a period of not less than twelve months;
- (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 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
- (vi) not entail trading in securities for market abuse.

4.3 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 necessary to enable such assessment and to approve and monitor the implementation of the plan as per provisions of the Regulations.

4.4 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.

However, the implementation of the trading plan shall not be commenced, if at the time of formulation of the plan, the Insider is in possession of any unpublished price sensitive information and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Plan shall be deferred until such unpublished price sensitive information becomes generally available information. Further, the Insider shall also not be allowed to deal in securities of the Company, if the date of trading in securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.

4.5 Upon approval of the trading plan, the Compliance Officer shall notify the plan to the stock exchanges on which the Securities are listed. Further, pre-clearance of trade, trading window norms and restrictions on contra trade shall not be applicable for trades executed in accordance with an approved trading plan.

5. Trading Window and Window Closure

- 5.1 (i) The trading window, i.e. the trading period of the stock exchanges, available for trading in the Company's securities.
- (ii) The trading window shall be, inter alia, closed 7 calendar days prior to the meetings in which the unpublished price sensitive information presented to Board is proposed to be held or from the date of circulation of Agenda papers pertaining to the subject referred above whichever is longer, upto 48 hours after the information submitted to the stock exchange. The Compliance Officer in consultation with Managing Director may close the trading window from the end of every quarter till 48 hours after the information submitted to the stock exchange.
- (iii) When the trading window is closed, the Insider shall not trade in the Company's Securities in such period.
- (iv) All Insiders shall conduct all their dealings 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 Point No. (ii) above or during any other period as may be specified by the Company from time to time.
- (vi) In case of ESOPs, 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 trading is closed.
- 5.2 The Compliance Officer shall intimate the closure of trading window to the Insider of the Company when he/she determines that Insider, 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.

5.3 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 in consultation with Managing Director decide the timing for opening/re-opening of the trading window, however in any event it shall not be earlier than forty-eight hours after the information becomes generally available.

5.4 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, banks, insolvency professional entities etc., assisting or advising the Company.

6. Pre-clearance of trades

Every Insider, who intend to deal in the Securities of the Company when the trading window is opened and if the value of the proposed trades, either in one transaction or in series of transactions over any calendar quarter, aggregates to above 10,000 shares or up to Rs. 10 lakhs (market value), whichever is less, should pre-clear the transaction(s). The pre-dealing procedure shall be hereunder:

- (i) An application may be made in the prescribed Form (Annexure 1) to the Compliance Officer indicating the estimated number of Securities that the Insider intends to deal in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the company in this behalf.
- (ii) An undertaking (Annexure 2) shall be executed in favour of the Company, inter alia, the following clauses, as may be applicable:
 - (a) That the Insider does not have any access or has not received “Unpublished Price Sensitive Information” up to the time of signing the undertaking.
 - (b) That in case the Insider has access to or receives “Unpublished 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 his position and that he/she would completely refrain from dealing in the Securities of the Company till the time such information becomes public.
 - (c) That Insider has not contravened the Code of Conduct as notified by the Company from time to time.
 - (d) That Insider has made a full and true disclosure in the matter.
- (iii) Every Insider shall execute their order in respect of Securities of the Company within one week after the approval of pre-clearance (Annexure-3) is given. The Insider shall file within 2 (two) days of the execution of the deal, the details of such deal with the

Compliance Officer in the prescribed form. In case the transaction is not undertaken, a report to that effect shall be filed (Annexure 4). If the order is not executed within 7 (seven) calendar days after the approval is given, the Insider must pre-clear the transaction again.

- (iv) Every Insider who buy or sell any number of Securities of the Company 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 Insider shall also not take positions in derivative transactions in the Securities 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.

- (v) 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.

7. Other Restrictions

- 7.1 The disclosures 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.
- 7.2 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.
- 7.3 The disclosures made under this Code shall be maintained for a period of five years.

8. Reporting Requirements for transactions in securities

Initial Disclosure

- 8.1 Every Promoter, Key Managerial Personnel and Director of the Company, within thirty days of these Code taking effect, shall forward to the Company the details of all holdings in Securities of the Company presently held by them including the statement of holdings of Immediate Relatives in the prescribed Form (Annexure 5).

8.2 Every person on appointment as a Key Managerial Personnel or a Director of the Company 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 seven days of such appointment or becoming a promoter.

Continual Disclosure

8.3 Every Designated Person and Director shall disclose to the Company the number of 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. 10 lakhs or 10,000 shares whichever is lower.

The disclosure shall be made within 2 working days of:

- (a) the receipt of intimation of allotment of Securities, or
- (b) the acquisition or sale of Securities or voting rights, as the case may be.

8.4 Designated Persons shall be required to disclose their and Permanent Account Number (PAN) and the names and PAN 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:

- 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; and
- d) 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.

9. Disclosure by the Company to the Stock Exchange(s)

9.1 Within 2 days of the receipt of intimation under Clause 8.3, the Compliance Officer shall disclose to all stock exchanges on which the Company is listed, the information received.

9.2 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.

10. Dissemination of Unpublished Price Sensitive Information

10.1 No information shall be passed by Insider by way of making a recommendation for the purchase or sale of Securities of the Company.

10.2` Disclosure/dissemination of Unpublished Price Sensitive Information with special reference to analysts, media persons and institutional investors:

The following guidelines shall be followed while dealing with analysts and institutional investors

- Only public information to be provided.
- At least two Company representatives be present at meetings with analysts, media persons and institutional investors.
- Unanticipated questions may be taken on notice and a considered response given later. If the answer includes price sensitive information, a public announcement should be made before responding.

11. Penalty for contravention of the Code of Conduct

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

11.2 Any Insider who trades 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.

11.3 Insider who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, recovery, clawback, ineligibility for future participation in employee stock option plans, etc.

11.4 The Company shall promptly inform SEBI in relation violation of the Regulations and the action by the Company shall not preclude SEBI from taking any action in case of violation of Regulations.

12. Dissemination and Publicity of Code of Conduct

Further, the enable to people to know how they are bought inside on sensitive transactions and to make them aware of their duties and responsibilities attached to receipt on the inside information including the liability that attaches to misuse or unwarranted use of such inside information, this Code shall be placed on the Company's website and may be also provided to the Insiders vide email and other communication channels or by giving references of the web link etc.

13. Authority to make alterations

The Board is authorised to make such alterations to this Code as considered appropriate, subject, however, to the condition that such alterations shall not be inconsistent with the provisions of the Regulations.

ANNEXURE 1
SPECIMEN OF APPLICATION FOR PRE-DEALING APPROVAL

Date:

To,
The Compliance Officer,
Camlin Fine Sciences Limited,
Mumbai

Dear Sir/Madam,

Application for Pre-dealing approval in securities of the Company

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading by Insiders, I seek approval to purchase / sale / subscription of _____ equity shares of the Company as per details given below:

1.	Name of the applicant	
2.	Designation	
3.	Number of securities held as on date	
4.	Folio No. / DP ID / Client ID No.)	
5.	The proposal is for	(a) Purchase of securities (b) Subscription to securities (c) Sale of securities
6.	Proposed date of dealing in securities	
7.	Estimated number of securities proposed to be acquired/subscribed/sold	
8.	Price at which the transaction is proposed	
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,

(Name & Signature)

ANNEXURE 2
FORMAT OF UNDERTAKING TO BE ACCOMPANIED WITH THE
APPLICATION FOR PRE-CLEARANCE

UNDERTAKING

To,
Camlin Fine Sciences Limited,
Mumbai

I, _____, _____ of the Company residing at _____, am desirous of dealing in _____ * shares of the Company as mentioned in my application dated _____ for pre-clearance of the transaction.

I further declare that I am not in possession of or otherwise privy to any unpublished Price Sensitive Information (as defined in the Company's Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading by Insiders (the Code) up to the time of signing this Undertaking.

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 the securities of the Company 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 two 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 calendar 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.

Signature : _____

Date :

* Indicate number of shares

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 **Camlin Fine Sciences Limited**

COMPLIANCE OFFICER
Date : _____

Encl: Format for submission of details of transaction

ANNEXURE 4

FORMAT FOR DISCLOSURE OF TRANSACTIONS

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

To,
The Compliance Officer,
Camlin Fine Sciences Limited,
Mumbai

With reference to the Pre-Clearance order dated _____, I
_____ hereby inform that:

- I have not bought / sold/ subscribed any securities of the Company
- I have bought/sold/subscribed to _____ securities as mentioned below on ____ (date)

Name of holder	No. of securities dealt with	Bought/sold/subscribed	DP ID/Client ID / Folio No	Price (Rs.)

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 5 years and produce to the Compliance officer / SEBI any of the 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 not to execute a contra trade of the above securities for a minimum period of six months.

In case there is any urgent need to sell the securities within the period of six months of purchase/subscription, I shall approach the Compliance Officer for necessary approval.

I declare that the above information is correct and that no provisions of the Company's Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading by Insiders and/or applicable laws/regulations have been contravened for effecting the above said transactions(s).

Signature : _____

Name :

Designation:

Date : _____

ANNEXURE 5
FORMAT FOR INITIAL DISCLOSURE OF SECURITIES

To,
The Compliance Officer,
Camlin Fine Sciences Limited,
Mumbai

I, _____, in my capacity as _____ of the Company hereby submit the following details of securities held in the Company as on _____ (date of becoming Promoter, Key Managerial Personnel and Director).

I. Details of securities held by me :

Type of Securities	No. of securities held	Folio No	Beneficiary A/c Client ID

II. Details of Immediate Relatives and securities held by them:

Pursuant to the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading by Insiders, I hereby declare that I have the following Immediate Relatives:

Name of Relative	Relationship	Type of securities	No. of Securities held	Folio No	Beneficiary A/c Client ID

Signature: _____

Date :

ANNEXURE 6
DISCLOSURE OF CHANGE IN SHAREHOLDING

To,
The Compliance Officer,
Camlin Fine Sciences Limited,
Mumbai

I, _____, in my capacity as _____ of the Company hereby submit the following details of change in holding of securities of the Company:

Name, PAN No. & address of shareholder	No. of securities held before the transaction	Receipt of allotment advice/ acquisition of /sale of securities	Nature of transaction & quantity (Purchase/ Sale/Others)	Trading member (TM) through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed

Details of change in securities held by dependent family members:

Name, PAN No. & address of shareholder	No. of securities held before the transaction	Receipt of allotment advice/ acquisition of /sale of securities	Nature of transaction & quantity (Purchase/ Sale/Others)	Trading member (TM) through whom the trade was executed with SEBI Registration No. of the TM	Exchange on which the trade was executed

I/We declare that I/We have complied with the requirement of the minimum holding period of six months with respect to the securities purchased/sold.

I hereby declare that the above details are true, correct and complete in all respects.

Signature: _____

Date :