



Code of practices and procedures for Fair Disclosure AND Code of Conduct for Prevention of Insider Trading of Unpublished Price Sensitive Information

KINTECH RENEWABLES LIMITED

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CODE OF PRACTICES & PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

[As envisaged under Regulation 8 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

INTRODUCTION

The Securities and Exchange Board of India (“SEBI”), in its endeavor to protect the interest of Investors in general, had notified the new Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“Regulations”) on 15th January, 2015 effective from 15th May, 2015.

It is mandatory in terms of the Regulations for every listed company to formulate a Code of Practice and Procedure for Fair Disclosure of Unpublished Price Sensitive Information.

DEFINITIONS

1. **“Act”** means the Securities and Exchange Board of India Act, 1992.
2. **“Board”** means the Board of Directors of the Company.
3. **“Code”** shall mean this Code of practices and procedures for Fair Disclosure AND Code of Conduct for Prevention of Insider Trading of Unpublished Price Sensitive Information including modification made thereto from time to time.
4. **“Company”** means Kintech Renewables Limited.
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 of Directors 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compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the procedures specified in these regulations under the overall supervision of the Board of Directors of the Company.

6. Chief Investor Relations Officer:

Chief Investor Relations Officer means any senior officer, to deal with dissemination of information and disclosure of unpublished price sensitive information and reporting to the Board of Directors, who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information, monitoring of trades and implementation of the codes specified under SEBI (Prohibition of Insider Trading) Regulation, 2015.

7. Unpublished Price Sensitive Information:

“Unpublished Price Sensitive Information” means any information, relating to a Company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following:

- (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;
- (v) changes in key managerial personnel; and
- (vi) Material events in accordance with the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

8. "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); or
 - b) a holding company or associate company or subsidiary company; or
 - c) an intermediary as specified in section 12 of the SEBI 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 recognized or authorized by the Board; or
 - i) a Banker of the Company; or
 - j) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a Director of a Company or his immediate relative or banker of the Company, has more than ten per cent, of the holding or interest.

9. "Dealing in Securities," means an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in the securities of the Company either as principal or agent.

10. "Employee" means every employee of the Company including the Directors in the whole time employment of the Company.

11. "Generally available Information" means information that is accessible to the public on a non-discriminatory basis.

12. **"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.
13. **"Insider"** means any person, who is,
 - a) a connected person; or
 - b) in possession of or having access to unpublished price sensitive information.
14. **"Promoter"** shall have the meaning assigned to it under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof.
15. **"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;
16. **"takeover regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;
17. **"trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly.
18. **"Specified Persons"** means all Directors, Employees and Connected Persons of the Company (including all Designated Persons).
19. **"Designated Persons"** shall include:
 - a) Directors; and
 - b) such Employees and Connected Persons (including representatives of the auditors, accountancy firms, law firms, analysts, consultants, etc.) as identified by the Compliance Officer in consultation with the Board in line with the objectives of the Code.

Words and expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (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 respective assigned to them in those legislation.

The Company shall adhere to the following Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("UPS"):

1. The Company shall make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concretion information comes into being in order to make such information generally available.
2. The Company shall make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure by disclosing the information to the Stock Exchanges immediately and uploading the same on Companies website.
3. A senior officer is designated as Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.

4. The Company shall give appropriate and fair responses to queries raised by regulatory authorities on news reports and requests for verification of market rumors.
5. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
6. The Company shall make reasonable steps to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences are generally available by uploading such transcripts and records available to the Company on the Companies official website to ensure official confirmation and documentation of disclosures made.
7. Company shall handle all unpublished price sensitive information on a “need to know” basis i.e. only to those who need the information to discharge their duty in the Company.
8. Company shall make prompt dissemination of unpublished price sensitive information that disclosed selectively, inadvertently or otherwise to make such information generally available.

Role of Compliance Officer:

1. The Board of the Company shall appoint the Company Secretary as the Compliance Officer to ensure compliance and for effective implementation of this Code and the Regulations.
2. The Compliance Officer shall report to the Board of the Company.
3. The Compliance Officer shall provide reports to the Chairman of the Audit Committee or to the Chairman of the Board of Directors at the end of every quarter at the immediately held meeting of Audit Committee and Board of Directors.
4. The Compliance Officer shall assist all employees for implementation of this Code and for ensuring compliance with the Regulations.
5. The Compliance Officer shall have access to all information and documents relating to the shares of the Company.

Preservation of “Price Sensitive Information”:

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 insider's legitimate purposes, performance of duties or discharge of his legal obligations.
2. Unpublished Price Sensitive Information may be communicated, provided, allowed access to or procured, in connection with a transaction which entails:
 - i. an obligation to make an open offer under the takeover regulations where the Board of the Company is of informed opinion that the proposed transaction is in the best interests of the Company; or
 - ii. not attracting the obligation to make an open offer under the takeover regulations but where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the Company and the information that constitute unpublished price sensitive information is disseminated 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.
3. 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.

4. 'Need to Know' basis: "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. All non-public information directly received by any employee should immediately be reported to the head of the department.

5. Confidential information: Specified persons privy to confidential information shall, in preserving the confidentiality of information, and to prevent its wrongful dissemination, adopt among others, the following safeguards:

- a) The files containing confidential information shall be kept secure;
- b) The computer files shall have security of login through a password; and
- c) Guidelines for maintenance of records prescribed by the person in charge of the information technology function shall be followed at all times.

Prevention of misuse of "Unpublished Price Sensitive Information":

The employees and connected persons designated on the basis of their functional role ("designated persons") in the Company shall be governed by an internal code of conduct governing dealing in securities. The Board shall in consultation with the Compliance Officer specify the designated persons to be covered by such code on the basis of their role and function in the Company.

Due regard shall be had to the access that such role and function would provide to unpublished price sensitive information in addition to seniority and professional designation.

Trading Plan:

The Regulations provide for Trading Plans and a Designated Person intending to formulate a Trading Plan shall consult the Compliance Officer to discuss the applicable rules and procedure. The Compliance Officer shall approve a Trading Plan in accordance with the applicable provisions of the Regulations and this Code. Such Trading Plan shall:

1. not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
2. 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;
3. entail trading for a period of not less than twelve months;
4. not entail overlap of any period for which another trading plan is already in existence;
5. set out either the value of trades to be effected or the number of shares to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
6. not entail trading in shares for market abuse.

The Compliance Officer shall consider the Trading Plan made as above and shall approve it. However, the Compliance Officer 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. 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 the shares of the Company, if the date of trading in the shares of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer. The compliance officer shall notify the trading plan to the Stock Exchanges (on which the shares are listed) upon approval of the trading plan.

Trading Window:

Trading Window shall remain open for trading in the shares of the Company other than the period/s for which the Trading Window is closed as mentioned herein.

1. The trading period i.e. the trading period of the Stock Exchanges, called "trading window", is available for trading in the Company's Shares.
2. The trading window shall be, inter alia, closed from the date of Notice of Board Meeting in which Unpublished Price Sensitive Information is to be declared to the time the unpublished price sensitive information is published.
3. When the trading window is closed, the Specified Persons shall not trade in the Company's shares in such period.
4. The Specified Persons shall conduct all their dealings in the shares 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 shares during the periods when the trading window is closed or during any other period as may be specified by the Company from time to time.

The Compliance Officer shall intimate the closure of trading window to all the Designated Persons when he determines that a designated person or class of designated persons can reasonably be expected to have possession of unpublished price sensitive information. Such closure shall be imposed in relation to such shares to which such unpublished price sensitive information relates.

The Compliance Officer after taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, shall decide the timing for re-opening of the trading window, however in any event it shall not be earlier than 48 hours after the information becomes generally available.

The provisions pertaining to 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.

Pre-clearance of trades:

Every Designated Person shall obtain a pre-trading approval as per the procedure prescribed herein for any trading in the shares of the Company proposed to be undertaken by such Designated Person or his Immediate Relatives. Such pre-trading approval would be necessary, only if the cumulative trading (*including trading in derivatives of Securities, if permitted by law*) whether in one transaction or a series of transactions in any Financial Year exceeds **Rs. 10 Lacs (market value)**. No Designated Person shall be

entitled to apply for pre-clearance of any proposed trade, if such Designated Person is in possession of unpublished price sensitive information even if the trading window is not closed and hence he shall not be allowed to trade.

Pre-clearance procedure:

1. An application may be made in the prescribed Form (**Annexure 1**) to the Compliance officer by the Designated Person.
2. An undertaking (**Annexure 2**) shall be executed in favour of the Company by such Designated Person.
3. Designated Person shall execute their order in respect of shares of the Company within **one week** after the approval of pre-clearance is given.
4. The Designated Person shall file within **2 days** of the execution of the deal, the details of such deal with the Compliance Officer in the prescribed form.
5. In case the transaction is not undertaken, a report to that effect shall be filed.
6. If the order is not executed within **7 days** after the approval is given, the such Designated Person must preOclear the transaction again.
7. The Designated Persons who buy or sell any number of shares 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.
8. The Designated Person shall also not take positions in derivative transactions in the shares of the Company at any time.
9. 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 SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.
10. The Compliance Officer may waive off the holding period in case of sale of shares after recording reasons for the same; but, no such sale will be permitted when the Trading Window is closed.
11. In the absence of the Compliance Officer, the Chief Financial Officer shall discharge the function referred to in above.

G. Disclosures:

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. The disclosures of trading in shares shall also include trading in derivatives of shares and the traded value of the derivatives shall be taken into account for purposes of this Code. The disclosures made under this Chapter shall be maintained by the company, for a minimum period of **five years**, in such form as may be specified.

Reporting for transactions:

Initial Disclosure: Every promoter/ Key Managerial Personnel / Director / Officers / Designated Employees of the Company, within **30 days** of these regulations taking effect, shall forward to the Company the details of all holdings in shares of the Company presently held by them including the statement of holdings of dependent family members in the form prescribed by SEBI. 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 **7 days** of such appointment or becoming a promoter in the form prescribed by SEBI.

Continual Disclosure: Every promoter, employee and director of the Company shall disclose to the Company the number of such shares acquired or disposed of within **2 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 Lacs** in the form prescribed by SEBI.

The disclosure shall be made within **2 working days** of (a) the receipt of intimation of allotment of shares, or (b) the acquisition or sale of shares or voting rights, as the case may be.

Disclosure to the Stock Exchanges:

Within 2 days of the receipt of intimation under Continual Disclosure, the Compliance Officer shall disclose to all Stock Exchanges, the information received in the same in the form prescribed by SEBI.

Dissemination of Price Sensitive Information:

The Specified Persons shall not pass any information by way of making a recommendation for the purchase or sale of the shares of the Company.

All Directors and the employees of the Company should follow the prescribed guidelines while dealing with analysts and institutional investors. The Directors / Employees shall provide only public information to analysts / research persons. In case any unpublished price sensitive information is proposed to be provided, the person proposing to so provide information shall first consult the Compliance Officer.

The Compliance Officer shall ensure that that the information provided to the analyst/research person/investor as above is made public simultaneously with such disclosure. All such conferences shall be attended by the Compliance Officer who may be accompanied by Directors / Employees of the Company.

In order to avoid misquoting or misrepresentation, the Compliance Officer can make transcripts or arrangements for recording the discussions at the meeting.

Penalty:

The Specified Person shall be individually responsible for complying with this Code. Any Specified Person who trades in the shares or communicates any information for trading in shares, in contravention of this Code / Regulations will be penalized and appropriate action may be taken by the Company including initiation of taking disciplinary action by the Company. Further, the action taken by the Company shall not preclude SEBI from taking any action in case of violation of Regulations.

(ANNEXURE 1)

SPECIMEN OF APPLICATION FOR PRE-TRADING APPROVAL

Date : _____

To,
Compliance Officer
Kintech Renewables Limited
Kintech House, 8, Shivalik Plaza,
Opp. AMA, IIM Road,
Ahmedabad – 380015

Sub.: Application for Pre-trading approval in Equity Shares of the Company

Dear Sir,

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

1.	Name of the Applicant	
2.	Category: Director / Employee / Designated Person / Immediate Relative	
3.	Department / Location	
4.	Folio no. / DP ID / Client ID	
5.	Proposal for:	1. Purchase of Equity share: Yes / No 2. Subscription of shares: Yes / No 3. Sale of Equity shares: Yes / No
6.	Number of Securities already held in the Company	
7.	Estimated Number of securities for which application for pre-trading approval is being made	
7(i)	Nature of dealing : Purchase/Sale/ Any other (Please specify)	
7(ii)	Expected Consideration:	
8.	Current market price as on the date of application	
9.	Name of proposed buyer / Seller (Applicable for off market transaction)	
10.	DP/BEN ID of the account / folio no. where the Shares will be credited / debited	
11.	Previous approval details and date for purchase / allotment (applicable only if the application is in respect of sale of Shares for which an earlier purchase sanction was granted by the Compliance Officer)	

I hereby declare that I do not have access to any price sensitive information / though I have access to price sensitive information but this transaction is not influenced by any such information (delete whichever is not applicable).

Yours faithfully,

[Signature of Applicant]

(ANNEXURE 2)

UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-TRADING APPROVAL

Date: _____

To,
Compliance Officer
Kintech Renewables Limited
Kintech House, 8, Shivalik Plaza,
Opp. AMA, IIM Road,
Ahmedabad – 380015

Sub.: Format of Undertaking/Declaration to be accompanied with the Application for Pre-Trading

Dear Sir,

1. I _____ resident of _____, hereby declare that I am Designated Person Director / Employee / Designated Person / Immediate Relative (Strike out whichever is not applicable).
2. I am not in possession of or otherwise privy to any Unpublished Price Sensitive Information (as defined in the Company's Code of Conduct for Prevention of Insider Trading) up to and at the time of signing this Undertaking.
In case that I have access to or I receive any unpublished price sensitive information 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 trading in the securities of the Company until such information becomes public.
3. I declare that I have not contravened the provisions of the Rules as notified by the Company from time to time.
4. In the event of this transaction being in violation of the Rules or the applicable laws, (a) I will, unconditionally, release, hold harmless and indemnify to the fullest extent, the Company and its directors and officers, (the 'indemnified persons') for all losses, damages, fines, expenses, suffered by the indemnified persons, (b) I will compensate the indemnified persons for all expenses incurred in any investigation, defense, crisis management or public relations activity in relation to this transaction and (c) I authorize the Company to recover from me, the profits arising from this transaction and remit the same to the SEBI for credit of the Investor Protection and Education Fund administered by the SEBI.
5. 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 trade within seven days of the receipt of approval failing which I shall seek pre-clearance afresh.

I declare that I have made full and true disclosure in the matter.

Signature: _____

Name:

Date:

FORMAT FOR PRE-CLEARANCE ORDER

Date: [●]
Name: [●]
Designation: [●]
Place: [●]

Pre-Clearance Order

This is to inform you that your request for dealing in [●] (numbers) shares of the Company as mentioned in your application dated [●] is **approved / disapproved**.

This approval is being issued to you based on your Undertaking, declarations, representations and warranties made by you in your application.

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 shares 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 submitted.

Yours faithfully,

COMPLIANCE OFFICER

**FORMAT FOR DISCLOSURE OF PARTICULARS BY PROMOTER / KEY MANAGERIAL
PERSONNEL / DIRECTOR/ DESIGNATED PERSON**

Date: [●]

To,
Compliance Officer
Kintech Renewables Limited
Kintech House, 8, Shivalik Plaza,
Opp. AMA, IIM Road,
Ahmedabad – 380015

Dear Sir,

Name of promoter / key managerial Personnel / director /designated person :	
Date of Appointment:	
Employee No.: (If applicable)	
Department:	
Location:	

Following are my Immediate Relatives:

Sr. No.	Name of Immediate Relative	Relationship

I hereby declare that I and/or my Immediate Relatives:

1. do not hold any Shares of the Company (including derivatives) as on date; **OR**
2. hold the Shares of the Company (including derivatives) as per the details below:

Name of Holder (along with details of joint holders) :	
Number of Shares (holding):	
Folio No. (Physical shares):	
DP ID / Client ID (Demat) :	

I hereby undertake to inform the changes in the above details from time-to-time.

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

Signature:

Name: [●]

**FORMAT OF ANNUAL STATEMENT OF HOLDINGS BY PROMOTERS / KEY MANAGERIAL PERSONNEL /
DIRECTOR / DESIGNATED PERSON AND THEIR IMMEDIATE RELATIVES**

Date: [●]

To,
Compliance Officer
Kintech Renewables Limited
Kintech House, 8, Shivalik Plaza,
Opp. AMA, IIM Road,
Ahmedabad – 380015

STATEMENT OF SHAREHOLDING

Dear Sir,

As on [●] (Date), I along with my Immediate Relatives hold following Shares (including derivatives) of the Company:

Name of Holder (along with details of joint holders) :	
Number of Shares (holding):	
Folio No. (Physical shares):	
DP ID / Client ID (Demat) :	

Signature:

Name: [●]

FORMAT FOR DISCLOSURE OF TRANSACTIONS CROSSING THE THRESHOLDS BY PROMOTER / DIRECTORS/ EMPLOYEES:

(To be submitted within 2 Trading Days of transaction/Dealing in the Shares (*including derivatives*) of the Company)

Date: [●]

To,
Compliance Officer
Kintech Renewables Limited
Kintech House, 8, Shivalik Plaza,
Opp. AMA, IIM Road,
Ahmedabad – 380015

The disclosure of the incremental transactions after the previous disclosure is required to be made when the transactions effected after the prior disclosure cross the threshold of **Rs. 10 Lacs (Rupees Ten Lacs only)** in the same calendar quarter:

Name	
PAN	
Address	
No. of Shares	
% of Shares	
Date of receipt of allotment Advice / acquisition / sale of Shares (including derivatives)	
Date of intimation to company	
Mode of acquisition (market Purchase / public / rights / preferential offer etc.)	
No. of Shares post Acquisition / sale	
% of Shares post Acquisition / sale	
Trading member through whom trade was executed with SEBI Registration No. of the trading member	
Exchange on which the trade was executed	
Buy/Sell quantity	
Buy/ Sell value	

Signature:

Name: [●]

ACKNOWLEDGEMENT FORM

For The Financial Year [●]

I have received and read the Company's 'Code of practices and procedures for Fair Disclosure AND Code of Conduct for Prevention of Insider Trading of Unpublished Price Sensitive Information'.

I understand the provisions and contents contained in the Code and also understand that there may be amendments to the contents of this Code or additional policies of the Company or other applicable laws to advance the object of this Code. I, the undersigned, do solemnly agree to comply with the provisions of this Code.

If I have any questions regarding the nature, applicability and scope of this Code, I know I can consult the Compliance Officer of the Company, knowing that my questions, reports, or complaints will be maintained in confidence.

I further agree to sign annually the acknowledgement form provided at the end of this Code, and return the same to the Compliance Officer of the Company.

Signature:

Name: [●]

Date: [●]