Glittek Granites Limited

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSONS AND THEIR IMMEDIATE RELATIVES

Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSONS AND THEIR IMMEDIATE RELATIVES
("Insider Trading Code")

1. Introduction

Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 **("Insider Trading Regulations")** provides the board of directors of every listed company shall formulate a code of conduct to regulate, monitor and report trading by its designated persons and their immediate relatives. The Insider Trading Regulations prohibit an insider of a Company (i) to deal in the securities of such Company while in possession of any unpublished price sensitive information; and (ii) to 'communicate, counsel or procure', whether 'directly or indirectly', any unpublished price sensitive information to any person including insiders, who while in possession of such information may 'deal' in the securities of the Company listed. This document embodies the Insider Trading Code to regulate, monitor and report trading by designated persons and their immediate relatives to be followed by the Company.

The Board of directors (the "**Board**") of **Glittek Granites Limited** (the "**Company**") has adopted the following policy and the Board may amend this policy from time to time.

2. Definitions

a) **"Board"** shall mean the board of directors of the Company.
b) **"Code" or "Code of Conduct"** means this code of conduct to regulate, monitor and report trading by Designated Persons and their Immediate Relatives, as amended from time to time.
c) **"Company"** means Glittek Granites Limited.
d) **"Compliance Officer"** means any senior officer designated by the Board as compliance officer for ensuring compliance of SEBI (Prohibition of Insider Trading) Regulations, 2015. Unless the Board designates any personnel as compliance officer, the Company Secretary shall be deemed to be the Compliance Officer.
e) **"Contra Trade"** means a trade or transaction which involves buying or selling any number of securities of the Company within a period of 6 months, trading or transacting in an opposite transaction involving sell or buy following the prior transaction.
f) **"Connected Person"** means:

(i) any person who is or has during the six months prior to the concerned act, 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 relative of connected persons specified in clause (i) above; or
- A holding company or associate company or subsidiary company; or

- An intermediary as specified in Section 12 of the Securities and Exchange Board of India Act, 1992, as amended or an employee or director thereof; or
- An investment company, trustee company, asset management company or an employee or director thereof; or
- An official of a stock exchange or of clearing house or corporation; or
- 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
- 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, as amended; or
- An official and/or employee of a self-regulatory organization recognized or authorized by the Board; or
- A banker of the Company; or
- A concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of the Company or his relative or banker of the Company, has more than ten per cent, of the holding or interest; or
- a firm or its partner or its employee in which a connected person specified in clause (i) above is also a partner; or
- a person sharing household or residence with a connected person specified in clause (i) above.

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

h) **"Designated Persons"** means:
   (i) the promoters of the Company;
   (ii) All directors of the Company (executive, non-executive & independent, whether whole-time or not);
   (iii) All Key Managerial Personnel;
   (iv) All employees of the Company or material subsidiaries in the finance, accounts, legal and secretarial departments of the company;
   (v) All employees of the Company and employees of its material subsidiaries who are up to two levels below the chief executive officer including all functional / departmental heads of the Company by whatever name called;
   (vi) Any support staff of the Company, such as IT staff or secretarial staff, including part – time employees, secondees, interns, etc. who have access to Unpublished Price Sensitive Information;
   (vii) Such other officers / employees of the Company and its material subsidiaries, as may be decided by the Board of Directors in consultation with the Compliance Officer / Managing Director & Chief Executive Officer, from time to time, based on their function and role in the organization.

i) **"Generally available Information"** means information accessible to public on non-discriminatory basis and shall not include unverified event or information reported in print or electronic media.

j) **"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.

k) **"Informant"** means an individual(s), who voluntarily submits to the Board a Voluntary Information Disclosure Form (as prescribed under the Schedule D of the Insider Trading Regulations) relating to an alleged violation of insider trading laws that has occurred, is occurring or has a reasonable belief that it is about to occur, in a manner provided under Insider Trading, regardless of whether such individual(s) satisfies the requirements, procedures and conditions to qualify for a reward.

l) **"Insider"** means any person who is a Connected Person or in possession of or having access to Unpublished Price Sensitive Information.

m) **"Insider Trading Regulations"** means the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended.

n) **"Key Managerial Personnel"** means person as defined in section 2(51) of the Companies Act, 2013, as amended from time to time.

o) **"Material Financial Relationship"** shall have the meaning as defined under Insider Trading Regulations.

p) **"Promoter"** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended or the Companies Act, 2013, as amended or any modification thereof.

q) **"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.

r) **"Relative"** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018.

s) **"Reward"** means any gratuitous monetary amount for which an Informant is declared eligible as per the provisions of the Insider Trading Regulations.

t) **"Securities"** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956, as amended except units of a mutual fund.

u) **"Takeover Regulations"** means the Securities and Exchange Board India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, or any modification thereof.

v) **"Trading"** means and includes subscribing, redeeming, switching, buying, selling, dealing, or agreeing to subscribe, redeem, switch, buy, sell, deal in any securities, and "trade" shall be construed accordingly.

w) **"Trading Day"** means a day on which the recognized stock exchanges are open for trading.

x) **"Unpublished Price Sensitive Information"** shall have the meaning assigned to it under the Insider Trading Regulations.

3. ROLE OF COMPLIANCE OFFICER

a) For the purpose of this Code, the Compliance Officer shall report to the Board of Directors of the Company and is responsible to enforce this Code. He will be authorized to seek such information from Designation Persons and their immediate relatives as required by this Code and to give such approvals, as are specified by this Code.

b) The Compliance Officer shall maintain records of all declarations and disclosures received under the code and responsible for making relevant disclosures to the stock exchanges on which the securities of the Company are listed. He shall maintain a database of the violations of the Code of Conduct by Designated Persons and immediate relatives of Designated Persons.

c) The Compliance Officer shall in consultation with the chairman and/or managing director specify prohibited period (i.e., closure of the Trading Window) from time to time and make announcement/s thereof ensuring that prohibited period is intimated to all concerned before the commencement of the said period. The Compliance Officer shall at quarterly intervals prepare a report on insider trading to the Chairman of the Audit Committee or the Chairman of the Board.

d) The Compliance Officer shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information, pre-clearing of trades as required under the Code, monitoring of trades for which pre-clearance is sought under the Code and the implementation of the Code under the overall supervision of the Board of Directors or the Head of the Company, as the case may be. The Compliance Officer shall maintain a record of all the Designated Persons and changes to the list from time to time. The Compliance Officer shall be responsible for approval of trading plan(s) and notifying the same to the stock exchanges, on which the securities of the Company are listed.

e) The Compliance Officer shall assist all employees in addressing any clarifications regarding the Insider Trading Regulations and the Code.

4. RESPONSIBILITIES OF DESIGNATED PERSONS AND THEIR IMMEDIATE RELATIVES

All Designated Persons and their immediate relatives shall maintain strict confidentiality with respect to all Unpublished Price Sensitive Information. Designated Person shall not:

a) Pass on Unpublished Price Sensitive Information to any person; or
b) Disclose Unpublished Price Sensitive Information to their immediate relatives and any other person; or
c) Discuss Unpublished Price Sensitive Information in public places where others might overhear; or
d) Disclose Unpublished Price Sensitive Information to any other Designated Person or any other person who does not need to know the information to perform his or her duties and responsibilities.

5. PRESERVATION OF "UNPUBLISHED PRICE SENSITIVE INFORMATION"

a) All UPSI is to be handled on a "Need to Know" basis, i.e. UPSI 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 likelihood of misuse of the information.
b) To prevent the misuse of confidential information the Company adopts a 'Chinese Wall' policy thereby separating those areas of the Company which routinely have access to confidential information, considered as 'inside areas' from those areas which deal with sale / marketing / investment advice or other departments providing support services, considered as 'public areas.
c) The employees in the inside areas shall not communicate any UPSI to any one in public area. Demarcation of various departments as 'inside area' may be implemented by the Compliance Officer, in consultation with the Chief Financial Officer of the Company.
d) In exceptional circumstances i.e., in furtherance of legitimate purposes, performance of duties or discharge of legal obligations, any Designated Person may be permitted to 'cross

the wall' and give UPSI to any person on a 'need to know' basis, under intimation to the Compliance Officer.

e) No insider shall communicate, provide, or allow access to any UPSI, relating to the Company or securities, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

f) No person shall procure from or cause the communication by any insider of UPSI, relating to the Company or securities, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

g) However, UPSI may be communicated, provided, allowed access to or procured, in connection with a transaction which:

(i) entails 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) does not attract the obligation to make an open offer under the Takeover Regulations but where the Board of the Company is of the informed opinion that the proposed transaction is in the best interests of the Company and the information that constitutes UPSI 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.

h) For the above purposes, 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 purpose of this clause and shall not otherwise trade in securities of the Company when in possession of UPSI.

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

6. PREVENTION OF MISUSE OF "UNPUBLISHED PRICE SENSITIVE INFORMATION"

All Designated Persons and their Immediate Relatives shall be subject to trading restrictions enumerated herein.

7. TRADING PLAN

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

B. Such trading plan shall –

(i) not entail commencement of trading on behalf of the insiders earlier than one hundred and twenty calendar days from the public disclosure of the plan;

(ii) not entail overlap of any period for which another trading plan is already in existence;

(iii) set out following parameters for each trade to be executed:

a. either the value of trade to be effected or the number of securities to be traded;
b. nature of the trade;

c. either specific date or time period not exceeding five consecutive trading days;
d. price limit, that is an upper price limit for a buy trade and a lower price limit for a sell trade, subject to the range as specified below:

(i) for a buy trade: the upper price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent higher than such closing price;

(ii) for a sell trade: the lower price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent lower than such closing price.

Explanation:

(i) While the parameters in sub-clauses (a), (b) and (c) shall be mandatorily mentioned for each trade, the parameter in sub-clause (d) shall be optional.

(ii) The price limit in sub-clause (d) shall be rounded off to the nearest numeral.

(iii) Insider may make adjustments, with the approval of the compliance officer, in the number of securities and price limit in the event of corporate actions related to bonus issue and stock split occurring after the approval of trading plan and the same shall be notified on the stock exchanges on which securities are listed.

(iv) not entail trading in securities of the Company for market abuse.

C. The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of this Code or Insider Trading 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 shall not be applicable for trades carried out in accordance with an approved trading plan.

D. The compliance officer shall approve or reject the trading plan within two trading days of receipt of the trading plan and notify the approved plan to the stock exchanges on which the securities are listed, on the day of approval.
E. The trading plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to either execute any trade in the securities outside the scope of the trading plan or to deviate from it except due to permanent incapacity or bankruptcy or operation of law.

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.

Provided further that if the insider has set a price limit for a trade under sub-clause (iv) of clause (v) of sub-regulation 2 of Insider Trading Regulations, the insider shall execute the trade only if the execution price of the security is within such limit. If price of the security is outside the price limit set by the insider, the trade shall not be executed.

Explanation: In case of non-implementation (full/partial) of trading plan due to either reasons enumerated in sub-regulation 4 of Insider Trading Regulations or failure of execution of trade due to inadequate liquidity in the scrip, the following procedure shall be adopted:

(i) The insider shall intimate non-implementation (full/partial) of trading plan to the compliance officer within two trading days of end of tenure of the trading plan with reasons thereof and supporting documents, if any.

(ii)Upon receipt of information from the insider, the compliance officer, shall place such information along with his recommendation to accept or reject the submissions of the insider, before the Audit Committee in the immediate next meeting. The Audit Committee shall decide whether such non-implementation (full/partial) was bona fide or not.

(iii) The decision of the Audit Committee shall be notified by the compliance officer on the same day to the stock exchanges on which the securities are listed.

(iv) In case the Audit Committee does not accept the submissions made by the insider, then the compliance officer shall take action as per this Code.

8. TRADING WINDOW AND PRE- CLEARANCE OF TRADES

a) Trading Window

(i) The trading window shall be closed when the Compliance Officer determines that a Designated Person or class of Designated Persons can reasonably be expected to have possession of Unpublished Price Sensitive Information. Such closure shall be imposed in relation to such Securities to which such Unpublished Price Sensitive Information relates.

(ii) When the trading window is closed, the Designated Persons and their Immediate Relatives shall not Deal in Securities of the Company. Trading restriction period shall be made applicable from the end of every quarter till 48 hours after the declaration of financial results. The gap between clearance of accounts by audit committee and board meeting should be as narrow as possible and preferably on the same day to avoid leakage of material information.

(iii) All Designated Persons and their Immediate Relatives shall conduct 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, and any other period as may be specified by the Company from time to time.

(iv) The Compliance Officer shall intimate the closure of trading window to all the Designated Persons of the Company.

(v) The Compliance Officer after considering 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. In any event such re-opening shall not be earlier than forty-eight hours after the information becomes generally available.

b) **Pre-clearance of transactions in Securities**

(i) When the trading window is open, trading by designated persons and their immediate relatives shall be subject to pre-clearance by the compliance officer, if the value of the proposed trades is above such thresholds limit of Rs. 10 lakhs.

(ii) The application for approval for pre-clearance shall be made in Form-I by the concerned Designated Person to the Compliance Officer along with a declarations to the effect that the applicant for pre-clearance is not in possession of any unpublished price sensitive information. The Compliance Officer shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.

(iii) The Compliance Officer shall consider the request made by the Directors, Designated Persons and accord approval, unless he/she is of the opinion that the grant of such approval would result in a breach of the provisions of the Code or the Insider Trading Regulations or the Act or any other law in force at that time.

(iv) Every approval given shall be valid for a period of 7 Trading days or such lesser period as prescribed in the approval.

(v) Any transaction or series of transaction executed without prior approval be in violation of this Code. However, prior approval is not required for trades executed in accordance with an approved Trading Plan and exercise of employee stock options.

(vi) All transactions intended by the Compliance Officer shall be approved by the Managing Director.

(vii) All Designated Person shall complete execution of approved transaction in the securities within the expiry of the approved period and submit details of transaction within two trading days in Form-II. The details of off-market trades are also required to be reported to the Company within two trading days of execution of transaction. The Obligation to disclose trading by the immediate relative of Designated Person/Directors or any other person for whom the Designated Person/Directors takes trading decision, lies on the Designated Person/Director.

(viii) If the transaction is not executed within the approval period, the Directors, Designated Person or their immediate relative, shall apply to the Compliance Officer for pre-clearance, if they intend to transact again.

(ix) All Designated Persons who buy or sell any number of Securities of the Company shall not enter into a contra trade during the next six months following the prior transaction. All Designated Persons shall also not take positions in derivative transactions in the Securities of the Company at any time. In case of any contra trade is executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Securities and Exchange Board of India for credit to the Investor Protection and Education Fund administered by the Securities and Exchange Board of India under the Securities and Exchange Board of India Act, 1992, as amended, provided that this shall not be applicable for trades pursuant to exercise of stock options.

(x) In case trading in securities is necessitated by personal emergency, the holding period of six months as specified above may be waived by the Compliance Officer after recording in writing his/her reasons in this regard. An application for waiver of holding period shall be made to the Compliance Officer through concerned Departmental Head in the prescribed Form III.

(xi) The Company is required to disclose to the stock exchanges details of transaction executed by Directors, Designated Person or their immediate relatives, within two trading days of receipt of disclosure from Directors, Designated Person or their immediate relatives.

9. OTHER RESTRICTIONS

Following additional restrictions shall apply wherein pre-clearance for the trade has been sought by Designated Persons:

a) 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.

b) The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be considered for purposes of this Code.

c) The disclosures made under this Code shall be maintained for a period of five years.

d) **Internal Control**

(i) The chief executive officer or managing director or such other analogous person of the Company shall put in place adequate and effective system of internal controls to ensure compliance with the requirements given in Insider Trading Regulations to prevent insider trading. Further, the Board is to ensure that the requirements are met by such persons under the Insider Trading Regulations.

e) The internal controls shall include the following:

(i) List of Designated Persons;
(ii) all the Unpublished Price Sensitive Information shall be identified, and its confidentiality shall be maintained as per the requirements of the Insider Trading Regulations;

(iii) adequate restrictions shall be placed on communication or procurement of Unpublished Price Sensitive Information as required by the Insider Trading Regulations;
(iv) lists of all employees and other persons with whom Unpublished Price Sensitive Information is shared shall be maintained and confidentiality agreements shall be signed, or notice shall be served to all such employees and persons;
(v) all other relevant requirements specified under the Insider Trading Regulations shall be complied with;
(vi) periodic process review to evaluate effectiveness of such internal controls.

f) The Audit Committee of the Company shall review compliance with the provisions of the Insider Trading Regulations at least once in a financial year and shall verify that the systems for internal control are adequate and are operating effectively.

g) The Company shall formulate written policies and procedures for inquiry in case of leak or suspected leak of Unpublished Price Sensitive Information, which shall be approved by the Board and accordingly initiate appropriate inquiries on becoming aware of such information and inform the Board promptly of such leaks, inquiries and results of such inquiries.

h) If an inquiry has been initiated by the Company in case of leak or suspected leak of Unpublished Price Sensitive Information the relevant intermediaries and fiduciaries shall co-operate with the Company in connection with such inquiry conducted by the Company.

i) The Company shall not discharge, terminate, demote, suspend, threaten, harass, either directly or indirectly, or discriminate against any employee who files a Voluntary Information Disclosure Form under the Insider Trading Regulations, irrespective of whether the information is considered or rejected by SEBI, or he or she is eligible for a Reward under the Insider Trading Regulations, by reason of:

(i) filing a Voluntary Information Disclosure Form under the Insider Trading Regulations;

(ii) testifying in, or otherwise assisting or aiding SEBI in any investigation, inquiry, audit, examination or proceeding instituted or about to be instituted for an alleged violation of the insider trading laws, or in any manner aiding the enforcement action taken by the Board;

(iii) breaching any confidentiality agreement or provisions of any terms and conditions of employment or engagement solely to prevent any employee from cooperating with SEBI in any manner.

It is further clarified that the Company does not require any employee to establish that: (a) SEBI has taken up any enforcement action in furtherance of information provided by such person; or (b) the information provided fulfils the criteria of being considered as an 'original information' under the Insider Trading Regulations. No employee that has filed a Voluntary Information Disclosure under the Insider Trading Regulations will be required to notify the Company of such filing or seek its prior permission or consent or guidance of any person engaged by the Company, as the case may be, before or after such filing.

10. REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES

a) Initial Disclosure

Every person on appointment as a Key Managerial Personnel or a director of the Company or upon becoming a Promoter or member of the Promoter Group shall disclose his holding of 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 in the prescribed Form B.

b) Continual Disclosures

(i) Every Promoter, member of the Promoter Group, designated person and director of the Company shall disclose to the Company the number of such Securities acquired or disposed of within two Trading Days of such transaction 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 more than Rs. 10 Lakhs. Every incremental transactions after any disclosure under this clause, shall be made when the transactions effected after the prior disclosure cross the threshold limit of Rupees 10 lakhs in Form C.

(ii) The Compliance Officer shall within two Trading Days of the receipt of such information, disclose the same to all Stock Exchanges on which the Company is listed.

(iii) The Compliance Officer shall maintain records of all the declarations in the appropriate form given by the directors / Promoter or member of the promoter group, Designated Persons for a minimum period of five years.

11. REPORTING REQUIREMENTS FOR DESIGNATED PERSONS

a) All Designated Persons shall disclose the annual statement of all Securities of the Company held as on March 31 every year, in the format set out in Form IV on or before April 25 of the next Financial Year.

b) All Designated Persons shall disclose names and Permanent Account Number, or any other identifier authorized by law along with phone, mobile and cell numbers of the following persons to the Company:

(i) immediate relatives;

(ii) persons with whom such designated person(s) shares a Material Financial Relationship;

(iii) Phone, mobile and cell numbers which are used by them.

c) In addition, all designated persons shall disclose to the company names of educational institutions from which designated persons have graduated and names of their past employers on a one-time basis.

d) The Compliance Officer shall maintain records of all the declarations/undertakings / forms as mentioned in this Code of Conduct, and received from time to time, for a period of five years.

e) The Compliance Officer shall take steps for disclosures required under this Code of Conduct to also be made through electronic filing in accordance with the system devised by the stock exchange.

12. PENALTY FOR CONTRAVENTION OF CODE

a) Any Designated Person who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalized and appropriate action may be taken by the Company.

b) The Compliance Officer shall report all the breaches of this Code to the Board. In the event of a breach of the Insider Trading Regulations, the Company shall promptly inform the stock exchanges where securities of the Company are traded, in such form and manner as may be specified by SEBI from time to time.

c) Designated Persons who violate the Code may also be subject to disciplinary action by the Company, which may include wage freeze, suspension, recovery, claw back, ineligibility for future participation in employee stock option plans, etc. Any amount collected under this shall be remitted to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

13. ASSISTANCE

For Clarifications, assistance, advice on any questions, doubts in the interpretation of this code, please contact Company Secretary & Compliance officer.

Company Secretary & Compliance Officer
Name: LATA BAGRI
Email ID: info@glittek.com

14. MODIFICATION OF THE POLICY

This Code is framed based on the provisions of the Insider Trading Regulations. In case of any subsequent amendments to the Insider Trading Regulations which makes any of the provisions in the Policy inconsistent, the provisions of the Insider Trading Regulations shall prevail. The Policy shall be reviewed or modified by the Board to incorporate the changes as may be felt appropriate by the Board.

The Company Secretary & Compliance Officer may update this policy from time to time only to the extent so as to reflect any changes SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time and the updated version be issued and published as necessary, without any requirement for approval from the Board.

15. EFFECTIVE DATE

The policy will be effective from November 1, 2026.

FORM B

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (1) (b) read with Regulation 6(2) – Disclosure on becoming a director/KMP]

Name of the company: Glittek Granites Limited ISIN of the Company: INE741B01027

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).

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

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

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

Open Interest of the Future contracts held as on the date			Open Interest of the Option Contracts held as on date		
Contract Specifications	Number of units (contracts* lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
7	8	9	10	11	12

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

Date:
Place:

Signature:
Name:
Designation

Annexure to Form B

Name:
Employee Code:

Sr. No.	Particulars	Name	PAN & Address	Phone and mobile number used by persons	No. and % of total Shareholding	Whether financially dependent or consults you for trading decisions (Y/N)
1.	Spouse					
2.	Father					
3.	Mother					
4.	Spouse's Father					
5.	Spouse's Mother					
6.	Son					
7.	Son's Wife					
8.	Daughter					
9.	Daughter's husband					
10.	Brother					
11.	Sister					
12.	Spouse's Brother					
13.	Spouse's Sister					
14.	If you are member of Hindu undivided					
15.	Name of persons with whom material financial relationship* is shared					

***"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 from a designated person during the immediately preceding 12 months, equivalent to at least 25% of the annual income of such designated person but shall exclude relationships in which the payment is based on arm's length transactions.

FORM C
SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]

Name of the Company: Glittek Granites Limited
ISIN of the Company: INE741B01027
Details of change in holding of Securities of Designated Person

Name, PAN, CIN/ DIN & address with Contact nos.	Category of Person (Promoter /member of the promoter group/designated person/ Directors/immediate relative to/others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice / acquisition of shares / sale of shares Specify,		Date of intimation to company	Mode of acquisition /disposal (on market / public / rights / preferential offer / off market / Inter-se transfer, ESOP, etc.	Exchange on which the trade was executed
		Type of security e.g.- Shares, Warrants, Convertible Debentures, Rights entitlements etc.,	No. & % of Share holding	Type of security e.g.- Shares, Warrants, Convertible Debentures, Rights entitlements etc.,	No.	Value	Transaction Type (Buy/ Sale/ Pledge / Revoke Invoke)	Type of security e.g.- Shares, Warrants, Convertible Debentures, Rights entitlements etc.,	No. & % of Share holding	From	To			

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

Note: "Securities" shall have the meaning as defined under regulation 2(1)(I) of SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended.
Value of transaction excludes taxes/brokerage/any other charges

Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc.)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
16	17	18	19	20	21	22

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

Name:
Signature:
Designation:
Date:
Place:

FORM I

FORM FOR PRE-CLEARANCE OF TRANSACTIONS:

[As per clause 7(2)(i) of code of conduct to regulate, monitor and report trading by its designated persons and their immediate relatives.]

To
The Company Secretary/Compliance Officer
Glittek Granites Limited
[Insert Address]

I intend to sell / purchase securities of the Company, as follows:

sr. No.	Name of the applicant	
1.	Designation	
2.	Department	
3.	Employee Code No.	
4.	Number and value of securities in the Company held as on date Folio No. / DP ID and Client ID	
5.	Nature of proposed trading a) Purchase in the open market b) Sale of securities c) Off-Market deal d) Other	
6.	Proposed date of trading in securities	
7.	No. of Shares proposed to be dealt. DP ID and Client ID	
8.	Price at which the transaction is Proposed	
9.	Current Market Price (as on the date of application)	

I hereby apply for the pre-clearance of the transaction(s) referred above. In relation to the above trading, I undertake that:

i. That I do not have any access, nor have I received any "Price Sensitive Information" up to the time of signing this undertaking.
ii. That in case I have access to or receive "Price Sensitive Information" after the of this undertaking but before the execution of the transaction I shall inform the Compliance Officer of the change in my position and that I would completely refrain from trading in the securities of the Company till the time such information becomes public.
iii. That I have not contravened the Code of Conduct (Insider Trading) for prevention of insider trading as notified by the Company from time to time.
iv. That I have made a full and true disclosure in the matter.
v. That I will go ahead with the transaction only after receiving the required clearance.
vi. That I will execute the order in respect of the securities of the Company within 7 Trading days after the approval of pre- clearance is given, failing which, fresh clearance shall be obtained.
vii. That I shall inform the Company (in Form II) within 2 days of transaction / trading in securities of the Company/end of 7 trading days from pre-clearance approval the details of the securities traded along with securities not traded (in respect of which preapproval had been obtained).

Signature:_____

Date:
Place:

FORM II

FORM FOR DISCLOSURE OF TRANSACTIONS

[As per clause 7(2)(viii)) of code of conduct to regulate, monitor and report trading by its designated
persons and their immediate relative.
(To be submitted within two days of transaction / trading in securities of the Company/end of 7 trading days from pre-clearance approval)

To
The Company Secretary/Compliance Officer
Glittek Granites Limited
[Insert Address]

Pre-Approval Reference No.:

I hereby inform that I

- have not bought / sold/ subscribed any securities of the Company (Reason)
- 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 3 years and produce to the Compliance officer / SEBI any of the following documents if sought for:

1. Broker's contracts 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 to hold the above securities for a minimum period of six months / undertake that no contra trade shall be entered within a period of six months. In case there is any urgent need to sell these securities within the said period, I shall approach the Compliance Officer for necessary approval (applicable in case of purchase / subscription).

I declare that the above information is correct and that no provisions of the Company's Co de and/or applicable laws / regulations have been contravened for effecting the above said transactions(s).

Signature:
Name:
Designation:
Date:
Place:

FORM III

APPLICATION FOR WAIVER OF MINIMUM HOLDING PERIOD

[As per clause 7(2)(i) of code of conduct to regulate, monitor and report trading by its designated persons and their immediate relatives

To
The Company Secretary/Compliance Officer
Glittek Granites Limited
[Insert Address]

Through: Department Head

Dear Sir,

I request you to grant me waiver of the minimum holding period of 6 months as required under the Company's' Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons and their Immediate Relatives, with respect to_securities of the Company held by me/ (name of family dependent)/jointly acquired by me on _____(date). I desire to deal in the said shares because of the under-mentioned emergency [mention reasons in brief along with supporting documents]

Thanking you
Yours faithfully,

Name:
Designation:
Employee Code No.:
(Signature)

Date:
Place:

FORM IV
ANNUAL DECLARATION
[As per Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015]

To
The Company Secretary/Compliance Officer
Glittek Granites Limited
[Insert Address]

ISIN of the Company: INE741B01027
Financial Year Ending:
Educational Qualification & Name of the Institute (onetime disclosure):
Details of previous employers (onetime disclosure):

Details of Holding as at the end of the financial year:

Name, PAN, CIN/ DIN & address with contact nos.	Category of Person (Promoters/ Promoter Group)	Securities held at the end of financial year		
		Type of security (For e.g. – Shares, Warrant, Convertible Debentures etc.)	No. and % of total Shareholding	Value
1	2	3	4	5

Note: In case the designated personnel have no holdings at the end of FY, please provide NIL declaration

(Signature):
Name
Designation

Annexure to Form IV

Name:
Employee Code:

Sr. No.	Particulars	Name	PAN & Address	Phone and mobile number used by persons	No. and % of total Shareholding	Whether financially dependent or consults you for trading decisions (Y/N)
1.	Spouse					
2.	Father					
3.	Mother					
4.	Spouse's Father					
5.	Spouse's Mother					
6.	Son					
7.	Son's Wife					
8.	Daughter					
9.	Daughter's husband					
10.	Brother					
11.	Sister					
12.	Spouse's Brother					
13.	Spouse's Sister					
14.	If you are member of Hindu undivided					
15.	Name of persons with whom material financial relationship* is shared					

***"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 from a designated person during the immediately preceding 12 months, equivalent to at least 25% of the annual income of such designated person but shall exclude relationships in which the payment is based on arm's length transactions.