



**Code of Conduct**  
for  
**Prevention of Insider Trading**  
of  
**Aviom India Housing Finance Private Limited**  
**("COMPANY")**

<b>Document Title</b>	<b>Code of Conduct For Prevention of Insider Trading</b>
<b>Approved by</b>	<b>Board of Directors</b>
<b>Policy Owner</b>	<b>Ms. Divyani Chand, Chief Compliance Officer &amp; Company Secretary</b>
<b>Date of Approval</b>	<b>November 16, 2021</b>

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## CHAPTER -1

### Introduction

This code shall be known as “Code of Conduct for Prevention of Insider Trading of Aviom India Housing Finance Private Limited” (“Code”) made pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 (“PIT Regulations”).

#### **1.1 Applicability**

This code shall apply to

1. Designated Persons of Aviom India Housing Finance Private Limited (“the Company”) as defined in the Code and their dependents;

#### **1.2 Definitions**

- (a) “Act” means the Securities and Exchange Board of India Act, 1992;
- (b) “Board” means Securities and Exchange Board of India.
- (c) “Body Corporate” means a body corporate as defined in section 2(11) of the Companies Act, 2013;
- (d) “Compliance Officer” means Company Secretary of the Company and in his absence any other senior officer, designated so and reporting to the Board of Directors as mentioned in the Regulations provided that Compliance Officer shall be financially literate i.e he/ she has the ability to read and understand basic financial statements i.e balance sheet, profit and loss account and statement of cash flows.
- (e) “Connected Person (s)” means persons as defined in PIT Regulations
- (f) “Dealing in Securities or Trading” means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any Securities, and "trade" shall be construed accordingly.
- (g) “Dependent(s)” includes 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.
- (h) “Designated Person (s)” shall include following persons including employees of the Company and its subsidiaries (including the employees who are seconded/ transferred/ deputed to other group or affiliated companies from the Company): –
  1. Directors of the Company
  2. Executive Directors of the subsidiary of the Company
  3. Key Managerial Personnel of the Company and it’s subsidiaries

4. Promoter and Promoter Group of the Company
5. Employees
  - i. who are Head of Departments of the Company
  - ii. upto two levels below Managing Director/Executive Director/ Chief Executive Officer of the Company and it's subsidiaries of the following departments of the Company:
    - a. Finance
    - b. Secretarial/Compliance;
    - c. Strategy/Merger & Acquisitions/Investor Relations;
    - d. Legal
    - e. Information Technology
    - f. Tax
    - g. Brand and Marketing
    - Internal Audit
  - iii. who are executive assistants to persons mentioned in (1) to (4) above.

(i) "Director(s)" means a Director appointed on the board of the Company.

(j) "Insider(s)" means any person who is:

- i) a Designated Person;
- ii) a connected person; or
- iii) in possession of or having access to unpublished price sensitive information;

(k) "Key Managerial Personnel" means key managerial personnel as defined in the Companies Act, 2013 and includes

- (a) Chief Executive Officer;
- (b) Managing Director;
- (c) Manager;
- (d) Company Secretary;
- (e) Whole-Time Director;
- (f) Chief Financial Officer.

(l) "Material Financial Relationship" means a relationship in which one person is recipient of any kind of payment such as by way of loan or gift from a designated person during the immediately preceding twelve 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."

(m) "Promoter and Promoter Group" means persons as shown in as promoter and promoter group in any of the latest public filings.

(n) "Regulations" means SEBI (Prohibition of Insider Trading) Regulations, 2015

(o) "Securities" means Securities of the Company and shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 or any modification thereof except units of a mutual fund;

- (p) "Unpublished Price Sensitive Information/ UPSI" means information as defined in PIT Regulations.
- 1.3 Words denoting the singular shall include the plural and vice versa and words denoting masculine gender shall include reference to feminine or neuter gender
- 1.4 Words and expressions used and not defined in this code but defined in the SEBI (Prohibition of Insider Trading) Regulations, 2015, Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation.
- 1.5 Unless the context requires otherwise, employee shall mean employee of the Company.
- 1.6 Compliance Officer
- 1.6.1 The Compliance Officer shall be responsible for setting forth policies and procedures and monitoring adherence to the rules for the preservation of unpublished price sensitive information, maintaining database containing details of Designated Persons and details of such persons/ entities with whom UPSI is shared, pre-clearing of all Designated Persons and their Dependents trades (through respective department heads, if any), monitoring of trades and implementation of this Code under the overall supervision of the Board of the Company.
- The database shall be maintained internally as per provisions maintained in PIT regulations and shall not be outsourced. Database shall be preserved for a period of not less than eight years after completing of relevant transactions and in the event of receipt of any information from the Board regarding any investigation or enforcement proceedings, the relevant information in the digital database shall be preserved till the completion of such proceedings.
- 1.6.2 The Compliance Officer shall maintain a record of the Designated Persons and any changes made in the list of Designated Persons and Insiders as per requirements of PIT Regulations.
- 1.6.3 The Compliance Officer shall assist all employees, Designated Persons, Insiders of the Company in addressing any clarification regarding PIT Regulations and the Company's Code.
- 1.6.4 The Compliance Officer shall report to the Board of Directors and shall provide reports to the Chairman of the Audit Committee of the Company, on a periodical basis whenever required.

## CHAPTER - 2

### PRESERVATION OF PRICE SENSITIVE INFORMATION

- 2.1 No Designated Person, Insider shall communicate, provide, or allow access to any UPSI, relating to the Company or Securities listed or proposed to be listed, to any person including other Insiders except where such communication is in furtherance of the Designated Person/Insider's legitimate purposes, performance of duties or discharge of legal obligations or as permitted in the PIT Regulations and is in accordance with Code of Practices and Procedures for Fair Disclosure of UPSI of the Company
- 2.2 Chinese Wall
- a) Areas of the Company which routinely have access to confidential information, shall be considered "inside areas" and be separated from those areas which deal with sale / marketing / investment advice or other departments providing support services, considered "public areas" by a "Chinese Wall".
  - b) The employees in the inside area shall not communicate any confidential information/ UPSI to anyone in public area.
  - c) In exceptional circumstances employees from the public areas may be brought "over the wall" and given confidential / UPSI on "need to know" basis criteria in furtherance of their legitimate purposes, performance of duties or discharge of legal obligations.

## CHAPTER 3

### PREVENTION OF MISUSE OF 'PRICE SENSITIVE INFORMATION

- 3.1 All Designated Persons/Insiders of the Company shall be subject to trading restrictions as enumerated below.
- 3.2 Trading Window
- 3.2.1 The Company shall specify a trading period, to be called "trading window", for trading in the Company's Securities. The trading window shall be closed during the time the information referred to in para 3.2.3 is unpublished or any time as communicated by the Compliance Officer.
- 3.2.2 When the trading window is closed, the Directors/ Key Managerial Personnel /Designated Employees/Connected persons and their Dependents shall not trade in the Company's Securities in such period except where trading plan has been approved by the Compliance Officer.
- 3.2.3 The trading window shall be, *inter alia*, closed at the time of:—
- a) Declaration of financial results;
  - b) Declaration of dividends;
  - c) change in capital structure by way of public/rights/preferential issue;
  - d) mergers, de-mergers, acquisitions, de-listings, disposals and expansion of business and such other transactions;
  - e) changes in Key Managerial Personnel; and
- 3.2.4 The time for commencement of closing of trading window and re-opening of trading window shall be decided by the Company. However, in any case:
- a) unless communicated otherwise, trading window will close at least 48 hours before the information referred to in para 3.2.3 becomes public.
  - b) the re-opening of trading window shall not be earlier than 48 hours after the information referred to in para 3.2.3 becomes public.
- Provided that in case of declaration of half - yearly/ annual financial results of the Company, trading window shall be closed from end of every quarter till 48 hours after declaration of financial results.
- 3.2.5 All Designated Persons/ Insiders of the Company shall conduct all their dealings in the Securities of the Company only in a valid trading window or as per approved trading plan and shall not deal in any transaction involving the purchase or sale of the Company's Securities during the periods when trading window is closed or where there is no pre-approved trading plan, or during any other period as may be specified by the Company from time to time.

- 3.2.6 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 ESOP's shall not be allowed when trading window is closed.

### **3.3 Trading Plan**

- 3.3.1 Trading plan is a plan under which Designated Person can trade in Securities even when trading window is closed. It gives an option to Insiders who may be perpetually in possession of UPSI and enabling them to trade in Securities in a compliant manner. This provision would enable the formulation of a trading plan by Designated Person to enable him to plan for trades to be executed in future. By doing so, the possession of UPSI when a trade under a trading plan is actually executed would not prohibit the execution of such trades that he had pre-decided even before the UPSI came into being.
- 3.3.2 Every Designated Person 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.
- 3.3.3 While presenting the trading plan, following points shall be kept in mind:
- a) There must be a gap of 6 months between the public disclosure of plan and commencement of trading.  
In any case, it should be remembered that this is only a statutory cool-off period and would not grant immunity from action if Designated Person was to be in possession of the same UPSI both at the time of formulation of the plan and implementation of the same.
  - b) In any case, trading will not be permitted between the twentieth trading day prior to the last day of any financial period for which results are required to be announced by the Company and the second trading day after the disclosure of such financial results.
  - c) Trading plan shall entail trading for a period of not less than twelve months.
  - d) Trading plan shall not entail overlap of any period for which another trading plan is already in existence.
  - e) Trading plan shall 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.
  - f) Trading on the basis of such a trading plan would not grant absolute immunity from bringing proceedings for market abuse.
- 3.3.4 While granting the approval, the Compliance Officer shall be entitled to seek such express undertakings as he may think necessary to assess and approve the plan.



- 3.3.5 The trading plan once approved shall be irrevocable and the Designated Person shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the Securities outside the scope of the trading plan.

Provided that the implementation of the trading plan shall not be commenced if any UPSI in possession of the Designated Person at the time of formulation of the plan has not become generally available at the time of the commencement of implementation.

- 3.3.6 Once the trading plan is approved, the Compliance Officer shall notify the plan to the stock exchanges on which the Securities are listed.

#### **3.4 Pre-clearance of Trades**

- 3.4.1 All Designated Persons and their Dependents who intend to deal in the Securities of the Company shall pre-clear the intended transactions including those of 'Dependent' in the Securities of the Company as per the pre-dealing procedure described hereunder.

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

- 3.4.2 Such pre-clearance of trade would be applicable wherever any Designated Person /his Dependent intends to deal in the Securities of the Company in excess of the minimum threshold limit of market value exceeding Rs. 5,00,000/- or 500 Securities whichever is less in one or more tranche in any one quarter.. However, Directors of the Company have to pre-clear their all intended transactions irrespective of value or number of Securities involved. Trades of the Compliance Officer which require pre-clearance in terms of the above shall be approved by the Managing Director or Chief Executive Officer or in their absence by any Whole Time Director of the Company.

- 3.4.3 An application in "Form I", as prescribed in the Code, shall be made to Compliance Officer, after obtaining the approval of departmental head, if any, indicating the estimated number of Securities that Designated Person intends to deal in and details of depository with which he has a depository account and such other details as may be required by any rule made by the Company in this behalf.

- 3.4.4 An undertaking in "Form I" shall be executed in favour of the Company by such Designated Person.

## CHAPTER 4

### OTHER RESTRICTIONS

- 4.1 Where any transaction has been approved, the Designated Person and their Dependents shall execute the order within one week of the clearance of the transaction, and where any transaction has been approved with any additional restrictions, the same shall be executed within the above time in accordance with the additional restrictions specified. If the order is not executed within one week after the approval is given, the Designated Person must pre-clear the transaction again.
- 4.2 The Compliance Officer shall have a right to revoke any clearance granted to any transaction or add further additional restrictions to any clearance, before the relevant transaction has been executed.
- 4.3 In case any transaction has been refused, the Designated Person and their Dependents shall be free to re-apply for pre-clearance of the transaction, which was refused, to the next higher authority i.e. to Managing Director/Chief Executive Officer /Whole-Time Director/ Executive Director, if Compliance Officer has refused the transaction.
- 4.4 All Designated Persons who buy or sell any number of Securities of the Company shall not enter into a contra trade or opposite transaction i.e. sell or buy any number of Securities during the next six months following the prior transaction.
- Provided further that trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.
- 4.5 No Designated Person shall take positions in derivative transactions in the Securities of the Company at any time.
- 4.6 In case the sale of Securities is necessitated by personal emergency, the holding period may be waived by the Compliance Officer/ Managing Director/Executive Director/ Chief Executive Officer/ Whole-Time Director on recommendation of head of department, if any, after recording in writing his/her reasons in this regard provided such relaxation does not violate the Regulations.

However, if a contra trade is executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Board for credit to the Investor Protection and Education Fund administered by the Board.

## CHAPTER 5 REPORTING

### REQUIREMENTS

5.1 All Designated Persons Connected persons are required to forward the following details to the Compliance Officer.

#### **5.1.1 Initial Disclosure**

All Designated Persons shall be required to forward their details (including details of their Dependents and persons with whom such Designated Person shares a Material Financial Relationship) and details of all holdings in Securities or voting rights held and positions taken in derivatives by such person to the Compliance Officer as per " Form II" prescribed in the Code alongwith a Non- Disclosure Agreement within 7 days of joining/appointment or becoming the Designated Person, whichever is applicable..

#### **5.1.2 Continual Disclosure**

All Designated Persons shall be required to forward following details: -

- (i) Half Yearly Statement in "Form III", as prescribed in Code of all holdings in Securities of the company within 30 days from the end of the half year.
- (ii) Annual statement in "Form IV", as prescribed in Code of all holdings in Securities within 30 days from the end of the financial year.
- (iii) Details of Dependents and persons with whom they have Material Financial Relationship in "Part II of Form II", as prescribed in Code within 30 days from the end of financial year and within seven days for any change therein.

#### **5.1.3 Event Based Disclosure**

##### **Disclosures by Designated Persons**

Every Designated Persons shall disclose to the Company the number of such Securities acquired or disposed of within two trading days of such transaction if the value of the Securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of ten lakh rupees or such other value as may be specified by Board in such format as specified under PIT Regulations..

Provided that if Designated Person does any off- market trade in Securities of the Company, he shall disclose the details of such trade within two working days to the Company in such format as specified under PIT Regulations.

### **Disclosures by Connected persons**

All Connected persons who for the time being are in possession of UPSI shall disclose to the Company the number of such Securities acquired or disposed of within five trading days of such transaction if the value of the Securities traded, whether in one transaction or a series of transactions over one month, aggregates to a traded value in excess of five lakh rupees or 500 securities whichever is less. .

Explanation 1: 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.

Explanation 2: It is clarified for the avoidance of doubts that the disclosure of the incremental transactions after any disclosure under this rule, shall be made when the transactions effected after the prior disclosure cross the threshold specified.

- 5.2 The Compliance Officer shall maintain a record of all the declarations given by all Designated Persons and Connected persons for a minimum period of five years.
- 5.3 The Compliance Officer shall place before the audit committee or before the Committee notified by the Board, on a quarterly basis all the details of the dealing in the Securities of the Company by the Designated Persons and Connected persons received by him and the accompanying documents that such persons had executed under the pre-dealing procedure as envisaged in this Code, wherever applicable.

## CHAPTER 6

### Leak/Suspected leak of Unpublished Price Sensitive Information

- 6.1 Any Employee of the Company or its subsidiaries can report instances of leak or suspected leak of UPSI (UPSI Leak) under Whistle Blower Policy of the Company (“WB Policy”).

However, notwithstanding anything contained in WB Policy in this regard, any complaint received relating to UPSI Leak shall be placed before the Audit Committee by the Chairperson of the Audit Committee (who is also ombudsperson under WB Policy). Audit Committee will investigate the UPSI Leak and all other connected matters in the manner it may deem fit including engaging internal people/outside consultants to assist in the investigation.

- 6.1 A Retaliation for reporting suspected violations either under the WB Policy or to the Board under SEBI (Prohibition of Insider Trading) Regulations, 2015 is strictly prohibited under this Code. Employee who reports any alleged violations of insider trading laws in accordance with the Informant mechanism introduced vide SEBI (Prohibition of Insider Trading) (Third Amendment) Regulations, 2019 dated 17 September 2019, will be protected against any discharge, termination, demotion, suspension, threats, harassment, directly or indirectly or discrimination irrespective of whether the information is considered or rejected by the Board or he or she is eligible for a Reward under these regulations, by reason of:

(i) filing a Voluntary Information Disclosure Form under these regulations;

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

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

- 6.2 Audit Committee may ask any information from relevant Insiders, intermediaries and fiduciaries of the Company in relation to such UPSI Leak.
- 6.3 Enquiry by the Audit Committee shall be completed in a time-bound manner but not later than three months from date of complaint received by ombudsperson. If enquiry gets delayed beyond three months, then reasons for same shall be recorded by the Audit Committee in writing along with the revised timelines.
- 6.4 Audit Committee may call in person any employee, Designated Persons or Insider of the Company in relation to the enquiry and that person shall fully cooperate in the enquiry including but not limited to sharing his official laptop, personal details for the

purpose of enquiry failing which it shall be deemed to be misconduct and non- cooperation on the part of that person and shall be accordingly dealt with in accordance with this Code and Company's other Codes and Policies.

- 6.5 Decision of Audit Committee in relation to enquiry shall be final and any violation shall be dealt in accordance with the Code in addition to actions that may be taken under WB Policy and other Codes and Policies of the Company.
- 6.6 Compliance Officer shall inform the SEBI about UPSI Leak and decision of Audit Committee within one working day from the date on which UPSI Leak matter was discussed by the Audit Committee and decided that an enquiry be initiated in the matter. Thereafter, once the inquiry is concluded by the Audit Committee, details of such conclusion and decision of Audit Committee shall also be intimated to SEBI within one working day from date of such decision

## CHAPTER 7

### Penalty for Contravention of the Code

- 7.1 Any Designated Persons /Connected person 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.
- 7.2 Designated Persons of the Company who violate this Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, recovery, render ineligible for future participation in employee stock option plans, etc.
- 7.3 The action by the Company shall not preclude Board from taking any action in case of violation of Regulations.
- 7.4 In case the Company observes that there has been a violation of these Regulations, the Company shall inform the stock exchanges where the securities of the Company are traded in such form and manner as may be specified by the Board from time to time.
- 7.5 Any amount collected under this clause shall be remitted to the Board for credit to the Investor Protection and Education Fund administered by the Board under the Act.

## CHAPTER 8

### FORMS

#### Form I

To,

Date:

The Compliance Officer  
Aviom India Housing Finance Private Limited

From: Name:

Designation:

Department:

Through: Head of Department(if any)

With reference to the Code of Conduct for Prevention of Insider Trading of the Company, I, the undersigned, seek your approval to buy/sell as a principal/agent in Securities of the Company, aggregating in value Rs. \_\_\_\_\_(approx.)

#### STATEMENT OF HOLDINGS AT THE TIME OF PRE-CLEARENCE

##### I. DETAILS OF SECURITIES HOLDING OF DESIGNATED PERSONS HELD IN THEIR OWN NAME

Name	Designation	Department	No. of securities Held (with Folio No/DP ID/Client ID)	Nature of Transaction for which Approval is sought [Purchase/Sell/Others (Pls. Specify)]	No. of securities to be dealt	Aggregate value of the Transaction( Rs.) (approx.)

##### II. DETAILS OF SECURITIES HELD BY DEPENDANTS

Name	Relationship	No. of securities Held (with Folio/DP ID/Client ID)	Nature of Transaction for which Approval is sought [Purchase/Sell /Others (Pls. Specify)]	No. of securities to be dealt	Aggregate value of the Transaction Aggregate value of the Transaction(Rs.) (approx.)



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Please tick the appropriate case:

I/We hereby declare that I have not purchased any securities in last 6 months ( If approval is sought for selling of securities)	
I/We hereby declare that I have not sold any securities in last 6 months ( If approval is sought for purchase of shares)	
The Shares to be dealt in are allotted under ESOP Scheme of the company and are not subject to lock in period of 6 month.	

Signature

Name of Designated Person

Name of Department Head  
Signature

\*\*In case the sale of securities is necessitated by personal emergency, Designated Person shall specify the reasons.

Reasons

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Enclosure: Undertaking

FOR OFFICE USE ONLY

PRE CLEARANCE ORDER

This is to inform you that your request for dealing in \_\_\_\_\_(nos.) \_\_\_\_\_ Shares/Debentures/Other Securities of the Company is approved. Please note that the said transaction must be completed within 7 days from the date of this order.

Conditions ( if any).....

For Aviom India Housing Finance Private Limited

Date \_\_\_\_\_

Compliance Officer/Managing Director/Executive Director/ CEO

UNDERTAKING

I, \_\_\_\_\_(Name, Designation and Deptt.) residing at \_\_\_\_\_, desirous of dealing in \_\_\_\_\_(nos.) of \_\_\_\_\_ securities/ Debentures/Other Securities (Please specify) as mentioned in my application dated \_\_\_\_\_ for pre-clearance of the transaction.

As required by the Code, I hereby state that

- (a) I have no access to nor do I have any information that could be construed as “Price Sensitive Information” as defined in the Code upto the time of signing this undertaking;
- (b) I am executing the transaction as per duly approved trading plan. (Please delete this clause if not applicable)
- (c) In the event that I have access to or received any information that could be construed as “Unpublished 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;
- (d) I have not contravened the provisions of the Code as notified by the company from time to time;
- (e) I have made full and true disclosure in the matter.

Place:  
Date:

Signature  
Name

Form II

Part I

Details of Individual

Emp. Code	PAN No.	Official email id	Personal email id	Mobile Number	Date of Becoming Designated Person	Name and address of Educational Institution from which Highest Professional Course is completed	Names of Past employers	Demat Account Details	Non Disclosure Agreement signed (Yes/No)

Part II

Details of Dependent

Name of Dependent	Address	Relation	PAN No. or in case of No PAN then Adahar no./ Passport No/ Driving License No.	Personal email id	Mobile Number	Demat Account Details

Details of Persons with whom there if Material Financial Relationship

Name of Dependent	Address	Relation	PAN No. or in case of No	Personal email id	Mobile Number	Demat Account
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			PAN then Adahar no./ Passport No/ Driving License No.			Details

*“Material Financial Relationship”* means 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 twelve 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.

Part III

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015  
 [Regulation 7 (1) (b) read with Regulation 6(2)- Disclosure on becoming a  
 director/KMP/Promoter]

Name of the company: \_\_\_\_\_

ISIN of the company: \_\_\_\_\_

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

Name, PAN No., CIN/DIN & Addresses with contact nos.	Category of Person (Promoters / KMP / Directors/immediate relatives/others etc.)	Date of appointment of Director /KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP		% of Security holding	Open Interest of the Future contracts held at the time of becoming Promoter/appointment of Director/KMP		Open Interest of the Option Contracts held at the time of becoming Promoter/appointment of Director/KMP	
			Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms

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

Signature:

Designation: Date:

Form III\*

To,  
The Compliance Officer  
Aviom India Housing Finance Private Limited

Date: \_\_\_\_\_

**I. HALF YEARLY STATEMENT OF SECURITYHOLDING OF DESIGNATED PERSONS**

Name	Designation	Department	No. of Securities Held on _____	No. of Securities Bought during the Half Year	No. of Securities Sold during the Half Year	No. of Securities held on _____	Folio/DP ID/Client ID

**II. DETAILS OF SECURITIES HELD BY DEPENDANTS**

Name	Relationship	No. of Securities Held on _____	No. of Securities Bought during the Half year	No. of Securities Sold during the Half year	No. of Securities held on _____	Folio/DP ID/Client ID

I/We hereby declare that I/We have complied with the Code and SEBI Regulations with respect of the Securities purchased/ sold.

I/We further declare that the above disclosure is true and correct and is in accordance with the previous disclosure given to the Company.

Signature \_\_\_\_\_

Name

Form IV\*

To,  
The Compliance Officer  
Aviom India Housing Finance Private Limited

Date: \_\_\_\_\_

**ANNUAL DISCLOSURE**

**I. STATEMENT OF SECURITYHOLDING OF DESIGNATED PERSONS**

Name	Designation	Department	No. of Securities Held on 01 <sup>st</sup> April 20	No. of Securities Bought during Year	No. of Securities Sold during Year	No. of Securities held on 31 <sup>st</sup> March 20	Folio/DP ID/Client ID

**II. DETAILS OF SECURITIES HELD BY DEPENDANTS**

Name	Relationship	No. of Securities Held on 01 <sup>st</sup> April 20	No. of Securities Bought during the year	No. of Securities Sold during the year	No. of Securities held on 31 <sup>st</sup> March 20	Folio/DP ID/Client ID

I/We hereby declare that I/We have complied with the Code and SEBI Regulations with respect of the Securities purchased/ sold.

I/We further declare that the above disclosure is true and correct and is in accordance with the previous disclosure given to the Company.

Signature \_\_\_\_\_

Name