

Code of Conduct for Prevention of Insider Trading

**CODE OF CONDUCT
FOR
PREVENTION OF INSIDER TRADING**



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Code of Conduct for Prevention of Insider Trading

2 **DEFINITIONS**

For the purpose of this Code the following terms shall have the meanings assigned to them as hereunder:

- (a) "**Act**" means the Securities and Exchange Board of India Act, 1992, as amended from time to time.
- (b) "**Board/Board of Directors**" shall mean the board of directors of the Company (as defined hereinafter).
- (c) "**Code**" shall mean this Code of Conduct for Prevention of Insider Trading, as amended from time to time.
- (d) "**Company**" or "**GreenCell**" GreenCell Mobility Private Limited and shall include its successors/assigns.
- (e) "**Compliance Officer**" means the Compliance Officer appointed pursuant to Clause 4 of this Code.
- (f) "**Confidential Information**" shall mean such information which is directly or indirectly related to GREENCELL and/or its group and/or associate companies or business associates or, companies under the Restricted List / Grey List (as defined hereinafter) and which is not available to the general public or which is proprietary in nature and also includes Price Sensitive Information (as defined hereinafter).

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- (g) **"Connected Person"** means:
- (i) any person who is or has during the 6 (six) months prior to the concerned act been associated with the Company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the Company or holds any position including a professional or business relationship between himself and the company whether temporary or permanent, that allows such person, directly or indirectly, access to Unpublished Price Sensitive Information or is reasonably expected to allow such access.
 - (ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established:
 - a) an Immediate Relative of Connected Persons specified in clause (i); or
 - b) a holding company or associate company or subsidiary company; or
 - c) an intermediary as specified in section 12 of the Act or an employee or director thereof; or
 - d) an investment company, trustee company, asset management company or an employee or director thereof; or
 - e) an official of a stock exchange or of clearing house or corporation; or
 - f) a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or

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- 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 Securities and Exchange Board of India (“**SEBI**”); or
- i) a banker of the Company; or
- j) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of the Company or his immediate relative or banker of the Company, has more than 10% (ten per cent) of the holding or interest.

Explanation: It is intended that a connected person is one who has a connection with the Company that is expected to put him in possession of Unpublished Price Sensitive Information. Immediate Relatives and other categories of persons specified above are also presumed to be Connected Persons but such a presumption is a deeming legal fiction and is rebuttable. This definition is also intended to bring into its ambit persons who may not seemingly occupy any position in the Company but are in regular touch with the Company and its officers and are involved in the Company’s operations. It is intended to bring within its ambit those who would have access to or could access Unpublished Price Sensitive Information about any company or class of companies by virtue of any connection that would put them in possession of Unpublished Price Sensitive Information.

- (h) “**Dealing in Securities**” means the act of subscribing, buying, selling or agreeing to subscribe, buy, sell or deal in the Securities of companies in the Restricted List / Grey List by any person to whom this Code applies, whether the deal is undertaken on his own or through an agent of such person.

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- (i) "**Designated Person(s)**" shall include:
- i Directors of GREENCELL;
 - ii The Chief Executive Officer (CEO), direct reportee(s) to the CEO and all the Business / Departmental Heads of the Company;
 - iii Permanent invitee/invitees to the meetings of the Board or any committees thereof;
 - iv Officers in grades of Manager and above of GREENCELL;
 - v All employees of investment, operations, research, acquisitions, business development, strategy, finance, accounts, treasury, legal & secretarial departments/teams of GREENCELL;
 - vi Secretaries of the directors and of the heads of the investments, operations, research, acquisitions, business development, finance, accounts, secretarial, legal and strategy departments/teams of GREENCELL;
 - vii Such other entities or persons as may be notified by the Compliance Officer from time to time.
- (j) "**Generally Available**" means information that is accessible to the public on a non- discriminatory basis.
- (k) "**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.
- (l) "**Insider**" means any person who is:
- i. a Connected Person; or
 - ii. in possession of or having access to Unpublished Price Sensitive Information (as defined hereinafter).

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- (m) "**Insider Trading Regulations**" shall mean the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, and any amendments thereto.
- (n) "**Managing Director**" means the Managing Director of the Company, as may be appointed by the Company from time to time.
- (o) "**Need to know basis**" means the disclosure of UPSI only to those within GREENCELL who need the information for legitimate purposes, in performance of duties or discharge of their legal obligations.
- (p) "**Restricted List or Grey List**" shall mean the list of companies maintained by the Company whose dealings in Securities by an Insider (which includes Designated Persons, his Immediate Relative, any Connected Person or person in possession of or having access to Unpublished Price Sensitive Information) are regulated.
- (q) "**SEBI Takeover Regulations**" shall mean the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011, and any amendments thereto.
- (r) "**Securities**" shall mean and include shares, scripts, stocks, bonds, debentures, debenture stock, derivatives and other marketable securities, rights or interest in securities, units or any other instrument issued by any collective investment scheme to the investors in such schemes; except units of a mutual fund.
- (s) "**Trading**" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any Securities, and "trade" shall be construed accordingly and shall include even dealing in any manner including pledge.

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- (t) **“Unpublished Price Sensitive Information”** or **“UPSI”** means any information, that relates directly or indirectly to the companies which are put on the Restricted List / Grey List pursuant to Clause 7 of this Code, that is not Generally Available which upon becoming Generally Available is likely to materially affect the price of their Securities and shall include the following:
- (i) periodical financial results;
 - (ii) intended declaration of dividend (both interim and final);
 - (iii) change in capital structure including buy-back of securities;
 - (iv) any major expansion plans or execution of new projects;
 - (v) amalgamations, mergers, takeovers, joint venture, acquisition, demerger, sale of stake and such other transactions including any consideration, proposal or recommendation thereof;
 - (vi) disposal of the whole or substantial part of the undertaking;
 - (vii) changes in key managerial personnel;
 - (viii) any significant changes in policies, plans or operations;
 - (ix) material events in accordance with the listing agreements that these companies may have with the stock exchange(s); and
 - (x) such other information as may be specified by the Compliance Officer for this purpose.
- (u) **“Working Days”** shall mean the working day when the regular trading is permitted on the concerned stock exchange where Securities are listed.

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3 PURPOSE OF THE CODE

This Code is designed to maintain the highest ethical standards whilst dealing with Securities added to the Restricted List / Grey List by persons to whom it is applicable. The Code also serves to implement the requirements of applicable regulations on such matters. The provisions of the Code are designed to prohibit an Insider from: (1) Trading either on his/her behalf or on behalf of any other person in Securities of companies added to the Restricted List / Grey List when in possession of UPSI; and (2) communicate or counsel or allow access or procure directly or indirectly, any Unpublished Price Sensitive Information to any person.

It is clarified that the above shall not be applicable to any communication required in the ordinary course of business or profession or employment or under any law for which the necessary process stated herein is followed. Thus, Unpublished Price Sensitive Information is required to be handled with care and to be dealt with strictly on a need to know basis. Further, inducement and procurement of any Unpublished Price Sensitive Information not in furtherance of any person's legitimate duties and discharge of obligations would be considered a violation of this Code.

4 COMPLIANCE OFFICER

"Compliance Officer" is the General Counsel of the Company or such other person as may be appointed by the Board in his/her place, from time to time, as Compliance Officer, and shall be assisted in the application and monitoring of this Code by other members of the legal and compliance team of the Company. The Board shall nominate any other person in the Company to act as Compliance Officer for the purpose of this Code during the absence of the General Counsel. For the purposes of this Code, the Compliance Officer shall report to the Board.

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The Compliance Officer shall be responsible for:

- (i) setting forth policies and procedures and monitoring adherence to the rules for the preservation of Price Sensitive Information;
- (ii) pre-clearing of trades by any Designated Person, his/her Immediate Relatives and by any other person for whom such Designated Person takes Trading decisions;
- (iii) monitoring Trades and the implementation of this Code under the overall supervision of the Board or any committee thereof.

The Compliance Officer shall maintain a record of Designated Person updated from time to time in consultation with the human resources department / functional heads of the Company.

The Compliance Officer shall assist all Designated Person in addressing any clarifications regarding the Insider Trading Regulations and the Code.

5 PRESERVATION OF UPSI:

Designated Persons shall maintain confidentiality of all UPSI. They shall not pass on such information to Immediate Relatives, other Designated Persons or to any person directly or indirectly by way of making a recommendation for the purchase or sale of Securities.

UPSI shall be handled on a "need to know basis" and with confidentiality.

All UPSI directly received by any Designated Person should immediately be reported to the Compliance Officer.

If, in the performance of duties, it becomes necessary for the Designated Person to disclose/receive any UPSI to/from any person outside the Company, e.g. third parties, advisors, auditors, consultants, etc., the Designated Person shall inform the Compliance Officer of the UPSI proposed to be disclosed / received and obtain the prior written

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consent of the Compliance Officer. The Designated Person shall ensure that the concerned third party, advisor, auditor, consultant, etc., executes an appropriate agreement for confidentiality/non-disclosure and non-dealing in Securities with the Company (subject to clearance from the Compliance Officer) before any disclosure/receipt of UPSI.

However, UPSI may be communicated, provided, allowed access to or procured, in furtherance of a legitimate purpose, performance of duties or discharge of legal obligation (including potential investment, divestment, takeover, mergers, trading in securities, change of control, etc.) if:

- i. the Board is of an informed opinion that the proposed transaction is in the best interest of the Company; or
- ii. if the transaction entails open offer under the SEBI Takeover Regulations, not only would the same price be made available to all shareholders of the Company but also all information necessary to enable an informed divestment or retention decision by the public shareholders is required to be made available to all shareholders in the letter of offer under those regulations; or
- iii. if the transaction does not entail making an open offer under the SEBI Takeover Regulations, the Board would cause public disclosures of such UPSI at least 2 (two) trading days before the proposed transaction to rule out any information asymmetry in the market.

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Limited access to UPSI

The Designated Person shall ensure that files, etc., containing UPSI are kept secure. Computer files, software, etc., shall be adequately secured with limited access password.

6 PREVENTION OF MISUSE OF UPSI

All Designated Persons/ their Immediate Relatives / Insider shall not:

- (i) use UPSI for Dealing in Securities;
- (ii) communicate or counsel or procure directly or indirectly, any Unpublished Price Sensitive Information to any person; and shall be subject to the Trading restrictions as enumerated in this Code.

7 SPECIAL PROVISIONS

7.1 CHINESE WALL

- 7.1.1 To prevent the misuse of UPSI, the Company shall adopt a "Chinese Wall" policy which separates those areas of the organization which routinely have access to UPSI, considered "inside areas" from those areas which deal with acquisition / sale / investment advise or other departments providing support services, considered "public areas".
- 7.1.2 The employees in the inside area shall not communicate any UPSI to any one in public area.
- 7.1.3 The employees in inside area may be physically segregated from employees in public area.
- 7.1.4 Demarcation of the various departments as inside area may be implemented by GREENCELL.

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- 7.1.5 In exceptional circumstances Designated Persons from the public areas may be brought “over the wall” and given UPSI on a need to know basis, under intimation to the Compliance Officer.

7.2 RESTRICTED LIST/GREY LIST

- 7.2.1 In order to monitor Chinese Wall procedures and Trading in Securities based on UPSI, GREENCELL shall restrict Trading in certain Securities and designate such list as a Restricted List / Grey List.
- 7.2.2 The Restricted List / Grey List shall comprise of Securities of an entity in which GREENCELL or any of the entity in which it, is considering investing and/or sale and/or are engaging in long term relationship or is privy to any UPSI and which are added to the Restricted List / Grey List from time to time unless deleted from the Restricted List / Grey List.
- 7.2.3 Any security which is being purchased or sold or is being considered for purchase or sale by GREENCELL on its own behalf, subsidiaries or on behalf of its clients, etc. shall be put on the Restricted List / Grey List.
- 7.2.4 The Departmental Heads of GREENCELL shall immediately intimate the Compliance Officer of companies to be included / excluded from the Restricted List / Grey List. The Restricted List / Grey List shall be updated every time upon receipt of intimation by the Compliance Officer.
- 7.2.5 As the Restricted List / Grey List itself is highly confidential information it shall not be communicated directly or indirectly to anyone outside the organisation. The Restricted List / Grey List shall be maintained in confidence by the Compliance Officer or his team.

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- 7.2.6 When any securities are on the Restricted List / Grey List, trading in these securities by Designated Persons may be blocked or may be disallowed at the time of pre-clearance.

8 PRE-CLEARANCE OF TRADES

- 8.1 The Designated Persons shall undertake transactions in any Security (including derivative) only after prior approval of the Compliance Officer by writing to <pre.clearance@greencellmobility.com>. The approval for trading shall be given only for Securities which are not on the Restricted List / Grey List. Prior to approving any trades, the Compliance Officer shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any UPSI. He/she shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.
- 8.2 The Compliance Officer shall either clear the requested trade or decline to clear the requested trade within three (3) Working Days of the receipt of the application. In case the Compliance Officer declines to clear the requested trade, he/she shall assign reasons in writing for doing so. If the Designated Person does not receive any response from the Compliance Officer within the aforesaid period of three (3) Working Days, the requested trade can be deemed to have been cleared by the Compliance Officer.
- 8.3 All Designated Persons or their Immediate Relatives shall execute their order of Securities within one week after the approval of pre-clearance is given. If the order is not executed within one week after the approval is given, the Designated Person must obtain pre-clearance of the trade again.
- 8.4 Any Designated Person or Insider who is privy to any UPSI shall preserve its confidentiality, follow the Code and not deal in Securities of any such company.

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- 8.5 An Insider, who may be perpetually in possession of UPSI, may formulate a trading plan for trades to be executed in future. The trading plan is to be presented 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.
- 8.6 Such trading plan shall:–
- (i) not entail commencement of trading on behalf of the Insider earlier than six months from the public disclosure of the plan;
 - (ii) entail trading for a period of not less than twelve months;
 - (iii) not overlap an already existing trading plan;
 - (iv) 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;
 - (v) not entail trading in securities for market abuse; and
 - (vi) 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.
- 8.7 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.
- 8.8 Prior to approving any trades, the Compliance Officer shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any UPSI. He shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.

9 OTHER RESTRICTIONS

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- 9.1 The Designated Person shall hold their investments for a minimum period of 7 (seven) days. The holding period would commence when the Securities are actually allotted/bought.
- 9.2 In case the sale of Securities is necessitated by personal emergency, the holding period may be waived by the Compliance Officer after recording in writing his/her reasons in this regard upon an application made in the prescribed form (**Form C**).
- 9.3 Designated Persons while preparing any research reports of a listed company shall disclose their shareholding / interest in such company to their Departmental Heads and the Compliance Officer and shall not Trade in Securities of such company for 30 days from the preparation of such report.

10 REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES**10.1 Reporting by Designated Person to the Company:**

The Designated Persons will be required to make the below mentioned disclosures to the Compliance Officer. The disclosures to be made shall include those relating to Trading by such person's Immediate Relatives.

Code of Conduct for Prevention of Insider Tradingi. Initial Disclosure:

The Designated Person shall disclose to the Company in **Form A & B**, the number of Securities or voting rights held and /or positions taken in derivatives, if any, by such Designated Person, his/her Immediate Relatives and by any other person for whom such Designated Person takes trading decisions, together with a disclosure of the names of such persons, within seven (7) days from the date of joining the Company.

ii. Annual Disclosure:

The Designated Person shall make an Annual Disclosure in **Form D & E** about the number of Securities or voting rights held and / or positions taken in derivatives, if any, by such Designated Person Immediate Relatives and by any other person for whom such Designated Person takes trading decisions, as on 31st March each year by 10th April of that year.

The disclosures required under this clause may also be made through electronic filing by sending e-mails to [<pre.clearance@greencellmobility.com>](mailto:pre.clearance@greencellmobility.com) or in accordance with such systems as devised by the stock exchange.

10.2 Reporting by the Compliance Officer:

- i. The Compliance Officer shall place before the Board, on a monthly basis, details of the dealings in Securities by the Designated Persons and the accompanying documents that such persons had executed under the pre-dealing procedure as envisaged under this Code.
- ii. The Compliance Officer shall maintain records of all the declarations in appropriate forms given by the Designated Persons for a minimum period of 3 (three) years.

Code of Conduct for Prevention of Insider Trading**11 CONTRAVENTION OF THE CODE**

Any Designated Person who contravenes any provision of this Code may be subject to appropriate sanctions and disciplinary actions by the Company, which would be determined by the CEO or Managing Director or the Board of Directors, based on the recommendations of the committee set up for this purpose. Such sanctions and disciplinary actions may include wage freeze, suspension, termination, deduction/non-payment of salary, demotion, etc.

The action taken by the Company shall not preclude SEBI from taking any action in case of violation of the Insider Trading Regulations.

In case it is observed by the Company / Compliance Officer that there has been a violation of the Insider Trading Regulations, SEBI shall be informed by the Company of the same.

THIS POLICY IS ONLY INTERNAL CODE OF CONDUCT AND ONE OF THE MEASURES TO AVOID INSIDER TRADING. YOU ARE REQUESTED TO UNDERSTAND AND OBSERVE THE SPIRIT AND THE INTENT BEHIND THIS CODE. IT IS THE RESPONSIBILITY OF EACH AND EVERY INDIVIDUAL IN THE ORGANISATION TO ENSURE FULL COMPLIANCE OF SEBI GUIDELINES AND OTHER RELATED STATUTES IN RELATION TO INSIDER TRADING.

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Code of Conduct for Prevention of Insider Trading

Form A

(Initial Disclosure under Code for Prevention of Insider Trading from Designated Person of a Company and his Immediate Relatives / person for whom the Designated Person takes trading decisions)

Name of Designated Person _____

Designation _____

Date of Assuming Office _____

PAN NO # _____

DP Name & ID# _____

Client Id# _____

Address _____

Disclosure is for – Self / Immediate Relatives / person for whom I take trading decisions* (strike out which is not applicable).

If the declaration is for Immediate Relatives / other person - such person's name _____

Name of all companies whose Securities / Voting Rights / Derivatives are held	Type of, Number & % of securities / voting rights / open position of Future contract / option contract (lot size & notional value) held on the date of assuming office	Mode of acquisition (market purchase / public rights / preferential offer etc.)

Details of the Designated Person or Immediate Relatives / person for whom I take trading decisions for whom this disclosure is made, as the case may be.

Note: 1) For details of more than 1 company, the holding statement of Securities held in dematerialised / physical form may be enclosed
2) Declaration to be given within seven (7) days of being appointed as Designated Person.

Yours truly,

(SIGNATURE)

Place:

Date



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FORM B

(Declaration from Designated Person(s) under Code for Prevention of Insider Trading in respect of their Immediate Relative or person for whom I take trading decisions)

Name of Designated Person _____

Designation _____ Date of Assuming Office _____

The Compliance Officer

Dear Sir,

Sub: **Declaration of my Immediate Relative and person(s) for whom I take trading decisions**

In terms of the requirement of the GREENCELL Code for Prevention of Insider Trading, the details of by my Immediate Relative and person(s) for whom I take trading decisions are specified hereunder:

Sr. No	NAME	PAN	DP ID & Client ID	RELATIONSHIP

I declare that, the above named Immediate Relative and person(s) for whom I take trading decisions do not hold any Securities / Voting Rights, etc., in any company and hence Declaration in Form A is not required to be provided for my Dependent Family Members.* **OR**

I declare that, the details of Securities / Voting Rights, etc., held by each of the above named Immediate Relative and person(s) for whom I take trading decisions is as disclosed in Form A enclosed.*

* (strike out which is not applicable)

Yours truly,

(SIGNATURE)

Date _____

Enclosure: 'Form A' disclosing Securities/voting rights held by my Immediate Relatives.



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FORM C

(Declaration by Designated Person(s) / Immediate Relatives / Other person(s) for permission to sell Securities within 7 (seven) days of purchase) to be discussed

The Compliance Officer
Mumbai

Date _____

Dear Sir,

Sub: PERMISSION FOR SALE OF SHARES / SECURITIES WITHIN 7 DAYS OF PURCHASE

In terms of the captioned subject the details of my/my Immediate Relatives / person for whom I take trading decisions (s) Mr./ Mrs. _____, last purchase of Shares / Securities are as specified hereunder:

Sr No	Name of companies whose Securities / Voting Rights / Derivatives are proposed to be sold	Date of Purchase	Number of Securities	DP ID & Client ID

Whereas in terms of the requirement of GREENCELL Code for Prevention of Insider Trading, Securities are required to be held for a period of at least 7 (seven) days of purchase, however, on account of the exigent circumstances mentioned hereunder, I desire to dispose the above Securities forthwith:

(Mention the reason for which exemption from holding period should be granted)

In view of the aforesaid I earnestly request that the Company accords its approval to my request for sale.

Thanking you,

(SIGNATURE) (Name) (Designation)



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Form D

(Annual Disclosure under Code for Prevention of Insider Trading from Designated Person of a Company / his Immediate Relatives / person for whom the Designated Person takes trading decisions)

Name of Designated Person _____ Designation _____

Disclosure for – Self / Immediate Relatives/Others * (strike out which is not applicable). Disclosure as on 31st March ____

If the declaration is of Immediate Relative / Others, his / her name _____ His / her PAN NO # _____

DP Name & ID# _____ Client Id # _____

Name of all companies whose Securities / Voting Rights / Derivatives are held	No. & % of Shares/ Securities / voting rights			
	Held at last disclosure	Bought during the year	Sold during the year	At the end of the year - March 31

Details of the Designated Person or Immediate Relative or Other Person for whom this disclosure is made, as the case may be.

Note: 1) For details of more than 1 company, the holding statement of Securities held in dematerialised / physical form may be enclosed

2) This Annual Disclosure is as on 31st March should be made before 10th April.

I/We declare that, I/We have complied with the requirement of the minimum holding period of 7 (seven) days with respect to the Securities.

Yours truly

(SIGNATURE)

Date_____



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FORM E

(Annual Disclosure from Designated Person(s) under Code for Prevention of Insider Trading in respect of their Immediate Relatives / person for whom the Designated Person takes trading decisions)

Name of Designated Person _____

Designation _____

Disclosure as on 31st March _____

The Compliance Officer

Dear Sir,

Sub: Declaration of my Immediate Relative / other person for whom I take trading decisions

In terms of the requirement of the GREENCELL Code for Prevention of Insider Trading, the details of by my Immediate Relatives / person for whom I take trading decisions are specified hereunder:

Sr. No	NAME	PAN	DP ID & Client ID	RELATIONSHIP

I declare that, as on date or during the past year, the above persons did not hold any Securities / Voting Rights, etc., in any company and hence Annual Declaration in Form D is not required to be provided for them. ***OR**

I declare that, the details of Securities / Voting Rights, etc., held by each of the above named persons is as disclosed in Form D enclosed.*

* (strike out which is not applicable)

Yours truly,

(SIGNATURE)

DATE _____

Enclosure: 'Form D' disclosing Securities/voting rights held by my Immediate Relatives / person for whom I take trading decisions)

Note - This Annual Disclosure is as on 31st March should be made before 10th April.



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