



CENTRALISED LUBRICATION SYSTEM

CENLUB INDUSTRIES LIMITED

CIN: L67120HR1992PLC035087

Regd. Office: Plot No-233-234, Sector-58,

Ballabgarh, Faridabad - 121 004, Haryana

Tel: +91-8826794470-73, Fax: +91 129-2307263

E-mail: cenlub@cenlub.in, Website: www.cenlub.in

**CODE OF CONDUCT TO REGULATE, MONITOR AND
REPORT TRADING BY INSIDERS**

**[Revised as per SEBI (Prohibition of Insider Trading) Regulations, 2015]
(Effective from 15th May 2015)**

INDEX

S. No.	Particulars
1.	Introduction
2.	Definitions <ul style="list-style-type: none">• Act• Code or Code of Conduct• Company• Compliance Officer• Connected Person• Designated Person• Generally available information• Immediate Relative• Insider• Key Managerial Personnel• Trading• Trading Day• Trading Window• Unpublished Price Sensitive Information
3.	Standards for Code of Conduct to Regulate, Monitor and Report trading by Insiders <ul style="list-style-type: none">• Preservation of Price Sensitive Information• Need to Know• Limited access to confidential information• Trade in securities when in possession of unpublished price sensitive information
4.	Trading Plan <ul style="list-style-type: none">• Requisites of Trading Plan• Approval of Trading Plan• Execution of Trading Plan
5.	Trading Window
6.	Pre-clearance of Trades
7.	Disclosure of Trading by Insider <ul style="list-style-type: none">• Initial Disclosure• Continual Disclosure
8.	Reporting to the Audit Committee
9.	Penalty for Contravention of the code
10.	Other Restrictions

S. No.	Particulars
11.	Amendment to the Code
12.	Code of Fair Disclosure adopted by the Company
13.	Annexure A – “Application for Pre-clearance”
14.	Annexure B – “Undertaking to be submitted along with the application for pre-clearance by the directors/officers/designated employees”
15.	Annexure C – “Pre-clearance Order”
16.	Annexure D – “Confirmation of Deal”
17.	Annexure E – “Form A” under Regulation 7(1)(a)
18.	Annexure F – “Form B” under Regulation 7(1)(b)
19.	Annexure G – “Form C” under Regulation 7(2)
20.	Annexure H – “Form D” under Regulation 7(3)

CENLUB INDUSTRIES LIMITED

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS

1. Introduction

The Securities and Exchange Board of India (SEBI) has notified the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 to be effective from 15th May, 2015 (“Regulations”), replacing the Securities and Exchange Board of India (Insider Trading) Regulations, 1992 which has now been repealed.

The Regulations have primarily been made to prohibit trading in shares of the Company on the basis of Unpublished Price Sensitive Information i.e. any information which relates directly or indirectly to a Company and which if published, is likely to materially affect the price of shares of the Company.

The Code of Conduct aims to ensure monitoring, timely reporting and adequate disclosure of price sensitive information by the promoters, directors, key managerial personnel and connected person of the Company. Further, it also aims to transparency and fairness in dealing with the stakeholders and also ensuring the adherence to all applicable laws and regulations.

Pursuant to the above, Shri Ashish Kumar Jha, Company Secretary has been appointed as the “Compliance Officer” and would report to the Chief Financial Officer.

This Code will be applicable to all Directors and Designated Persons and their Immediate Relatives as per the Regulations.

2. Definitions

- 2.1. “**Act**” means the Securities and Exchange Board of India Act, 1992.
- 2.2. “**Code**” or “**Code of Conduct**” shall mean the Code of Conduct to Regulate, Monitor and Report trading by Insiders of Cenlub Industries Limited as amended from time to time.
- 2.3. “**Company**” means Cenlub Industries Limited.
- 2.4. “**Compliance Officer**” means Company Secretary or such other senior officer, designated so and reporting to the Board of Directors who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board of Directors of the Company.

2.5. **"Connected Person"** means:

- (i) any person who is or has during the six months prior to the concerned act been associated with a company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the Company or holds any position including a professional or business relationship between himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.
- (ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established:
 - (a) an immediate relative of connected persons specified in clause (i); or
 - (b) a holding company or associate company or subsidiary company; or
 - (c) an intermediary as specified in Section 12 of the Act or an employee or director thereof; or
 - (d) an investment company, trustee company, asset management company or an employee or director thereof; or
 - (e) an official of a stock exchange or of clearing house or corporation; or
 - (f) a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
 - (g) a member of the Board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
 - (h) an official or an employee of a self-regulatory organization recognised or authorized by the Board; or
 - (i) a banker of the Company; or
 - (j) a concern, firm, trust, hindu undivided family, company or association of persons wherein a director of the Company or his immediate relative or banker of the Company, has more than ten per cent, of the holding or interest.

2.6. **"Designated Person"** means,-

- (i) Promoters of the Company
- (ii) Board of Directors
- (iii) Key Managerial Personnel
- (iv) Employees of the Company in the grade of Associate Vice President and above
- (v) Every employee in the finance, accounts, secretarial and legal department as may be determined and informed by the Compliance Officer
- (vi) Connected person as defined above (in para 2.5)

2.7. **"Generally available information"** means information that is accessible to the public on a non-discriminatory basis;

- 2.8. **"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;
- 2.9. **"Insider"** means any person who is: i) a connected person; or ii) in possession of or having access to unpublished price sensitive information;
- 2.10. **"Key Managerial Personnel"** means:
- (i) the Chief Executive Officer or the managing director or the manager;
 - (ii) the Whole-time director;
 - (iii) the Chief Financial Officer; and
 - (iv) the Company Secretary.
- 2.11. **"Trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;
- 2.12. **"Trading day"** means a day on which the recognized stock exchanges are open for trading;
- 2.13. **"Trading Window"** means the period during which trading may be carried out in Company's Securities by Connected person;
- 2.14. **"Unpublished Price Sensitive Information"** – means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall ordinarily including but not restricted to, information relating to the following:
- (i) financial results
 - (ii) dividends
 - (iii) change in capital structure
 - (iv) mergers, de-mergers, acquisitions, delisting's, disposals and expansion of business and such other transactions
 - (v) changes in key managerial personnel
 - (vi) material events in accordance with the listing agreement
 - (vii) Any such other information which may affect the price of securities

3. **Standards for Code of Conduct to Regulate, Monitor and Report trading by Insiders**

3.1. Preservation of Price Sensitive Information

Insider shall maintain the confidentiality of all Unpublished Price Sensitive Information. He/she should not pass such information to any person including the other insider, unless the other person needs the same for some legitimate business purposes/ performance of duties.

3.2. Need to Know

Unpublished Price Sensitive Information is to be handled on a “Need to Know” basis, i.e. such information shall not be shared with any person including the other insider except where such information is required to be passed for legitimate purposes and for performance of duties or discharge of legal obligation.

3.3. Limited access to confidential information

Files containing Unpublished Price Sensitive Information or any such related confidential information shall be kept secure. Computer files must have adequate security of login and password and physical files shall be kept in safe custody under proper locks etc. Files containing confidential information, if not needed, should be deleted / destroyed after being used.

3.4. Trade in securities when in possession of unpublished price sensitive information

No insider shall trade in securities of the Company when in possession of Unpublished Price Sensitive Information provided that the Insider may prove his innocence by giving valid reasons of the circumstances like:

- a. the transaction is an off market transaction inter-se between the promoters who were in possession of the same Unpublished Price Sensitive Information without breach of promises of regulation 3 of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, if such transaction is made for legitimate purpose and both parties had made a conscious and informed trade decision.
- b. In case of non-individual insiders:-
 - (i) the individuals who were in possession of such Unpublished Price Sensitive Information were different from the individuals taking trading decisions and such decision-making individuals were not in possession of such Unpublished Price Sensitive Information when they took the decision of trade; and
 - (ii) such appropriate and adequate arrangements were in place and the information of the Unpublished Price Sensitive Information is not communicated from the individuals who were in possession of the Unpublished Price Sensitive Information to the individuals who took the decision for trade.
- c. Trading is done pursuant to the trading plan submitted to the Company.
- d. In cases of trades by Connected Person, the onus of establishing that they were not in possession of Unpublished Price Sensitive Information shall be on such Connected Person.
- e. In any other case the onus would be on SEBI.

4. Trading Plan

An insider before possessing Unpublished Price Sensitive information may formulate a Trading Plan and the same shall be approved by the Compliance Officer after evaluation with regard to the Regulations and shall be notified to the stock exchange(s). By virtue of the pre-planned trading plan, an Insider can plan for trades to be executed by him/her in future. By doing so, the possession of Unpublished Price Sensitive Information when a trade under a trading plan is actually executed would not prohibit the execution of such trades that he/she had pre-decided even before the Unpublished Price Sensitive Information came into being. There are following stages for the implementation of the trading plan:

4.1. Requisites of Trading Plan

- a. Any trading (as per the trading plan) shall only be executed on expiry of six months from the date of public disclosure of the said plan.
- b. Trading, as per the trading plan, not to take place between 20th trading day prior to the last day of the financial period for which the results are required to be announced by the Company and 2 trading days after the disclosure of such financial results.
- c. Insider can give one trading plan at a time and the same should not be for less than 12 months, i.e. there cannot be any overlapping of trading plans.
- d. Any trading plan should set out either the value of trades or the number of securities to be traded, along with specific dates and time intervals.
- e. Trading on the basis of such a trading plan should not lead to market abuse. If any manipulative activity is detected, it would be open to initiate proceedings for alleged breach of SEBI (Prohibition of Fraudulent and Unfair Trade Practices Relating to the Securities market) Regulations, 2003.

4.2. Approval of Trading Plan

- a. An insider shall present the trading plan 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. The Compliance Officer shall review the Trading Plan.
- c. The compliance officer shall assess whether the trading plan made by the Insider is not in violation of the said regulations.
- d. The Insider shall provide the undertaking that he/she is not in possession of Unpublished Price Sensitive Information or that he would ensure that any Unpublished Price Sensitive Information in his possession becomes generally available before he/she commences executing his trades.

- e. The Compliance Officer shall approve the trading plan and notify the same to the stock exchanges on which the securities are listed.

4.3 Execution of Trading Plan

- a. The trading plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the plan without any deviation.
- b. The trading plan shall be deferred if any Unpublished Price Sensitive Information in possession of the Insider at the time of implementation of the plan has not become generally available.

5. **Trading Window**

- 5.1 Designated Persons and their Immediate Relatives are not allowed to trade in the shares of the Company during the period(s) when the Trading Window is closed. The Trading Window shall remain closed for such period as may be informed prior to the happening of any of the following events in general:
 - a. Declaration of financial results (quarterly, half-yearly and annually).
 - b. Declaration of dividend (interim/ final).
 - c. Issue of securities by way of public / rights / bonus etc.
 - d. Any major expansion plans or execution of new projects.
 - e. Amalgamation, mergers, acquisitions, takeovers and buy back of shares.
 - f. Disposal of whole or substantially the whole of the Company.
 - g. Any changes in policies, plans or operations of the company.
 - h. Acquisition, de-merger, restructuring, scheme of arrangement, spin-off of divisions etc.
 - i. Consolidation / sub-division of shares.
 - j. Voluntary de-listing of shares by the company.
 - k. Forfeiture of shares.
 - l. ADR / GDR or any other class of securities to be issued abroad.
 - m. Cancellation of dividend/right/bonus etc.
 - n. Changes in Key Managerial Personnel.
- 5.2 The Compliance Officer (in consultation with the Board of directors of the Company) may for a longer period close Trading Window for the events mentioned above or on any such other matter as they deem fit after taking into account the sensitivity of the event / case.
- 5.3 The Compliance Officer shall take all reasonable steps to inform the Designated Persons and/or Insiders about the date of closing and re-opening of the Trading Window. The trading in the Company's securities would be permitted only on the expiry of forty eight hours after the information becomes publically available.
- 5.4. In case of Employee Stock Option Plans (ESOPs), exercise of option may be allowed during the period when the Trading Window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when the Trading Window is closed.

6. Pre-clearance of trades

Pre-clearance will not be necessary if the deal is for 5000 Equity Shares to be traded in single transaction or less than 20000 Equity Shares to be traded in series of transactions within one week or such other limit as the CMD/Board may consider.

Any pre-cleared trade not executed by the Designated Person or their Immediate Relatives within 7 trading days of its pre clearance would require fresh clearance for the trades to be executed.

An application may be made in the prescribed format as annexed to the Code as Annexure A, to the Compliance Officer indicating the estimated transaction value and the number of securities that the Designated person, and/ or on behalf of his Immediate Relative, intends to deal in, the details as to the securities in such depository mode and such other details as may be specified in this behalf.

Along with the request for pre-clearance of transaction, an undertaking shall be executed in favour of the Company by such Designated Person, that he/his Immediate Relatives are not in possession of Unpublished Price Sensitive Information. An undertaking shall be executed by the director / officer / designated employee of the Company as per the format annexed herewith in Annexure B.

The Compliance Officer may approve/dis-approve any of the pre-clearance requests, as per his analysis & checklist in the format prescribed in Annexure C.

7. Disclosure of Trading by Insider

7.1. Initial Disclosure

- a. Every promoter, Key Managerial Personnel and director shall provide the disclosure of his holding of securities of the company within 30 days of the implementation of these regulations to the Compliance officer (i.e. by 13th June, 2015) as per Annexure E.
- b. Every person appointed as Key managerial personnel or a director of the company or upon becoming the promoter shall within 7 days of such appointment or becoming a Promoter, shall provide disclosure of his holding of securities to the Compliance Officer as per Annexure F.

7.2 Continual Disclosure

- a. Every promoter, employee and director of the Company shall disclose, within 2 trading days, to the Compliance officer the number of securities acquired or disposed of, whether in one transaction or in series of transaction over any calendar quarter and the value of such transactions is in excess of Rs. 10.00 Lacs as per Annexure G.
- b. Any person/entities getting associated with the company and falling within the ambit of the 'Connected Person' are themselves to make sure that their concerned employees/associates do not enter into any share trading pertaining to the company during the period they are in

possession of Unpublished Price Sensitive Information and/or in contrary to the provisions of the said regulations. The said Connected Persons have to take requisite disclosure from its related employees. Also, the said Connected Person is required to provide the disclosure in the format as provided in Annexure H.

8. Reporting to the Audit Committee

The Compliance Officer shall quarterly report to the Chairman of the Audit committee about the disclosures or trading plans received and action taken on the same. Further, the Audit Committee shall update the status of such reports to the Board of Directors and may seek advice on the matters as they deem fit.

9. Penalty for Contravention of the code

- 9.1. Any Designated Person who trades in securities or communicates any information for trading in securities in contravention of the Code of Conduct may be penalized by SEBI as they may deem fit and appropriate action would be taken.
- 9.2. Designated Persons of the Company who violate the Code of Conduct shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension for future participation in employee stock option plan etc.
- 9.3. The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

10. Other Restrictions

- 10.1. A Designated Person who is permitted to trade shall not execute a contra trade within 6 months of such trade in securities of the Company. The Compliance Officer is empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate these regulations.
- 10.2. 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 SEBI for credit to the Investor Education and Protection Fund administered by the SEBI under the Act.
- 10.3. In case it is observed by the Company/Compliance Officer that there has been a violation of SEBI (Prohibition of Insider Trading) Regulations, 2015, the Company shall promptly inform to the SEBI.

11. Amendment to the Code

This Code and any subsequent amendment(s) thereto, shall be by way of written approval of the Board of Directors and shall promptly be notified to the Stock Exchange(s) where the securities of the Company are listed.

12. Code of Fair Disclosure adopted by the Company

A code of practices and procedures for fair disclosure of unpublished price sensitive information adopted by the Company is set out below:

- 12.1. It shall be ensured that the unpublished price sensitive information is promptly disseminated to make it generally available, subsequent upon finding that a credible and concrete information having the potential of effecting the price of securities of the Company exists or comes into being.
- 12.2. It shall be ensured that uniform and universal dissemination of unpublished price sensitive information is promptly made to avoid selective disclosures.
- 12.3. It shall be ensured that any unpublished price sensitive information which gets disclosed selectively or inadvertently, is promptly disseminated through Stock Exchanges and made generally available.
- 12.4. The Company shall ensure that appropriate and fair responses and replies are promptly provided/given to the news report and any request for verification of market rumors received from regulatory authorities.
- 12.5. It shall be ensured that no unpublished price sensitive information is shared with analysts and research personnel.
- 12.6. Best practices shall be followed to ensure the recordings/transcripts of the proceedings of meetings with analysts and other investor relation conferences are disseminated by publishing the same on the website of the Company.
- 12.7. Unpublished price sensitive information is to be handled on need-to-know basis.
- 12.8. The following officials of the Company have been designated as Chief Investor Relations Officers to deal with dissemination and disclosure of unpublished price sensitive information subject to the approval of Board of Directors and/or Managing Director:

S. No.	Name of the Official	Designation
1.	Shri V.K.Gupta	Chief Financial Officer
2.	Shri Ashish Jha	Company Secretary

ANNEXURE A

APPLICATION FOR PRE-CLEARANCE

To: The Compliance Officer
.....

From: Name
Designation
Department

Through Division/Department Head

With reference to the code for prohibition of Insider Trading of, I seek your approval to subscribe to/agree to subscribe to/purchase/sell/deal as an agent/principal in (Nos.) equity shares of the Company.

The statement of shareholding in Form “.....” as on and Undertaking in the prescribed format are enclosed for your perusal in this connection.

Date:

Signature

FORM FOR SEEKING PRE-CLEARANCE

Date:

The Compliance Officer,
Cenlub Industries Limited
Regd. Office: Plot No-233-234, Sector-58
Ballabgarh, Faridabad -121 004, Haryana
Tel: +91-8826794470-73, Fax: +91 129-2307263
E-mail: cenlub@cenlub.in, Website: www.cenlub.in

Dear Sir,

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct to Regulate, Monitor and Report trading by Insiders, I seek your approval for buying/selling no. of equity shares in my capacity as Director/Officer/Designated Employee and on behalf of my Immediate Relatives. The said shares will be bought/sold in the name of whose Depository Participant details and/or existing folio nos. are as under:

I. DETAILS OF SHAREHOLDING OF DIRECTORS/OFFICERS/DESIGNATED EMPLOYEES HELD IN THEIR OWN NAME.

Name	No. of shares held (with Folio/DP ID/ Client ID)	Nature of Transaction for which approval is sought	No. of shares to be dealt

II. DETAILS OF SHARES HELD BY IMMEDIATE RELATIVES

Name	Relationship	No. of shares held (with Folio/DP ID/ Client ID)	Nature of Transaction for which approval is sought	No. of shares to be dealt

I agree to comply with the rules enclosed with this Form and I hereby declare that I am seeking this clearance on the basis that I do not have any Price Sensitive Information which by definition means only information which relates directly or indirectly to the Company and which if published, is likely to materially affect the price of shares of the Company.

Enclosed please find Undertaking as per format prescribed by you.

Signature :

Designation :

RULES (Forming part of Annexure A)

1. An Undertaking as per the enclosed format would have to be enclosed with the Application.
2. After obtaining the clearance the orders would have to be executed within one week and if the order is not executed within one week after the approval is given, you would have to get the transaction pre-cleared once again.
3. Shares thus acquired should be held for a minimum period of Six months in order to be considered as being held for investment purposes. However, the Compliance Officer is empowered to grant relaxation from application of this clause and such reasons shall be recorded in writing which shall not be in violation of the Regulations.
4. Any transaction with regard to the Company's shares whether in one transaction or in series of transaction over any calendar quarter and the value of such transactions exceeds Rs. 10.00 Lacs in traded value should be communicated to the Company within 2 trading days of the conclusion of the transaction.
5. Submission of Annual Statements as on the last day of the Financial Year of the Company which is presently 31st March regarding all holdings in the Company's shares along with particulars of Immediate Relatives, within following 10 working days of the last day of the Financial Year.

ANNEXURE B

UNDERTAKING TO BE SUBMITTED ALONGWITH THE APPLICATION FOR PRE-CLEARANCE BY THE DIRECTORS/OFFICERS/DESIGNATED EMPLOYEES

I,, S/o. Mr..... residing at am desirous of dealing in shares of the Company as mentioned in my application dated for pre-clearance of the transaction.

As required by the Code of Conduct to Regulate, Monitor and Report trading by Insiders of Cenlub Industries Limited, 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 up to the time of signing this undertaking.
- b) In the event that I have access to or received any information that could be construed as “Price Sensitive Information” as defined in the code, after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the compliance officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public.
- c) I have not contravened the provisions of the Code of Conduct to Regulate, Monitor and Report trading by Insiders as notified by the Company from time to time.
- d) I have made full and true disclosure in the matter.

Date:

Signature:

Name:

Designation:

ANNEXURE C

PRE-CLEARANCE ORDER

This is to inform you that your request for dealing in (nos.) share of the Company as mentioned in your above-mentioned application is approved. Please note that the said transaction must be completed on or before (date) that is within 7 days from today.

Date :

For

Compliance Officer

FORMAT OF APPROVAL LETTER BY THE COMPANY

Date

.....
.....
.....

Dear Sir,

I, refer to your application dated pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct to Regulate, Monitor and Report trading by Insiders for seeking our permission to buy/sell

..... no. of shares of the Company.

The Company hereby gives its consent to buy/sell not more than

.....
no. of shares of the Company provided the above transaction is not based on any unpublished Price Sensitive Information relating to the Company.

Your kind attention is drawn to the following provisions which you need to, inter-alia, strictly observe in terms of the above Regulations while dealing in the shares of the Company.

1. The Transaction would have to be executed within one week and if the same is not executed within one week after the approval is given, you would have to get the transaction pre-cleared once again.
2. Shares thus acquired should be held for a minimum period of Six months in order to be considered as being held for investment purposes. However, the Compliance Officer is empowered to grant relaxation from application of this clause and such reasons shall be recorded in writing which shall not be in violation of the Regulations.
3. Any transaction with regard to the Company's shares under this approval should be communicated to the Company within 2 working days of the conclusion of the transaction as per the enclosed Confirmation Letter and Dealing Information Form as per Annexure "D".

It may please be noted that any violation in compliance with aforesaid regulation would attract penal provisions by the Company, which would include Wage Freeze, Suspension or ineligibility to participate in future ESOPs. This would not preclude SEBI from taking its own action.

Thanking you,

Yours faithfully,
For **Cenlub Industries Limited**

Compliance Officer

ANNEXURE D

CONFIRMATION OF DEAL

(To be intimated within two days)

The Compliance Officer,
Cenlub Industries Limited
Regd. Office: Plot No-233-234, Sector-58
Ballabgarh, Faridabad -121 004, Haryana
Tel: +91-8826794470-73, Fax: +91 129-2307263
E-mail: cenlub@cenlub.in, Website: www.cenlub.in

I confirm that the share dealing for which approval was granted on
was completed on by purchasing/selling..... (nos.) equity
shares of the Company.

Date :

Signature :

DEALING INFORMATION FORM

Date :

The Compliance Officer,
Cenlub Industries Limited
Regd. Office: Plot No-233-234, Sector-58
Ballabgarh, Faridabad -121 004, Haryana
Tel: +91-8826794470-73, Fax: +91 129-2307263
E-mail: cenlub@cenlub.in, Website: www.cenlub.in

Dear Sir,

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct to Regulate, Monitor and Report trading by Insiders, I hereby inform you about buying/selling No. of shares in my capacity as Director/Officer/Designated Employees alongwith my Immediate Relatives.

I declare that the above dealing was not on the basis of any unpublished Price Sensitive Information relating to the Company.

Signature :

Designation :

ANNEXURE E

FORM A

**Securities and Exchange Board of India (Prohibition of Insider Trading)
Regulations, 2015**

[Regulation 7(1)(a) read with Regulation 6(2)]

Name of the company: Cenlub Industries Limited

ISIN of the company: INE627F01011

**Details of Securities held by Promoter, Key Managerial Personnel (KMP),
Director and other such persons as mentioned in Regulation 6(2)**

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person(Promoters/ KMP/Directors/ Immediate relatives/others etc.)	Securities held as on the date of regulation coming into force		% of Shareholding
		Type of security (For eg. – Shares,Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5

Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option Contracts held as on the date of regulation coming into force	
Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
6		7	

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

Signature :
Designation :
Date :
Place :

ANNEXURE F

FORM B

**Securities and Exchange Board of India (Prohibition of Insider Trading)
Regulations, 2015**

[Regulation 7(1)(b) read with Regulation 6(2)]

Name of the company: Cenlub Industries Limited

ISIN of the company: INE627Fo1011

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 & address 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 Shareholding
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5	6

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	
Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
7		8	

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

Signature :
Designation :
Date :
Place :

ANNEXURE G

FORM C

**Securities and Exchange Board of India (Prohibition of Insider Trading)
Regulations, 2015**

[Regulation 7(2) read with Regulation 6(2)]

Name of the company: Cenlub Industries Limited

ISIN of the company: INE627F01011

**Details of change in holding of Securities of Promoter, Employee or Director
of a listed company and other such persons as mentioned in Regulation 6(2)**

Name, PAN No., CIN/DIN & address of Promoter/ Employee/ Director with contact nos.	Category of Person (Promoters/ KMP/ Directors/ Immediate Relatives/ others etc.)	Securities held prior to acquisition/ disposal		Securities acquired/ disposed		% of shareholding		Date of Allotment advice/ acquisition of shares/sale of shares specify	
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For eg. Shares, Warrant, Convertible Debentures etc.)	No.	Pre transaction	Post transaction	From	To
1	2	3	4	5	6	7	8	9	10

Date of Intimation to company	Mode of acquisition (market purchase/ public/rights /preferential offer/off market/Inter-se transfer etc.)	Trading in Derivatives (Specify type of contract, Futures or options etc.)				Exchange on which the trade was executed
		Buy		Sell		
		Value	Number of units (contracts * lot size)	Value	Number of units (contracts * lot size)	
11	12	13	14	15	16	17

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

Signature :
Designation :
Date :
Place :

ANNEXURE H

FORM D (Indicative Format)

**Securities and Exchange Board of India (Prohibition of Insider Trading)
Regulations, 2015**

**Regulation 7(3) – Transactions by Other connected persons as identified
by the company**

Name, PAN No., CIN/DIN & address of connected persons, as identified by the company with contact nos.	Connection with company	Securities held prior to acquisition/ disposal		Securities acquired/ disposed		% of shareholding		Date of Allotment advice/ acquisition of shares/sale of shares specify	
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For eg. Shares, Warrant, Convertible Debentures etc.)	No.	Pre transaction	Post transaction	From	To
1	2	3	4	5	6	7	8	9	10

Date of Intimation to company	Mode of acquisition (market purchase/ public/rights /preferential offer/off market/Inter-se transfer etc.)	Trading in Derivatives (Specify type of contract, Futures or options etc.)				Exchange on which the trade was executed
		Buy		Sell		
		Value	Number of units (contracts * lot size)	Value	Number of units (contracts * lot size)	
11	12	13	14	15	16	17

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

Signature :
 Designation :
 Date :
 Place :