

**CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT
TRADING BY ITS EMPLOYEES AND OTHER CONNECTED PERSONS
TOWARDS ACHIEVING COMPLIANCE WITH SEBI INSIDER
TRADING REGULATIONS
[Under Regulation 9 (1) and (2) of SEBI (Prohibition of Insider Trading)
Regulations, 2015, as Amended]**

Introduction

Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 [as amended by the Securities & Exchange Board of India (Prohibition of Insider Trading) (Amendment) Regulations, 2018] (“the Regulations”) require the Board of Directors of every listed company to, inter alia, ensure that the Chief Executive Officer or Managing Director shall formulate a code of conduct, with their approval, to regulate, monitor and report trading by its designated persons and immediate relatives of designated persons by adopting the minimum standards set out in Schedule B to the Regulations.

In compliance with the aforesaid Regulations, the Board of Directors (“the Board”) of Mrs. Bectors Food Specialities Limited (“the Company”) has approved this Code (Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons), as formulated by the Chairman and Managing Director of the Company which shall be effective from the date the SEBI (Prohibition of Insider Trading) Regulations, 2015 taking effect with respect to the Company.

This Code, adopted by the Board on 19th September, 2020, replaces the existing Code of Conduct to Regulate, Monitor and Report Trading by Insiders.

The Company endeavours to preserve the confidentiality of unpublished price sensitive information and to prevent misuse of such information. The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations, as modified from time to time.

1. Applicability

This Code shall be applicable to all designated persons and relatives of designated persons.

2. Definitions

2.1 “**Code**” means Code of Conduct to Regulate, Monitor and Report Trading by designated persons and immediate relatives of designated persons as modified from time to time.

2.2 “**Compliance Officer**” for the purpose of the Regulations and this Code means the Company Secretary of the Company.

2.3 “**Designated Employees**” of the Company shall include:

- i. All Employees of the rank of General Managers and above;
- ii. All employees in the Finance & Accounts Department, Secretarial Department, Taxation Department and IT Department, except management trainees and

iii. apprentice, who are located at the place(s) of preparation and consolidation of accounts and / or financial results;

iv. Any employee of the Company, not falling under the above class but who has access to unpublished price sensitive information.

2.4 "**Designated Person**" means -

- i. Board of Directors and Promoters;
- ii. Key Managerial Personnel as defined in the Companies Act, 2013;
- iii. Designated Employees of the Company;
- iv. Connected person as defined in the Regulations

2.5 "**Immediate Relative**" shall have the same meaning as defined in the Regulations.

2.6 "**Insiders**" shall have the same meaning as defined under the Regulations and / or as decided by the Compliance Officer, in consultation with the Chairman & Managing Director of the Company, as and when required.

2.7 "**Specified Persons**" means all Directors, Connected Persons, Insiders, Employees, Promoters and their immediate relatives.

Words and expressions used but not defined in this Code shall have the same meaning assigned to them in the Regulations, the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996), the Companies Act, 2013 (18 of 2013) and the Rules made thereunder and the Regulations shall have the meanings respectively assigned to them in those legislations.

3. Duties of the Compliance Officer

3.1 The Compliance Officer 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 and shall have access to all information and documents relating to the Securities of the Company for the aforesaid purpose.

3.2 Grant of pre-trading approvals to the Designated Persons for trading in the Company's Securities by them / their Immediate Relatives and monitoring of such trading.

3.3 The Compliance Officer shall maintain a record (either manual or in electronic form) of the Designated Persons and their Immediate Relatives and changes thereto from time-to-time.

3.4 The Compliance Officer shall assist all the Specified Persons in addressing any clarifications regarding the Regulations and this Code.

3.5 The Compliance Officer shall place a report to the Board and the Audit Committee on annual basis on the following:

Status of compliance of the Code;

Status of Compliance of the Code of Fair Disclosure;

Details of trading in securities of the Company by Designated Persons;

4. **Violation(s), if any, of the Code.Preservation of Unpublished Price Sensitive Information (“UPSI”)**

- 4.1 All information shall be handled within the organization on a need-to-know basis and no unpublished price sensitive information shall be communicated to any person except as prescribed under the Code of Fair Disclosure of the Company.

Unpublished price sensitive information may be communicated, provided, or allowed access to or procured, in connection with a transaction that would:

- entail an obligation to make an open offer under the takeover regulations where the Board of the Company is of an informed opinion that sharing of such information is in the best interest of the Company;
- not attract the obligation to make an open offer under the takeover regulations but where the Board of the Company is of an informed opinion that the proposed transaction is in the best interests of the Company and the information that constitute unpublished price sensitive information is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the Board may determine to be adequate and fair to cover all relevant and material facts.

However, any person in receipt of an unpublished price sensitive information pursuant to a “legitimate purpose” shall be considered an “insider” for the purpose of this Code and due notice shall be given to such person to maintain confidentiality of the UPSI in compliance with these Regulations or shall be required to execute an agreement to maintain confidentiality, except for the purpose prescribed under the Act and shall not otherwise trade in securities of the Company when in possession of any UPSI.

- 4.2 UPSI shall be handled strictly on a “**Need to Know**” basis. This means that the UPSI shall be disclosed only to those persons who need to know the same in furtherance of a legitimate purpose, the course of performance or discharge of their duty and whose possession of UPSI will not in any manner give rise to a conflict of interest or likelihood of misuse of the information.
- 4.3 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 etc. Files containing confidential information should be deleted / destroyed on its expiry.

5. **Trading by Insiders - Rules & Restrictions**

- 5.1 No Insider shall trade in securities of the Company that are listed or proposed to be listed when in possession of unpublished price sensitive information provided that the Insider may

defend his action by giving valid reasons of the circumstances like:

- (i) the transaction is an off-market inter-se transfer between promoters who were in possession of the same unpublished price sensitive information without being in breach of the applicable provisions and both parties had made a conscious and informed trade decision;
- (ii) in the case of non-individual Insiders: -
 - (a) 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 to trade; and
 - (b) appropriate and adequate arrangements were in place to ensure that these regulations are not violated and no unpublished price sensitive information was communicated by the individuals possessing the information to the individuals taking trading decisions and there is no evidence of such arrangements having been breached;
- (iii) the trades were pursuant to a trading plan.

5.2 In the case of connected persons the onus of establishing, that they were not in possession of unpublished price sensitive information, shall be on such connected persons and in other cases, the onus would be on the Board.

5.3 No Designated Person shall at any time, enter into and take positions in derivative transactions in the Securities of the Company.

5.4 Irrespective of the fact that the Trading Window is open, Designated Persons shall not, within six months of buying or selling any number of Securities of the Company, enter into an opposite transaction i.e. sell or buy, as the case may be, in any number of the Securities of the Company, except as provided under the Code. The Compliance Officer can grant relaxation from strict application of the above restriction after recording the reasons in this regard provided that such relaxation does not violate the Regulations. It may however, be noted that in terms of the Regulations, no such purchase/ sale will be permitted when the Trading Window is closed. Notwithstanding the above, should the Designated Persons execute an opposite transaction, inadvertently or otherwise, in violation of the restrictions set out above, the profits from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the SEBI Act, 1992

5.5 The provisions of this Code shall be applicable for trading either as first named shareholder or joint holder.

5.6 Creation of pledge is allowed when the trading window is closed.

5.7 Trading restrictions under this Code are also applicable to Designated Persons who engage Portfolio Managers and it shall be responsibility of Designated Person to ensure that the Portfolio Managers complies with this Code.

5.8 In case of doubt, the Designated Person shall check with the Compliance Officer or the Officer designated by him/her from time-to-time whether the provisions relating to preclearance are

applicable to any proposed transaction in the Company's Securities.

6. Trading Plan

- 6.1 Insider may formulate a trading plan and present the same to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his/her behalf in accordance with such plan.
- 6.2 The following are the requirements of the trading plans:
- (i) Trading can be done after six months of commencement / public disclosure of the trading plan.
 - (ii) Trading plan shall not entail trading for the period between twentieth trading day prior to 31st March of every year and the second trading day after the disclosure of financial results.
 - (iii) The trading plan shall not be for less than 12 months.
 - (iv) The Trading Plan shall not entail overlap of any period for which another trading plan is in existence.
 - (v) Insider 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.
- 6.3 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.
- 6.4 Provided that the implementation of the trading plan shall not be commenced if any unpublished price sensitive information in possession of the Insider at the time of formulation of the plan, has not become generally available at the time of the commencement of its implementation and in such event the Compliance Officer shall confirm that the commencement ought to be deferred until such unpublished price sensitive information becomes generally available.
- 6.5 Further, the designated person(s) and/or Insider shall also not be allowed to deal in Securities of the Company, if the date of trading in Securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.

7. Trading Window

- 7.1 The trading window shall be closed from the end of every quarter and shall remain closed upto 48 hours after the declaration / publication of financial results.
- 7.2 The Compliance Officer shall also close the trading window when he determines that a Designated Person or class of Designated Persons can reasonably be expected to have possession of UPSI. In respect of declaration of financial results, the Trading Window can be

closed from the end of every quarter till 48 hours after the declaration of financial results which shall in any case remain closed at least from a date that is 7 days prior to date of declaration of financial results till 48 hours after the declaration of financial results. In other cases the trading window shall be opened 48 hours after the UPSI becomes generally available. The gap between clearance of accounts by audit committee and board meeting should be as narrow as possible and preferably on the same day to avoid leakage of material information.

- 7.3 The Designated persons and their immediate relatives can trade Company shares only when the trading window is open.
- 7.4 The trading window shall be closed when Compliance Officer determines that designated person or a class of designated person are expected to be in possession of unpublished price sensitive information, relating to the following matters / events:
- (i) financial results;
 - (ii) dividends;
 - (iii) change in capital structure;
 - (iv) mergers, de-mergers, acquisitions, delisting, disposal and expansion of business and such other transactions; and
 - (v) changes in key managerial personnel;
- 7.5 The Compliance Officer shall take all reasonable steps to ensure that the designated persons and/or Insiders are informed in advance, about the date of closing and opening of the Trading Window.
- 7.6 The timing for re-opening of the trading window shall be determined by the Compliance Officer taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, which in any event shall not be earlier than forty-eight hours after the information becomes generally available.
- 7.7 Trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

8. Pre-clearance of trades

All Designated Persons or their immediate relatives, who intend to deal in the securities of the Company when the trading window is open and is the value of the proposed trades is above Rs. 10 lakhs (market value), whether in one transaction or a series of transactions over any calendar quarter, should pre-clear the transaction. However, Designated Persons or their immediate relatives shall not be entitled to apply for pre-clearance of any proposed trade if such Designated Persons or their immediate relatives is in possession of UPSI even if the trading window is not closed and hence such Designated Persons or their immediate relatives shall not be allowed to trade. For pre-clearance following procedure should be followed:

- 8.1 An application be made to the Compliance Officer in the prescribed form for pre-clearance of the transaction if the threshold limit is likely to be exceeded.

- 8.2 To execute an undertaking in favour of the Company in the prescribed form.
- 8.3 The proposed transaction can be carried out only after receiving appropriate clearance from the Compliance Officer in prescribed form
- 8.4 The execution of the order in respect of the securities of the Company will have to be completed within 7 days from the date of such approval of pre-clearance. The details of such deal shall be submitted with the Compliance Officer in the prescribed form within 2 days of the execution of deal. In case the transaction is not undertaken a 'Nil' report shall be submitted within 2 days.
- 8.5 If the order is not executed within 7 days as specified above, the applicant must pre-clear the transaction again.
- 8.6 No contra trade shall be executed by the designated person within a period six months from date of execution of the pre-cleared trade.
- 8.7 The Compliance Officer may be empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate the applicable regulations.
- 8.8 In case of execution of a contra trade, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Securities & Exchange Board of India ("SEBI") for credit to the Investor Protection and Education Fund.
- 8.9 Pre-clearance of trades shall not be required for a trade executed as per an approved trading plan.

9. Reporting Requirements for Transactions in Securities

9.1 General:

- a) The disclosures to be made by any person under this Code shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.
- b) The disclosures of trading in Securities shall also include trading in derivatives of Securities and the traded value of the derivatives shall be taken into account for the purpose of this Code.
- c) The disclosures made under this Code shall be maintained for a period of five years.

9.2 Initial Disclosures:

- a) Every promoter, member of the promoter group, key managerial personnel and director, of the Company, **within thirty days of these regulations taking effect**, shall disclose his holding of securities of the Company as on the date of these Regulations taking effect, to the Company within thirty days of these Regulations taking effect in the prescribed Form.
- b) Every person on appointment as a key managerial personnel or a director of the Company or upon becoming a promoter or member of the promoter group shall disclose his holding of securities of the Company as on the date of appointment or becoming a promoter, to the Company within **seven days of such appointment** or becoming a promoter in the prescribed Form

9.3 Continual Disclosures:

- a) Every promoter, member of the promoter group, designated person and the directors of the Company shall disclose to the Company the number of such securities acquired or disposed of within **two trading days** of such transactions 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 in the prescribed Form
- b) The Company shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.

9.4 Additional Disclosures

The Company may at its discretion require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the Company in such form and at such frequency as may be determined by the Compliance Officer in order to monitor compliance with the Code.

9.5 Disclosure by other Connected Persons

- a) The Compliance Officer may require any other Connected Person or class of Connected Persons to make disclosures of holdings and trading in securities of the Company in the prescribed form and at such frequency as may be determined by the Company in order to monitor compliance with this code.
- b) The disclosure to be made by any person under this Code shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.

10. Internal Control

The Chairman & Managing Director of the Company shall put in place adequate and effective system of internal controls to ensure compliance with the requirements given in the Regulations as well as with this Code.

- 10.1 All employees who have access to unpublished price sensitive information are identified as Designated Employee.
- 10.2 All the unpublished price sensitive information shall be identified and its confidentiality shall be maintained as per this Code and the Regulations.
- 10.3 Adequate restrictions shall be placed on communication or procurement of unpublished price sensitive information as required by these Regulations.
- 10.4 List of all employees and other persons with whom unpublished price sensitive information is shared shall be maintained and confidentiality agreement shall be signed or notice shall be served to all such employees and persons.
- 10.5 All other relevant requirements specified under the Regulations shall be complied with.
- 10.6 This code shall be circulated by the HR Department amongst all the existing employees of the Company and in case of new joining at the time of his / her joining, irrespective of their functional role in the Company. This code shall be circulated amongst the Designated Persons.
- 10.7 Policy and procedure for inquiry in case of leak or suspected leak of Unpublished Price Sensitive Information is as specified in Schedule-2.
- 10.8 The Whistle-blower policy of the Company, enables employees to report instances, if any, of leak of UPSI.
- 10.9 If an inquiry is initiated by the Company in case of reported leakage or suspected leak of UPSI, the Intermediaries and Fiduciaries engaged by the Company shall co-operate with the Company in connection with such inquiry conducted by the Company.
- 10.10 The Compliance Officer shall review the process to evaluate effectiveness of the internal controls at the end of every half year, commencing from 21st September, 2020.
- 10.11 Notwithstanding anything contained hereinabove, the Audit Committee shall also review the compliance with the provisions of this Code and the Regulations at least once in a financial year commencing 21st September, 2020 and shall verify that the systems for internal control are adequate and are operating effectively.

11. Penalty for contravention of the Code

Every Designated Person shall be individually responsible for complying with the applicable

provisions of this Code (including to the extent the provisions hereof are applicable to their Immediate Relatives).

Any violation of this Code shall, in addition to any other penal action that may be taken by the Company pursuant to law, also be subject to disciplinary action which in respect of an Employee may include wage freeze, suspension, recovery, claw back or termination of employment.

Action taken by the Company for violation of the Code against any person will not preclude SEBI from taking any action for violation of the Regulations or any other applicable laws/rules/regulations.

In case it is observed by the Company/Compliance Officer that there has been a violation of the Regulations, the Compliance Officer shall inform SEBI promptly.

12. Amendment / Modification

The Board of Directors of the Company may, subject to applicable laws, amend/substitute any provision(s) with a new provision(s) or replace the Code entirely with a new Code.

In any circumstance where the terms of the Code differ from any law, rule, regulation, etc. for the time being in force, the law, rule, regulation, etc. shall take precedence over the Code.

The Code and any subsequent amendment(s) thereto, shall be promptly intimated to the Stock Exchanges.

FORMAT FOR REQUEST OF TRADING PLAN

The Compliance Officer,
Mrs. Bectors Food Specialities Limited,
Theing Road, Phillaur- 144410

Dear Sir,

I [Insert Name of the employee], in my capacity as [Insert Designation] of the company hereby submit the following trading plan for your review and approval in terms of the Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons .

Trading Plan

Date/intervals of Trade Execution	No. of Securities Traded	Nature of Transaction and quantity	Trading Account details	Trading Member details
		Purchase/ sale/ others		

Details of securities held by immediate Relative of the Employee

Name of the person and relationship with the designated employee	Date of Trading in securities	No. of Securities Traded	Nature of Transaction and quantity	Trading Account details	Trading member details
			Purchase/ Sale/ others		

I hereby undertake that I am not in violation of the Company's Code of Conduct or SEBI (Prohibition of Insider Trading) Regulations, 2015 (as amended) while formulating the aforesaid trading plan.

I undertake to furnish such information as required by the Compliance Officer with regard to the Trading Plan.

Date:

Signature

FORMAT FOR APPROVAL OF TRADING PLAN

Name: [Insert Name]

Designation: [Insert Designation]

Place: [Insert Place]

This is to inform you that your request/immediate relatives request for approval of trading plan in relation to shares of the Company as mentioned in your application dated [Insert Date] is approved.

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.

You acknowledge that in order to comply with the principles of Company's Code of Conduct and SEBI (Prohibition of Insider Trading) Regulations, 2015 (as amended) you may be required to further furnish information in relation to the trading plan.

The approval is based on your express undertakings that you will not contravene any provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (as amended) and Code of Conduct of the Company and the Trading plan is not for the purposes of market abuse.

Yours faithfully, for Mrs.Bectors Food Specialities Limited

Compliance Officer

Date:

Encl: Format for submission of details of transaction

**APPLICATION FOR PRE-DEALING APPROVAL
[DESIGNATED PERSON]**

Date:

The Compliance Officer
Mrs. Bectors Food Specialities Limited
Theing Road, Phillaur- 144410

Dear Sir/Madam,

Application for Pre-dealing approval in securities of the Company

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 (as amended) and the Company's Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons, I seek approval to purchase / sale / subscription of _____ equity shares of the Company as per details given below:

1.	Name of the applicant	:	
2.	In case of immediate relative, name of employee and relationship with him/her	:	
3.	Designation	:	
4.	No. of securities held as on date	:	
5.	Folio No. / DP ID / Client ID	:	
6.	PAN	:	
7.	The proposal is for (please tick)	:	(i) Purchase of securities (ii) Sale of securities (iii) Subscription to the securities
8.	Proposed date of dealing in securities	:	
9.	Estimated no. of securities proposed to be acquired / sold / subscribed	:	
10.	Price at which the transaction is proposed	:	
11.	Current market price (as on date of application)	:	
12.	Whether the proposed transaction will be through the stock exchange or off-market deal	:	

I enclose herewith the form of Undertaking duly signed by me.

Yours faithfully,

(Signature of designated person)

**FORMAT OF UNDERTAKING/DECLARATION TO BE ACCOMPANIED WITH
THE APPLICATION FOR PRE-CLEARANCE**

UNDERTAKING/DECLARATION

Date:

The Compliance Officer
Mrs. Bectors Food Specialities Limited
Theing Road, Phillaur- 144410

I, _____, resident of _____ hereby declare that I am Designated Person of Mrs. Bectors Food Specialities Limited.

I further declare that I am not in possession of or otherwise privy to any Unpublished Price Sensitive Information (as defined in the Company's Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons up to and at the time of signing this Undertaking/Declaration.

In case I have access to or I receive any Unpublished Price Sensitive Information after signing this Undertaking/Declaration but before execution of the transaction, I shall inform the Compliance Officer of the change in my position and I would, and ensure that my Immediate Relatives would completely refrain from Trading in the Securities (including derivatives) of the Company till the time such Unpublished Price Sensitive Information becomes generally available.

I declare that I have not contravened the Code as notified by the Company from time to time.

I undertake to submit the necessary report within two Trading Days of execution of the transaction/a "Nil" report if the transaction is not undertaken.

I am aware that, I shall be liable to face penal consequences as set forth in the Code including disciplinary action under the Code of the Company, in case the above declarations are found to be misleading or incorrect at any time.

I agree to comply with the provisions of the Code and provide any information relating to the trade as may be required by the Compliance Officer and permit the Company to disclose such detail to SEBI, if so required by SEBI.

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

(Signature of Applicant)

FORMAT FOR APPROVAL OF PRE-CLEARANCE ORDER

Name: [Insert Name]

Designation: [Insert Designation]

Place: [Insert Place]

This is to inform you that your request for dealing in [Insert number of shares] shares of the Company as mentioned in your application dated [Insert Date] is approved. Please note that the said transaction must be completed on or before [Insert Date] that is within 7 days from today. In case you do not execute the approved transaction /deal on or before the aforesaid date this approval shall stand withdrawn and you would have to seek fresh pre-clearance before executing any transaction/deal in the securities of the Company. Further, you are required to file the details of the executed transactions in the attached format within 2 days from the date of transaction/ deal. In case the transaction is not undertaken a 'Nil' report shall be necessary.

Based on your undertaking it is understood that you have not executed any opposite transaction in past six months and not contravened the provisions of the Code as notified by the Company from time to time.

Please note this approval can be withdrawn, if subsequently the information provided by you in the application form or the undertaking is found incorrect.

Yours faithfully, for Mrs.Bectors Food Specialities Limited

Compliance Officer

Date:

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

To,

The Board of Directors
Mrs.Bectors Food Specialities Limited
Theing Road, Phillaur- 144410

Dear Sir(s)/Madam,

I, _____ being the [designation] of Mrs.Bectors Food Specialities Limited (the Company) do hereby disclose as under, the annual shareholding under the Code of Conduct Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons for the financial year ended 31st March,

_____, in respect of the equity shares of the Company held by me and/or my immediate relatives:

Sl. No.	Name of the Shareholder	Name of Relative and relationship with holder	Number of Shares held	Folio No / DP-ID & Client-ID

Place:

Date:

Signature :

Name :

Designation :

FORM A

**SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (a) read with Regulation 6(2) - Initial disclosure to the
Company]**

Name of the Company _____

ISIN of the Company _____

Details of Securities held by Promoter, Key managerial personnel (KMP), Director and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN & Address with contact nos.	Category of Person (Promoters/ KMP/ Directors/ Immediate relative to/ 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

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

Details of Open Interest (OI) in derivatives of the Company held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

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		
Contract Specifications	Number of units(contracts * lot size)	Notional Value in Rupee terms	Contract Specifications	Number of Units(contracts * lot size)	Notional value in Rupee terms
7	8	9	10	11	12

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

Name &
Signature:
Designation:
Date:
Place:

FORM B

**SEBI (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, CIN/DIN & Address with contact nos.	Category of Person (Promoters/ KMP/ Directors/ Immediate relative to/ 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 e.g.- Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5	6

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

Details of Open Interest (OI) in derivatives of the Company 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)

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		
Contract Specifications	Number of units(contracts * lot size)	Notional Value in Rupee terms	Contract Specifications	Number of Units(contracts * lot size)	Notional value in Rupee terms
7	8	9	10	11	12

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

Name &
Signature:
Designation:
Date:
Place:

FORM C

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

Name of the Company.....

ISIN of the Company.....

Details of change in change in holding of securities of promoters, employee or director of a listed and other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN, & address with contact nos.	Category of person (Promoters /KMP /Director /Immediate relative to/others etc.)	Securities held prior to acquisition/ disposal		Securities acquired/ Disposed				Securities held post acquisition/ Disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to Company	Mode of acquisition / disposal (on market/ public/ rights/ preferential offer/ off market/ inter-se transfer/ ESOPs, etc)
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No. and % of share-holding	Type of Security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transac - tion type (Buy/ Sell/ Pledge/ Revoke/ Invoke)	Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No. and % of share-holding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

Note: "Securities" shall have the same meaning as defined under regulation 2 (1)(i) of SEBI (Prohibition of Insider trading) regulations,2015

Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or options etc)					Exchange on which the trade was executed	
Type of contract	Contract Specifications	Buy		Sell		
		Notional Value	Number of units (Contracts * lot size)	Notional Value	Number of units (Contracts * lot size)	
15	16	17	18	19	20	21

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

Name &
Signature:
Designation:
Date:
Place:

FORM D
SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (3) - Transactions by Other connected persons as identified by the Company]

Details of trading in securities by other connected persons as identified by the company.

Name, PAN, CIN/DIN, & address with contact nos. of other connected persons as identified by the Company	Connection with Company	Securities held prior to acquisition/ disposal		Securities acquired/ Disposed				Securities held post acquisition/ Disposal		Date of allotment advice/ acquisition of shares/sale of shares specify		Date of intimation to Company	Mode of acquisition / disposal (on market/ public/ rights/ preferential offer/ off market/ inter-se transfer/ ESOPs, etc)
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No. and % of Share-holding	Type of Security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transac - tion type (Buy/ Sell/ Pledge/ Revoke / Invoke)	Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No. and % of share-holding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

Note: "Securities" shall have the same meaning as defined under regulation 2 (1)(i) of SEBI (Prohibition of Insider trading) regulations,2015

Details of trading in derivatives by other connected persons as identified by the Company.

Trading in derivatives (Specify type of contract, Futures or options etc)					Exchange on which the trade was executed	
Type of contract	Contract Specifications	Buy		Sell		
		Notional Value	Number of units (Contracts * lot size)	Notional Value	Number of units (Contracts * lot size)	
15	16	17	18	19	20	21

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

Name &
Signature:
Designation:
Date:
Place: