



CODE OF CONDUCT FOR REGULATING, MONITORING, & REPORTING TRADING BY INSIDERS AND CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE.

Version	Approved by	Details	Date
V1.	Board	As per SEBI notification dated January 15, 2015 requiring all listed companies should formulate an insider trading policy, the Bank had placed Federal Bank Code of Conduct for Regulating, Monitoring and Reporting Trading by Insiders and code of Practices and Procedures for Fair Disclosure to the Board of the Bank in its meeting dated 5 th September 2015. The Board has approved the same in the said meeting.	September 5, 2015
V2	Board	Amendment in the existing policy made by including change in the names of designations of the employees in the management cadres and approved by the Board.	January 15, 2018
V3	Board	SEBI vide circular dated 31 December 2018 brought about some amendments to the existing Insider Trading Regulations, 2015. In order to bring those changes to the Bank's Code the same was submitted to the Audit Committee and thereafter to the Board for its approval.	February 26, 2019
V4	Board	SEBI vide circular dated 31 December 2018 mandated framing of Policy For Determination of Legitimate Purpose and Policy For Inquiry In Case of Leak of Unpublished Price Sensitive Information or Suspected Leak of Unpublished Price Sensitive Information And Procedure for the Same	April 03, 2019
V5	Board	Securities and Exchange Board of India vide (Prohibition of Insider Trading) (Third Amendment) Regulations, 2019 introduced a new chapter for informant mechanism to reward whistleblowers and the same has made part of the Code.	February 25, 2020

V6	Board	Securities and Exchange Board of India introduced Securities and Exchange Board of India (Prohibition of Insider Trading) (Amendment) Regulations, 2020 (w.e.f. July 17, 2020) and a SEBI Circular SEBI/HO/ISD/ISD/CIR/P/2021/19 dated 09 February 2021	March 25, 2021
V7	Board	The code was amended in line with SEBI (PIT) Amendment Regulations, 2021 dated April 26, 2021, SEBI Circular No. SEBI/HO/ISD/ISD/CIR/P/2021/617 dated August 13, 2021 on Automation of Continual Disclosures under Regulation 7(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 and Comprehensive FAQs On SEBI (PIT) Regulations, 2015 on April 29, 2021	January 12, 2022



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CODE OF CONDUCT FOR REGULATING, MONITORING& REPORTING TRADING BY INSIDERS AND CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE.

CHAPTER I

1. Introduction

This code of Conduct shall be called “**Code of Conduct for Regulating, Monitoring and Reporting Trading by Insiders and code of Practices and Procedures for Fair Disclosure**” (hereinafter referred to as the Code)

2. The Policy and Obligations

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

Every Director and other Designated persons of the Bank has a duty to safeguard the confidentiality of all such information obtained in the course of his or her work at the Bank. No Director and other Designated persons may use his or her position or knowledge of the Bank to gain personal benefit or to provide benefit to any third party.

3. Objective of the Code

The objective of the Code is to regulate, monitor and report trading by Designated Persons and other Connected Persons towards achieving compliance with SEBI(Prohibition of Insider Trading) Regulations, 2015. The Code shall also provide for practices and procedures for fair disclosure of unpublished price sensitive information.

4. Applicability

This Code shall apply to all designated persons and connected persons as mentioned in this Code.

5. Definitions

In this Code, unless the context otherwise requires:

- (i) "SEBI Act" or "Act"** means the Securities and Exchange Board of India Act, 1992;
- (ii) "Regulations"** means the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time;
- (iii) "the Bank"** means The Federal Bank Limited;

(iv) "Code" means **Federal Bank Code of Conduct for Regulating, Monitoring and Reporting Trading by Insiders and code of Practices and Procedures for Fair Disclosure**, as modified from time to time;

(v) "Connected Person" includes

- a) A Director, Key Managerial Personnel or any person who is or has been in a contractual or fiduciary or employment relationship at any time in the six month period prior to the date of determining whether that person, as a result of such relationship, was, directly or indirectly, (i) allowed access to UPSI (Unpublished Price Sensitive Information) or (ii) reasonably expected to be allowed access to UPSI;
- b) Any person who is or has been in frequent communication with an Officer of the Bank at any time in the six month period prior to the date of determining whether that person, as a result of such frequent communication, was, directly or indirectly, (i) allowed access to UPSI or (ii) reasonably expected to be allowed access to UPSI;
- c) An employee including officer of the Bank who has access to UPSI or is reasonably expected to have access to UPSI;
- d) Any person who has a professional or business relationship with the Bank and that relationship, directly or indirectly, (i) allows access to UPSI or (ii) is reasonably expected to allow access to UPSI;
- e) Central Statutory Auditors of the Bank

The persons enumerated below shall be deemed to be Connected Persons if such person has access to UPSI or is reasonably expected to have access to UPSI –

- i. an immediate relative of connected persons
- ii. a holding company or associate company or subsidiary company;
- iii. an intermediary as specified in section 12 of the Act or an employee or director thereof;
- iv. an investment company, trustee company, asset management company or an employee or director thereof;
- v. an official of a stock exchange or of clearing house or corporation;
- vi. 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;
- vii. 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;
- viii. an official or an employee of a self-regulatory organization recognised or authorized by SEBI;
- ix. a banker of the company;
- x. a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a Bank or his immediate relative or banker of the company, has more than ten per cent of the holding or interest;

(vi) "Designated person" shall consist of, Connected Persons who are:

- a) Directors of the Bank;
- b) Key Managerial Personnel
- c) *Chief Operating Officer, Chief Credit Officer, Chief Risk Officer, Chief Vigilance Officer, and Chief Information Security Officer.*
- d) All Executive Directors, Executive and Senior Vice Presidents of the Bank
- e) All Heads of Departments and all the employees of the Bank in the management cadre' viz. Scale V(Deputy Vice President) and above.
- f) All employees of Finance & Accounts Department, CEO Secretariat, Executive Director's Office, Secretarial Department and secretaries to Executive and Senior Vice Presidents.

- h) All the *Employees working in Corporate Planning Department, Loan Collection and Recovery Department* who are engaged in the finalization of financial results of the Bank, employees working in Integrated Risk Management Department and handling the section relating to CRAR, *Disclosure, employees of Marketing Department who are handling Press Release on financial results and Investor Relations, all the employees of IT Department who are connected with the conduct of Online meetings of Board/ Audit Committee.*
- i) Any other connected person, designated by the Bank on the basis of their functional role from time to time;
- j) Immediate Relatives of a to i above

(vii) "**Director**" means a member of the Board of Directors of the Bank;

(viii) "**Generally Available Information**" means information that is accessible to the public on a non-discriminatory basis;
(Information published on the website of a stock exchange, would ordinarily be considered generally available.)

(ix) "**Key Managerial Personnel**" or "**KMP**", shall have the meaning assigned to it under the Companies Act, 2013

(x) "**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;

(xi) "**Insider**" means any person who is: i) a connected person; or ii) in possession of or having access to unpublished price sensitive information;

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

(xiii) "**Original Information**" means any relevant information submitted in accordance with these regulations pertaining to any violation of insider trading laws that is:-

- i. derived from the independent knowledge and analysis of the Informant;
- ii. not known to the Board from any other source, except where the Informant is the original source of the information;
- iii. is sufficiently specific, credible and timely to - (1) commence an examination or inquiry or audit, (2) assist in an ongoing examination or investigation or inquiry or audit, (3) open or re-open an investigation or inquiry, or (4) inquire into a different conduct as part of an ongoing examination or investigation or inquiry or audit directed by the Board;
- iv. not exclusively derived from an allegation made in a judicial or administrative hearing, in a Governmental report, hearing, audit, or investigation, or from the news media, except where the Informant is the original source of the information; and
- v. not irrelevant or frivolous or vexatious.

Explanation. –Information which does not in the opinion of the Board add to the information already possessed by the Board is not original information.

- (xiv) "**promoter**" shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, ~~2{2018}~~ or any modification thereof;
- (xv (a)) "**promoter group**" shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof
- (xvi) '**Reward**' means any gratuitous monetary amount for which an Informant is declared eligible as per the provisions of these regulations
- (xvii) "**Securities**" shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 or any modification thereof except units of mutual fund;
- (xviii) "**Stock Exchange**" means:
- (a) Bombay Stock Exchange; and
 - (b) National Stock Exchange of India Limited; and
 - (c) such stock exchanges in India where Banks securities may get traded
- (xix) "**Trading**" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;
- (xx) "**Trading Day**" means a day on which the recognized stock exchanges are open for trading where securities of the Bank are listed;
- (xxi) "**Trading Window**" means trading period for trading in the Bank's securities. All days shall be the trading periods except when trading window is closed;
- (xxii) "**Unpublished Price Sensitive Information**" or "**UPSI**" means any information, relating to the Bank 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;(intended declaration of dividend both interim and final, if any)
 - (iii) Issue of securities (by way of Public/ Rights/ Bonus etc.) or Buy-back of securities or change in capital structure;
 - (iv) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
 - (v) changes in key managerial personnel; and
 - (vi) Compliance Officer may decide any other matter also as Price Sensitive Information;

All other words and phrases will have the same meaning as defined under the SEBI(Prohibition of Insider Trading) Regulations, 2015 as amended from time to time. Words and expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules & regulations made thereunder shall have the meanings respectively assigned to them in that legislation.

(xxiii) "Compliance Officer" means the Company Secretary of the Bank or in his absence an officer of the Bank not below the rank of Senior Vice President of the Bank shall act as Compliance officer for the purpose of administration of the Code

The Compliance Officer shall be one who is financially literate and is capable of meeting requirements for legal and regulatory compliance under insider trading regulations.

(xxiv) "Financially literate" shall mean a person who has the ability to read and understand basic financial statements i.e. balance sheet, profit and loss account, and statement of cash flows

6. Implementation of the Code

6.1 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 Code under the overall supervision of the Board of Directors.

6.2 A Record of Designated persons shall be maintained by HR Department under the overall supervision and control of the Compliance Officer and changes taking place in the employee list from time to time shall be informed by HR Department to the Compliance Officer for incorporating in the record of designated persons.

6.3 The Compliance Officer shall provide any clarifications with regard to the implementation of this Code.

CHAPTER II

CONFIDENTIALITY & COMMUNICATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION

7. Preservation of "Unpublished Price Sensitive Information"

7.1 All Designated persons and the Connected Persons (Insiders) shall maintain the confidentiality of price sensitive information. All information shall be handled within the organisation on a need-to-know basis and no unpublished price sensitive information shall be communicated to any person except in furtherance of the insider's legitimate purposes, performance of duties or discharge of his legal obligations.

7.2 No insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to the Bank or securities listed or proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

7.3 No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to the Bank or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

7.4 The board of directors shall make a policy for determination of “legitimate purposes” as a part of “Codes of Fair Disclosure and Conduct” formulated under SEBI (Prohibition of Insider Trading) Regulations from the time of applicability of this regulation.

The term “legitimate purpose” shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of SEBI (Prohibition of Insider Trading) Regulations.

7.5 Any person in receipt of unpublished price sensitive information pursuant to a “legitimate purpose” shall be considered an “insider” for purposes of these regulations and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with these Code .

7.6 Notwithstanding anything contained in the Code, an unpublished price sensitive information may be communicated/provided, allowed access to or procured, in connection with a transaction that would:-

(i) entail an obligation to make an open offer under the takeover regulations where the Board of directors of the Bank is of informed opinion that the sharing of such information is in the best interests of the Bank;

(ii) not attract the obligation to make an open offer under the takeover regulations but where the board of directors of the Bank is of informed opinion that the sharing of such information is in the best interests of the Bank and the information that constitute unpublished price sensitive information is disseminated to be made generally available atleast two trading days prior to the sharing of such information being effected in such form as the board of directors may determine to be adequate and fair to cover all relevant and material facts.

7.7 For the purpose of the above clause, the parties shall be required to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the purpose of Clause 7.6 mentioned above and shall not otherwise trade in securities of the Bank when in possession of unpublished price sensitive information.

7.8 The Board of Directors or Head(s) of the organisation of every person required to handle unpublished price sensitive information shall ensure that a structured digital database is maintained containing the nature of unpublished price sensitive information and the names of such persons who have shared the information and also the names of such persons with whom information is shared under this regulation along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such database shall not be outsourced and shall be maintained internally with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.

7.8A The board of directors or head(s) of the organisation of every person required to handle unpublished price sensitive information shall ensure that the structured digital database is preserved for a period of not less than eight years after completion of the relevant transactions and in the event of receipt of any information from the Board regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.

7.9 For the purpose of prompt public disclosure of UPSI, the Bank also adopts the Code regarding practice & procedure for Fair Disclosure set out at **Annexure-I**.

CHAPTER III TRADING RESTRICTIONS

8. Trading restrictions on Designated Persons/Connected Persons

- 1) No designation person / connected person shall enter into derivative transactions in respect of the securities of the Bank
- 2) Designated Persons who Trade in the securities of the Bank shall not enter into an opposite transaction during the next six months following the prior transaction. In case of any contra trade be 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 Protection and Education Fund administered by SEBI. Provided that this shall not be applicable for trades pursuant to exercise of stock options.
- 3) Exercise of ESOPs shall not be considered to be “trading” except for the purpose of the requirements of disclosure mentioned in this code. If a designated person has sold/ purchased shares, he can subscribe and exercise ESOPs at any time after such sale/purchase, without attracting contra trade restrictions.
- 4) Buy back offers, open offers, rights issues, FPOs (Follow on Public Offer), bonus, exit offer etc. of the Bank are available to designated persons also, and restriction of ‘contra-trade’ shall not apply in respect of such matters

9. Trading Window

9.1) The trading window shall be closed till completion of 48 hours from the time at which the information referred to in clause 9.2 becomes generally available.

9.2 The Trading Window shall be *inter-alia* closed:

- (a) From the end of every quarter till 48 hours after the declaration of financial results
- (b) Ten days prior to Board meeting for declaration of interim dividend if any and thirty days prior to Board meeting for declaration of final dividend;
- (c) Ten days prior to Board meeting for change in capital structure like issue of securities by way of public/right/bonus, buy-back etc and change in key managerial personnel;
- (d) Ten days prior to the Board Meeting held to approve any mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
- (e) For such period and for any such other material event (in accordance with the listing agreement and SEBI(LODR) Regulations,2015) as may be deemed fit by the Compliance Officer;

However if the circumstances so warrants the time for closing the window may be increased or decreased with the approval of Compliance Officer / Managing Director.

9.3 The trading window may be re-opened after closure, not earlier than 48 hours after the UPSI in question becomes generally available.

9.4 All Designated persons and their immediate relatives shall conduct all their trading in the securities of the Bank only in a valid trading window and shall not trade in bank's securities during the periods when trading window is closed, as referred to in clause 9.2 or during any other period as may be specified by the bank from time to time.

9.5 In case of ESOPs, exercise of option may be allowed in the period when the trading window is closed. However sale of shares allotted on exercise of ESOPs shall not be allowed when trading window is closed.

9.6 Creation of pledge or invocation of pledge of securities is allowed when trading window is closed. However, the pledgor or pledgee may demonstrate that the creation of pledge or invocation of pledge was bona fide.

9A Prohibition on Insider Trading

An Insider shall not, directly or indirectly, –

i) Trade in securities that are listed or proposed to be listed when in possession of UPSI;

When a person who has traded in securities has been in possession of unpublished price sensitive information, his trades would be presumed to have been motivated by the knowledge and awareness of such information in his possession

Provided that the insider may prove his innocence by demonstrating the circumstances including the following:

- a) Trades pursuant to a Trading Plan set up in accordance with this Code.
- b) the transaction is an off-market inter-se transfer between insiders who were in possession of the same unpublished price sensitive information without being in breach of regulation 3 of SEBI (Prohibition of Insider Trading) Regulations and both parties had made a conscious and informed trade decision;

Provided that such unpublished price sensitive information was not obtained under sub-regulation (3) of regulation 3 of SEBI PIT regulations

Provided further that such off-market trades shall be reported by the insiders to the Bank within two working days. The bank shall notify the particulars of such trades to the stock exchange on which the securities are listed within two trading days from receipt of the disclosure or from becoming aware of such information

- c) the transaction was carried out through the block deal window mechanism between persons who were in possession of the unpublished price sensitive information without being in breach of regulation 3 of SEBI PIT 2015 and both parties had made a conscious and informed trade decision;

Provided that such unpublished price sensitive information was not obtained by either person under sub-regulation (3) of regulation 3 of these regulations.

d) the transaction in question was carried out pursuant to a statutory or regulatory obligation to carry out a bona fide transaction.

- e) the transaction in question was undertaken pursuant to the exercise of stock options in respect of which the exercise price was pre-determined in compliance with applicable regulations
- f) 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
- ii) Trade in securities of the Bank except when the Trading Window is open and the Insider is not in possession of UPSI.
- iii) 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.

10. Pre-clearance of Trades

- 1) Designated Persons may trade in the securities of the Bank when the trading window is open, after obtaining approval of the Compliance Officer by submitting an application as per Annexure 1 and an undertaking as per Annexure 2. The Board of Directors shall be the approving authority for the pre-clearance requests from the Compliance Officer, Other Key Managerial Personnel, Directors and their immediate relatives.
- 2) The Compliance Officer shall not approve any proposed trade by the Designated Person if the Compliance Officer determines that such Designated Person is in possession of UPSI even though the trading window is open.
- 3) The Compliance Officer may, after being satisfied that the application and undertaking are true and accurate, approve Trading by a Designated Person, on the condition that the trade so approved shall be executed within seven trading days following the date of approval.
- 4) The Designated Person shall, within two days of the execution of the trade, submit the details of such trade to the Compliance Officer as per Annexure 3. In case the transaction is not undertaken, a report to that effect shall be filed in the said form.
- 5) If the pre-cleared Trade is not executed within seven trading days after the approval is given, the Designated Person must secure pre-clearance of the transaction again.
- 6) A Designated Person who trades in securities without complying with the pre-clearance procedure as envisaged in this code or gives false undertakings and/or makes misrepresentations in the undertakings executed by him/her while complying with the pre-clearance procedure shall be subject to the penalties as envisaged in this Code.

7) Nothing in this Code relating to preclearance shall apply to any trade by designated persons if the market value of the securities traded along with the proposed trade, whether in one transaction or a series of transactions over a calendar quarter is below Rs.10 Lakhs, or such other amount as may be specified by the Board of Directors from time to time (a “de minimis Trade”) provided the Designated Person is not in possession of UPSI while executing the de minimis Trade. Further Pre-Clearance is not required for exercise of employee stock options.

11. Trading Plans

1. An Insider shall be entitled to formulate a trading plan and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.
2. 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) 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 Company and the second trading day after the disclosure of such financial results;
 - (iii) entail trading for a period of not less than twelve months;
 - (iv) not entail overlap of any period for which another trading plan is already in existence;
 - (v) 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; and
 - (vi) not entail trading in securities for market abuse.
3. The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of the Regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.

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

Provided further that trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

4. 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.

Provided that the implementation of the trading plan shall not be commenced if any unpublished price sensitive information in possession of the insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation 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 information.

5. Upon approval of the trading plan, the Compliance Officer shall notify the plan to the Stock Exchanges on which the securities are listed.

11A Penalty for Contravention of the Code

- 1) Designated persons who violate Insider Trading Code shall be subject to disciplinary action by the Bank, which may include, serving cautionary letter, wage freeze, suspension, ineligibility for future participation in the Bank's stock option plans, recovery clawback or termination. Any amount collected under this clause shall be remitted to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act. If any violation of the Code is found, the same shall be reported to HR Department for initiating suitable actions under the HR Policy of the Bank.
- 2) The Stock Exchanges where the Securities of the Bank are traded would be promptly informed of the violation of Insider Trading Code/ Regulations in such form and such manner as may be specified by SEBI from time to time.

CHAPTER IV REPORTING AND DISCLOSURE REQUIREMENTS

12) Initial Disclosure:

- a) Every person on appointment as a Key Managerial Personnel or a director of the Bank or upon becoming a promoter or member of the promoter group shall disclose his / her and Immediate Relatives' holding of securities of the Bank as on the date of appointment, to the Bank within seven days of such appointment, as per Form B set out in Annexure 4.

13) Disclosures by other Connected Persons

The Compliance Officer may, require any other Connected Person to disclose the holdings and trading in securities of the Bank as per Form D set out in Annexure 5 at such frequency as he may determine.

14) Code of Conduct

1. The board of directors of the Bank shall formulate a code of conduct to regulate, monitor and report trading by designated persons and immediate relatives of designated persons towards achieving compliance with SEBI (Prohibition of Insider Trading) Regulations, adopting the minimum standards set out in Schedule B of SEBI (Prohibition of Insider Trading) Regulations, without diluting the provisions of regulations in any manner.
2. The board of directors shall in consultation with the compliance officer specify the designated persons to be covered by the code of conduct on the basis of their role and function in the organisation and the access that such role and function would provide to unpublished price sensitive information in addition to seniority and professional designation and shall include: -
 - (i) Employees of the Bank on the basis of their functional role or access to unpublished price sensitive information in the organization;
 - ii) Chief Executive Officer and employees upto two levels below Chief Executive Officer of the Bank, irrespective of their functional role in the bank or ability to have access to unpublished price sensitive information

- iii) The support staff of the Bank, such as IT staff or secretarial staff who have access to unpublished price sensitive information.

The Board of Directors of the Bank has identified the designated persons as per the definition given under clause 5 (vi) of this code.

- 3. Designated persons shall be required to disclose names and Permanent Account Number or any other identifier authorized by law of the following persons to the bank on an annual basis and as and when the information changes:
 - a) immediate relatives
 - b) persons with whom the designated person(s) shares a material financial relationship
 - c) Phone, mobile and cell numbers which are used by them
 - d) In addition, the names of educational institutions from which designated persons have graduated and names of their past employers shall also be disclosed on a one time basis.

The term “material financial relationship” shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift from a designated person during the immediately preceding twelve months, equivalent to at least 25% of the annual income of such designated person but shall exclude relationships in which the payment is based on arm’s length transactions.”

- 4. The bank shall have a process for how and when people are brought ‘inside’ on sensitive transactions. Individuals should be made aware of the duties and responsibilities attached to the receipt of Inside Information, and the liability that attaches to misuse or unwarranted use of such information

15) Institutional Mechanism for Prevention of Insider trading

- 1) The MD&CEO or Compliance Officer shall put in place adequate and effective system of internal controls to ensure compliance with the requirements given in the Code to prevent insider trading.
- 2) The internal controls shall include the following:
 - a) all employees who have access to unpublished price sensitive information are identified as designated person;
 - b) all the unpublished price sensitive information shall be identified and its confidentiality shall be maintained;
 - c) adequate restrictions shall be placed on communication or procurement of unpublished price sensitive information as required by SEBI PIT regulations;
 - d) lists of all employees and other persons with whom unpublished price sensitive information is shared shall be maintained and confidentiality agreements shall be signed or notice shall be served to all such employees and persons;
 - e) all other relevant requirements specified under SEBI PIT regulations shall be complied with;
 - f) periodic process review to evaluate effectiveness of such internal controls.
- 3) The board of directors shall direct to ensure that the MD/Compliance Officer as per the Code/any other authorised person undertakes/ensures compliance with regulation 9 and sub regulation (1) of SEBI PIT regulation;

- 4) The Audit Committee of the Bank shall review compliance with the provisions of these regulations at least once in a financial year and shall verify that the systems for internal control are adequate and are operating effectively.
- 5) The Bank shall formulate written policies and procedures for inquiry in case of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information, which shall be approved by board of directors from such date as may be applicable and accordingly initiate appropriate inquiries on becoming aware of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information and inform the SEBI promptly of such leaks, inquiries and results of such inquiries.
- 6) The Bank shall make employees aware of the whistle-blower policy to enable employees to report instances of leak of unpublished price sensitive information if any.
- 7) If an inquiry has been initiated by the bank in case of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information, the relevant intermediaries and fiduciaries shall co-operate with the Bank in connection with such inquiry conducted by the bank

16) Miscellaneous

- 1) The Board of Directors shall be empowered to amend, modify, interpret the Code and such Code shall be effective from such date that the Board of Directors may notify in this behalf.
- 2) The Compliance Officer shall provide the Audit Committee of the Board of the Bank, on a quarterly basis, all the details of trading in securities by the Designated Persons including any violations of the Code. The compliance officer shall also report to the board of directors the required compliance of this regulation at least once in a year.
- 3) The Compliance Officer shall maintain (a) updated list of Designated Persons, (b) records of disclosures and pre-clearance applications and undertakings for a period of five years.
- 4) The Bank shall require all designated persons who is required to handle unpublished price sensitive information in the course of business operations to formulate and adhere to a code of conduct to achieve compliance with this Code. In case the bank observe that there has been a violation of this Code, then the Bank shall inform the Board of Directors of the Bank promptly.

CHAPTER – V

SEBI INFORMANT MECHANISM

INFORMANT MECHANISM SCHEME

Any employee can voluntary submit original information relating to alleged violation of this insider trading code that has occurred, is occurring or has a reasonable belief that it is about to occur, to the Office of Informant Protection of SEBI in the format and manner set out in Schedule D to SEBI (Prohibition of Insider Trading) (Third Amendment) Regulations, 2019.

PROTECTION AGAINST RETALIATION AND VICTIMIZATION

Informant will be protected against any adverse action and/ or discrimination as a result of a reporting to SEBI under this Scheme, provided it is justified and made in good faith. The organization is forbidden from taking any adverse action against you for exercising your right as above. Adverse action is defined as:

- Discharge
- Termination of service
- Demotion
- Suspension
- Threatening
- Harassment
- Discrimination against employment

Review of the Code

The Code shall be reviewed on a yearly basis.

Annexure I

CODE OF PRACTICE & PROCEDURE FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

In consonance with the principles of fair disclosure specified in SEBI (Prohibition of Insider Trading Regulations), 2015, (Insider Trading Regulations) the Bank would adhere to following practice and procedure for fair disclosures in respect of unpublished price sensitive information (UPSI) relating to the Bank and/ or its securities.

1. Any information that could have a material impact on price of shares/ securities of the Bank shall be promptly disclosed to Stock Exchanges where the shares/ securities of the Bank are listed. Such disclosure would subject to receipt of internal approvals and made through authorised personnel of the Bank, in accordance with applicable corporate and securities laws.
2. Uniform and universal dissemination of UPSI would be ensured by the Bank by adopting a common platform i.e. Stock Exchanges for public disclosure. Once the UPSI is communicated to Stock Exchanges as aforesaid, then other medium of dissemination may also be used to ensure such information is made accessible to the public on a non-discriminatory basis.
3. An officer not below the rank of Deputy Vice President would be the 'Chief Investor Relations Officer' of the Bank for the purpose of this code and Insider Trading Regulations. He/she is authorized by the Bank to ensure proper and timely dissemination of information in the ordinary course of the business of the Bank and also to disclose UPSI relating to the Bank and/ or its securities to the investors/ analysts, press, electronic/social media and other concerned members of the public.
4. In the unlikely event of any UPSI being disclosed selectively, inadvertently or otherwise, at any forum whether in India or abroad, the Chief Investor Relations Officer of the Bank, shall take effective steps to promptly disseminate such information to the Stock Exchanges, for public disclosure.

5. The 'Chief Investor Relations Officer' of the Bank is authorized to respond to any queries that may be received from stock exchanges, press, electronic/ social media or investors of the Bank, for verification of any market rumours relating to the Bank and/ or any of its subsidiaries, subject to internal clearances.
6. In case any disclosure of UPSI is inadvertently made at a meeting with analysts or at any investors relation conference, which if made public could materially impact the price of the securities of the Bank on the stock exchange(s), it would be promptly communicated to the stock exchanges on which the securities of the Bank are listed, so as to ensure such information is generally available to the public.
7. Any information that may be classified as UPSI would be dealt with by the Directors and Employees of the Bank on 'Need to Know' basis only.
8. This code and any amendments thereto shall be available on the website of the Bank.
9. The Policy for determination of legitimate purpose which forms part of this Code is detailed below.

POLICY FOR DETERMINATION OF LEGITIMATE PURPOSE

PREFACE

This Policy, as a part of " **Code of Practice & Procedure for Fair Disclosure of Unpublished Price Sensitive Information**" formulated under Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations 2015, will be known as "Policy for Determination of Legitimate Purposes" hereinafter referred to as the "Policy".

This Policy is prepared in accordance with Regulation 3(2A) of SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018.

OBJECTIVE

The objective of this policy is to identify 'Legitimate Purposes' for performance of duties or discharge of legal obligations, which will be considered as exception for the purpose of procuring unpublished price sensitive information (UPSI) relating to the Bank or its listed securities or proposed to be listed securities, if any.

DEFINITION

The term "legitimate purpose" shall include sharing of UPSI in the ordinary course of business by an insider with partners, collaborators, lenders, bankers, customers, suppliers, merchant bankers, legal advisors, auditors, Insolvency Professionals, other advisors or consultants or any other person with whom UPSI is shared provided that such sharing has not been carried out to evade or circumvent the Prohibitions of Insider Trading Regulations. In case of any specific situation, Compliance Officer and/or Chief Investor Relations Officer, in consultation with MD & CEO will decide the legitimate purpose.

Insider" - Any person in receipt of UPSI pursuant to a "legitimate purpose" shall be considered as an "insider" for purpose of these regulations and due notice shall be given to such persons (Insiders) to maintain confidentiality of such unpublished price sensitive information in compliance with these regulations.

SHARING OF UPSI FOR LEGITIMATE PURPOSE

The UPSI may be shared by any Bank's official(s) either with other Employees of the Bank or with Third Parties for the legitimate purpose(s) which shall include the following:

- (i) Sharing of UPSI in the ordinary course of business of the Bank including but not limited to existing or proposed partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants etc-
- (ii) Sharing of UPSI where such communication is in furtherance of performance/ discharge of duty(ies); The Insiders should handle UPSI with care and to deal with the information with them when transacting their business strictly on a need-to-know basis.
- (iii) Sharing of UPSI for discharge of legal/ regulatory obligation(s) as required under any statute(s); and
- (iv) Sharing of UPSI for any other genuine or reasonable purpose as may be determined by the Compliance Officer of the Bank as per this Code.

ISSUE OF NOTICE TO THE RECIPIENT OF UPSI

Due notice shall be given to the insider as per this Policy, (i) To make aware such person that the information shared is or would be UPSI. (ii) To make aware such person about the duties and responsibilities while in possession of such UPSI and the liability attached thereto for any unauthorized use of such UPSI.

Annexure II

POLICY FOR INQUIRY IN CASE OF LEAK OF UNPUBLISHED PRICE SENSITIVE INFORMATION OR SUSPECTED LEAK OF UNPUBLISHED PRICE SENSITIVE INFORMATION AND PROCEDURE FOR THE SAME

BACKGROUND

The SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 has mandated every listed company to formulate a written policy and procedures for inquiry in case of leak of unpublished price sensitive information and initiate appropriate inquiries on becoming aware of leak of unpublished price sensitive information and inform the SEBI promptly of such leaks, inquiries and results of such inquiries.

In this regard, Board of Directors of The Federal Bank Limited have laid down this policy for inquiry in case of leak of Unpublished Price Sensitive Information (UPSI) or suspected leak of UPSI ('the policy'), and procedure for the same for adoption.

OBJECTIVES

- (i) To restrict and prohibit the practice of sharing of UPSI, with the un-authorized persons, which originates from within the Bank and which may affect the market price of the Bank or may cause loss of reputation and investors confidence in the Bank by ensuring sufficient deterrents are in place to penalize insiders/designated persons.
- (ii) To curb the un-ethical practices of sharing UPSI by Insiders/ Designated Persons with any person, firm, Company or Body Corporate.
- (iii) To initiate inquiry in case of leak of UPSI or suspected leak of UPSI and inform the same to the Securities and Exchange Board of India ("SEBI") promptly.
- (iv) To penalize any Insider/Designated Persons who appears to have found guilty of violating this policy.
- (v) To strengthen the internal control system to prevent leak of UPSI.

SCOPE

The Bank endeavors to preserve the confidentiality of un-published price sensitive information (UPSI) and to prevent misuse of such information. The Bank shall strive to restrict and prohibit the practice of sharing of UPSI which originates from within the Bank by any insider, designated person, support staff or any other known or un-know person(s) with any un-authorized person which may affect the market price of the Bank or may cause loss of reputation and investors confidence in the Bank

DEFINITION

'**Leak of UPSI**' shall refer to such act / circumstance(s) by virtue of which an UPSI is made available or becomes available, by any means or mode to any person, association, body, firm, agency, society, entity or to a group thereof, whether registered or otherwise before its official publication or announcement or formal circulation in public domain and which shall also include any purported attempt thereof.

APPLICABILITY

This policy shall apply to all designated persons and immediate relative of designated persons and persons in possession of or having access to unpublished price sensitive information.

DISCLOSURE OF ACTUAL OR SUSPECTED LEAK OF UPSI TO STOCK EXCHANGES:

On becoming aware of actual or suspected leak of Unpublished Price Sensitive Information of the Bank, the Compliance Officer and/or Chief Investor Relations Officer in consultation with MD & CEO shall ensure that the same shall be promptly intimated to the Stock Exchanges on which the securities of the Bank are listed.

REPORT OF ACTUAL OR SUSPECTED LEAK OF UPSI TO SEBI

On becoming aware of actual or suspected leak of Unpublished Price Sensitive Information of the Bank, the Compliance Officer/CIRO shall ensure that a report on such actual or suspect leak of UPSI, preliminary inquiry thereon and results thereof shall be promptly made to the SEBI/ Stock Exchanges on which the securities of the Company are listed.

PROCESS OF INQUIRY IN CASE OF LEAK OF UPSI OR SUSPECTED LEAK OF UPSI

1. Inquiry under this policy shall commence based on a written complaint received from any employee, department of the Bank, Registrar and Share Transfer Agent, designated person, Depository, Stock Exchange, Registrar of Companies or any official thereof, from any regulatory / statutory authority or any other department of Central or State Government.
2. The complaint shall inter alia state particulars of the complainee and details of the complaint. The Complainant has the option of annexing such documentary evidence, as deemed reasonable for the purpose of substantiating the complaint lodged.
3. The Complaint shall be addressed to the Bank or Board or Audit Committee or Chairman or MD & CEO.
4. Within 5 (five) working days of receipt of the complaint, MD shall write to the complainee intimating the details of the complaint received and requesting him to give a written representation within 7 (seven) working days of receipt of letter. If MD is of the view that the complaint has been lodged to secure needless publicity for defamatory matter which is detrimental to the interest of the Bank then he can discard the complaint with reasons recorded in writing.
5. Within 7 (seven) working days of receipt of representation, MD shall proceed to investigate the matter and for such purpose may consult such persons, whether internal or otherwise or obtain such external assistance or opinion, as he may deem expedient in this regard. During the course of such investigation, MD may call for such additional documents, representations, etc. as he may deem fit.
6. If no representation is received within the aforesaid stipulated time, MD shall issue notice to the complainee asking him to show cause as to why the Company should not initiate disciplinary proceedings, as applicable, against him.

7. On completion of the preliminary investigation under point 5, receipt of reply to the show cause notice issued under point 6 or on non-receipt thereof, MD shall refer the matter to the Chairperson/Chairman of the Audit Committee, along with his opinion, for his consideration.
8. Chairperson/Chairman of the Audit Committee of the Board on receipt of such opinion shall proceed to convene a meeting of the Audit Committee and shall actually convene the concerned meeting within a period of 45 days of receipt of opinion of MD.
9. The Audit Committee of the Board shall consider the matter and put forward its recommendation to the Board. The Board, on receipt of such recommendation and after due review, if forms an opinion that the complainees is guilty of leak of UPSI or suspected leak of UPSI, then it will order for necessary disciplinary proceedings of the company, which will be in addition to the penal provisions stated under SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 and any other statutory enactments, as applicable.
10. The Company suomotore reserves the right of initiating an inquiry under this policy against any designated person if it has reasons to believe that such person has leaked UPSI or suspected to leak UPSI.
11. This policy shall not in any way preclude any referrals, complaints, measures, actions etc. which can be instituted or which are available under the existing Vigil Mechanism Policy of the Bank
12. The Board shall have the power to amend any of the provisions of this Policy, substitute any of the provisions with a new provision and also replace this Policy entirely with a new Policy.
13. Any words used in this Policy but not defined herein shall have the same meaning as described to it in the Companies Act, 2013 or Rules made thereunder, Securities & Exchange Board of India Act or Rules and Regulations made thereunder, SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015, SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 or any other relevant legislation/law applicable to the Company, as amended from time to time.

INTERPRETATION:

(a) The Compliance Officer shall be consulted on the matters of interpretation of any of the provisions of this Code/ Policy. The Compliance Officer shall have a right to consult an expert for seeking clarification on any of the provisions of the Regulations or this Policy.

(b) In case if any of the provisions of this Policy are found to be not in conformity with the provisions of the Regulations or any law or rules and regulations framed under any law (hereinafter referred to as the provision of law) then the provision of law shall prevail over such provision of the Policy. In such a case, the other provisions of this Code which are not inconsistent with the provision of the law shall continue to apply.

Annexure-1

APPLICATION FOR PRE-TRADING APPROVAL

To,
The Compliance Officer,
The Federal Bank Limited

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Bank's Code of Conduct for Regulating, Monitoring and Reporting Trading by Insiders and code of Practices and Procedures for Fair Disclosure, I seek approval to purchase / sell / subscribe/ pledge/ _____ equity shares of the Bank as per details given below:

1.	Name of the applicant	
2.	Designation	
3.	Number of securities held as on date	
4.	Folio No. / DP ID / Client ID No.	
5.	The proposal is for	a) Purchase of securities (b) Subscription to securities (c) Sale of securities
6.	Proposed date of trading in securities	
7.	Estimated number of securities proposed to be purchased/subscribed/sold	
8.	Current market price (as on date of application)	
9.	Whether the proposed transaction will be through stock exchange or off-market trade	

I enclose herewith the Undertaking signed by me.

Signature : _____

Name:

Date :

Annexure 2

UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-CLEARANCE

To,
The Compliance Officer,
The Federal Bank Limited

I, _____, _____ of the Bank residing at _____, am desirous of trading in _____ shares of the Bank as mentioned in my application dated _____ for pre-clearance of the transaction.

I further declare that I am not in possession of any unpublished price sensitive information up to the time of signing this Undertaking.

In the event that I have access to or receive any unpublished price sensitive information 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 trading in the securities of the Company until such information becomes public.

I declare that I have not contravened the provisions of the Code as notified by the Bank from time to time.

In the event of this transaction being in violation of the Code or the applicable laws, (a) I will, unconditionally, release, hold harmless and indemnify to the fullest extent, the Bank and its directors and officers, (the 'indemnified persons') for all losses, damages, fines, expenses, suffered by the indemnified persons, (b) I will compensate the indemnified persons for all expenses incurred in any investigation, defense, crisis management or public relations activity in relation to this transaction and (c) I authorize the Bank to recover from me, the profits arising from this transaction and remit the same to the SEBI for credit of the Investor Protection and Education Fund administered by the SEBI.

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

If approval is granted, I shall execute the trade within seven days of the receipt of approval failing which I shall seek pre-clearance afresh.

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

Signature : _____

Name:

Date :

Annexure 3
DISCLOSURE OF TRANSACTIONS

(To be submitted within 2 days of transaction / trading in securities of the Bank)

To,
The Compliance Officer,
The Federal Limited

I hereby inform that I

- have not bought / sold/ subscribed/pledged any securities of the Bank
- have bought/sold/subscribed/pledged to _____ securities as mentioned below on _____ (date) through NSE/BSE/ Off Market.

Name of holder	No. of securities traded	Name of Stock Exchange	Bought / sold / subscribed	DP ID/Client ID/Folio No.	Price (Rs.) (Value of the Transaction)

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

Signature : _____

Name:

Date :

**Annexure 4
Form B**

**SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (a) read with Regulation 6 (2) –Disclosure on becoming a director/KMP/Promoter/Member of promoter group]**

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 or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoters/ member of promoter group/ KMP / Directors/ immediate Relative to/others etc)	Date of appointment of Director /KMP OR Date of becoming Promoter/ member of promoter group	Securities held at the time of becoming Promoter/member of promoter group /appointment of Director/KMP		% of Shareholding
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5	6

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

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 or member of the promoter groups of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2)

Open Interest of the Future contracts held at the time of becoming Promoter/ member of promoter group /appointment of Director/KMP			Open Interest of the Option Contracts held at the time of becoming Promoter/member of promoter group /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:

Annexure 5
FORM D
SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (3) Transactions by Other connected persons]

Name of the Company: The Federal Bank Limited
 ISIN of the company: ISIN: INE171A01029

Details of change in holding of Securities of Other connected persons of a listed company .

Name, PAN, CIN/DIN, & address with contact nos. of other connected persons as identified by the company.	Conn ect ion with comp an y	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.)	Exchan ge on which the trade was executed
		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/Sale/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	15

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

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

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

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

Name:
Signature:
Place

RACI METRIX

R – Responsible	Refers to those who do the work to complete the task.
A – Accountable	Designates the person who ultimately answer f for the results of an activity, and also who delegates the work to the people who will execute it.
C – Consulted	Refers to those who sought be heard on the related activity, and with whom there is two-way communication.
I – Informed	Designates those who sought to be kept up-to-date on the progress of the activity, and with whom there is just one-way communication.

Code of Conduct For Regulating, Monitoring, & Reporting Trading By Insiders And Code Of Practices And Procedures For Fair Disclosure.	Secretarial Dept	HR Dept	MD&CEO	ACB	Board
Chapter-I	R/A	R/C	I	I	I
Chapter-II Confidentiality & Communication of Unpublished Price Sensitive Information	R/A/C	-	R/A/I	R/A/I	R/A/I
Chapter III Trading Restrictions	R/A/C	-	-	R/A/I	R/A/I
Chapter IV Reporting and Disclosure Requirements	R/A/C	-	-	R/A/I	R/A/I
Chapter – V SEBI Informant Mechanism	C/I	-	-	R/A	R/A
Code of Practice & Procedure for Fair Disclosure of Unpublished Price Sensitive Information	R/A/C	-	I	I	I

Policy for Determination of Legitimate Purpose	R/A/I	-	C	-	-
Policy for Inquiry in Case Of Leak Of Unpublished Price Sensitive Information Or Suspected Leak Of Unpublished Price Sensitive Information And Procedure For The Same	R/A	-	C/A/I	A/I	A/I