



OCEANIC FOODS LIMITED

Corporate identification number: L15495GJ1993PLC019383

Registered Office: Opp. Brooke bond factory P. N. Marg,
Jamnagar -361002 Gujarat – India

Code of Conduct to regulate, monitor and Report trading by Insiders

(Pursuant to Securities and Exchange Board of India,
(Prohibition of Insider Trading) Regulations, 2015
(Effective from 01st April 2019)

1. PREAMBLE:

The Securities and Exchange Board- of India in its endeavor to protect the interests of investors in general and for the orderly and healthy growth of the capital markets, had notified the SEBI (Prohibition of Insider Trading) Regulations, 2015 (the Regulations), which were amended by SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 vide SEBI Notification dated December 31, 2018 to put in place a framework for prohibition of insider trading in securities and to strengthen the legal framework thereof.

Regulation 9 (1) of the Regulations mandates inter-alia the Board of Directors of every listed company to formulate a Code of Conduct to regulate, monitor and trading by its designated persons and immediate relatives of designated' persons towards achieving compliance with the Regulations, adopting the minimum standards set out in Schedule 'B' to the Regulations, without diluting the provisions of the Regulations in any manner.

2. DEFINITIONS:

2.1 "Act" means the Securities and Exchange Board of India Act, 1992.

2.2 "Board" means Securities and Exchange Board of India.

2.3 "Board of Directors" means Board of Directors of Oceanic Foods Limited.

2.4 "Code" or "Code of Conduct" shall mean the Code Of Practices And Procedures And Code Of Conduct To Regulate, Monitor And Report Trading In Securities And Fair Disclosure Of Unpublished Price Sensitive Information / (and earlier Code of Internal Procedures & Conduct for Prevention of Insider Trading) for Regulating, Monitoring and Reporting of trading by insiders of **OCEANIC FOODS LIMITED** as amended from time to time.

2.5 "Company" means Oceanic Foods Limited.

2.6 "Compliance Officer" means the Company Secretary of the Company appointed in terms of Section 203 of the Companies Act 2013 is appointed as the Compliance Officer, who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of this code under the overall supervision of the Board of Directors of the company.

2.7 "Connected Person" means:

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

2.9 "**Employee**" means every employee of the Company (whether working in India or abroad) including the directors in the employment of the Company.

2.10 "**Generally available Information**" means information that is accessible to the public on a Non-discriminatory basis.

2.11 "**Immediate Relative**" means a spouse of a person, and includes parents, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities

2.12 "**Insider**" means:

- a. Promoter of the Company
- b. Director of the Company
- c. Key Managerial Personnel
- d. A Connected Person as defined in clause 2.7 above
- e. Auditors of the Company
- f. All employees of the Company and any person who, in the opinion of the Compliance Officer, is in possession of or having access to Unpublished Price Sensitive Information.

2.13 "**Promoter**" shall have the meaning assigned to it under the SEBI (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modifications thereof;

2.14 "**Securities**" shall have the meaning assigned to it under the Securities Contracts Regulations Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund;

2.15 "**Trading**" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in securities of the Company, and "trade" shall be construed accordingly;

2.16 "**Trading Day**" means a day on which the recognized stock exchanges are open for trading;

2.17 "**Unpublished Price Sensitive Information**" means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to following:-

- i. Financial Results;
- ii. Dividends;
- iii. Change in capital structure;
- iv. Mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
- v. Changes in Key Managerial Personnel; and
- vi. vi) Other material events or information in accordance with Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations 2015

2.18. "**Chief Investor Relations Officer**" means the Chief Financial Officer/Company Secretary and Compliance Officer or any other officer of the Company as designated as such by the Board of Directors of the Company

2.19 **"Legitimate Purpose"** shall include sharing of unpublished price sensitive information in the course of business by an insider with partners, collaborators; lenders; customers; suppliers; bankers; merchant bankers; legal advisors; auditors; insolvency professionals; other advisors or consultants provided that such sharing has not been carried out to evade or circumvent the prohibitions of these Regulations.

2.20 **"Designated Persons"** shall include

- i. Promoter and Promoter Group of the Company;
- ii. All Directors;
- iii. Secretaries and Executive Assistants reporting to the Executive Chairman and the Managing Director;
- iv. Every employee in the Grade of L5 and above;
- v. Every employee in the Finance, Accounts, Secretarial, Taxation, Corporate, I.T. and Legal Departments irrespective of their roles and designations and the support staff of the respective departments;
- vi. Any other employee as may be determined on case to case basis and informed by the Compliance Officer from time to time in consultation with the Chairman. and Managing Director of the Company;
- vii. Persons in contractual, fiduciary or advisory relationship with the Company i.e. consultants, retainers, auditors, law firms, analysts, etc.; and
- viii. Immediate relatives of persons covered under clause (i) to (vii) above

2.21 **"Financially Literate"** means a person who has the ability to read and understand basic financial statements i.e. balance sheet, the statement of profit and loss and the statement of cash flows.

2.22. **"Need to Know basis"** means the Unpublished Price Sensitive Information should be disclosed only to those within the Company who need information to discharge their duties and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.

3. PERSONS GOVERNED BY THIS CODE:

This code is applicable to all the employees and Insiders as defined under clause 2.12 hereinabove.

4. ROLE OF COMPLIANCE OFFICER:

- 4.1. The compliance officer shall report to the board of directors and in particular, shall provide reports to the Chairman of the Audit Committee, if any, or to the Chairman of the board of directors at such frequency as may be stipulated by the board of directors.

- 4.2. The Compliance Officer shall administrate this Code and also undertake actions as are prescribed to it under the Regulations (such as approval and disclosure of the trading plan of Insiders to the stock exchanges on which the Securities of the Company are listed).
- 4.3. The record of Designated Employees shall be maintained by Personnel Department under the overall supervision and control of the Compliance Officer and changes taking place in the list from time to time shall be incorporated therein.
- 4.4. The Compliance Officer shall assist all employees in addressing any clarifications regarding the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and this Code of Conduct.

5. PRESERVATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION:

- a) All information shall be handled within the Company 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.
- b) Unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction which entails:
 - i. an obligation to make an open offer under the takeover regulations where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the Company; or
 - ii. not attracting the obligation to make an open offer under the takeover regulations but where the Board of Directors of the Company is of 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 of Directors may determine.

However, the Board of Directors shall require the parties 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 limited purpose and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information.

“Need to Know” basis means that Unpublished Price Sensitive Information should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.

c) Limited access to Confidential information:

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password.

6. PREVENTION OF MISUSE OF UNPUBLISHED PRICE SENSITIVE INFORMATION:

Employees and connected persons designated on the basis of their functional role ("designated persons") in the Company shall be governed by an internal code of conduct governing dealing in securities.

a) Trading Plan: An insider shall entitle to formulate a trading plan for dealing in securities of the Company 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.

b) 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 issuer of the securities 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.

The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of these regulations. However, he shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of this plan.

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. However, the implementation of the trading plan shall not be commenced, if any unpublished price sensitive information in possession of insider at the time of formulation of plan has not become generally available at the time of commencement of implementation. The commencement of the Plan shall be deferred until such unpublished price sensitive information becomes generally available information. Further, the 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. Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

7. TRADING WINDOW AND WINDOW CLOSURE:

- a) The trading period, i.e. the trading period of the stock exchanges, called 'trading window', is available for trading in the Company's securities.
- b) The trading window shall be, inter alia, closed *from the end of every quarter till 48 hours after the declaration of financial results.* the unpublished price sensitive information is published.
- c) When the trading window is closed, the Specified Persons shall not trade in the Company's securities in such period.
- d) All Specified Persons shall conduct all their dealings in the securities of the Company only in a valid trading window and shall not deal in any transaction involving the purchase or sale of the Company's securities during the periods when the trading window is closed, as referred to in Point No. (ii) above or during any other period as may be specified by the Company from time to time.
- e) 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 is closed.

The Compliance Officer shall intimate the closure of trading window to all the designated employees of the Company when he determines that a designated person or class of designated persons can reasonably be expected to have possession of unpublished price sensitive information. Such closure shall be imposed in relation to such securities to which such unpublished price sensitive information relates. The Compliance Officer after taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, shall decide the timing for re-opening of the trading window, however in any event it shall not be earlier than forty-eight hours after the information becomes generally available.

The trading window shall also be applicable to any person having contractual or fiduciary relation with the Company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the Company.

The trading window shall be interalia closed for the following purposes:

- a. Declaration of financial results (Quarterly, Half-yearly & Annual);
- b. Declaration of Dividend (Interim & Final);
- c. Issue of securities by way of public / rights / bonus etc;
- d. Any major expansion plans or execution of new projects;
- e. Amalgamation, mergers, acquisitions, takeovers and buy back of shares;
- f. Disposal of whole or substantially the whole of the company;
- g. Any changes in policies, plans or operations of the company;
- h. Acquisition, de-merger, restructuring, scheme of arrangement, spin-off of divisions etc.
- i. Consolidation / splitting of shares;
- j. Voluntary de-listing of shares by the company;
- k. Forfeiture of shares;
- l. ADR / GDR or any other class of securities to be issued abroad
- m. Cancellation of dividend/right/bonus etc.

8. PRECLEARANCE OF TRADE:

All Specified Persons, who intend to deal in the securities of the Company when the trading window is opened and if the dealing in securities exceeds 10,000 Equity Shares, should pre-clear the transaction. However, no designated person shall be entitled to apply for pre-clearance of any proposed trade if such designated person is in possession of unpublished price sensitive information even if the trading window is not closed and hence he shall not be allowed to trade. The pre-dealing procedure shall be hereunder:

a) An application shall be made in the prescribed Form (*Annexure I*) to the Compliance officer indicating the estimated number of securities that the Specified Person intends to deal in, the details as to the depository with which he has a security account, the details as to the securities in such depository mode and such other details as may be required by any rule made by the company in this behalf.

b) A Declaration in the prescribed form (*Annexure II*) shall be made to the Company by such Specified Person specifying, inter alia, the following clauses, as may be applicable:

i. That the employee/director/officer does not have any access or has not received "Price Sensitive Information" up to the time of signing the Declaration.

- ii. That in case the Specified Person has access to or receives “Price Sensitive Information” after the signing of the Declaration but before the execution of the transaction he/she shall inform the Compliance Officer of the change in his position and that he/she would completely refrain from dealing in the securities of the Company till the time such information becomes public.
- iii. That he/she has not contravened the code of conduct for prevention of insider trading as notified by the Company from time to time.
- iv. That he/she has made a full and true disclosure in the matter.

c) All Specified Persons shall execute their order in respect of securities of the Company within seven trading days after the approval of pre-clearance in the prescribed form (*Annexure III*).

d) The Specified Person shall file within 2 (two) days of the execution of the deal, the details of such deal and in case the transaction is not undertaken, a report to that effect to the Compliance Officer in the prescribed form (*Annexure IV*).

e) If the order is not executed within seven days after the approval is given, the employee/director must pre-clear the transaction again.

f) All Specified Persons who buy or sell any number of shares of the Company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction. All Specified Persons shall also not take positions in derivative transactions in the shares of the Company at any time.

g) 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 Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

h) In case of subscription in the primary market (initial public offers), the above mentioned entities shall hold their investments for a minimum period of 30 days. Provided that the holding period would commence when the securities are actually allotted.

i) The Compliance Officer may waive off the holding period in case of sale of securities in personal emergency after recording reasons for the same. However, no such sale will be permitted when the Trading window is closed.

9. DISCLOSURES AND REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES:

- 9.1. The disclosures to be made by any person under this code shall include those relating to trading by an Insider.

9.2. The disclosures of trading in securities shall also include trading in derivatives of securities and the traded values of the derivatives shall be taken into account for the purpose of this Code.

9.3. Initial Disclosure:

Every Promoter, Director and Key Managerial Personnel of the Company and every Designated Persons, shall within 30 days from the effective date of this Code, forward to the Company the details of all the holdings in the Securities of the Company presently held by them including the statement of holdings of dependent family members in the Form prescribed under Annexure-D.

Every person on appointment as a Director or the Key Managerial Personnel of the Company or any person upon becoming a Promoter or a Designated Person shall disclose his holding of securities of the Company as on the date of appointment or re-appointment or becoming a Promoter or Designated Person, to the Company within seven days of such appointment or becoming in the format given in Annexure - E.

9.4. Continual Disclosure:

Every promoter, employee and director of every company shall disclose to the company the number of such securities acquired or disposed of within 2 trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of 10 lakh rupees or such other value as may be specified;

The disclosure shall be made within 2 trading days of:

- a. the receipt of intimation of allotment of shares, or
- b. the acquisition or sale of shares or voting rights, as the case may be.

9.5. Disclosure by the Company to the Stock Exchange:

Within 2 days of the receipt of intimation under Clause 10, the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received. The Compliance officer shall maintain records of all the declarations in the appropriate form given by the directors / officers / designated employees for a minimum period of five years.

9.6. Annual Disclosure:

The Directors and Designated Persons shall disclose to the Compliance Officer the number of securities held by them in the Company as on 31st March each year as per the format given in Annexure - G. They shall also disclose the number of securities in the Company held by their dependents (spouse and dependent children). This disclosure should be made before the 30th April each year. This disclosure should be made even if the shareholding is NIL as on 31st March of each year. The Directors and Designated Persons shall also give an annual confirmation of their adherence to the Code.

The Compliance officer shall maintain records of all such declarations in the appropriate form given by the Directors/ Officers/ Designated Persons for a minimum period of five years.

10. CODE OF FAIR DISCLOSURES AND CONDUCT:

The Company has also laid down a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI) as required by the SEBI (Prohibition of Insider Trading) Regulations 2015. The said Code is posted on the Company's Website.

11. AMENDMENT TO THE CODE:

This Code may be amended from time to time in accordance with the regulatory changes as notified by Securities and Exchange Board of India. The Compliance Officer is authorised to make minor modifications to this Code which would remove ambiguities, enhance clarity on the provisions of the Code. Any major modification to the Code will require authorization by the Board.

12. PENALTY FOR CONTRAVENTION OF CODE OF CONDUCT:

- 12.1. Every Insider shall be individually responsible for complying with the provisions of this Code (including to the extent the provisions hereof are applicable to his/ her dependents).

- 12.2. Any Insider who trades in securities or communicates any information for trading in securities of the Company, in contravention of this Code may be penalized and appropriate action may be taken by the Company.
- 12.3. Designated Persons who violate this Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligibility for future participation in employee stock option plans, etc. The penalties /disciplinary action will be decided by the Board/Committee of the Board based on reports submitted by the Compliance Officer.
- 12.4. The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015. For this purpose the Compliance Officer shall inform SEBI if there is any violation of the Code and SEBI Regulations.

Annexure- I
Oceanic Foods Limited
Application for preclearance approval

Date:

To,
Company Secretary & Compliance Officer
Oceanic Foods Limited
Jamnagar.

Dear Sir,

Sub: Application for pre-clearance approval in securities of the Company.

Pursuant to the provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct for prevention of Insider trading, I seek your approval for Purchase/ Sale / Subscription of _____ equity shares of the Company as per details given below:

Sr. No	Particulars	Details
1.	Name of Applicant:	
2.	Designation:	
3.	No. of Securities held as on date:	
4.	Folio No./ DP ID/ Client ID:	
5.	Approval is for	a) Purchase of Securities b) Sale of Securities c) Subscription of Securities
6.	Proposed Period for dealing in Securities	
7.	Estimated number of securities proposed to be acquired/ sold/subscribed	
8.	Whether the transaction will be through Stock exchange or Off market	
9.	Folio no/ DP ID Client ID where the securities will be credited/ debited (Applicable only in Off market transaction)	

Thanking you,
Yours faithfully

(Name of Employee)

Annexure- II
Oceanic Foods Limited

Specimen of Declaration to be accompanied with Pre clearance Approval

To,

Oceanic Foods Limited

Opp. Brooke Bond Factory,

P. N. Marg, Jamnagar-361002

I, _____(Name), _____(Designation) of the Company residing at _____, am desirous of dealing in _____ shares of the Company as mentioned in my application dated _____ for preclearance of the transaction.

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 for prevention of Insider Trading (the Code) up to the time of signing this Undertaking. In the event that I have access to or received any information that could be construed as "Price Sensitive Information" as defined in the Code, after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public.

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

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 deal within 7 trading days of the receipt of approval failing which I shall seek pre-clearance again.

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

Signature of Employee

Date:

Place:

Annexure- III
Oceanic Foods Limited
Specimen for Pre-clearance approval

To,

Name: _____

Designation: _____

Place: _____

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

In case you do not execute the approved transaction /deal on or before the aforesaid date 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, to the Company, 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 filed with the Company.

Yours faithfully

For Oceanic Foods Limited

Compliance Officer

Date:

Annexure- IV

Oceanic Foods Limited

Specimen for disclosure of Transactions

(To be submitted within 2 days of transaction/ dealing in securities)

To,
The Compliance Officer
Oceanic Foods Limited
Opp. Brooke Bond Factory,
P. N. Marg, Jamnagar-361002

I hereby inform that I

- have not bought / sold/ subscribed any securities of the Company.
- have bought/sold/subscribed to _____ securities as mentioned below on _____ (date)

Name of Holder	No. of Securities Dealt with	Mode of Dealing (Sale/Purchase/subscription)	Folio No. / DP ID Client ID	Folio No. / DP ID Client ID

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 5 years and produce to the Compliance officer / SEBI any of the following documents:

- a) Broker's contract note.
- b) Proof of payment to/from brokers.
- c) Extract of bank passbook/statement (to be submitted in case of demat transactions).
- d) Copy of Delivery instruction slip (applicable in case of sale transaction).

I agree to hold the above securities for a minimum period of six months. In case there is any urgent need to sell these securities within the said period, I shall approach the Compliance Officer for necessary approval. (applicable in case of purchase / subscription).

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

Signature:
Name of Holder: _____
Designation: _____
Date:

Annexure- V

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 Relatives/Others Etc.	Securities held as on the date of regulation coming into force		% of shareholding
		Type of Security (For eg: Shares, Debentures, Warrants etc.)	No of Shares	
1	2	3	4	5

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 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	No. of units (Contracts * lot size)	Notional Value in Rupee terms	Contract Specifications	No. of units (Contracts * lot size)	Notional Value in Rupee terms
6	7	8	9	10	11

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

Name & Signature :

Designation :

Date :

Place :

Annexure- VI

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), 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 Relatives/Others Etc.	Securities held as on the date of regulation coming into force		% of shareholding
		Type of Security (For eg: Shares, Debentures, Warrants etc.)	No of Shares	
1	2	3	4	5

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), Director or upon becoming a Promoter of listed company 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	No. of units (Contracts * lot size)	Notional Value in Rupee terms	Contract Specifications	No. of units (Contracts * lot size)	Notional Value in Rupee terms
6	7	8	9	10	11

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

Name & Signature : _____

Designation : _____

Date : _____

Place : _____

Annexure- VII

FORM C

SEBI (Prohibition of Insider Trading) Regulations, 2015

[Regulation 7 (2) read with Regulation 6(2) - Continual disclosure]

Name of the company: _____

ISIN of the company: _____

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

Name, PAN, CIN/ DIN, & addresses with contact nos	Category of Person (Promoters/ KMP / Director or s/imm ediate relative to/ other 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 Intima tion to compa ny	Mode of acquisiti on / disposal (on market/ public/ rights/ preferen tial offer / off market/ Inter-se transfer, ESOPs etc.)
		Type of securi ty (For eg. – Share s, Warra nts , Conv erti ble Debe ntur es etc	No. and % of shar eh oldi ng	Type of securi ty (For eg. – Share s, Warra nts, Conv ert ible Debe ntures etc.)	No .	Va lue	Trans actio n Type (Buy/ Sale/ Pledg e / Revo ke/ Invok e	Type of securi ty (For eg. – Share s, Warra nts, Conv erti ble Debe ntures etc.)	No. & % 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.

Annexure- VIII

Oceanic Foods Limited
Annual Disclosure of shareholding

To,
The Compliance Officer,
Oceanic Foods Limited

From:

Name of Insider : _____
Employee Code : _____
Designation : _____
Department : _____
Unit/ Location : _____

Dear Sir,

With reference to Clause 11.6 of the Code of Conduct for Prevention of Insider Trading, I hereby furnish my and my immediate relatives' shareholding as on 31st March, _____ (year).

SR. No	Name of Shareholder (With relation in case of immediate relative)	DP Id/ CL Id/ Folio No	No. of shares held on (on the first day of the year)	No. of shares bought during the year	No. of shares sold during the year	No. of shares held on (at the end of the year)

I confirm that I have adhered to the code of conduct during the year ended 31st March, _____ (the year)

Date : _____
Signature : _____