

GST No. 03AABCA2863R1ZH



CIN-U27109PB1985PLC006476

ATAM VALVES LIMITED

(FORMERLY ATAM VALVES PVT. LTD.)

1051, OUTSIDE INDUSTRIAL AREA, JALANDHAR CITY-144004, PUNJAB, INDIA.

T: 91-181-5001111, 5019616/617

F: 91-181-2290611

E-mail : sales@atamfebi.com

E-mail : marketing@atamfebi.com

Website : www.atamvalves.in

ATAM VALVES LIMITED

INSIDER TRADING PROHIBITION CODE

[Pursuant to SEBI (Prohibition of Insider Trading)
Regulations, 2015]

(Version 1.0)

- ❖ Code of Conduct to Regulate, Monitor and Report Trading in Securities of the Company;
- ❖ Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information & Policy for determination of “Legitimate Purpose”

EFFECTIVE FROM: DATE OF LISTING

For ATAM VALVES LIMITED

A handwritten signature in black ink, appearing to read 'Sant Jain', written over the printed name 'Sant Jain'.

DIRECTOR

ATAM VALVES LIMITED

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**Code of Conduct to Regulate, Monitor and Report Trading in Securities of the Company****Background:**

This Code has been formulated to regulate, monitor and report trading by the Designated Persons to comply with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time. The Code is prescribed to ensure that the Designated Persons do not trade in the Securities of the Company when in possession of UPSI, and to prevent any speculative dealings, knowingly or unknowingly, by the Designated Persons.

Interpretation

Words and expressions not defined in this Policy shall have the same meaning as contained in the SEBI (Prohibition of Insider Trading) Regulations, 2015 (SEBI PIT Regulations), Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and the rules and regulations made thereunder.

Scope & Applicability

This Code is applicable to all Insiders. Every Insider must review this code.

Definitions

- Company means "Atam Valves Limited" or "AVL"
- **Insiders include:**
 - 1) Designated Persons comprising:-
 - a) Promoter, Directors, KMPs & Senior Management of the Company;
 - b) Directors and KMPs of the holding Company and material subsidiary Companies, if any;
 - c) All Executive, Personal Secretaries/Assistants of Directors, KMPs
 - d) Immediate Relatives of persons covered under clause (a) to (c);
 - 2) Connected Person as defined in SEBI PIT Regulations;
 - 3) Any person who is in possession of or having access to UPSI;
 - 4) Any other person who may be included in the ambit of definition of Insider as per applicable SEBI Regulations;
 - 5) Persons as mentioned above who have ceased to be associated with the Company shall be deemed as Insiders and shall not, for a period of 6 (six) months from date of cessation, directly or indirectly trade in Company's Securities while in possession of any UPSI;

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6) Persons as mentioned above who ceases to be an Insider as per the Designated Person list shall be considered as an Insider for a cooling period of 3(three) months.

▪ 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;

▪ **“Trading”** means an act of subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell, deal in any securities and “trade” shall be construed accordingly

▪ Unpublished Price Sensitive Information (UPSI)

Means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following:

(i) financial results;

(ii) dividends;

(iii) change in capital structure;

(iv) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;

(v) changes in key managerial personnel.

(vi) Any other event as may be determined by the Company/ the Compliance Officer which is likely to materially affect the price of the Securities of the Company.

▪ What Is Insider Trading

“Insider Trading” is principally the act of Trading in Securities with the advantage of having asymmetrical access to UPSI, which when published, would impact the price of the Securities in the market.

The following procedures have been established, and will be maintained and enforced, by the Company to prevent Insider Trading. Every Designated Person required to follow these procedures:-

A. Restrictions on Communication to UPSI

(i) Communication or procurement of unpublished price sensitive information:

a. No insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to the company or securities listed or proposed to be



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- 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.
- b. No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to the company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
 - c. Notwithstanding anything contained in this regulation, unpublished price sensitive information may be communicated, provided, allowed access to or procured, in connection with a transaction.
 - d. entail 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;
 1. entail 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
 2. not attract 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.
 - e. For the purpose clause d.1.a above 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 purpose of d.1.a above, and shall not otherwise trade in securities of the Company when in possession of Unpublished Price Sensitive Information.
- B. Trading when in possession of unpublished price sensitive information**
- No insider shall trade in the equity shares of the Company when in possession of unpublished price sensitive information except as allowed under the Regulation 4(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015.
- C. Trading Plans :**
- a. An insider shall be entitled to formulate a trading plan pursuant to Regulation 5(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015 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.

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- b. The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of these 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. No insider shall apply to the Compliance Officer for pre-clearance of Trading Plans during the closure of the Trading Window. No Insider shall execute contra-trade during the period of the Trading Plan which has been approved by the Compliance Officer of the Company.
- c. The Trading Plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan pursuant to Regulation 5(4) of SEBI (Prohibition of Insider Trading) Regulations, 2015 without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.
- d. Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

D. DISCLOSURES OF TRADING BY INSIDERS**D.1 General provision**

- a. Every public disclosure under this part shall be made in such form as may be specified.
- b. The disclosures to be made by any person under this policy and or the regulation shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.
- c. The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account. Provided that trading in derivatives of securities is permitted by any law for the time being in force.
- d. The disclosures made under this policy and or the regulation shall be maintained by the company, for a minimum period of five years, in such form as may be specified.

D.2 Disclosure by certain persons**A. Initial Disclosure:**

Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter or member of the promoter group shall disclose his equity shareholding in the Company as on the date of the appointment or becoming a Promoter, to the Compliance Officer within seven days of such appointment or becoming a Promoter or member of the promoter group as set out in the **Form A**.

B. Continual Disclosure:

- a. Every Promoter, member of the promoter group, designated person and Director of every Company shall disclose to the Company the number of equity shares acquired or

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disposed of within two trading days of such transaction, if the value of the equity shares traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. Ten Lacs. Such Disclosure shall be made in **Form B**.

Explanation: Acquisition or disposal would include creation, invocation or revocation of pledge of the securities.

- b. The Compliance officer or authorized person of the Company shall notify the particulars of such Trading to Stock Exchange, within two trading days of receipt of the disclosure or from becoming aware of such information.

Note : The disclosure of the incremental transaction after any disclosure under this policy or regulation shall be made when the transaction after the prior disclosure cross the threshold.

E. Code of Practices and procedures for fair disclosure of Unpublished Price Sensitive Information

1. The Company shall ensure prompt disclosure of Unpublished Price Sensitive Information (here in referred after "UPSI") with the Stock Exchange where the Securities of the Company are listed.
2. The Company shall make uniform and universal dissemination of UPSI to avoid selective disclosure. Upon the information being submitted with the Stock Exchange, the information shall be deemed to be generally available shall no longer be treated as UPSI.
3. The Company shall appoint Company Secretary / Compliance Officer or authorized such person as deem fit as Chief Investor Relation Officer for the purpose of aforesaid SEBI Regulation and to dealt with the dissemination of information and disclosure of UPSI. In the absence of the Company Secretary, such other officer as may be authorized by the Board.
4. The Company shall prompt disseminate UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by Regulatory Authorities such as Stock Exchanges, etc.
6. Ensure that information shared with analysts and research personnel is not UPSI.
7. The Company shall adopt best Practices to make transcripts or record of proceeding of meeting with analyst and other investor relations conference on the official website to ensure official confirmation and documentation of disclosure made. Details relating to quarterly performance and financial results are disseminated to the shareholders through the press releases and uploaded on the Company's website.
8. The Company shall ensure handling of all UPSI on a "need to know basis" basis only



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F. Code of Conduct to regulate Monitor and Report Trading

1. Duties of the Compliance Officer / Authorized person by the Board

- a. Shall report to the Board of Directors and in particulars provide reports to the Chairman of the Audit Committee and / or to the Chairman of the Board at the quarterly meeting
- b. Shall be responsible for overseeing and coordinating disclosure of unpublished price Sensitive Information to stock exchange, shareholder, media and educating staff on disclosure policies and procedure.
- c. Shall from time to time inform the stock exchanges of any unpublished price sensitive information on immediate basis.

2. Preservation of Unpublished Price Sensitive Information

Insiders including designated person shall not pass on such information to any person directly or indirectly by way of making a recommendation for the purchase of or sale of securities of the Company. Following practices should be followed in this regard.

a. Need to know basis :

Unpublished Price Sensitive Information shall be disclosed only to those within the Company, where it is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of information.

b. Limited access to confidential information:

File containing confidential information shall be kept secure.

c. Chinese Wall

To prevent misuse of confidential information, the Company shall separate those areas that routinely have access to confidential information to be called as inside areas from those which provide support services and team of sales and marketing, considered " Public Areas"

All the Non - public Information directly received by any employee shall immediately be reported to the concern person. In exceptional circumstances employees from the public areas may be brought "over the wall" and given the confidential information on the basis of need to know basis under intimation to the Compliance officer.

3. Trading restrictions

All designated person shall be subject to trading restrictions as enumerated below;

- (a) **The Trading window:** The period prior to declaration of Unpublished Price Sensitive Information. Trading Window will be closed from the end of the quarter only in the case of Declaration of Dividends (Interim & Final) and for the below mentioned instances from the date on which the Company sends intimation to the Stock exchange advising the date of Board Meeting

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happening of the following events and shall remain closed 48 hours after the publication of the price sensitivity information i.e.

- (i) Issue of securities by way of Public/ Rights /Bonus etc.
- (ii) Any major expansion plan or execution of new project
- (iii) Amalgamation, Mergers, takeovers or any buy back.
- (iv) Disposal of the whole or substantially the whole of the undertaking.
- (v) Any major change in policies, plans or operation of the Company

The Designated person shall not involve in the transaction of purchase or sale of securities during the trading window or any other period as may be specified from time to time.

(b) Pre-clearance of Trades:

When the trading window is open trading by designated person shall subject to pre-clearance by the Compliance officer if the value is above the threshold as decided by the Compliance Officer or authorized person by the Board of Directors.

Pre- Clearance procedure:

- a. An application for pre-clearance of trade shall be made in the format set out in Form - C to the Compliance officer alongwith the undertaking in favour of the Company incorporating, interalia the following clauses as may be applicable that.
 - i. Do not have access or received any Unpublished Price Sensitive Information up to the time of signing the undertaking.
 - ii. And if after signing the undertaking has come across to the Unpublished Price Sensitive Information shall inform the concern person immediately and refrain from execution of transaction
 - iii. He or she has not contravened the provisions of the code or regulation
 - iv. The designated person shall execute their within one week after the approval of pre-clearance is given, if not, then the order must pre-clear the transaction again.
 - v. The designated person shall hold their investment for a minimum period of Six months and shall not be permitted to execute a contra trade within aperiod of six months from the date of said trade while such restriction shall not be applicable for trades pursuant to stock options.
- (i) the closure of the Trading window.

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**G. Violation of the Code:**

- (a) Every Promoter, Key Managerial Personnel, Director and Designated Employee of the Company and the persons deemed to be connected persons as per this Code who violates any of the provisions of this Code will be penalized and appropriate action will be taken against them by the Company after giving reasonable opportunity to them to show cause. They shall also be subject to disciplinary action including wage freeze, Suspension, in-eligibility for future participation in E.S.O.P. etc.
- (b) If the Insider deals in the equity shares of the Company, violating the Code, the Compliance Officer will confidentially maintain the list of the same.
- (c) In addition to the action which may be taken by the Company, the persons violating this Code will also be subject to any penal action by SEBI as per SEBI Act and the Company shall inform the same to the SEBI promptly.

H. Policy for Determination of Legitimate Purpose

In reference to clause 2A of regulation 3 of regulations and any modification(s) / amendment (s) thereto, Policy for determination of legitimate purpose is as under.

- a. "Legitimate purpose" shall mean sharing of Unpublished Price Sensitive Information in the course of the business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, insolvency professionals, other advisors or consultants provided that such sharing has not been carried out to evade or circumvent the prohibitions of the Regulations.
- b. No insider shall communicate, provide, or allow access to any Unpublished Price Sensitive Information, relating to securities of the Company, to any person including other insiders except where such communication is in furtherance of Legitimate purposes, performance of duties or discharge of legal obligations.
- c. No person shall procure from or cause the communication by any insider of Unpublished Price Sensitive Information, relating to securities of the Company or securities proposed to be listed by the Company, except in furtherance of Legitimate purposes, performance of duties or discharge of legal obligations.
- d. Any person in receipt of Unpublished Price Sensitive Information pursuant to legitimate purpose shall be considered an insider for the purpose of this policy and due notice shall be given to such persons to maintain confidentiality of Unpublished Price Sensitive Information in compliance with the regulation.
- e. Unpublished Price Sensitive Information, such as Financial results, declaration of Dividends, proposal of Corporate Restructuring, diversification, expansion acquisition in the stake of other entities, change in KMP's etc., shall be handled within the Company on a need to know

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basis and the same should be disclosed only to those who need such information to discharge their duties or legal obligations by virtue of their respective role and function, whose possession of such information will not give rise to a conflict of interest or appearance of misuse of such information

- f. A structure database shall be maintained containing the names of such persons or entities as the case may be with whom such information is shared for legitimate purposes along with PAN or any other identifier authorized by law where PAN is not available.



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Form A :

Form for Initial disclosure of holdings of equity shares / other securities of the company

Name of the Company : **Atam Valves Limited**

ISIN of the Company : _____

1. Details of Securities held by the director, promoter, member of promoter group, KMP or insider

Name PAN No., CIN/ DIN & Address with Contact No.	Category of Person (Promoters/ Promoter Group/ KMP/ Directors / immediate Relative to/ others, etc.)	Securities held as on date		% of shareholding
		Type of security (For e.g. Shares Warrants, Convertible Debentures, etc.)	No.	

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 Specification	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms

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

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2. Details of securities held by the immediate relative of the above-mentioned person

Name PAN No., CIN/ DIN & Address with Contact No.	Category of Person (Promoters/ Promoter Group/ KMP/ Directors / immediate Relative to/ others, etc.)	Securities held as on date		% of shareholding
		Type of security (For e.g. Shares Warrants, Convertible Debentures, etc.)	No.	

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 Specification	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms

I affirm that whatever I have declared above is true and I or my immediate relatives are not holding any other securities of the Company.

Name & Signature:

Designation:

Date:

Place:

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Form B**Form for continual disclosure of holdings of equity shares / other securities of the Company**Name of the Company : **Atam Valves Limited**

ISIN of the Company : _____

Sir,

I wish to inform you that I have acquired / disposed of _____ equity shares / other securities of the Company. Details of the same are mentioned below:

Name, PAN, CIN/ DIN & addresses with contact no.	Category of person (Promoters / Promoter / Group/ KMP / Director / immediate relative to/ others,/ Connection with the Company)	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal	
		Type of security For e.g. - Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding	Type of security (For e.g. - Shares, Warrants, Convertible Debentures Etc.)	No	Value	Transaction Type (Buy / Sale / Pledge / Revoke/ Invoke)	Type of security For e.g. - Shares, Warrants, Convertible Debentures etc.)	No. and % of shareholding
(1)	(2)	(3)	(4)	(5)	(6)	(7)	(8)	(9)	(10)

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/ Interse transfer, ESOPs etc.)
From	To		
(11)	(12)	(13)	(14)

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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 (Contract * lot size)	Notional Value	Number of units (Contract * lot size)	

I affirm that whatever I have declared above is true and correct.

Name & Signature:

Designation:

Date:

Place:

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Form C**Application for Pre-clearance of trading in securities of the Company**

From :

Name :

Designation :

Department / Unit :

PAN :

Address:

Date : _/_/___

To

The Compliance Officer

Atam Valves Limited

Sir,

I hereby intend to inform you that I propose to purchase / sale _____ equity shares / other securities of the Company, details of the same are as mentioned below :

Transaction (Sale/ Purchase)	Existing share holding	No. of shares / other security proposed to be bought / sold	DP & Client ID

Undertaking :

I hereby undertake and confirm:

a) that I do not have any access or have not received Unpublished Price Sensitive Information up to the time of signing this undertaking.

b) that in case I obtain access to or receive any Unpublished Price Sensitive Information after the signing of this undertaking but before the execution of the transaction, I shall inform the Compliance Officer of the change in my position and that I would completely refrain from dealing in the Securities of the Company till the time such information becomes public.

c) that I have not contravened the code of conduct for prevention of insider trading as notified by the Company from time to time. d) that I have made a full and true disclosure in this application.

I affirm that I have made a full and true disclosure in this regard to the best of my knowledge and belief.

Signature

Name:

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REPORT FOR VIOLATION OF CODE OF CONDUCT UNDER SEBI (PROHIBITION OF INSIDER TRADING), REGULATIONS, 2015Name of the Company: **ATAM VALVES LIMITED**

Sl. No.	Particulars	Details
1	Name of the Listed Company/ Intermediary / Fiduciary	
2	Please tick the appropriate checkbox Reporting in capacity of : <input type="checkbox"/> Listed Company <input type="checkbox"/> Intermediary <input type="checkbox"/> Fiduciary	
3	Name of the Designated Person (DP) Name of the immediate relative of DP if reporting is for immediate relative	
4	PAN of the Designated Person (DP) PAN of the immediate relative of DP if reporting is for immediate relative	
5	Designation of the DP	
6	Functional Role of DP	
7	Whether DP is Promoter / Promoter Group / holding CXO level position (e.g. CEO, CFO, CTO ec.)	
8	Transaction Details a. Name of the Scrip b. N. of Shares traded (Which includes pledge) and value (Rs.) (Date wise)	
9	In case value of trade(s) is more than 10 lacs in a calendar quarter - a. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to company under regulation 7 of SEBI (Prohibition of Inside Trading) Regulations, 2015 b. Date of intimation of trade(s) by Company to stock exchange under regulation 7 of SEBI (Prohibition of Inside Trading) Regulations, 2015	
10	Details of violations observed under SEBI (Prohibition of Insider Trading) Regulations, 2015	
11	Action Taken by Listed Company/ Intermediary/ Fiduciary	
12	Reasons recorded in writing for taking action stated above	
13	Details of the previous instances of violations, if any, since last financial year	
14	Any other relevant information	

Yours Faithfully

Name and Signature of Compliance Officer

PAN :

Email ID :

Mobile Number :