

LUX INDUSTRIES LIMITED

Code of Internal Procedure and Conduct to Prohibit Insider Trading in Securities of Lux Industries Limited (“The Company”)

<u>Version</u>	7.0
<u>Date of Initial Approval</u>	<u>11.05.2015 (Circular Resolution)</u>
<u>Last amended on</u>	<u>23rd May 2025, 13th February 2025, 9th August 2022, 23rd March 2021, 10th November 2020 and 12th February 2019.</u>



LUX INDUSTRIES LIMITED

CONTENTS

S. N.	Particulars	Page No
1.	Objective and Scope of the Insider Trading Code	3
2.	Applicability	3
3.	Definitions	4
4.	Publication of the Code	9
5.	Functions of Compliance Officer	9
6.	Trading Plans	11
7.	Circumstances and procedures for bringing people "Inside"	12
8.	Internal control to be ensured under the Regulations	14
9.	Trading Window and Window Closure	16
10.	Pre-clearance of trades	18
11.	Reporting and Disclosure Requirements	20
12.	Other Disclosure Requirements	22
13.	Protection of the Informant	22
14.	Penalty for contravention of the Code on (Prohibition of Insider Trading) Regulations, 2015	22
15.	Authority to make alterations	23
16.	Annexures	25



LUX INDUSTRIES LIMITED

INSIDER TRADING CODE

(CODE OF INTERNAL PROCEDURE AND CONDUCT TO PROHIBIT INSIDER TRADING IN SECURITIES OF THE COMPANY)

1. Objective and Scope of the Insider Trading Code

The Company endeavors to preserve the confidentiality of Unpublished Price Sensitive Information (“UPSI”) and to prevent misuse of such information. The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws, rules and regulations.

Every Designated Person of the Company has a duty to safeguard the confidentiality of all such information obtained in the course of their work at the Company. No Designated Person shall use their position or knowledge of the Company for personal gain or to benefit any third party.

The Company is committed to:

- 1) preserve the confidentiality and preventing misuse of any unpublished price sensitive information about the Company or any of its securities;
- 2) adhere to transparency and fairness in dealing with all stakeholders of the Company; and
- 3) comply strictly with applicable regulations of the Securities and Exchange Board of India.

The Objective of this Insider Trading Code is to establish standards and regulate and/or monitor compliance of Insider Trading Regulations of the Company by all “Designated Persons” and their responsibility to preserve and maintain confidentiality of UPSI that may or is expected to impact the price of securities of the Company.

To achieve these objectives, the Company hereby notifies Lux Industries Limited’s Insider Trading Code.

2. Applicability

- i. This Insider Trading Code is to be followed by all Designated Persons and their Immediate Relatives. The Compliance Officer (defined hereinafter) may extend the applicability of this Code to such persons as the Compliance Officer may deem fit, from time to time.
- ii. No Designated Person while in possession of any Unpublished Price Sensitive Information (UPSI) related to the Company or any of its securities, shall:
 - Trade or have dealings in the securities of the Company, either on their own behalf or on behalf of any other person;



LUX INDUSTRIES LIMITED

- Communicate, provide or grant access to, or advise, directly or indirectly, any unpublished information related to the Company or any of its securities, to any other person, except on a need to know basis for legitimate purposes in relation to the Company, as explained in the Company's "Policy for Fair Disclosure of Unpublished Price Sensitive Information".
- iii. All Designated Person(s) and their immediate relatives shall conduct their trading in the securities of the Company only during a valid Trading Window and strictly in compliance with this Code.

3. Definitions

- 3.1.1** "Act" means the Securities and Exchange Board of India Act, 1992.
- 3.1.2** "Board" means the Board of Directors of the Company.
- 3.1.3** "Code" or "Insider Trading Code" shall mean the Code of Internal Procedure and Conduct for Regulating, Monitoring and Reporting of trading by Designated Persons of Lux Industries Limited, as amended from time to time.
- 3.1.4** "Company" means Lux Industries Limited and its material subsidiary (s) in relation to this Insider Trading Code.
- 3.1.5** "Compliance Officer" means Company Secretary or such other senior officer designated so by the Board of Directors, who is financially literate¹ and capable of understanding legal and regulatory compliance requirements under SEBI (Prohibition of Insider Trading) Regulations, 2015 and who shall be responsible for ensuring compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of UPSI, monitoring of trades and implementation of the Code under the overall supervision of the Board of Directors of the Company.
- 3.1.6** "Connected Person" or "Deemed Connected Person" means:
- (i) any person who is or has been, during the six months prior to the concerned act, associated with a company, in any capacity, directly or indirectly, 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, whether temporary or permanent, with the company, that allows such a person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.

¹"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.



LUX INDUSTRIES LIMITED

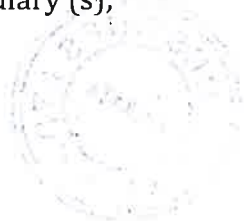
(ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established-

- (a) a relative of the Connected Persons specified in (i) above; or
- (b) a holding company or associate company or subsidiary company or
- (c) an intermediary as specified in Section 12 of the Act or an employee or director thereof; or
- (d) an investment company, trustee company, asset management company or an employee or director thereof; or
- (e) an official of a stock exchange or of clearing house or corporation; or
- (f) a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
- (g) a member of the Board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
- (h) an official or an employee of a self-regulatory organization recognized or authorized by the Board; or
- (i) a banker of the Company; or
- (j) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of the Company or his relative or banker of the Company, has more than ten per cent, of the holding or interest; or
- (k) a firm or its partner or its employee in which a connected person specified in sub-clause (i) of clause (3.1.6) is also a partner; or
- (l) a person sharing household or residence with a connected person specified in sub-clause (i) of clause (3.1.6).

3.1.7 “Dealing in Securities” means an act of subscribing, buying, selling or agreeing to subscribe to, buy, sell or deal in the securities of the Company either as principal or agent.

3.1.8 “Designated Person(s)” shall mean and include :

- i. Executive and Non-Executive Directors of the Company and its material subsidiary (s);
- ii. Key Managerial Personnel of the Company and its material subsidiary (s);
- iii. Such executives of the Company and any of its material subsidiary (s); who are in the Functional Management Band (‘FM Band’) and above;
- iv. Promoters of the Company;
- v. Promoters Group of the Company;
- vi. Employee(s) in the Secretarial, Investor Relations & Strategy, Finance, Accounts, Corporate Communication department / functions of the Company or its material subsidiary (s);



LUX INDUSTRIES LIMITED

- vii. Any support staff of the Company such as IT staff or secretarial staff having access to unpublished price sensitive information;
- viii. CEO and employees upto two levels below the CEO in the Company and its material subsidiary (s) irrespective of their functional roles or ability to have access to UPSI; and
- ix. Any other connected person as may be determined and informed by the Compliance Officer from time to time.

3.1.9 "Director" means a member of the Board of Directors of the Company.

3.1.10 "Employee" means every employee of the Company including the Directors in the employment of the Company.

3.1.11 "Generally available Information" means information that is accessible to the public on a non-discriminatory basis and shall not include unverified event or information reported in print or electronic media.

3.1.12 "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;

3.1.13 "Informant" means an individual(s), who voluntarily submits to SEBI a Voluntary Information Disclosure Form relating to an alleged violation of insider trading laws that has occurred, or 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.

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

3.1.15 "Key Managerial Personnel" means person as defined in Section 2(51) of the Companies Act, 2013.

3.1.16 "Promoter" shall have the same meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.

3.1.17 "Promoter Group" shall have the same meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof.



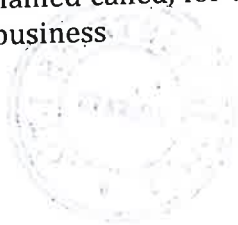
LUX INDUSTRIES LIMITED

- 3.1.18 "Regulations"/ "PIT Regulations"** shall mean the Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (PIT) and any amendments thereto.
- 3.1.19 "Relative"** shall mean the following:
- i. spouse of the person;
 - ii. parent of the person and parent of its spouse;
 - iii. sibling of the person and sibling of its spouse;
 - iv. child of the person and child of its spouse;
 - v. spouse of the person listed at sub-clause (iii); and
 - vi. spouse of the person listed at sub-clause (iv)
- 3.1.20 "Securities"** shall have the same meaning assigned to it under the Securities Contracts (Regulations) Act, 1956 (42 of 1956) or any modification thereof;
- 3.1.21 "Takeover regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;
- 3.1.22 "Trading"** means and includes subscribing, redeeming, switching, buying, selling, dealing, or agreeing to subscribe, redeem, switch, buy, sell, deal in any securities, and "trade" shall be construed accordingly;
- 3.1.23 "Trading Day"** means a day on which the recognized stock exchanges on which the securities of the Company are listed, are open for trading;
- 3.1.24 "Trading Plan"** is a plan formulated by an Insider and presented to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on behalf of the Insider in accordance with such plan as per Regulation 5 of the Regulations.
- 3.1.25 "Trading Window"** Notional window used as an instrument of monitoring trading by Designated Persons;
- 3.1.26 "Unpublished Price Sensitive Information" or "UPSI"**
- 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;



LUX INDUSTRIES LIMITED

- (iii) change in capital structure;
- (iv) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business, award or termination of order/contracts not in the normal course of business and such other transactions;
- (v) changes in key managerial personnel [other than due to superannuation or end of term, and resignation of a Statutory Auditor or Secretarial Auditor;];
- (vi) change in Rating(s) other than ESG rating(s);
- (vii) fund raising proposed to be undertaken;
- (viii) agreements, by whatever name called, which may impact the management or control of the company;
- (ix) fraud or defaults by the company, its promoter, director, key managerial personnel, or subsidiary or arrest of key managerial personnel, promoter or director of the company, whether occurred within India or abroad;
- (x) resolution plan/ restructuring or one-time settlement in relation to loans/borrowings from banks/financial institutions;
- (xi) admission of winding-up petition filed by any party /creditors and admission of application by the Tribunal filed by the corporate applicant or financial creditors for initiation of corporate insolvency resolution process against the company as a corporate debtor, approval of resolution plan or rejection thereof under the Insolvency and Bankruptcy Code, 2016;
- (xii) initiation of forensic audit (by whatever name called) by company or any other entity for detecting mis-statement in financials, misappropriation/ siphoning or diversion of funds and receipt of final forensic audit report;
- (xiii) action(s) initiated or orders passed within India or abroad by any regulatory, statutory, enforcement authority or judicial body against the listed entity or its directors, key managerial personnel, promoter or subsidiary, in relation to the company;
- (xiv) outcome of any litigation(s) or dispute(s) which may have an impact on the company;
- (xv) giving of guarantees or indemnity or becoming a surety, by whatever named called, for any third party, by the company not in the normal course of business



LUX INDUSTRIES LIMITED

(xvi) granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals;

(xvii) Such other matters as may be specified under the SEBI regulations or decided by the Company from time to time.

Words and expressions used and not defined in this policy shall have same meaning as defined in the Regulations (as amended from time to time.)

4. Publication of the Code

This Code upon its adoption by the Board of Directors of the Company shall be uploaded on the Company's website and any updates hereto shall be promptly reflected on the Company's website.

5. Functions of Compliance Officer

The Compliance Officer shall be responsible for:

- 5.1 Setting forth policies and procedures and monitoring and adherence to the rules for preservation of UPSI, pre - clearance of trades of Designated Persons and their Immediate Relatives, monitoring of trades and the implementation of the Code under the overall supervision of the Board of Directors;
- 5.2 Maintaining record of Designated Persons and immediate relatives in the format provided in **Annexure 9**;
- 5.3 Maintaining list of directors and employees comprising of the CEO and upto two levels below CEO of the Company and furnishing details to the depositories of any change in the list, on an immediate basis on the same day;
- 5.4 Monitoring adherence to the Regulations and the Insider Trading Code;
- 5.5 After review of the declaration received from the applicant in the format prescribed hereinafter grant of pre-trading clearance to the Designated Persons for dealings in the Company's Securities and monitoring of such trade;
- 5.6 Reviewing and Approving Trading Plan as may be formulated by any Insider in terms of the Regulations, and notifying the same to the stock exchanges within prescribed timeline, in which securities of the Company are listed;
- 5.7 The Compliance Officer shall maintain a record of instances under Para 10 of Schedule B of PIT regulation, where the requirement of holding the Securities during the holding period is waived.



LUX INDUSTRIES LIMITED

- 5.8 Intimation of closure of Trading Window to the Designated Persons;
- 5.9 Placing status reports before the Chairman of Audit Committee, detailing any trading in the Securities by the Designated Persons along with the documents that such persons had executed in accordance with the pre-clearance procedure prescribed under the Code of Conduct at regular intervals but not less than once in a year;
- 5.10 Assisting all the Employees in addressing any clarifications regarding the Regulations and this Insider Trading Code;
- 5.11 Sensitizing the employees of the manner and circumstances in which people may be brought "inside" on sensitive transactions, duties and responsibilities attached to the receipt of inside information, and the liability that attaches to misuse or unwarranted use of such information.
- 5.12 Maintaining a structured digital database containing the nature of unpublished price sensitive information and the names of such persons who shared the information and the names of such person with whom information is shared under this Regulation for legitimate purpose, along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available and giving of due notice to such insiders to maintain confidentiality of such unpublished price sensitive information in compliance with the Regulations. 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.
- 5.13 The aforesaid digital database is to be 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.
- 5.14 In the absence of the Compliance Officer due to leave or other reasons, an Officer designated by him/her from time-to-time shall discharge the functions referred above. The officer so designated should be financially literate and capable of understanding legal and regulatory compliance requirements under the PIT Regulations and this Code. Further, the said officer shall act as the Compliance Officer and be responsible for all duties and responsibilities of Compliance Officer, during the period of his/her absence.



LUX INDUSTRIES LIMITED

- 5.15 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.

6. Trading Plans

As an exception to the condition that an Insider shall not trade when in possession of UPSI, any Insider may, subject to prior approval of a Trading Plan by the Compliance Officer and public disclosures, commence trading on his own behalf in the securities of the Company as per the approved Trading Plan in accordance with the provisions of Regulation 5 of the PIT Regulations. The Compliance Officer shall approve or reject the trading plan within two trading days of receipt of the trading plan and notify the same on the day of its approval to the stock exchanges in which the securities of the Company are listed.

A trading plan shall –

- (a) Not entail commencement of trading on behalf of the insider earlier than one hundred and twenty calendar days from the public disclosure of the plan;
- (b) not entail overlap of any period for which another trading plan is already in existence;
- (c) set out following parameters for each trade to be executed:
 - a. either the value of trade to be effected or the number of securities to be traded;
 - b. nature of the trade;
 - c. either specific date or time period not exceeding five consecutive trading days;
 - d. price limit, that is an upper price limit for a buy trade and a lower price limit for a sell trade, subject to the range as specified below:
 - i. for a buy trade: the upper price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent higher than such closing price;
 - ii. for a sell trade: the lower price limit shall be between the closing price on the day before submission of the trading plan and upto twenty per cent lower than such closing price.

Explanation:

- (i) While the parameters in sub-clauses (a), (b) and (c) shall be mandatorily mentioned for each trade, the parameter in sub-clause (d) shall be optional.
- (ii) The price limit in sub-clause (d) shall be rounded off to the nearest numeral.
- (iii) Insider may make adjustments, with the approval of the Compliance Officer, in the number of securities and price limit in the event of corporate actions related to bonus issue and stock split occurring after the approval of trading plan and the same shall be notified on the stock exchanges on which securities are listed.

Provided further that if the Insider has set a price limit for a trade under sub-clause (d) above, the Insider shall execute the trade only if the execution price of the security



LUX INDUSTRIES LIMITED

is within such limit. If price of the security is outside the price limit set by the insider, the trade shall not be executed.

(d) 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 the PIT Regulations and shall be entitled to seek express undertakings as may be necessary to enable such assessment to approve and monitor the implementation of the trading plan.

Provided that the requirement with respect to pre-clearance of trades shall not be required for a trade executed as per an approved trading plan. Provided Further that trading window norms shall not be applicable for trades carried out in accordance with an approved trading plan.

The trading plan once approved shall be irrevocable and such person shall mandatorily have to implement the plan, without being entitled to either execute any trade in the securities outside the scope of the trading plan or to deviate from it except due to permanent incapacity or bankruptcy or operation of law.

Provided that the implementation of the trading plan shall not be commence, if any UPSI in possession of the Insider at the time of formulation of the plan has not become generally available at the time of commencement of implementation of the trading plan.

Explanation: In case of non-implementation (full/partial) of trading plan due to either reasons enumerated herein or failure of execution of trade due to inadequate liquidity in the scrip, the following procedure shall be adopted:

(i) The Insider shall intimate non-implementation (full/partial) of trading plan to the Compliance Officer within two trading days of end of tenure of the trading plan with reasons thereof and supporting documents, if any.

(ii) Upon receipt of information from such person, the Compliance Officer, shall place such information along with his recommendation to accept or reject the submissions of the Insider, before the Audit Committee in the immediate next meeting. The Audit Committee shall decide whether such non-implementation (full/partial) was bona fide or not.

(iii) The decision of the Audit Committee shall be notified by the compliance officer on the same day to the stock exchanges on which the securities are listed.

(iv) In case the Audit Committee does not accept the submissions made by such person, then the compliance officer shall take action as per the Code of Conduct.

7 Circumstances and procedures for bringing people "Inside"

7.1 Circumstances



LUX INDUSTRIES LIMITED

People may be brought inside in following situations:

- Availing of consultancy from professionals for confidential matters;
- Availing of assistance within the organization from another team/ department for a corporate action viz. merger, demerger, restructuring etc, where the information is not generally available;
- Availing finance from banks, financial institutions for end-use, where the information is not generally available;
- In the course of conduct of due diligence under any provision of law;
- Other situations arising in the ordinary course of business which shall be documented by the Compliance Officer based on the inputs received from Managing Director and other Designated Persons handling UPSI from time to time.
- Indicative list of situations mandating bringing of people inside is as under:

Nature of UPSI	Person responsible in Handling UPSI	People required to be brought inside
Finalization of results and financial statements.	CFO, Head of accounts	<ul style="list-style-type: none"> • Statutory auditors. • Investor relation department finalizing the press release.
Merger, demerger, acquisition, restricting etc.	Chairman, MD, WTD, CFO & CS	<ul style="list-style-type: none"> • Statutory auditors • Consultants, law firms for due diligence, documentation. • In-house Legal team • Secretarial team at the time of finalization of board agenda and circulation.
Sale of significant stake in the Company by promoter	Promoter	<ul style="list-style-type: none"> • Chairman, MD, WTD, CFO & CS
Levy of penalty for violation/ contravention by a regulatory authority	Head of concerned department, MD, CFO.	<ul style="list-style-type: none"> • CS; • Concerned official of the regulator dealing with the matter.
Change in management	Board of directors, CS, HR head	<ul style="list-style-type: none"> • Secretarial team • Concerned department head • HR team



LUX INDUSTRIES LIMITED

Nature of UPSI	Person responsible in Handling UPSI	People required to be brought inside
Change in capital structure	Chairman, MD, WTD, CFO & CS, Head of Accounts	<ul style="list-style-type: none"> • Secretarial team • Accounts team

7.2 Procedure:

- An employee of the Company can be brought 'inside' only if he/she is conversant with their obligation to preserve confidentiality of UPSI and after obtaining approval of the Managing Director or other Designated Persons handling the said UPSI. The need for the person to know the UPSI shall also be stated while seeking approval;
- The information about sharing of UPSI shall be promptly informed to the Compliance Officer for updating in the digital database;
- A person other than an employee of the Company can be brought 'inside' only after ensuring that the organization represented by such person has appropriate code in place covering the compliance to be ensured by the fiduciary/ intermediary under the Regulations.
- Confidentiality agreements shall be entered into with the person other than employees of the Company, before sharing of UPSI.
- Once a person is brought 'inside', Permanent Account Number or any other identifier authorized by law, where Permanent Account Number is not available, shall be promptly shared to the Compliance Officer for updating the digital database.
- The Compliance Officer may require the person brought 'inside' to make disclosure of holdings and trading in securities of the Company in Form C in order to monitor compliance with the Regulations.

8 Internal control to be ensured under the Regulations

- The requirements under Insider Trading Code shall be sensitized to all the employees of the Company for following purpose;
 - Educating all insiders about the sensitivity of information and the need to restrict disclosures on "need to know" basis;
 - Educating all such executives who deal with sensitive information to ensure strictest confidentiality;
 - Educating and training all employees about basic security practices, such as password and physical security procedures viz. locking the workstation or logging out of the systems while leaving the cubicle/ workstation/ cabin;
 - Ensuring that trading in securities of any other company, in respect of whom the company's executives have UPSI, is barred;



LUX INDUSTRIES LIMITED

- Ensuring that the investment team/investment committee of the Company has “chinese wall” protection from such team as may have UPSI in relation to clients;
 - Ensuring that trading by all employees in company’s securities are disclosed, if such trades are in excess of the stipulated amount every quarter;
 - Ensuring that Designated Persons are aware of closure of trading window;
 - Ensuring that Designated Persons take prior approval for any trading while trading window is open;
 - Ensuring that Designated Persons are aware of contra trade restrictions.
 - Ensuring that there is adherence to Company’s internal code/protocol while speaking to press/public forums;
 - Ensuring entry in digital database as soon as the UPSI is passed inside/ outside the organization
 - Disclosure requirements under the Code and the Regulations.
- The Compliance Officer, in discussion with the Managing Director shall maintain a list of potential UPSI identified and ensure confidentiality of the same. For timely identification of UPSI, the Compliance Officer, based on information obtained from the Managing Director or other Designated Persons handling UPSI, may maintain a sensitivity list identifying factors or developments which generally give rise to the emergence of UPSI in the Company and identify the likely flow of information.
 - Files/ documents/ papers in relation to UPSI shall be kept secure. Computer files shall have adequate security of login and password and the security administrators shall restrict the amount of database access that is given to the users. The insiders should not accidentally access UPSI on account of inadequate or improper account rights or inadequate permission/ access control. The extent of access to be granted to the employees of respective department should be determined in consultation with respective head of the department.
 - In the event there is a need for any sharing of information across the departments/ to any other Designated Person or employee, prior consent of the Managing Director or concerned Designated Person handling UPSI to be obtained stating that such sharing of information is not in violation of the Regulations and is for legitimate purpose.
 - The Compliance Officer shall be timely informed about sharing of UPSI for legitimate purpose along with the details with respect to the nature of UPSI and the names of such persons who shared the information and the names of such person with whom the information is shared under this Regulation for legitimate purpose, along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available and other details required to be given to the Compliance Officer under the Regulations.
 - Where UPSI is required to be shared with any other person other than the Designated Persons/ employees of the Company, such person shall be required to execute agreements to contract confidentiality and non-disclosure obligations on the part of



LUX INDUSTRIES LIMITED

such person and such person shall keep information so received confidential and shall not otherwise trade in securities of the company when in possession of UPSI.

- The Compliance Officer shall maintain and timely update the digital database of list of Designated Persons and their immediate relatives, list of persons other than Designated Persons with whom UPSI has been shared and contract for confidentiality has been duly executed, based on the information received from the Managing Director or Designated Person handling UPSI.
- The Compliance Officer shall monitor trading activity, especially around important events such as earnings announcements, acquisitions and other events material to a Company's value that are in the nature of UPSI, for the persons referred above.
- Any breach suspected by any Designated Person, employees or persons other than the Designated Persons/ employees of the Company shall be promptly brought to the notice of Compliance Officer in the manner provided in Whistle Blower and Vigil Mechanism Policy of the Company available on the website of the Company at: <https://www.luxinnerwear.com/> and in case of an instance of leakage of UPSI, an inquiry to be initiated in the manner approved by the Board of Directors of the Company.
- The Chairman and Managing Director of the Company shall be responsible to review and evaluate effectiveness of the internal control measures and update the Audit Committee on the same at least once in a year to enable the verify the adequacy and effectiveness of the internal controls.

9 Trading Window and Window Closure

- i. A notional trading window shall be used as an instrument of monitoring trading by the Designated persons.
- ii. The trading window shall be closed when the Compliance Officer 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.
- iii. When the trading window is closed, the Designated Persons and their immediate relatives shall not trade in the Company's securities during such period.
- iv. All Designated Persons and their immediate relatives shall conduct all their dealings in the securities of the Company only during the period when the trading window is open and shall not enter in any transaction involving the purchase or sale of the Company's securities during the periods when the trading window is



LUX INDUSTRIES LIMITED

- 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.
- v. In case of ESOPs, exercise of option may be allowed during the period when the trading window is closed. However, sale of shares allotted on exercise of ESOPs shall not be allowed when trading window is closed.
 - vi. The Compliance Officer shall intimate the closure of trading window in writing or by e-mail to all the Designated Person of the Company when he or she determines that a designated person or class of designated persons can reasonably be expected to have possession of UPSI.
 - vii. The Compliance Officer after taking into account various factors including the UPSI 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.
 - viii. The trading window closure 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.
 - ix. Trading restriction period shall be made applicable from the end of every quarter till 48 hours after the declaration of financial results.

Provide that the trading window restrictions shall not apply in respect of -

(a) transactions specified in clauses (i) to (iv) and (vi) of the proviso to sub-regulation (1) of regulation 4 of the PIT Regulations and in respect of a pledge of shares for a bonafide purpose such as raising of funds, subject to pre-clearance by the Compliance Officer and compliance with the respective regulations made by SEBI;

(b) transactions which are undertaken in accordance with respective regulations made by the Board such as acquisition by conversion of warrants or debentures, subscribing to rights issue, further public issue, preferential allotment or tendering of shares in a buy-back offer, open offer, delisting offer or transactions which are undertaken through such other mechanism as may be specified by the Board from time to time.

(c) Offer for Sale and Rights Entitlements transactions carried out in accordance with the framework specified by SEBI from time to time.

(d) trades executed as per the approved trading plan.

When the Trading Window is closed, Designated Persons shall require prior clearance from the Compliance Officer in respect of pledge of securities of the Company/ release of pledged securities of the Company.



LUX INDUSTRIES LIMITED

10 Pre-clearance of trades

- 10.1 All Designated Persons who intend to deal in the securities of the Company when the trading window is opened and if the value of the proposed trades is above Rs. 10 Lakhs in value or 2% of total shareholding whichever less is, (hereinafter referred to as '**threshold**') 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 UPSI even if the trading window is not closed and hence he or she shall not be allowed to trade.

Pre-clearance shall not be applicable in the following case –

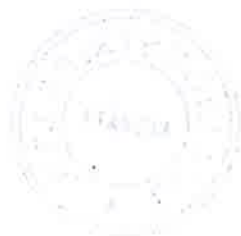
1. for contra trade, where the Trade is pursuant to Trading Plan; or
2. where such Trade to be carried out does not exceed the above threshold.

10.2 The pre-clearance procedure shall be hereunder:

- (i) An application may be made in the **prescribed Form (Annexure 1)** to the Compliance officer indicating the estimated number of securities that the Designated Person intends to deal in, the details as to the depository with which he or she has a security account, the details as to the securities in such depository made and such other details as may be required by any rule made by the Company in this behalf.

In case of trading by the Compliance Officer, prior permission from the from board shall be obtained.

- (ii) An **undertaking (Annexure 2)** shall be executed in favour of the Company by such Designated Person incorporating, *inter alia*, the following clauses, as may be applicable:
- (a) that the Designated Person does not have any access or has not received "Unpublished Price Sensitive Information" up to the time of signing the undertaking.
 - (b) that in case the Designated Person has access to or receives "Unpublished Price Sensitive Information" after the signing of the undertaking 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.



LUX INDUSTRIES LIMITED

- (c) that he/she has not contravened the code on PIT as notified by the Company from time to time.
 - (d) that he/she has made a full and true disclosure in the matter.
 - (e) that he/she undertake to submit the necessary report within two trading days of execution of the transaction/a 'Nil' report, if the transaction is not undertaken.
 - (e) that he/she is aware that, he/she shall be liable to face penal consequences as set forth in the Code including disciplinary action, wage freeze, suspension etc. under the Code of the Company, in case the above declarations are found to be misleading or incorrect at any time.
 - (f) that he/she hereby undertake not to transact in Securities in the sanctioned period in case trading window is declared closed subsequently.
 - (iii) All Designated Persons and their immediate relatives shall execute their order in respect of Securities of the Company within one week after the approval of pre-clearance order **(Annexure 3)** is given. The Designated Person shall file within 2 (two) days of the execution of the deal, the details of such deal with the Compliance Officer in the prescribed form. In case the transaction is not undertaken, a report to that effect shall be filed within the above stated timeline. **(Annexure 4)**.
 - (iv) If the order is not executed within seven days after the approval is given, the Designated Person must apply for pre-clearance again.
 - (v) All Designated 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 Designated Persons shall also not take positions in derivative transactions in the shares of the Company at any time. 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.
- Provided that this shall not be applicable for trades pursuant to exercise of stock options.

- (vi) The Compliance Officer may waive off the holding period in case of contra trade of securities for reasons to be recorded in writing provided that such



LUX INDUSTRIES LIMITED

relaxation does not violate the Regulations. However, no such contra trade will be permitted when the Trading window is closed.

11 Reporting and Disclosure Requirements

11.1 Personal Information:

Designated Persons shall be required to disclose the names and Permanent Account Number or any other identifier authorized by law of the following persons to the company on an annual basis and as and when the information changes:

- (a) immediate relatives;
- (b) persons with whom such designated person(s) shares a material financial relationship;

Explanation-

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.

- (c) Phone, mobile and cell numbers which are used by them;
- (d) names of educational institutions from which designated persons have graduated (to be granted on one-time basis);
- (e) Names of their past employers (to be granted on one-time basis).

11.2 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 holding of securities of the company as on the date of appointment or becoming a promoter, to the company within seven days of such appointment or becoming a promoter.

The disclosure shall be given in the format provided in **Annexure 4**.

11.3 Annual Disclosure

In addition to the furnishing of Personal Information referred above, every Designated Person and member of promoter group shall disclose all holdings in Securities of the Company including that of his/her Immediate Relatives as on March 31 of the relevant financial year, within 7 (seven) days in the format provided in **Annexure 5**



LUX INDUSTRIES LIMITED

11.4 Continual Disclosure

Every promoter, member of promoter group, designated person and director of the Company acquiring or trading in securities of the Company subsequent to the initial disclosure, shall disclose to the Company in the format provided in **Annexure 6** to the Company, the number of such securities acquired or disposed by him/her or his/her Immediate Relatives within 2 (two) trading days of such transaction or receipt of intimation of allotment of securities, 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 Rupees ten lakhs or such amount as may be specified.

Explanation: It is clarified for the avoidance of doubts that the disclosure of the incremental transactions after any disclosure under this clause, shall be made when the transactions effected after the prior disclosure cross the threshold specified in this clause.

Further, pursuant to SEBI circular SEBI/HO/ISD/ISD/CIR/P/2020/168 dated September 09, 2020, SEBI had implemented system driven disclosures with effect from October 01, 2020 which was in force parallel with existing manual based disclosures till March 31, 2021. Therefore, manual disclosure under this sub-clause by the designated persons is not required.

However, the existing procedure shall continue without exemption for trading by immediate relatives of designated persons.

11.5 Disclosure by other Connected persons

The Compliance Officer may require any other Connected Person to disclose the holdings and trading in securities of the company as per (Annexure 8) at such frequency as she or he may determine.

11.6 Off-market trades by Insider

- Every Insider shall disclose in the format provided in **Annexure 6** to the Company, off-market trades done by him/her within 2 (two) working days of such transaction.
- The Compliance Officer shall notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days from receipt of disclosure or from becoming aware of such information.



LUX INDUSTRIES LIMITED

12 Other Disclosure Requirements

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

13 Protection of the Informant

The Company shall ensure suitable protection against any discharge, termination, demotion, suspension, threats, harassment, directly or indirectly or discrimination against any employee who files a Voluntary Information Disclosure Form, irrespective of whether the information is considered or rejected by SEBI he or she is eligible for a Reward under the Regulations, by reason of –

- (a) filing a Voluntary Information Disclosure Form under the Regulations;
- (b) testifying in, participating in, or otherwise assisting or aiding SEBI in any investigation, inquiry, audit, examination or proceeding instituted or about to be instituted for an alleged violation of insider trading laws or in any manner aiding the enforcement action taken by the SEBI; or
- (c) breaching any confidentiality agreement or provisions of any terms and conditions of employment or engagement solely to prevent any employee from cooperating with the SEBI in any manner.

14 Penalty for contravention of the Code on PIT

- 14.1 Persons governed by this Code shall be individually responsible for complying with the provisions of the Code (including to the extent the provisions hereof are applicable to his/her dependents).
- 14.2 Persons governed by this Code who trades in securities or communicates any information for trading in securities, in contravention of this Code may be subjected to appropriate action by the Company for such violations.

Under Section 15G of the Securities and Exchange Board of India Act, 1992 ("the SEBI Act") any Insider who indulges in insider trading in contravention of the



LUX INDUSTRIES LIMITED

Regulations is liable to a penalty which shall not be less than ten lakh rupees but which may extend to twenty-five crore rupees or three times the amount of profits made out of insider trading, whichever is higher. Under Section 24 of the SEBI Act, anyone who contravenes or abets the contraventions of the provisions of the Act or of any Rules or Regulations made thereunder, he or she shall be punishable with imprisonment for a term which may extend to ten years, or with fine, which may extend to twenty five crore rupees or both. If any person fails to pay the penalty imposed he or she shall be punishable with imprisonment for a term which shall not be less than one month, but which may extend to ten years or with fine, which may extend to twenty-five crore rupees or with both.

14.2 Persons governed by this Code who violate the Code shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, recovery, ineligibility for future participation in employee stock option plans, etc. Any amount collected under this clause shall be remitted to SEBI for credit to the Investor Protection and Education Fund administered by the SEBI by way of the link available on the homepage of SEBI's website (www.sebi.gov.in) under the head "Click here to make payment to SEBI IPEF", or in such other manner as may be notified by SEBI from time to time.

14.3 The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

14.4 In case it is observed by the Compliance Officer that there has been a violation of the SEBI Regulations by the Designated Person including that of his/her Immediate Relatives, the Compliance Officer shall promptly inform the stock exchange(s) where the securities of the Company are traded, in such form and such manner as may be specified by SEBI from time to time about such violation."

14.5 Person(s) governed by this Code against whom information has been furnished by the Company/Compliance Officer to SEBI for violations of the Regulations/Code, shall provide all information and render necessary co-operation as may be required by the Company/Compliance Officer or SEBI in this connection.

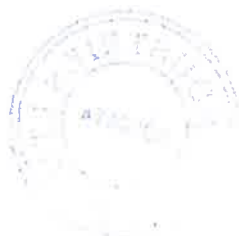
15 Authority to make alterations:

The Board of Directors are authorized to make such alterations to this Code as considered appropriate subject to the condition that such alterations shall not be inconsistent with the provisions of the Regulations or any amendments thereto.



LUX INDUSTRIES LIMITED

Any part of this Code, if at any time, is found to be inconsistent with the PIT Regulations or any amendments thereto, the provisions of the Regulations shall prevail over this Code till such time appropriate alterations are made herein.



LUX INDUSTRIES LIMITED

ANNEXURES

ANNEXURE 1

SPECIMEN OF APPLICATION FOR PRE-CLEARANCE APPROVAL

Date:

To,

The Compliance Officer,

Lux Industries Limited,

Kolkata

Dear Sir/Madam,

Application for Pre-dealing approval in securities of the Company

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's **Insider Trading Code**, I seek approval to purchase / sale / subscription of _____ equity shares of the Company 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 (d) Pledge (e) De-pledge (f) Others (Specify)
6	Proposed date of dealing in securities	
7	Estimated number of securities proposed to be acquired/subscribed/sold	
8	Price at which the transaction is proposed	
9	Current market price (as on date of application)	
10	Whether the proposed transaction will be through stock exchange or off-market deal	
11	Folio No. / DP ID / Client ID No. where the securities will be credited / debited	

I enclose herewith the form of Undertaking signed by me.

Yours faithfully

(Signature of the Designated Person)



LUX INDUSTRIES LIMITED

ANNEXURE 2

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

UNDERTAKING

To,
The Compliance Officer
Lux Industries Limited,
Address
Kolkata

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

As required by the Code on PIT of Lux Industries Limited, I hereby state that-

- (a) I further declare that I am not in possession of or otherwise privy to any unpublished Price Sensitive Information (as defined in the Company's Code of Conduct to Regulate, Monitor and Report Trading (the Code) up to the time of signing this Undertaking.
- (b) In the event that I have access to or received any information that could be construed as "Price Sensitive Information" as defined in the Code, after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public.
- (c) I declare that I have not contravened the provisions of the Code as notified by the Company from time to time.
- (d) I undertake to submit the necessary report within two days of execution of the transaction / a 'Nil' report if the transaction is not undertaken.
- (e) If approval is granted, I shall execute the deal within 7 days of the receipt of approval failing which I shall seek pre-clearance.
- (f) that I am aware that, I shall be liable to face penal consequences as set forth in the Code including disciplinary action, wage freeze, suspension etc. under the Code of the Company, in case the above declarations are found to be misleading or incorrect at any time.
- (g) that I hereby undertake not to transact in securities in the sanctioned period in case trading window is declared closed subsequently.
- (h) I declare that I have made full and true disclosure in the matter.

Date :

Signature : _____

* Indicate number of shares



LUX INDUSTRIES LIMITED

ANNEXURE 3 FORMAT FOR PRE- CLEARANCE ORDER

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 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 the details of the executed transactions in the attached format within 2 days from the date of transaction/deal. In case the transaction is not undertaken a 'Nil' report shall be necessary.

**Yours faithfully,
For LUX INDUSTRIES LIMITED**

COMPLIANCE OFFICER

Date : _____

Encl: Format for submission of details of transaction



LUX INDUSTRIES LIMITED

ANNEXURE 4

FORM A

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 Regulation 7 (1) (b) read with Regulation 6(2)]

Name of the company: _____

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 other such persons as mentioned in Regulation 6(2).

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (KMP / Director or Promoter or member of the promoter group/ Immediate relative to/others, etc.)	Date of appointment of KMP/Director / OR Date of becoming Promoter/ member of the promoter group	Securities held at the time of appointment of KMP/Director or upon becoming Promoter or member of the promoter group		% of Shareholding
			Type of securities (For eg. - Shares, Warrants, Convertible Debentures, Rights entitlements, 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 on the securities of the company held on appointment of 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).



LUX INDUSTRIES LIMITED

Open Interest of the Future contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group			Open Interest of the Option Contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group		
Contract Specification	Number of units(contract s*lot size)	Notional Value in Rupee terms	Contract Specifications	Number of units(contract s*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:

Date:

Place:



LUX INDUSTRIES LIMITED

ANNEXURE 5

FORMAT OF ANNUAL STATEMENT OF HOLDINGS BY DESIGNATED PERSONS AND THEIR IMMEDIATE RELATIVES

To,
The Compliance Officer,
Lux Industries Limited
Kolkata

Dear Sir,

STATEMENT OF SHAREHOLDINGS IN THE COMPANY

As on _____, I along with my dependents hold the Securities of the Company, details whereof are as under:

Description of Security:

<i>Name of DP and Immediate Relative</i>	<i>Physical Holdings</i>			<i>Electronic Holdings</i>		
	<i>Folio No.</i>		<i>Total Holdings</i>	<i>DP ID</i>	<i>Client ID</i>	<i>Total Holdings</i>

Yours truly,

Signature: _____

Name: _____

Company (applicable to Designated Person)

Empl. No. _____

Dept/Div. _____

Note:

"Immediate Relative" means the spouse of the Designated person and includes parent, sibling and child of such designated person or of the spouse, who are either financially dependent on the Designated Person or consult the Designated Person in taking decisions relating to trading in securities.



LUX INDUSTRIES LIMITED

**ANNEXURE 6
FORM B**

Securities and Exchange Board of India (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 or member of Promoter group, Designated Person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2)

Name, PAN, CIN/DIN, & addresses with contact nos.	Category of Person (Promoter/member of the promoter group/designated person/Director/immediate relative to/others etc.)	Securities held prior to acquisition / disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice / acquisition of shares / disposal 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.)	Exchange on which the trade was executed
		Type of securities (For eg. - Shares, Warrants, Convertible Debentures, Rights entitlements etc.)	No. and % of share holding	Type of securities (For eg. - Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No.	Value	Transaction Type (Purchase/sale/Pledge/Revo cat ion / Invo cat ion/ Othe rs- please specify)	Type of securities (For eg. - Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of share holding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15



LUX INDUSTRIES LIMITED

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

(ii) Value of transaction excludes taxes/brokerage/any other charges

Details of trading in derivatives on the securities of the company by Promoter, member of the promoter group, designated person or Director of a listed company and immediate relatives of such persons and other such persons as mentioned in Regulation 6(2).

Trading in derivatives (Specify type of contract, Futures or Options etc.)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
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:

Designation:

Date:

Place:



LUX INDUSTRIES LIMITED

ANNEXURE 7

FORM C

Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (3) -Transaction by other connected persons as identified by the company

Name of the company: _____

ISIN of the company: _____

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

Name, PAN, CIN/DIN, & address with contact nos.	Connection with company	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/acquisition of shares/disposal		Date of intimation to company		Mode of acquisition/disposal (on market/public/rights / Preferential offer / off market/ Inter-se transfer, ESOPs etc.)	Exchange on which the trade was executed
		Type of securities (For eg. - Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of share holding	Type of securities (For eg. - Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	N o.	V a l u e	Tran s a c t i o n Type (Purchase/Sale/Pledge/Revo cation / Invo cation/ Othe rs-pleas e specify)	Type of securities (For eg. - Shares, Warrants, Convertible Debentures, Rights entitlement, etc.)	No. and % of share holding	From	To				
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	



LUX INDUSTRIES LIMITED

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

(ii) Value of transaction excludes taxes/brokerage/any other charges

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

Trading in derivatives (Specify type of contract, Futures or Options etc.)						Exchange on which the trade was executed
Type of Contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
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

Signature:

Designation:

Date:

Place:



LUX INDUSTRIES LIMITED

ANNEXURE 8

Statement of holding of Securities at the time of joining the company by Designated Person/Any other Connected Person

(Under LUX INDUSTRIES LIMITED Insider Trading Code)

The Compliance Officer

LUX INDUSTRIES LIMITED

39, Kali Krishna Tagore Street

Kolkata - 700007

Reg : Initial/Annual Disclosure of Shareholding

Following are the details of shares of Lux Industries Limited held by me and/or my immediate relatives as on

Name	Relationship	No. of Shares held in the Company	Other Details such as Folio / DP Id / Client Id
	Self		
Immediate Relative:			
1.			
2.			

I undertake to furnish the Annual Statement regarding the complete details of all shares held by us within 15 days from the end of each year.

Signature :

Name :

Designation :

Department :

Date :

E-Mail ID for Communication :

Note:

1. You may also submit through electronic mail at the dedicated e-mail id cs@luxinnerwear.com followed by a hard copy.
2. "Immediate Relative" means the spouse of the Designated person and includes parent, sibling and child of such designated person or of the spouse, who are either financially dependent on the Designated Person or consult the Designated Person in taking decisions relating to trading in securities.



