

**LOTUS EYE HOSPITAL AND INSTITUTE LIMITED**  
**CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING**

This code has been formulated to regulate, monitor and report trading in the securities of the company by its Designated Persons and Relatives of the designated persons, in accordance with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time.

**1. APPLICABILITY**

- A. This code is applicable to the “Designated Persons and their Relatives”.
- B. This code is applicable to trading in the Company’s securities and derivatives.

**2. DEFINITIONS**

**2.1 “Compliance officer”** means the Managing Director of the Company, who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of Unpublished Price sensitive information (UPSI), monitoring of trades and implementation of the code under the overall supervision of the Board of Directors of the Company.

**2.2 “Connected person”** means any person who is or has during the 6 (six) months prior to the concerned act been associated with a company, directly or indirectly, in any capacity including:

- by reason of frequent communication with its officers or
- by being in any contractual, fiduciary or employment relationship or
- by being a director, officer or an employee of the company or
- holds any position including a professional or business relationship between himself and the company whether temporary or permanent,

that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access **AND**

- any person who has been defined as Connected Person **OR** deemed to be connected persons under Regulation 2(d) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and includes a Relative of a Connected Person.

**2.4 “Designated Persons”** of the Company shall mean and include

- (i) Directors of the company.
- (ii) Promoters of the company
- (iii) Every employee in the grade of General Manager and above.
- (iv) Every employee in the Corporate Finance & Accounts Department, Secretarial Department, Strategy Department / Chairman’s / Managing Director’s / Whole Time Director’s office / Internal Audit Department / Corporate Communication, irrespective of their cadre (herein after referred to as “inside areas”)
- (v) Employees of material subsidiary(s) of the company, designated on the basis of their functional role or access to unpublished price sensitive information in the organization by their board of directors



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- (vi) promoters who are individuals or investment companies for intermediaries or fiduciaries
- (vii) Chief Executive Officer and employees upto two levels below Chief Executive Officer of **the company**, irrespective of their functional role in the company or ability to have access to unpublished price sensitive information
- (viii) Chief Executive Officer and employees upto two levels below Chief Executive Officer of **intermediary, fiduciary of the Company** irrespective of their functional role in the company or ability to have access to unpublished price sensitive information
- (ix) Chief Executive Officer and employees upto two levels below Chief Executive Officer of **material subsidiaries** of the company irrespective of their functional role in the company or ability to have access to unpublished price sensitive information
- (x) Any support staff of listed company, intermediary or fiduciary such as IT staff or secretarial staff who have access to unpublished price sensitive information.

and

- (xi) Any other person as may be specified by the Compliance Officer / Managing Director from time to time, who may have access to unpublished price sensitive information

**2.5** “**Employee**” means every employee of the Company (whether working in India or abroad), including directors in the employment of the Company.

**2.6** “**Fiduciaries**” includes Professional firms such as auditors, accountancy firms, law firms, analysts, practicing company secretaries, secretarial auditors, insolvency professional entities, consultants, banks etc., assisting or advising the Company.

**2.7** “**Generally available information**” means information that is accessible to the public on a non-discriminatory basis.

**2.8** “**Insider**” means any person who is:

1. a connected person or
2. in possession of or having access to unpublished price sensitive information.

any person who has been defined as Insider under Regulation 2(g) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 or any modification thereof.

**2.9** “**Promoter & Promoter Group**”

**Promoter** shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof;

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

**2.10** “**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)

**2.11 “Securities”** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 or any modification thereof except units of a mutual fund;

#### Code of Conduct for Prevention of Insider Trading

**2.12 “Trading”** means and includes subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell or deal in any securities of the company.

**2.13 “Trading day”** means a day on which the recognized Stock Exchanges are open for trading.

**2.14 “Trading window”** refers to the period during which the company’s securities can be traded.

**2.15 “Unpublished Price sensitive information”** means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities. It shall ordinarily include 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

Words and expressions used and not defined herein shall have the meaning respectively assigned to them under the SEBI (Prohibition of Insider Trading) Regulations, 2015.

### **3. PRESERVATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

- 3.1** All Designated persons / Insider should maintain confidentiality of the Unpublished Price Sensitive Information.
- 3.2** All Unpublished Price Sensitive Information shall be handled within the company on a need-to-know basis.
- 3.3** Unpublished price sensitive information shall not be communicated to any person **except in furtherance of the insider’s legitimate purposes**, performance of duties or discharge of his legal obligations.
- 3.4** To prevent the misuse of Unpublished Price Sensitive Information, the Company **shall adopt a “Chinese Wall” policy which separates those areas of the company** which routinely have access to Unpublished Price Sensitive Information considered **“Inside Areas” from those areas which** are not dealing with the Unpublished Price Sensitive Information considered as **“Public areas”**.
- 3.5** The employees in the Inside Area shall not communicate any Unpublished Price Sensitive Information to anyone in the public areas.
- 3.6** In exceptional circumstances employees from the public area may be brought **“over the**



**wall” and given Unpublished Price Sensitive Information on a “need to know” basis,**  
under intimation to the compliance officer.

- 3.7** Any other persons having contractual or fiduciary relation with the company, such as auditors, accountancy firms, law firms, practicing company secretaries, secretarial auditors, analysts, consultants etc., assisting or advising the

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company who are expected to have UPSI shall formulate a code of conduct to regulate, monitor and report the trading by its employees and other connected persons towards achieving the compliance of the regulations.

**3.8** Misuse of such information shall be strictly avoided.

**3.9** Files containing Unpublished Price Sensitive Information shall be kept secure and computer files shall be protected with login ID and passwords.

## **4. DISCLOSURES**

### **4.1 Initial Disclosures**

**4.1.1** Every promoter, key managerial personnel and director of the company shall **disclose his holding of the company's securities, as on the date of the SEBI (Prohibition of Insider Trading) Regulations, 2015** taking effect, to the company within thirty days of these regulations taking effect. This initial disclosure shall be made to the Company in **Form A**

**4.1.2** Every person on appointment as a key managerial personnel or a director of the company or upon becoming a promoter shall disclose his holding of the 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. This initial disclosure shall be made to the Company in **Form B**.

### **4.2 Continual Disclosures**

**4.2.1** Every promoter, Designated Person and director of the company shall disclose to the company the number of such securities acquired or disposed of within two trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a **traded value in excess of ten lakh rupees (Rs.10 lakh only)**.

**4.2.2** The disclosure of the incremental transactions after any disclosure under this code, shall be made when the transactions effected after the prior disclosure cross the threshold specified above in that calendar quarter.

**4.2.3** The aforesaid disclosure shall be made in **Form C**.

### **4.3. Disclosure by the Company**

**4.3.1** The company shall notify the particulars of the continual disclosures received from the persons referred in 4.2, to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.

### **4.4 Disclosure by the Designated Person**

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

- a) Relatives
- b) persons with whom such designated person(s) shares a material financial relationship
- c) Phone, mobile and cell numbers which are used by them

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In addition, the names of educational institutions from which designated persons have graduated and names of their past employers shall also be disclosed on a one time basis.

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

### **4.5 Periodical Reporting Requirements for transaction insecurities**

**4.5.1** All designated persons of the company shall be required to report their own and their Relatives level of holdings in securities as on 31<sup>st</sup> March every year to the Compliance officer in **Form D**, on or before 15<sup>th</sup> April, every year.

**4.5.2** The designated person, who has got the approval through pre-clearance for the trade, may report in **Form F**, within 2 days from the execution of trade to the Compliance officer.

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

## **5. PREVENTION OF MISUSE OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

### **5.1 Trading window**

**5.1.1.** The trading window will remain closed as per the SEBI (Prohibition of Insider Trading) Regulations – as amended by time to time.

**5.1.2.** During the period of closure of the trading window the designated persons and their relatives shall not trade in the securities of the Company.

### **5.2 Trading Plan**

**5.2.1** An insider shall have an option to formulate a trading plan and present it to the compliance officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan. The Compliance Officer shall only approve a Trading Plan in accordance with the applicable provisions of the regulations.

Such 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:
  - (i) either the value of trade to be effected or the number of securities to be traded;

- (ii) nature of the trade;
- (iii) either specific date or time period not exceeding five consecutive trading days;
- (iv) 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:

a. 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;

b. 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 (i), (ii) and (iii) shall be mandatorily mentioned for each trade, the parameter in sub-clause (iv) shall be optional.

(ii) The price limit in sub-clause (iv) 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.

d. not entail trading in securities for market abuse.

**5.2.2** The compliance officer shall consider the trading plan made as above and shall approve it forthwith. However, he shall be entitled to take express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per provisions of the SEBI Insider Trading Regulations.

**5.2.3** The trading plan once approved shall be irrevocable and the Designated Persons shall mandatorily have to implement the plan, without being entitled to either to 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.

**5.2.4** The implementation of the trading plan shall not be commenced if at the time of formulation of the plan, the Designated Person is in possession of any unpublished price sensitive information and the said information has not become generally available at the time of the commencement of implementation.

**5.2.5** Upon approval of the trading plan, the Compliance Officer shall notify the plan to the stock exchanges on which the securities are listed.

**5.2.6** Provided that pre-clearance of trades shall not be required for a trade executed as per an approved trading plan. Provided further that trading window norms shall not be applicable for trades carried out in accordance with an approved trading plan.



- 5.2.7** Provided further that if the insider has set a price limit for a trade under sub-clause of clause (v) of sub-regulation 2, the insider shall execute the trade only if the execution price of the security is within such limit. If price of the security is outside the price limit set by the insider, the trade shall not be executed.

Explanation: In case of non-implementation (full/partial) of trading plan due to either reasons enumerated in sub-regulation 4 or failure of execution of trade due to inadequate liquidity in the scrip, the following procedure shall be adopted:

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.

Upon receipt of information from the insider, 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.

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.

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

#### Trading when Trading Window is Open (Pre clearance for Trade)

- 5.2.8** When the trading window is open, trading by designated persons shall be subject to pre-clearance by the compliance officer, in case the Compliance officer or his relative wishes to trade in the securities of the company, he should get pre-clearance from the Chief Financial Officer and all the provisions of pre-clearance shall also be applicable to the Compliance officer.
- 5.2.9** Compliance officer prior to approving any trades, shall seek declarations to the effect that the applicant for pre-clearance is not in possession of any unpublished price sensitive information.
- 5.2.10** The designated persons shall make an application for pre-clearance along with the Undertaking in **Form E**, to the Compliance officer. The request can be sent by email to [companysecretary@lotuseye.org](mailto:companysecretary@lotuseye.org)
- 5.2.11** Compliance officer shall either clear or decline to clear the proposed transaction. He should communicate his decision within 7 days of receipt of request. In case of declining, the reason shall also be informed.
- 5.2.12** The designated persons shall execute the trades that have been pre-cleared by the compliance officer, within seven trading days, failing which fresh pre-clearance would be needed for the trades to be executed.

### **5.3 Other restrictions**

- 5.3.1** A designated person who is permitted to trade, shall not execute a contra trade within a period of six months after the prior transaction.
- 5.3.2** The compliance officer may grant relaxation from the strict application of such restriction, for reasons to be recorded in writing provided that such relaxation does not violate these regulations.
- 5.3.3** If a designated person executes a contra trade, inadvertently or in violation of such a restriction, the profits from such trade shall be remitted to the SEBI for the credit of the Investor Protection and Education Fund administered by the SEBI.

### **6. SANCTIONS & DISCIPLINARY ACTIONS FOR CONTRAVENTION OF THE CODE OF CONDUCT**

- 6.1** Any designated person who trades in securities or communicates any information for trading in securities, in contravention of the code of conduct may be penalized and appropriate action may be taken by the board of directors of the company.
- 6.2** Designated persons who violate the code of conduct shall also be subject to disciplinary action by the board of directors of the company, which may include wage freeze, suspension, recovery, clawback etc.
- 6.3** The action by the company shall not preclude the SEBI from taking any action in case of violation of the SEBI [Prohibition of Insider Trading], Regulations, 2015.

#### **6.4 Protection against retaliation and victimisation**

Employee who files a Voluntary Information Disclosure Form, to report any alleged violations of Insider Trading Laws in accordance with the Informant mechanism introduced vide SEBI (Prohibition of Insider Trading) (Third Amendment) Regulations, 2019 dated 17 September 2019, will be protected against any discharge, termination, demotion, suspension, threats, harassment, directly or indirectly or discrimination.

### **7. INFORMATION TO SEBI IN CASE OF VIOLATION OF SEBI [PROHIBITION OF INSIDER TRADING] REGULATIONS, 2015**

In case it is observed by the Board of Directors of the company, that there has been a violation of the SEBI [Prohibition of Insider Trading] Regulations, 2015, they shall inform the SEBI, promptly.

### **8. REPORTING**

The Compliance Officer will submit a report on an annual basis to the Chairman of the Audit Committee, instances of violation of the Code or the Regulation by any person and on the disclosures, Trading Plans and pre-clearances approved and rejected.

### **9. AMENDMENT**

The Board of the Company reserves its right to amend or modify this Code in whole or in part, as and when deemed fit.

In case of any amendments(s), clarification(s), circulars(s) etc, issues by the relevant authorities, not being consistent with the provisions laid down under this code, then such amendment(s), clarification(s), circulars(s) etc. shall prevail upon the provisions hereunder and this code shall stand amended accordingly from the effective date as laid down under such amendment(s), clarifications(s), circular(s)etc.

**10. CONCLUSION**

All Designated Persons are advised to familiarize themselves with the SEBI Regulations and comply with the same, as well as with this Code; both in letter and in spirit. Designated Persons are also advised to ensure compliance by their Relatives.

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**FORM A**

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

Name of the company: \_\_\_\_\_

ISIN of the company: \_\_\_\_\_

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

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relative to/others etc)	Securities held as on the date of regulation coming into force		% of Share holding Contract Specifications	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		
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Contract Specifications	Number of units (contracts * lotsize)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lotsize)	Notional value in Rupee terms
1	2	3	4	5	6	7	8	9	10	11

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

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

Name & Signature: \_\_\_\_\_

Designation: \_\_\_\_\_

Date: Place: \_\_\_\_\_

**FORM B**

**SEBI (Prohibition of Insider Trading) Regulations, 2015**

**[Regulation 7 (1) (b) read with Regulation 6 (2) – Disclosure on becoming a director/KMP/Promoter]**

Name of the company: \_\_\_\_\_

ISIN of the company: \_\_\_\_\_

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

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP/ Directors/immediate relative to/others etc)	Date of appointment of Director /KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/appointment of Director/KMP		% of Shareholding	Open Interest of the Future contracts held at the time of becoming Promoter / appointment of Director / KMP			Open Interest of the Option contracts held at the time of becoming Promoter / appointment of Director / KMP		
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	6	7	8	9	10	11	12

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

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

Name & Signature: \_\_\_\_\_

Designation: \_\_\_\_\_

Date: \_\_\_\_\_

Place: \_\_\_\_\_

**FORM C**

**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, Employee or Director of a Listed Company and other such persons as mentioned in Regulation 6(2)**

Name, PAN., CIN/DIN & address of with contact nos.	Category of Person (Promoters/ KMP / Directors /immediate Relatives to/ others etc)	Securities held prior to acquisition/ disposal		Securities acquired/Disposed				Shareholding held post acquisition / disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition / disposal (on market/ public rights/ preferential offer / off market/ Inter-se transfer, ESOP etc.)	Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No and % of share holding	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No	Value in Rs.	Transaction Type (Buy/Sale/Pledge/Revoke/Invoke)	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No and % of share holding	From	To			Type of contract	Contract specifications	Buy		Sell		
																Notional Value	No. of units (contract size)	Notional Value	No. of units (contract size)	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21

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

Name & Signature:

Designation:

Date:

Place:

**FORM D(Indicative Format)**

**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015  
Regulation 7 (3) – Transactions 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 of with contact nos. of Other connected persons as identified by the company	Connection with company	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Shareholding held post acquisition / disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition / disposal (on market/ public rights/ preferential offer / off market/ Inter-se transfer, ESOP etc.)	Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No and % of share holding	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No	Value in Rs.	Transaction Type (Buy/Sale/Pledge/Revoke/Invoke)	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No and % of share holding	From	To			Type of contract	Contract specifications	Buy		Sell		
																Notional Value	No. of units (contract size)	Notional Value	No. of units (contract size)	
1	2	3	4	5		7	8	9	10	11	12	13	14	15	16	17	18	19	20	21

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

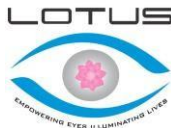
Name & Signature

:Date :

Place :







Code Of Conduct For Prevention Of Insider Trading

Form E

**FORMAT OF APPLICATION FOR PRE-CLEARANCE**

Date:

To,  
The Compliance Officer  
**Lotus Eye Hospital and Institute Limited**  
S.F.770/12, Avinashi Road,  
Civil Aerodrome Post,  
Coimbatore – 641 014

Dear Sir/Madam,

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

**Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct for Prevention of Insider Trading**, I seek approval to trade (purchase / sale / subscription etc) of \_\_\_\_\_ equity shares of the Company as per details givenbelow:

1. Name of the applicant	
2. Designation	
3. Name of the person, who is trading	
4. Number of securities held as on date a) By the applicant b) By the person executing trade	
5. Folio No. / DP ID / Client ID No.	
6. The Proposal is for a) Purchase of securities b) Subscription to securities c) Sale of securities	
7. Proposed date of trading in securities	
8. Estimated number of securities proposed to be acquired/subscribed/sold	
9. Price at which the transaction is proposed	
10. Current market price (as on date of application)	
11. Whether the proposed transaction will be through stock exchange or off-market deal	
12. Folio No. / DP ID / Client ID No. where the securities will be credited / debited	

I hereby confirm and declare that:

a. I am not in possession of or otherwise privy to any unpublished Price Sensitive Information

**(as defined in the Company's Code of Conduct for prevention of Insider Trading (the Code)**

up to the time of signing this Undertaking. In the event that I have access to or received any **information that could be construed as "Price Sensitive Information" as defined in the Code**

after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public.

Contd.. 2

- b. I declare that I have not contravened the provisions of the Code as notified by the Company from time to time.
- c. If approval is granted, I shall execute the trade within 7 days of the receipt of approval failing which I shall seek pre-clearance again, if necessary.
- 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 (within 9 days from the date of pre-clearance)**.
- e. I have made full and true disclosure in the matter.

Yours faithfully,

(Signature of Applicant)

**For the use of Compliance Officer:**

Date of receipt of application	Approval Date	Approval Number	Compliance Officer's Signature



**Form F**

**Format for Reporting of trades executed**

Date:

To,  
The Compliance Officer  
**Lotus Eye Hospital and Institute Limited**  
S.F.770/12, Avinashi Road,  
Civil Aerodrome Post,  
Coimbatore – 641 014

Dear Sir/Madam,

**Reporting of trades executed after pre-clearance**

Pre-Clearance approval no & Date:		
Name of the Applicant for pre-clearance		
Details of Person who executed the trade a. Name b. Address b. PAN		
No & Value of shares held by the Person who executed the trade	No. of share	Value of Share
Before this trade (opening)		
Current trade (Buy / Sale etc)		
After the trade (Closing)		
Mode of acquisition (market purchase / public / Rights / preferential offer etc.)		
Date of trade		
Exchange on which the trade was executed		

Signature of the Applicant

Name :

Place :

Date :