

	GALAXY SURFACTANTS LIMITED	
TITLE: CODE OF CONDUCT (INSIDER TRADING) TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSONS AND THEIR IMMEDIATE RELATIVES	Document No.	Secretarial\Policies\001
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CODE OF CONDUCT (INSIDER TRADING) TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSONS AND THEIR IMMEDIATE RELATIVES

(Pursuant to Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015)

Trading in securities of the Company by Designated Persons and their Immediate Relatives based on Unpublished Price Sensitive Information erodes the investors' confidence in the integrity of the management and is unhealthy for the capital markets.

To put in place a framework for prohibition of insider trading in securities and to strengthen the legal framework relating thereto, Securities and Exchange Board of India ("SEBI") has notified the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("PIT Regulations").

In compliance with the requirement of the PIT Regulations, this Code of Conduct (Insider Trading) to regulate, monitor and report trading by Designated Persons and their Immediate Relatives ('this Code') is being adopted by the Board of Galaxy Surfactants Limited.

1. DEFINITIONS:

As used in this Code:

- a) **"Act"** means the Securities and Exchange Board of India Act, 1992 as amended from time to time;
- b) **"Board of Directors"** means the Board of Directors of Galaxy Surfactants Limited;
- c) **"Companies Act"** means the Companies Act, 2013 as amended from time to time;
- d) **"Company" or "GSL"** means Galaxy Surfactants Limited;
- e) **"Code of Conduct (Insider Trading)"** means the "GSL Code of Conduct (Insider Trading) to regulate, monitor and report trading by Designated Persons and their Immediate Relatives" as amended from time to time;

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f) "Connected Person"¹ means:

any person who is or has been during the 6 months prior to the concerned act associated with the 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whether temporary or permanent, with the Company that allows such person, directly or indirectly, access to unpublished price sensitive information, or is reasonably expected to allow such access.

i. 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) ²a relative of connected persons specified in clause (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 the 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 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 recognised or authorized by SEBI; 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 10% of the holding or interest; or
- k) ³a firm or its partner or its employee in which a connected person referred in (f) above is also a partner; or
- l) a person sharing a household or residence with a connected person referred in (f) above

g) "Designated Employee(s)" means

¹ As defined under Regulation 2(1)(d) of SEBI (Prohibition of Insider Trading) Regulations, 2015

² Substituted for "an immediate" as per the Securities and Exchange Board of India (Prohibition of Insider Trading) (Third Amendment) Regulations, 2024 w.e.f. May 17, 2025

³ Inserted as per the Securities and Exchange Board of India (Prohibition of Insider Trading) (Third Amendment) Regulations, 2024 w.e.f. May 17, 2025

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- i. all Employees comprising of Key Managerial Persons, Senior Management Executives and functional heads of the Company and Directors, CEO & CFO of its material subsidiaries;
- ii. Every employee in the Corporate Finance & Accounts (RMU), Secretarial, Business Creation, Business Commercial, Sourcing and IT/SAP Process of the Company;
- iii. Every employee of the Company in Grade M4 and higher in hierarchy; and
- iv. such other Employees who may be designated as such from time to time by the Board for the purpose of this Code of Conduct (Insider Trading) and who may be able to have access to any unpublished 'price sensitive information' as defined in this Code of Conduct (Insider Trading) or the PIT Regulations.

h) **"Non-Designated Employee(s)"** means employees of the Company who are not Designated Employees

i) **"Designated Person(s)"** means

- a. Directors
- b. Designated Employee
- c. Promoters
- d. Any other person(s) who is designated as Designated Person by the Board on the basis of their role and function in the organisation.

j) **"Employee"** means every employee of the Company including the Directors in the employment and persons engaged as Retainers or through contractors;

k) **"Generally available Information"** ⁴ means information that is accessible to the public on a non-discriminatory basis;

Information published on the website of a stock exchange, would ordinarily be considered as generally available.

l) **"Immediate Relative"** ⁵means 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.

m) **"Insider"** ⁶ means any person who is:

- i. a connected person; or
- ii. in possession of or having access to unpublished price sensitive information.

⁴ As defined under Regulation 2(1)(e) of SEBI (Prohibition of Insider Trading) Regulations, 2015

⁵ As defined under Regulation 2(1)(f) of SEBI (Prohibition of Insider Trading) Regulations, 2015

⁶ As defined under Regulation 2(1)(g) SEBI (Prohibition of Insider Trading) Regulations, 2015

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- n) **"Key Managerial Person"** means person as defined in Section 2(51) of the Companies Act, 2013;
- o) **"Legitimate Purpose"** shall include sharing of unpublished price sensitive information in the ordinary course of business by an Insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these Regulations."
- p) ⁷"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 of the sibling or its spouse; and
 - (vi) spouse of the person of the child of the person or its spouse.
- q) **"Securities"** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund;
- r) **"Takeover regulations"** means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;
- s) **"Trading"** ⁸ means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly.
- t) **"Trading Day"** ⁹ means a day on which the recognized stock exchanges are open for trading;
- u) **"Stock Exchange"** means a stock exchange which is notified by the Central Government in the Gazette or by SEBI, under Section 4 of the Securities Contracts (Regulation) Act, 1956 as a recognized Stock Exchange;
- v) **"Trading Window"** means a trading period as specified by the Company from time to time for trading in the Company's Securities;

⁷ Inserted as per the Securities and Exchange Board of India (Prohibition of Insider Trading) (Third Amendment) Regulations, 2024 w.e.f. May 17, 2025

⁸ As defined under Regulation 2(1)(l) of SEBI (Prohibition of Insider Trading) Regulations, 2015

⁹ As defined under Regulation 2(1)(m) of SEBI (Prohibition of Insider Trading) Regulations, 2015

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w) "**Threshold Limit**" means 1,000 shares or Rs. 10,00,000/- in value whichever is lower.

It is hereby clarified that for the purpose of calculating the threshold limit –

1. Both buy and sell transactions shall be aggregated for determining the limit
2. The value of the underlying shall be considered, in case of trading in derivatives, for the purpose of determining the threshold limit.
3. The trades done by the immediate relatives of a Designated Person or a Non-Designated Employee shall also be considered along with the trades done by such Designated Person or the Non-Designated Employee.

x) "**Unpublished Price Sensitive Information**" (UPSI) ¹⁰means: any information, relating to the company or its securities, directly or indirectly, that is not generally available, which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to information relating to the following:

- (i) Financial results;
- (ii) Dividends;
- (iii) Change in capital structure;
- (iv) Mergers, de-mergers, acquisitions, delisting, disposals and expansion of business, ¹¹ [award or termination of the 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 statutory auditor or secretarial auditor
- (vi) change in rating 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 in 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 the company or any other entity for detecting mis-statement in financials, misappropriation/ siphoning or diversion of funds and receipt of final forensic audit report;

¹⁰ As defined under Regulation 2(1)(n) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

¹¹ Inserted as per the Securities and Exchange Board of India (Prohibition of Insider Trading) (Third Amendment) Regulations, 2024 w.e.f. May 17, 2025

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- (xiii) action(s) initiated or orders passed within India or abroad, by any regulatory statutory, enforcement authority or judicial body against the company 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 name called, for any third party, by the company not in a normal course of business;
- (xvi) granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals]

¹²

- y) **All other words and phrases** used and not defined in this Code but defined in the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislations.

2. **COMPLIANCE OFFICER**

- a) The Company Secretary shall be the Compliance Officer reporting to the Board of Directors, responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of UPSI, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the Board of Directors of the Company.
- b) The Company Secretary shall hold the position so long as he / she is in the employment of the Company. In case of vacancy, till such time a successor is appointed, the Chief Financial Officer or any other person authorized by the Board shall, in the interim period act as the Compliance Officer.
- c) The Compliance Officer shall ensure proper assistance to all the employees / directors in addressing any clarifications regarding the PIT Regulations and this Code.

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

- 3.1 All UPSI is to be handled on a "Need to Know" basis, i.e. UPSI should be disclosed only to those within the Company who need the information to

¹² Clause no. (vi) stands omitted vide SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 w. e. f. April 1, 2019

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discharge their duty and whose possession of such information will not give rise to a conflict of interest or likelihood of misuse of the information.

To prevent the misuse of confidential information the Company adopts a 'Chinese Wall' policy thereby separating those areas of the Company which routinely have access to confidential information, considered as 'inside areas' from those areas which deal with sale / marketing / investment advice or other departments providing support services, considered as 'public areas'.

The employees in the inside areas shall not communicate any UPSI to any one in public area. Demarcation of various departments as 'inside area' may be implemented by the Compliance Officer.

In exceptional circumstances i.e. in furtherance of legitimate purposes, performance of duties or discharge of legal obligations, any Designated Person may be permitted to 'cross the wall' and give UPSI to any person on a 'need to know' basis, under intimation to the Compliance Officer.

- 3.2 No insider shall communicate, provide, or allow access to any UPSI, relating to the Company or securities listed or proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- 3.3 No person shall procure from or cause the communication by any insider of UPSI, relating to the Company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- 3.4 However, UPSI may be communicated, provided, allowed access to or procured, in connection with a transaction which:
 - entails an obligation to make an open offer under the takeover regulations where the Board of Directors of the Company is of informed opinion that the proposed transaction is in the best interests of the Company; or
 - does not attract the obligation to make an open offer under the takeover regulations but where the Board of Directors of the Company is of the informed opinion that the proposed transaction is in the best interests of the Company and the information that constitutes UPSI is disseminated to be made generally available at least 2 trading days prior to the proposed transaction being effected in such form as the Board of Directors may determine.
- 3.5 For the above purposes, the Board of Directors shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations

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on the part of such parties and such parties shall keep information so received confidential, except for the purpose of this Clause and shall not otherwise trade in securities of the Company when in possession of UPSI.

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

4. PREVENTION OF MISUSE OF "UNPUBLISHED PRICE SENSITIVE INFORMATION"

All Designated Persons and their Immediate Relatives shall be subject to trading restrictions enumerated herein.

As a general overriding rule, no Insider shall trade in securities of the Company when in possession of UPSI.

When a person who is in possession of UPSI, has traded in securities, his trades would be presumed to be motivated by the knowledge and awareness of such information in his possession.

4.1 Trading Plan:

An insider shall be entitled to formulate a trading plan and present it to the Compliance Officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan. This gives an option to persons who may be perpetually in possession of Unpublished Price Sensitive Information and enabling them to trade in securities in a compliant manner.

4.2 Trading Plan shall:

- (i) not entail commencement of trading on behalf of the insider earlier than 6 months from the public disclosure of the plan;
- (ii) not entail trading for the period between the 20th trading day prior to the last day of any financial period for which results are required to be announced by the issuer of the securities and the 2nd trading day after the disclosure of such financial results;
- (iii) entail trading for a period of not less than 12 months;
- (iv) not entail overlap of any period for which another trading plan is already in existence;

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- (v) set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
- (vi) not entail trading in securities for market abuse.

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

4.4 The Trading Plan once approved shall be irrevocable and the Insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.

However, the implementation of the trading plan shall not be commenced, if at the time of formulation of the plan, the Insider is in possession of any UPSI and the said information has not become generally available at the time of the commencement of implementation. The Compliance Officer shall confirm that the commencement of the Plan shall be deferred until such UPSI becomes generally available information. Further, the Insider shall also not be allowed to trade in securities of the Company, if the date of trading in securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.

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

4.6 The provisions regarding pre-clearance of trades, trading window norms and restrictions on contra trade shall not be applicable for a trade executed as per an approved Trading Plan.

5.1 Trading Window:

Other than the period(s) for which the 'Trading Window' is closed as prescribed hereunder, the same shall remain open for trading in the Securities of the Company by the Designated Persons and their immediate relatives.

Trading Window will be closed from the end of every quarter till 48 hours after the declaration of financial results.

In addition to the above, Trading window may be closed by the Company during such times in addition to the above period as it may deem fit from time to time including

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when the Compliance Officer determines that a Designated Persons or a class of Designated Persons can be reasonably expected to possess UPSI till 48 hours after the UPSI is made public.

No Designated Person and their immediate relatives shall trade in the securities of the Company when the trading window is closed. The provisions for trading window shall also be applicable to any person having contractual or fiduciary relation with the Company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the Company.

It shall be the responsibility of the Designated Persons to advice their immediate relatives of trading window period closures.

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

5.2 Pre- clearance of Trades:

a) All Designated Persons of the Company, who intend to trade in the securities of the Company irrespective of the value of the trade will have to make an application to the Compliance Officer in the prescribed form (Form F) given in this Code for pre-clearance of the transaction. However, no Designated Persons of the Company 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.

Non-Designated Employees may trade in securities of the Company upto the Threshold Limit in a Financial Year without any pre-clearance. In respect of transactions beyond the annual Threshold Limit, the above pre-clearance provisions shall apply.

b) The application for approval for preclearance shall be made in Form F by the concerned Designated Person or the Non-Designated Employee to the Compliance Officer with the confirmation as per the following matrix:

	Dealing By	To be confirmed By
1.	Designated Persons (Other than the Head of the Process)	Concerned Head of the Process and CFO
2.	Designated Persons (Head of the Process)	Concerned Director and CFO
3.	Non Designated Employees (Beyond the Annual Threshold Limit) (Other than Head of the Process)	Concerned Head of the Process and CFO
4.	Director	Managing Director and CFO

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5.	Managing Director or Director Finance	Chairman of the Board and Audit Committee
6.	Promoter	Chairman of the Board and Audit Committee

- c) The Compliance Officer shall confidentially maintain a list of such securities as a "restricted list" which shall be used as the basis for approving or rejecting applications for pre-clearance of trades.
- d) The restrictions contained in this clause shall also apply to immediate relatives in respect of which the concerned Designated Person or the concerned Non Designated Employee shall be responsible for the compliance under this policy.

6 OTHER RESTRICTIONS:

Following additional restrictions shall apply wherein pre-clearance for the trade has been sought by Designated Persons and Non Designated Employees:

- 6.1** All the preapproved trades shall in respect of the securities of the Company shall be executed within 7 (seven) Trading days after the approval of pre-clearance is given, failing which, fresh pre-clearance for trades to be executed shall be obtained.
- 6.2** The concerned persons shall disclose to the Company in the prescribed Form (Form E) the number of securities acquired or disposed of for which pre-clearances is obtained within 2 trading days of such transaction.
- 6.3** The concerned persons shall disclose to the Company in the prescribed Form (Form E) the number of securities not traded including reasons for such decision for which pre-clearances is obtained within 2 trading days of completion of 3 Trading days after the approval of pre-clearance is given.
- 6.4** 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.
- 6.5** 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.
- 6.6** Any Designated person or a Non Designated Employee who is permitted to trade shall not execute a contra trade within 6 months. In case any contra trade is executed, inadvertently or otherwise, in violation of the restriction, the profits from such trade shall be liable to be disgorged for remittance to the SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

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These period restrictions under this clause shall not be applicable for trades done in pursuance of a valid and approved trading plan and trades done pursuant to exercise of ESOP.

In case trading in securities is necessitated by personal emergency, the holding period of 6 months as specified above may be waived by the Compliance Officer after recording in writing his/her reasons in this regard. An application for waiver of holding period shall be made to the Compliance Officer through concerned Departmental Head in the prescribed Form (Form G).

7 REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES:

Initial Disclosure

- 7.1** Every promoter, member of promoter group, Key Managerial Personnel, Director and Designated Employees of the Company within 30 days of this Code taking effect, shall forward to the Company the details of all holdings in securities of the Company presently held by them including the statement of holdings of dependent family members in the prescribed Form (Form A).
- 7.2** Every person on appointment as a key managerial personnel or Designated Employee or a director of the Company or upon becoming a promoter or member of 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 7 days of such appointment or becoming a promoter in the prescribed Form (Form B).

Continual Disclosure

- 7.3** Every promoter, member of promoter group and Designated Person of the Company shall disclose to the Company in the prescribed Form (Form C) 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 Rs. 10 Lakhs.

The disclosure shall be made within 2 trading days of:

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

- 7.4** Every promoter, member of promoter group and Designated Employee of the Company shall within 30 days of the beginning of every financial year, disclose to

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the Company in the Prescribed Form (Form H) prescribed details and the holding of such securities as at the end of the financial year and the details each purchase / sale of the securities during the financial year so ended. This disclosure shall also applicable to any Non Designated Employee who has traded in the security of the Company beyond the Threshold Limit in financial year. Any change in information provided earlier (other than holding of securities) shall be informed within 30 days of such in Form H.

7.5 The Company may, at its discretion, require any other Connected Person(s) to make disclosure of holdings and trading in securities of the Company in the prescribed form (form D) and at such frequency as may be determined by the Compliance Officer.

Disclosure by the Company to the Stock Exchange(s)

7.6 Within 2 trading days of the receipt of intimation under Clause 7.3, the Compliance Officer shall disclose to all Stock Exchanges on which the Company is listed, the information received.

7.7 The Compliance officer shall maintain records of all the declarations in the appropriate form given by Designated Persons for a minimum period of 5 years.

8 PENALTY FOR CONTRAVENTION OF CODE OF CONDUCT (INSIDER TRADING):

8.1 Failure to comply with this Code shall be considered to be a serious disciplinary matter.

8.2 The Compliance Officer shall report all the breaches of this code to the Board of Directors of the Company. The Board of Directors, considering the nature and severity of the breach, may decide to report any such breach and action to the Securities and Exchange Board of India.

8.3 In addition to any civil or criminal action that the regulatory authorities may initiate, any person violating the Code shall be liable for penalty as under:

Category of Breach	Suggested Actions
Mis-Reporting / Non Reporting of transactions which are required to be disclosed under this Code	<ul style="list-style-type: none"> Written warning for the first breach For every subsequent breach penalty of Rs. 25,000
Trading beyond the timelines given for trading after the pre-clearance	<ul style="list-style-type: none"> Penalty of Rs. 50,000 or the notional profit made or loss avoided considering the closing price of the security on the last day

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	of the approval period, whichever is higher.
Dealing in securities by the Designated Persons or their Immediate Relatives during the Close Period	<ul style="list-style-type: none"> Penalty of Rs. 50,000 or twice the amount of profits made or losses avoided due to the act, whichever is higher. Internal action – e.g. suspension, freeze on increment / promotion Termination of employment
Dealing without obtaining pre-clearance	
Dealing when in possession of unpublished price sensitive information	
Passing on UPSI or making recommendation directly or indirectly for dealing in securities on the basis of such information	
Any other non-compliance not specified above	Such penalty as is deemed appropriate by Managing Director and Director Finance

The Managing Director and Director Finance after giving opportunity of being heard and considering the factors such as knowledge of UPSI, level of management of the individual concerned, number of securities transacted, whether the breach is deliberate etc. shall decide on the penalties proposed as above or to take any other action as they may deem appropriate.

9 GENERAL:

- 9.1** Audit Committee of the Board of Directors shall review the compliance with the provisions of this Policy at least once in a financial year and shall verify that the systems for internal control are adequate and are operating effectively.
- 9.2** This Policy shall be reviewed by the Board of Directors of the Company once in three years or subsequent to any changes in the Regulations.

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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: Galaxy Surfactants Limited
C-49/2, TTC, Industrial Area,
Pawne, Navi Mumbai - 400 703

ISIN of the company: INE600K01018

**Details of Securities held by Promoter, Promoter Group, 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/ Promoter Group / KMP/Directors /immediate relative to/others etc)	Securities held as on the date of regulation coming into force		% of Share- Holding
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No	
1	2	3	4	5
Names of education institution (college) of graduation	Names of past employers			
6	7			

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

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

Open Interest of the Future contracts held as on the date of regulation coming into force			Open Interest of the Option Contracts held as on the date of regulation coming into force		
Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
8	9	10	11	12	13

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

Name & Signature:

Designation:

Date:

Place:

	GALAXY SURFACTANTS LIMITED	
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Annexure to Form A

Name:

Employee Code:

<u>Name of Relative</u>	<u>Relation</u>	<u>Address</u>	<u>Whether financially dependent or consults you for trading decisions (Y/N)</u>	<u>PAN</u>
	<u>Spouse</u>			
	<u>Father</u>			
	<u>Mother</u>			
	<u>Child1</u>			
	<u>Child2</u>			
	<u>Brother</u>			
	<u>Sister</u>			
	<u>Father in Law</u>			
	<u>Mother in Law</u>			
	<u>Sibling1 of Spouse</u>			
	<u>Sibling2 of Spouse</u>			

Signature: _____

Date: _____

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FORM B¹³

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

Name of the company: Galaxy Surfactants Limited
C-49/2, TTC, Industrial Area,
Pawne, Navi Mumbai - 400 703

ISIN of the company: INE600K01018

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter or Member of the Promoter Group of a listed company and immediate relative of such persons and by other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN & Address with contact nos.	Category of Person (KMP/Director/ Promoters/Member of the Promoter Group/immediate relative to/others etc.)	Date of appointment of KMP/Director OR Date of becoming Promoter/Member of Promoter Group	Securities held at the time of at the time of appointment of KMP/Director or upon becoming Promoter or Member of the Promoter Group/		% of Share- holding
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5	6

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

Details of Open Interest (OI) in derivatives of the company held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter or Member of the Promoter Group of a listed company and immediate relatives of such persons and by such other such persons as mentioned in Regulation 6(2).

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 Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract Specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
7	8	9	10	11	12

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

Name & Signature:

Designation:

Date:

Place:

¹³ Format of Form B amended w.e.f. March 22, 2021 as per SEBI circular dated February 9, 2021

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FORM C¹⁴

SEBI (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]

Name of the company: Galaxy Surfactants Limited
 C-49/2, TTC, Industrial Area,
 Pawne, Navi Mumbai - 400 703

ISIN of the company: INE600K01018

Details of change in holding of Securities of Promoter, Member of the Promoter Group, Designated Person or Director of a listed company and immediate relatives of such persons and such other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoter/s/Member of the Promoter Group/ Designated Person / Directors/immediate relative to/other s etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of 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 security (For eg. – Shares, Warrants, Convertible Debentures, rights, entitlement etc.)	No. and % of shareholding	Type of security (For eg. – Shares, Warrant, Convertible Debentures, rights, entitlement etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge / Revocation / Invocation / /others, please specify)	Type of security (For eg. – Shares, Warrants, Convertible Debenture s rights entitlement etc.)	No. and % of shareholding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

¹⁴ Format of Form B amended w.e.f. March 22, 2021 as per SEBI circular dated February 9, 2021

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

		GALAXY SURFACTANTS LIMITED	
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FORM D¹⁵

SEBI (Prohibition of Insider Trading) Regulations, 2015
Regulation 7(3) – Transactions by Other connected persons as identified by the Company

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

Name, PAN, CIN/DIN, & address with contact nos. of other connected persons as identified by the company	Connection with company	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition / disposal (on market/public/ rights/ preferential offer / off market/ Inter-se transfer, ESOPs etc.)	Exchange on which the trade was executed
		Type of security (For eg. – Shares, Warrants, Convertible Debentures, rights, entitlement etc.)	No. and % of shareholding	Type of security (For eg. – Shares, Warrants, Convertible Debentures, rights, entitlement etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge / Revocation/ Invocation/ other, please specify)	Type of Security (For eg. – Shares, Warrants, Convertible Debentures, rights, entitlement etc.)	No. and % of shareholding	From	To			
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15

¹⁵ Format of Form B amended w.e.f. March 22, 2021 as per SEBI circular dated February 9, 2021

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

Name:

Signature:

Place:

	GALAXY SURFACTANTS LIMITED	
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FORM E
FORM FOR DISCLOSURE OF TRANSACTIONS

[as per Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and Clause 6.2, 6.3, 7.3 of GSL Code of Conduct (Insider Trading) to regulate, monitor and report trading by Insiders]

(To be submitted within 2 days of transaction / trading in securities of the Company/end of 7 trading days from pre-clearance approval)

To

The Company Secretary/Compliance Officer

Galaxy Surfactants Limited

C-49/2, TTC, Industrial Area,

Pawne, Navi Mumbai - 400 703

(Fax. No. 022-27615883/886)

Pre-Approval Reference No.: _____

I hereby inform that I

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

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Name of holder	No. of securities dealt with	Bought/sold/subscribed	DP ID/Client ID / Folio No	Price (Rs.)

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 3 years and produce to the Compliance officer / SEBI any of the following documents if sought for:

1. Broker's contract note.
2. Proof of payment to/from brokers.
3. Extract of bank passbook/statement (to be submitted in case of demat transactions).
4. Copy of Delivery instruction slip (applicable in case of sale transaction).

I agree to hold the above securities for a minimum period of six months/undertake that no contra trade shall be entered within a period of six months. In case there is any urgent need to sell these securities within the said period, I shall approach the Compliance Officer for necessary approval. (*applicable in case of purchase / subscription*).

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

Date : _____ Signature : _____ Name : _____ Designation: _____

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FORM F

FORM FOR PRE-CLEARANCE OF TRANSACTIONS:

[as per Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and Clause 5.2 (a) of GSL Code of Conduct (Insider Trading) to Regulate, Monitor and Report trading by Insiders]

To

The Company Secretary/Compliance Officer
 Galaxy Surfactants Limited
 C-49/2, TTC, Industrial Area,
 Pawne, Navi Mumbai - 400 703
 (Fax. No. 022-27615883/886)

I intend to sell / purchase securities of the Company, as follows:

1.	Name of the applicant	:	
2.	Designation	:	
3.	Department	:	
4.	Employee Code No.	:	
5.	Number and value of securities in the Company held as on date Folio No. DP ID Client ID	:	
6.	Nature of proposed trading	:	a) Purchase in the open market b) Sale of securities

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		c) Off-Market deal
7.	Proposed date of trading in securities	:
8.	No. of Shares / Debentures proposed to be dealt. Folio No./ DP ID & Client ID where the securities will be credited /debited	: Nos.
9.	Price at which the transaction is proposed	:
10.	Current Market Price (as on the date of application)	:

I hereby apply for the pre-clearance of the transaction(s) referred above.

In relation to the above trading, I undertake that:

- i. That I do not have any access nor have I received any "Price Sensitive Information" upto the time of signing this undertaking.
- ii. That in case I have access to or receive "Price Sensitive Information" after the signing of this undertaking but before the execution of the transaction I shall inform the Compliance Officer of the change in my position and that I would completely refrain from trading in the securities of the Company till the time such information becomes public.
- iii. That I have not contravened the Code of Conduct (Insider Trading) for prevention of insider trading as notified by the Company from time to time.
- iv. That I have made a full and true disclosure in the matter.

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- v. That I will go ahead with the transaction only after receiving the required clearance.
- vi. That I will execute the order in respect of the securities of the Company within 7 Trading days after the approval of pre-clearance is given, failing which, fresh clearance shall be obtained.
- vii. That I shall inform the Company (in Form E) within 2 days of transaction / trading in securities of the Company/end of 7 trading days from pre-clearance approval the details of the securities traded along with securities not traded (in respect of which pre approval had been obtained)

Signature

Place :

Date:

Confirmation of the immediate senior of the applicant:

I, _____, <Designation>, immediate senior of the applicant Mr. _____ confirm that the applicant is not holding any UPSI at the time of making this application.

Place:

Signature of Concerned Head

Date:

Signature of CFO

	GALAXY SURFACTANTS LIMITED	
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FORM G

APPLICATION FOR WAIVER OF MINIMUM HOLDING PERIOD

[As per Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and Clause 6.6 of *GSL Code of Conduct (Insider Trading) to Regulate, Monitor and Report trading by Insiders*]

Date:

To
 The Company Secretary/Compliance Officer
 Galaxy Surfactants Limited
 C-49/2, TTC, Industrial Area,
 Pawne, Navi Mumbai - 400 703 (Fax. No. 022-27615883/886)

Through Departmental Head

Dear Sir,

I request you to grant me waiver of the minimum holding period of 6 months as required under the Code of Conduct (Insider Trading) for prevention of Insider Trading with respect to securities of the Company held by me/.....(name of relative) singly/jointly, acquired by me on.....(date). I desire to trade in the said securities on account of (Give reason).

Thanking you,

Yours faithfully,

Name of the applicant	:	
Designation	:	
Department	:	
Employee Code No.	:	

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FORM H – Annual Declaration

[Regulation 7.4 of Code of Conduct (Insider Trading)]

Name of the company: Galaxy Surfactants Limited, C-49/2, TTC, Industrial Area, Pawne, Navi Mumbai - 400 703	
ISIN of the company: INE600K01018	Financial Year Ending: _____

Details of Holding as at the end of the financial year:

Name, PAN, CIN/DIN & address With contact nos.	Category of Person (Promoters/Member of Promoter Group/ Designated Employee)	Securities held at the end of financial year		
		Type of security For eg. – Shares, Warrant, Convertible Debentures, rights, entitlement etc.)	No. and % of total shareholding	Value
1	2	3	4	5

Names and PAN of the Immediate Relatives	Whether financially dependent or consults you for trading decisions (Y/N)	Name of persons with whom material financial relationship* is shared	Phone and mobile number used by persons referred in column no. 6 and 7
6	7	8	9
Spouse			
Father			
Mother			
Brother(s)			
Sister(s)			
Child 1			
Child 2			
Father in Law			
Mother in Law			
Sibling 1 of Spouse			
Sibling 2 of spouse			

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Details of change in holding during the financial year

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoters/Member of Promoter Group/ Designated Employee)	Securities acquired/Disposed during the financial year				Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Pre Approval Reference No.	Mode of acquisition / disposal (on market/public/ rights/ preferential offer / off market/ Inter-se transfer, ESOPs etc.)	Exchange on which trade was executed
		Type of security (For eg. – Shares, Warrant, Convertible Debentures, rights, entitlement etc.)	No.	Value	Transaction Type (Buy/ Sale/Pledge /Revocations /Invocations, others please specify)	From	To				
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.

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Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company 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)	
13	14	15	16	17	18	19

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

Name & Signature:

Designation:

Date:

Place:

**"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.