



**LUCINA LAND DEVELOPMENT LIMITED**

(CIN: U70109DL2006PLC151260)

Regd. Office: Office No. 202, 2nd Floor, A-18, Rama House, Middle Circle, Connaught, Place,  
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**CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSONS AND THEIR RELATIVES**  
(Adopted on January 21, 2025)

**1 Introduction & Objectives**

With a view to govern the conduct of insiders relating to insider trading, the Securities and Exchange Board of India (SEBI) had formulated SEBI (Prohibition of Insider Trading) Regulations 2015, as amended from time to time.

Regulation 9 of the above-mentioned Regulations requires all listed companies to set up appropriate mechanism and to frame and implement a code of internal procedures and conduct, based on the Schedule B and other relevant provisions of the said Regulations, to regulate, monitor and report trading by its designated persons and immediate relatives of designated persons.

In compliance with the above requirements, Lucina Land Development Limited (“LLDL” or “the Company”) has introduced this code to regulate, monitor and report trading in securities of the Company by Insiders including Designated Persons and their Immediate Relatives (as defined herein).

“Code” means this Code of Conduct for Prevention of Insider Trading including modifications made thereto from time to time.

**2 Target Audience**

The Code applies to all Employees/ Designated Persons, Insider and other Connected Persons.

**3 Applicability and Validity of the Policy**

This policy will become applicable from such date as approved by the Board of Directors. This Code of Conduct shall be applicable to all Board Members and also to Senior Management Staff immediately one level below the Board Members.

**4 Regulatory & Statutory Reference:** Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended, from time to time.

**5 Compliance Officer:** means any senior officer, designated so and reporting to the Board of Directors, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under the SEBI Regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of Unpublished Price Sensitive Information, monitoring of Trades and the implementation of this Code as required under the SEBI Regulations under the overall supervision of the Board of Directors. The Board has designated the Company Secretary of the Company to be its first Compliance Officer for the purposes of the SEBI Regulations and this Code.

**5.1. Subject to the supervision of the Board of Directors, the Compliance Officer, shall be responsible for:**

1. setting forth policies, procedures, monitoring adherence to the rules for the preservation of UPSI, pre-clearing of the trades of the Designated Persons and their Immediate Relatives (directly or through respective department heads, as may be decided by the Company from time to time), monitoring of trades and the implementation of the Code of Conduct under the overall supervision of the Board of Directors of the Company.

2. report to the Board of Directors or Chairman of the Board in such manner and at such frequency as may be stipulated by the Board of Directors, but not less than once in a year.
3. assist in addressing any clarifications regarding the Regulations and the Company's Code.
4. maintain records of all the declarations in the appropriate form for a period prescribed under applicable Regulations.
- 6 **“Designated Persons”**: The Board of Directors and/or Compliance Officer of the Company, shall determine the list of designated persons on the basis of their role and function in the organization and the access that such role and function would provide to unpublished price sensitive information in addition to seniority and professional designation, who shall be covered by this Code. Following category of Employees have been designated as “Designated Persons” for the purpose of this Code:
  - a. Promoters and Promoter Group of the Company;
  - b. Directors of the Company;
  - c. Permanent invitees / invitees to the Board and Committee Meetings, if any, including Personal Assistant / Secretary;
  - d. Members of Executive Committee, if any, of the Company not being Directors including Personal Assistant / Secretary;
  - e. Personal Assistant / Secretary to all the above persons;
  - f. Employees in the cadre of Assistant General Manager and above of the Company and its subsidiaries;
  - g. All other Employees of the Company and its holding, subsidiaries, irrespective of their cadre in accounts, finance, treasury and tax departments, secretarial, legal and compliance departments, internal audit department, business / investor’s relations and corporate communications department, IT department.
  - h. Persons employed on contract basis and performing similar roles or having similar responsibilities as persons mentioned;
  - i. Any other Employees or persons as may be determined by the Board or Compliance Officer, from time to time or as may be required as per the Regulations.

#### **7 Penalty for contravention of code of conduct**

- i. Any Employees including Designated Person, who himself/herself or through his/her Immediate Relatives trades in Securities of the Company or communicates any UPSI, for trade in Securities or facilitates the communication of such information, in contravention of this Code of Conduct may be penalized and appropriate action may be taken by the Company.
- ii. Designated Person who violates the Code of Conduct shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, withholding of promotions and including ineligibility for future participation in employee stock option plans, etc.
- iii. The action by the Company shall not preclude SEBI from taking any action against any Employee including Designated Person in case of violation of these Regulations & Company’s Code of Conduct.
- iv. Disciplinary action by the Company, which may include wage freeze, suspension, withholding of promotions and including ineligibility for future participation in employee stock option plans, etc.

The action by the Company shall not preclude SEBI from taking any action against any Employee including Designated Person in case of violation of these Regulations & Company’s Code of Conduct.

- 8 **“Securities”**: shall mean and include shares and derivatives or other securities of the Company as defined under the Securities Contracts (Regulation) Act, 1956 and related rules.
- 9 **“Unpublished Price Sensitive Information”** (UPSI) means any information, directly or indirectly related to the Company, that is not generally available which upon becoming generally available, is likely to materially affect the price of the Securities of the Company, ordinarily including but not restricted to, information relating to the following:-
  - a. periodical financial results of the Company;
  - b. intended declaration of dividends (both interim and final);
  - c. change in capital structure;
  - d. mergers, de-mergers, acquisitions, delisting, disposal and expansion of business, award or termination of order/contracts not in the normal course of business and such other transactions;
  - e. any change in Key Managerial Personnel, other than due to superannuation or end of term, and resignation of a Statutory Auditor or Secretarial Auditor;

- f. change in rating(s), other than ESG rating(s);
- g. fund raising proposed to be undertaken;
- h. agreements, by whatever name called, which may impact the management or control of the company;
- i. 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;
- j. resolution plan/ restructuring or one time settlement in relation to loans/borrowings from banks/financial institutions;
- k. 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;
- l. 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;
- m. 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;
- n. outcome of any litigation(s) or dispute(s) which may have an impact on the company;
- o. 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;
- p. granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.

**10 “Immediate Relatives”** for this purpose, means spouse (irrespective of the fact that whether she / he is financially dependent or not and whether she / he consult such person in taking decisions relating to trading in Securities of the Company or not) and parents, siblings and child of the person, who are either financially dependent on such person or consult such person in taking decisions relating to trading in Securities of the Company;

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

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

## **12 Prevention of misuse of “Unpublished Price Sensitive Information”**

### **12.1 Trading Plans**

- i. 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.
- ii. 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:
      - 1. 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
      - 2. 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.
  - d. not entail trading in securities for market abuse.
- iii. The compliance officer shall review the trading plan to assess whether the plan would have any potential for violation of these regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.
- iv. 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.

- v. Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

“**Trading**” means and includes subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell, deal in Securities and “trade” shall be construed accordingly. However, exercise of ESOPs shall not be considered to be “trading” except for the purposes of Chapter III of the Regulations (i.e. the Disclosure requirements).

## 12.2 Trading Window

- i. The Company shall specify a trading period from time to time to be called "Trading Window", for trading in the Company's Securities. The trading window shall be closed during the time the information is unpublished.
- ii. Employees / Designated Persons and Immediate Relatives shall not trade in the Securities of the Company during the Closure of the “Trading Window” i.e. the period during which trading in Securities of the Company is prohibited.
- iii. The “Trading Window” shall be, closed Inter alia at the time of: -
  - a. periodical financial results of the Company;
  - b. intended declaration of dividends (both interim and final);
  - c. mergers, de-mergers, acquisitions, delisting, disposal and expansion of business;
  - and
  - d. any material events in accordance with the listing agreement and SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015;
  - e. Change in Key Managerial Personnel;

The period of commencement of closure of Trading Window shall be intimated, in advance, by the Company, from time to time.

- iv. The Trading Window shall be opened 48 hours after the information or any other information which could be deemed to be of a price sensitive nature, becomes public.
- v. All Employees / Designated Persons and Immediate Relatives shall trade in the Securities of the Company only during the free period and not during the periods when Trading Window is closed or during any other period as may be specified by the Company from time to time.

The Trading Window shall also be applicable to persons who are having contractual or fiduciary relations with the Company including the Auditors, Accountancy Firms, Law Firms etc., assisting or advising the Company.

## 12.3 Pre-clearance of Trade

- i. All Designated Persons who intend to trade in Securities of the Company, for themselves and also for their Immediate Relatives, aggregating to trade value of Rupees Ten Lacs or more, during a calendar quarter, should obtain a pre-clearance of the transactions.
- ii. An application for pre-clearance of the proposed transaction shall be made in attached format (Annexure A) (Application for Pre-Clearance of Trade) in this regard, to the Compliance Officer.
- iii. An undertaking shall be executed in favour of the Company, in the attached format (Annexure A).
- iv. In case, any Designated Person and their Immediate Relative fails to execute the trade within 7 trading days after the pre-clearance, he / she shall report such decision to Compliance Officer.
- v. All Employees / Designated Persons and Immediate Relatives shall execute their order for trading in the Securities of the Company within seven trading days after the approval of pre-clearance is given, failing which fresh pre-clearance would be needed for the trades to be executed.
- vi. No Employee / Designated Person and Immediate Relatives, shall apply for pre clearance of any proposed trade when in possession of an UPSI, even if the trading window is not closed.

## 12.4 Restriction on opposite transaction till six months

All Designated Persons and their Immediate Relatives who trade in the Securities of the Company shall not execute a contra trade, during the next six months following the preceding transaction.



For the sake of clarity, if any Designated Person and their Immediate Relatives has bought any shares / Securities of the Company, he / she cannot sell any Securities of the Company, within a period of six months, from the date of such purchase.

Similarly, in case any Designated Person and their Immediate Relatives has sold any Securities, he / she cannot acquire any Securities, within a period of six months, from the date of such sale.

Provided that the aforesaid provisions shall not be applicable in case of exercise of ESOPs.

Provided further that the Compliance Officer may grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate the Insider Trading Regulations.

#### **For the Sake of Clarity:**

- i. If a designated person has sold/ purchased shares, he can subscribe and exercise ESOPs at any time after such sale/purchase, without attracting contra trade restrictions.
- ii. Where a designated person acquires shares under an ESOP and subsequently sells/pledges those shares, such sale shall not be considered as contra trade, with respect to exercise of ESOPs
- iii. Where a designated person purchases some shares (say on August 01, 2015), acquires shares later under an ESOP (say on September 01, 2015) and subsequently sells / pledges (say on October 01, 2015) shares so acquired under ESOP, the sale will not be a contra trade but will be subject other provisions of the Regulations, however, he will not be able to sell the shares purchased on August 01, 2015 during the period of six months from August 01, 2015.

Where a designated person sells shares (say on August 01, 2015), acquires shares later under an ESOP (say on September 01, 2015) the acquisition under ESOP shall not be a contra trade. Further, he can sell/pledge shares so acquired at anytime thereafter without attracting contra trade restrictions. He, however, will not be able to purchase further shares during the period of six months from August 01, 2015 when he had sold shares.

### **13 Reporting Requirements for transactions in Securities**

- i. The following disclosures of the Securities held in the Company shall be made to the Compliance Officer:
  - a. Every person on appointment as the key managerial personnel or a director of the Company or upon becoming its 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;
  - b. Every promoter, employee or director of the Company and its subsidiaries shall disclose the number of such Securities, purchased or sold within 2 (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. Ten Lacs. The disclosure shall be made in the format prescribed for the purpose under the Regulations
  - c. For the avoidance of doubts, it is clarified that the disclosure of the incremental transaction, after any disclosure under (b) above, shall be made, when the transactions effected after the prior disclosure cross the threshold limit of Rs. Ten Lacs.
- ii. The Designated person shall disclose the following information in a format attached as Annexure B, on annual basis, to the Company within 21 days from the end of the Financial Year and as and when the information changes within 21 days of such change;
  - a) Name of Immediate Relatives
  - b) persons with whom such designated person(s) shares a Material Financial Relationship
  - c) Permanent Account Number or any other identifier authorized by law of (a) & (b)
  - d) Phone, mobile and cell numbers of (a) & (b)
  - e) Educational institutions from where the designated person graduated
  - f) Name of past employer(s)

The information required under Part IX (2)(e) and (f) may be disclosed on one time basis only.

**14 “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.

**15 Chinese Wall procedure**

1. To prevent the misuse of confidential information, the Company shall adopt a "Chinese Wall" policy which separates those areas of the Company, which routinely have access to confidential information, considered "Inside Areas" from those departments providing support services, considered "Public Areas".
2. The persons in the inside area shall not communicate any price sensitive information to anyone in public area.
3. In exceptional circumstances, persons from the public areas may be allowed to “Cross the Wall” and give confidential information on the basis of "need to know" criteria, after written intimation to the Compliance Officer.

**Crossing the Wall**

The Compliance Officer in consultation with the Board of Directors of the Company shall decide on how and when any person(s) should be brought ‘inside’ on any proposed or ongoing sensitive transaction(s).

A person(s) shall be brought inside on any proposed or ongoing sensitive transaction(s) of the Company who may be an existing or proposed partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants etc. for legitimate purpose which shall include the following;

1. in the ordinary course of business;
2. in furtherance of performance of duty(ies);
3. for discharge of legal obligation(s);
4. for any other genuine or reasonable purpose as may be determined by the Compliance officer of the Company;
5. for any other purpose as may be prescribed under the Regulations or Company Law or any other law for the time being in force, in this behalf, or as may be amended from time to time.

**16 “Legitimate Purpose”** includes 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 Regulations.

Employees / Designated Persons shall maintain the confidentiality of all UPSI. They shall not pass on such information to any person directly or indirectly by way of making a recommendation for entering into any trade in the Securities of the Company or in any other manner whatsoever nor shall they allow or facilitate access to such information.

**17 Mechanism for prevention of Insider Trading**

The Compliance Officer shall put in place a adequate system of effective controls to ensure compliance with the requirements given in these regulations.

The internal control shall include the following :

- i. Identification of Designated persons from time to time who may have the UPSI.
- ii. Adequate circulation of this code.
- iii. Maintenance of digital database of the persons having UPSI.
- iv. Giving advance notice to designated persons to maintain confidentiality before sharing UPSI.
- v. Providing clarification to designated persons as and when asked for.

**18 Restrictions On Trading when in possession of unpublished price sensitive information**

- i. No insider shall trade in securities that are listed or proposed to be listed on a stock exchange when in

possession of unpublished price sensitive information:

Provided that the insider may prove his innocence by demonstrating the circumstances including the following:

- a) the transaction is an off-market inter-se transfer between promoters who were in possession of the same unpublished price sensitive information without being in breach of regulation 3 and both parties had made a conscious and informed trade decision;
- b) In the case of non-individual insiders: –
  - the individuals who were in possession of such unpublished price sensitive information were different from the individuals taking trading decisions and such decision-making individuals were not in possession of such unpublished price sensitive information when they took the decision to trade; and
  - appropriate and adequate arrangements were in place to ensure that these regulations are not violated and no unpublished price sensitive information was communicated by the individuals possessing the information to the individuals taking trading decisions and there is no evidence of such arrangements having been breached;
- ii. In the case of connected persons the onus of establishing, that they were not in possession of unpublished price sensitive information, shall be on such connected persons and in other cases, the onus would be on the Board.

The Board may specify such standards and requirements, from time to time, as it may deem necessary for the purpose of these regulations.

**“Connected Person”** means:

- i. any person who is or has during the 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.
- 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 relative of connected persons specified in clause (i); or
  - a holding company or associate company or subsidiary company; or
  - an intermediary as specified in section 12 of the Act or an employee or director thereof; or
  - an investment company, trustee company, asset management company or an employee or director thereof; or
  - an official of a stock exchange or of clearing house or corporation; or
  - 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
  - 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
  - an official or an employee of a self-regulatory organization recognised or authorized by the Board; or
  - a banker of the company; or
  - a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten per cent. of the holding or interest;

**“Relative”** shall mean the following:

- a) Spouse of the person;
- b) Parent of the person and parent of its spouse;
- c) Sibling of the person and sibling of its spouse;

- d) Child of the person and child of its spouse
- e) Spouse of the person listed at sub-clause (c); and
- f) Spouse of the person listed at sub-clause (d).

## **19 Leak of Unpublished Price Sensitive Information**

In cases of leak or suspected leak of UPSI, the Compliance Officer or any other analogous body as may be authorized by the Board of Directors, shall conduct the enquiry to determine the possible role of every person who had access to information which was leaked. This includes persons/members of committees, those consolidating results, people preparing board notes and presentations, besides the persons involved in disseminating the information. The Company may ask for relevant information or even conduct enquiry upon the relevant intermediaries and fiduciaries, who shall co-operate with the Company in connection with such enquiry.

The Compliance Officer shall, accordingly submit a report the Board of Directors on the enquiry, present systems, processes and controls, the manner in which these would be strengthened besides details of persons manning these systems and the periodicity of monitoring.

The Company shall promptly inform the SEBI, of such leaks, inquiries and results of such inquiries.

“**Fiduciary/Fiduciaries**” means professional firms such as auditors, accountancy firms, law firms, analysts, insolvency professional entities, consultants, banks etc., assisting or advising the Company.

NOTE: It is intended that a connected person is one who has a connection with the company that is expected to put him in possession of unpublished price sensitive information. Immediate relatives and other categories of persons specified above are also presumed to be connected persons but such a presumption is a deeming legal fiction and is rebuttable. This definition is also intended to bring into its ambit persons who may not seemingly occupy any position in a company but are in regular touch with the company and its officers and are involved in the know of the company’s operations. It is intended to bring within its ambit those who would have access to or could access unpublished price sensitive information about any company or class of companies by virtue of any connection that would put them in possession of unpublished price sensitive information.

**Annexure -A**

**Pre-clearance Application Form**

To  
The Compliance Officer  
Lucina Land Development Limited (“LLDL”)

Dear Sir,

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and Code for Prevention of Insider Trading in LLDL’s securities, I seek approval for purchase/sale/ subscription of the Securities (give description) of the Company as per the details given below:

1.	Name of the applicant	
2.	Designation	
3.	Trade to be made by	Self Relative
4.	Number of Securities held as on date	
5.	Permanent account number	
6.	Folio No. / DP ID / Client ID No.	
7.	The application is for	Purchase of securities Subscription to securities Sale of securities Pledge
8.	Proposed date of trading in securities	
9.	Number of securities proposed to be purchased/subscribed/sold/pledge	
10.	Current market price (as on date of application)	
11.	Whether the proposed transaction will be through stock exchange or off-market trade	
12.	Folio No. / DP ID / Client ID No. where the securities will be credited / debited	

In this connection I solemnly confirm and declare:

- a) THAT I do not have access to nor do I have any information that could be construed as Unpublished Price Sensitive Information as defined in the Code upto the time of signing this undertaking;
- b) THAT in case I have access to receive Unpublished Price Sensitive Information after the signing of the undertaking but before the execution of the transaction, I shall inform the Compliance Officer of any change in such position and that I shall completely refrain from dealing in the Securities of the Company till the time such information becomes public;
- c) THAT I have not contravened the ‘Code of Conduct to Regulate, Monitor and report trading by Designated Persons and their Relatives’ for prevention of insider trading as notified by the Company from time to time;
- d) THAT I shall hold the Securities for a minimum period of six (6) months from the date of trade/ THAT I have complied with the requirement of minimum holding period of six (6) months with respect to the Securities sold (*applicable only in respect of sale transaction*).

I hereby solemnly declare that I have made full and true disclosure in this regard to the best of my knowledge and belief.

I hereby solemnly declare that value of the Securities traded, whether in one transaction or a series of transactions over a calendar quarter, including the proposed trade aggregates to a traded value are in excess of INR 10,00,000 (Indian Rupees ten lakhs).

Pre-clearance may kindly be accorded in terms of the requirement of the “Code of Conduct to Regulate, Monitor and report trading by Designated Persons and their Relatives” of the Company.

Date:

Place:

Signature

Name of the Designated Person

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[Residential Address]  
MOBILE: [•] | EMAIL: [•]

**Disclosure under SEBI (Prohibition of Insider Trading) Regulations, 2015  
([Regulation 9 (1) read with Clause 14 of Schedule B])**

[Date]

To,  
Compliance Officer,  
Lucina Land Development Limited

Subject: Disclosure as on date of joining / as on April 1, 20\_\_.

Dear Sir,

I, [ ] d/o or s/o [ ] R/o [ ] , [ ] of [ ] , do hereby submit the following details:

**A. Details of Spouse:**

Sr. No.	Relation	Name	PAN	Contact Details
1	Spouse			

**A. Details of other Immediate Relatives, who are either financially dependent or consult in taking decisions relating to trading in Securities of the Company:**

Sr. No.	Relation	(A) Financially dependent on me	(B) Consult with me in taking decisions relating to trading in Securities of the Company	Name	PAN	Contact Details
2	Mother	Yes/No	Yes/No			

3	Father	Yes/No	Yes/No			
4	Brother	Yes/No	Yes/No			
5	Sister	Yes/No	Yes/No			
6	Child	Yes/No	Yes/No			
7	Spouse's Mother	Yes/No	Yes/No			
8	Spouse's Father	Yes/No	Yes/No			
9	Spouse's Brother	Yes/No	Yes/No			
10	Spouse's Sister	Yes/No	Yes/No			

**Details of Educational Institutions :**

Sr. No.	Name of Educational Institution	Affiliated To	Educational Course	Passing Year
1				

**B. Details of Past Employer:**

Sr. No.	Name of Employer	Address	Contact Details
1			

**C. Details of Persons with whom Material Financial Relationship\* is shared:**

Sr. No.	Relation	Name	PAN	Contact Details
1				

I hereby declare that the information provided by me above is true and complete in all respects. I undertake to immediately intimate the Compliance Officer in case of any change in the above information. I understand that non-disclosure / untrue disclosure shall entail penal consequences and I shall be solely liable in case subsequently it is found out that information provided by me is untrue or incomplete.

**Yours Sincerely,**

**[Name of Designated Person]**

**[Designation]**

**Email:**

**Phone No:**

*\* 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*