

GUJARAT TERCE LABORATORIES LIMITED

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS

[Pursuant to Regulation 9 read with Schedule B and Schedule C of the SEBI (Prohibition of Insider Trading) Regulations, 2015]

(Reviewed and Revised by the Board of Directors on 29th May, 2026; effective from 29th May, 2026)

CIN: [L24100GJ1985PLC007753] | Equity Shares listed on BSE Limited (Main Board)

I. Preamble

Pursuant to Regulation 9(1) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (the "PIT Regulations"), every listed company is required to formulate a code of conduct to regulate, monitor and report trading by its Designated Persons and their immediate relatives, adopting the minimum standards set out in Schedule B to the PIT Regulations. This Code of Conduct (the "Code") is adopted by the Board of Directors of Gujarat Terce Laboratories Limited (the "Company") towards achieving compliance with the PIT Regulations, and replaces the earlier code of conduct of the Company on the subject.

This Code, together with the Policy for Determination of Legitimate Purposes (Part XII) and the Policy and Procedure for maintenance of the Structured Digital Database (Part XIII), forms an integral part of the Company's insider trading compliance framework.

II. Title, Applicability and Commencement

1. This Code shall be called the "Gujarat Terce Laboratories Limited – Code of Conduct for Prohibition of Insider Trading".
2. This Code is applicable to all Promoters and members of the promoter group, Directors, Key Managerial Personnel, Designated Persons and their immediate relatives, Connected Persons, and all other persons who are or may come into possession of Unpublished Price Sensitive Information (UPSI) of the Company.
3. This Code shall come into force with effect from 29th May, 2026, as amended from time to time.

III. Definitions

In this Code, unless the context otherwise requires, the following terms shall have the meanings assigned below. Words and expressions used but not defined herein shall have the meanings respectively assigned to them under the PIT Regulations, the Securities and Exchange Board of India Act, 1992, the Companies Act, 2013, the Securities Contracts (Regulation) Act, 1956, or the Depositories Act, 1996.

"Act" means the Securities and Exchange Board of India Act, 1992.

"Board" means the Securities and Exchange Board of India (SEBI), unless the context refers to the Board of Directors of the Company.

"Board of Directors" means the Board of Directors of the Company, as constituted from time to time.

"Compliance Officer" means the Company Secretary of the Company, who is financially literate and is capable of appreciating the requirements for legal and regulatory compliance under the PIT Regulations,

and who is responsible for compliance with the policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of UPSI, monitoring of trades and the implementation of this Code under the overall supervision of the Board of Directors of the Company. As on the date of this Code, Ms. Aashka Solanki, Company Secretary, is the Compliance Officer. The Compliance Officer shall report to and act under the overall supervision of the Board of Directors and shall provide reports to the Chairman of the Audit Committee.

“Connected Person” means a connected person as defined under Regulation 2(1)(d) of the PIT Regulations, including any person who is or has during the period of six months prior to the concerned act been associated with the Company, directly or indirectly, in any capacity, that allows such person, directly or indirectly, access to UPSI or is reasonably expected to allow such access, and the categories of persons deemed to be connected persons under the said Regulation.

“Designated Person” means a person designated as such by the Board of Directors on the recommendation of the Compliance Officer, as set out in Part IV of this Code.

“Generally Available Information” means information that is accessible to the public on a non-discriminatory basis.

“Immediate Relative” means a spouse of a person, and includes parent, sibling and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities.

“Insider” means any person who is (i) a Connected Person; or (ii) in possession of or having access to UPSI.

“Key Managerial Personnel or KMP” means key managerial personnel as defined under Section 2(51) of the Companies Act, 2013.

“Legitimate Purpose” shall have the meaning assigned to it in the Policy for Determination of Legitimate Purposes set out in Part XII of this Code.

“Need to Know” means that UPSI shall be disclosed only to those persons within the Company who need the information to discharge their duty, and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.

“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.

“Structured Digital Database or SDD” means the structured digital database maintained by the Company under Regulation 3(5) of the PIT Regulations, as described in Part XIII of this Code.

“Trading” means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell or deal in any securities, and “Trade” shall be construed accordingly.

“Trading Day” means a day on which the recognised stock exchanges are open for trading.

“Unpublished Price Sensitive Information or UPSI” means 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 include but not be 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; and
- (vi) change in rating(s), other than ESG rating(s).

IV. Designated Persons

On the recommendation of the Compliance Officer, the Board of Directors has determined the following persons to be Designated Persons for the purposes of this Code, having regard to their role and function and the access that they may have to UPSI:

- all Promoters and members of the promoter group of the Company;
- all Directors of the Company (whether executive, non-executive or independent);
- the Chief Executive Officer and employees up to two levels below the Chief Executive Officer / Managing Director, by whatever name called, whether or not so designated;
- the Chief Financial Officer, the Company Secretary, and all key managerial personnel of the Company;
- all employees of the Accounts, Finance, Secretarial, Legal and Compliance functions, and the functional / unit heads;
- any support staff of the Company, such as IT staff or secretarial staff, who have access to UPSI;
- the Chief Executive Officer and employees of every material subsidiary of the Company designated on the basis of their functional role (as and when the Company has such a subsidiary); and
- any other person or employee, and their immediate relatives, as may be identified and designated as such by the Board of Directors / Compliance Officer from time to time on account of their access to UPSI.

V. Communication or Procurement of UPSI

- a) No Insider shall communicate, provide or allow access to any UPSI relating to the Company or its securities, to any person including other Insiders, except where such communication is in furtherance of a Legitimate Purpose, performance of duties or discharge of legal obligations.
- b) No person shall procure from, or cause the communication by, any Insider of any UPSI relating to the Company or its securities, except in furtherance of a Legitimate Purpose, performance of duties or discharge of legal obligations.
- c) No Insider shall counsel or procure any other person to trade in the securities of the Company on the basis of UPSI.

- d) All UPSI shall be handled within the Company strictly on a “need to know” basis. Files and records containing confidential information shall be kept secure, and computer files shall have adequate digital security including password protection and access controls.
- e) UPSI may be communicated, provided, allowed access to or procured in connection with a transaction that would (i) entail an obligation to make an open offer under the takeover regulations where the Board of Directors of the Company is of the informed opinion that sharing of such information is in the best interests of the Company; or (ii) not attract the obligation to make an open offer but where the Board of Directors of the Company is of the informed opinion that sharing of such information is in the best interests of the Company and the information that constitutes UPSI is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected. In both cases, the parties shall execute agreements to contract confidentiality and non-disclosure obligations, and shall keep the information confidential and not otherwise trade in the securities of the Company when in possession of UPSI.
- f) Whenever any person is brought “inside” on a sensitive transaction or otherwise receives UPSI for a Legitimate Purpose, such person shall be made aware of the duties and responsibilities attached to the receipt of UPSI and the liability that attaches to misuse or unwarranted use of such information, and the person’s details shall be entered in the Structured Digital Database in accordance with Part XIII.

VI. Trading Window and Restrictions on Trading

All Designated Persons and their immediate relatives shall trade in the securities of the Company only when the trading window is open, and shall not trade when the trading window is closed.

(a) Closure of trading window

The trading window shall remain closed from the end of every quarter (i.e., from the closure of the relevant financial period) until forty-eight (48) hours after the declaration of the financial results to the stock exchanges. The trading window shall also be closed during such other periods, and in respect of such UPSI, as may be determined by the Compliance Officer, in consultation with the Managing Director / Whole-time Director where required, having regard to events such as the declaration of dividend, issue of securities, buy-back, expansion plans, execution of new projects, amalgamation, merger, takeover, disposal of the whole or substantially the whole of the undertaking, and any other matter that has a bearing on the price of the securities.

In respect of declaration of financial results, the closure of the trading window for Designated Persons shall, in addition, be administered through the framework specified by SEBI and the depositories for automated/system-driven freezing of the demat accounts (PAN) of Designated Persons. The trading window restriction shall not apply in respect of (i) transactions specified in Regulation 4(1) of the PIT Regulations (such as off-market inter-se transfers between Insiders who were in possession of the same UPSI), (ii) exercise of options or trades pursuant to an approved Trading Plan, and (iii) such other transactions as may be specified by SEBI from time to time, subject in each case to compliance with the conditions prescribed.

The Compliance Officer or any other authorised person from the Secretarial department of the Company shall notify the Designated Persons and the stock exchanges, as applicable, of the closure and re-opening of the trading window.

VII. Pre-Clearance of Trades

All Designated Persons who intend to trade in the securities of the Company (directly or through their immediate relatives) when the trading window is open shall obtain prior pre-clearance of the proposed transaction from the Compliance Officer if the market value of the securities proposed to be 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 (₹10,00,000) or such other threshold as the Board of Directors may stipulate from time to time.

- g) An application for pre-clearance shall be made in the prescribed form (Annexure 1), accompanied by an undertaking (Annexure 1A).
- h) Prior to approving any trade, the Compliance Officer shall seek a declaration to the effect that the applicant is not in possession of any UPSI, and shall have regard to whether any such declaration is reasonably capable of being rendered inaccurate. The Compliance Officer may also confidentially maintain a list of securities as a “restricted list” which shall be used as the basis for approving or rejecting applications for pre-clearance.
- i) The Compliance Officer shall, after satisfying himself/herself that the application and undertaking are in order and that the proposed trade will not breach the PIT Regulations or this Code, pre-clear the trade within two (2) trading days of receipt of the complete application, in the prescribed form (Annexure 2).
- j) The Designated Person shall execute the pre-cleared trade within seven (7) trading days from the date of pre-clearance, failing which fresh pre-clearance shall be obtained.
- k) The Designated Person shall report the details of the executed trade to the Compliance Officer within two (2) trading days of execution, in the prescribed form (Annexure 3). Where the transaction is not undertaken, a ‘Nil’ report shall be submitted within two (2) trading days of the expiry of the said seven (7) trading days.

Contra-trade restriction

A Designated Person who is permitted to trade shall not execute a contra-trade, i.e., having pre-cleared and executed a purchase, he/she shall not execute a sale, and vice versa, in respect of any number of the securities of the Company, for a period of six (6) months from the date of the earlier transaction. Should a contra-trade be executed, inadvertently or otherwise, in violation of this restriction, the profits made from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund. The Compliance Officer may, for reasons recorded in writing, grant relaxation from the strict application of this restriction provided that such relaxation does not violate the PIT Regulations. This restriction shall not apply to trades pursuant to the exercise of stock options, or to trades carried out in accordance with an approved Trading Plan.

VIII. Disclosures of Trading

- l) Initial disclosure – Every Promoter, member of the promoter group, Key Managerial Personnel and Director of the Company shall disclose his/her holding of securities of the Company as on the date of these regulations taking effect, within thirty (30) days, in Form A; and every person on appointment as a KMP or Director, or upon becoming a Promoter or member of the promoter group, shall disclose his/her holding of securities as on the date of appointment or becoming such, within seven (7) days, in Form B.
- m) Continual disclosure – Every Promoter, member of the promoter group, Designated Person and Director shall disclose to the Company the number of securities acquired or disposed of, within two (2) trading days, 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 (₹10,00,000), in Form C. The Company shall notify the particulars of such trading to the stock exchanges within two (2) trading days of receipt of the disclosure or from becoming aware of such information.
- n) Disclosure by other connected persons – The Company may, at its discretion, require any other Connected Person or class of Connected Persons to make disclosures of holdings and trading in securities of the Company in Form D, at such frequency as may be determined by the Company.
- o) Annual disclosure – All Designated Persons / Connected Persons shall furnish, in Form E, to the Compliance Officer, details of their holding of securities and transactions in the securities of the Company, on an annual basis (as on 31st March).
- p) Each Designated Person and Connected Person shall ensure that their respective wealth managers, portfolio managers or similar persons do not trade in the securities of the Company on their behalf, unless such Designated Person or Connected Person is permitted to trade in accordance with this Code.

IX. Disclosure Obligations of Designated Persons

Designated Persons shall disclose to the Company the names and Permanent Account Number (or any other identifier authorised by law where PAN is not available) of the following persons, on an annual basis and as and when the information changes:

- immediate relatives;
- persons with whom such Designated Person shares a material financial relationship; and
- the phone, mobile and cell numbers used by them.

In addition, the names of educational institutions from which the Designated Persons have graduated and the names of their past employers shall be disclosed on a one-time basis. For this purpose, the term “material financial relationship” means 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.

X. Trading Plan

An Insider shall be entitled to formulate a trading plan in respect of securities of the Company and present it to the Compliance Officer for approval and public disclosure, pursuant to which trades may be carried out on his/her behalf in accordance with such plan, in compliance with Regulation 5 of the PIT Regulations (as amended with effect from 24th September, 2024).

Such trading plan shall:

- (vii) not entail commencement of trading on behalf of the Insider earlier than one hundred and twenty (120) calendar days from the public disclosure of the plan;
- (viii) set out either the value of trades to be effected or the number of securities to be traded, the nature of the trade, and the intervals at, or dates on, which such trades shall be effected; and may set out the upper price limit for a buy trade and the lower price limit for a sell trade (within twenty per cent of the closing price on the date of submission of the plan), in the manner specified by SEBI;
- (ix) specify the time period for execution of the trades, which shall not exceed such outer limit as may be prescribed for the splitting of trades, and shall not entail overlap of any period for which another trading plan is already in existence;
- (x) not entail trading in securities for market abuse.

The Compliance Officer shall review the trading plan to assess whether it would have any potential for violation of the PIT Regulations, and shall be entitled to seek such express undertakings as may be necessary. The Compliance Officer shall approve or reject the trading plan within two (2) trading days of receipt, and on approval shall notify the plan to the stock exchanges on which the securities are listed on the same day.

Once approved, the trading plan shall be irrevocable and the Insider shall mandatorily implement it, without being entitled to deviate from it or to execute any trade in the securities outside the scope of the trading plan, save in the exceptional circumstances permitted under Regulation 5 (such as permanent incapacity, bankruptcy or operation of law) and subject to the Compliance Officer's satisfaction. Trades pursuant to an approved trading plan shall not require separate pre-clearance, and the trading window norms and the restriction on contra-trade shall not apply to such trades; however, contra-trade is not permissible within an approved trading plan. The implementation of the trading plan shall not commence if any UPSI in possession of the Insider at the time of formulation has not become generally available at the time of commencement, in which case the Compliance Officer shall defer commencement until such UPSI becomes generally available.

XI. Sanctions, Reporting of Violations and Powers of the Board

Any Designated Person or other person who contravenes any provision of this Code shall be liable for appropriate action by the Company, which may include wage freeze, suspension, recovery, clawback, ineligibility for future participation in any employee benefit scheme, or such other disciplinary action as the Board of Directors or the Managing Director / Whole-time Director may determine, in addition to the

requirement to disgorge any profits in the manner prescribed. The action taken by the Company shall not preclude SEBI from taking any action in case of violation of the PIT Regulations.

In case it is observed by the Company / Compliance Officer that there has been a violation of the PIT Regulations or this Code, the Company shall promptly inform the stock exchanges where the securities are listed, in such form and manner as may be specified by SEBI from time to time, and shall maintain records of such violations. Amounts collected by way of disgorgement shall be remitted to SEBI for credit to the Investor Protection and Education Fund.

In relation to any suspected contravention by a Designated Person, the Board of Directors or a committee constituted in this regard may serve a notice on the Designated Person (or, where it considers it necessary in the interest of the Company, initiate proceedings without serving notice), investigate the records and documents in the possession of such person or of the Company, and record the reasons for its decision in writing, before imposing any sanction.

Reporting by the Compliance Officer

The Compliance Officer shall provide reports to the Chairman of the Audit Committee and to the Board of Directors at such frequency as may be stipulated, but not less than once in a financial year, covering pre-clearances sanctioned or rejected; details of transactions effected pursuant to pre-clearance (including cases where no transaction was executed after securing pre-clearance, with reasons); details of relaxations granted; disciplinary actions taken; disclosures received under the PIT Regulations; trading plans presented for approval; and any other relevant information. The Compliance Officer shall place these details before the Board of Directors at its first meeting held after the close of the financial year.

XII. Policy for Determination of Legitimate Purposes

This Policy forms an integral part of this Code, in compliance with Regulation 3(2A) of the PIT Regulations.

Meaning of Legitimate Purpose: “Legitimate Purpose” shall include the sharing of UPSI 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 the PIT Regulations.

UPSI shall not be communicated in connection with any transaction that would (i) be in breach of the PIT Regulations, or (ii) be carried out to evade or circumvent the prohibitions thereof. Any person in receipt of UPSI pursuant to a Legitimate Purpose shall be considered an “Insider” for the purposes of the PIT Regulations, and the Company shall give due notice to such person to maintain the confidentiality of the UPSI in compliance with the PIT Regulations. The Compliance Officer shall maintain the record of such sharing in the Structured Digital Database. The persons receiving such UPSI shall not trade in the securities of the Company when in possession of UPSI, and shall handle the UPSI strictly on a need-to-know basis and for the Legitimate Purpose for which it was shared.

XIII. Structured Digital Database (SDD) — Policy and Procedure

In compliance with Regulation 3(5) and 3(6) of the PIT Regulations, the Company shall maintain a Structured Digital Database, the maintenance and integrity of which shall be the responsibility of the Compliance Officer under the supervision of the Board of Directors.

- The SDD shall contain the names of, and the Permanent Account Number (or other identifier authorised by law where PAN is not available) of, every person (including every Insider and every person with whom UPSI is shared) along with the nature of the UPSI shared and the names of the persons who have shared and received such UPSI.
- The SDD shall be maintained internally, within the Company, and shall not be outsourced. It shall be maintained with adequate internal controls and checks, including time-stamping and audit trails, so as to ensure that it is non-tamperable.
- The SDD shall be updated promptly, on a real-time basis, whenever UPSI is shared, and shall not allow deletion or modification of entries other than through a non-tamperable audit trail.
- The information contained in the SDD shall be preserved for a period of not less than eight (8) years after the completion of the relevant transaction, and in the event of receipt of any information from SEBI regarding any investigation or enforcement proceedings, the relevant information shall be preserved until the completion of such proceedings.

XIV. Confidentiality and Chinese Wall

To prevent the misuse of UPSI, the Company shall segregate those areas of the Company that routinely have access to confidential information (“inside areas”) from those that do not (“public areas”). Employees and Designated Persons working within an inside area shall not communicate any UPSI to any person in a public area. In exceptional circumstances, employees or Designated Persons from the public areas may be allowed to “cross the wall” and be given UPSI on a need-to-know basis, under intimation to the Compliance Officer and on entry in the Structured Digital Database. Directors, KMP and employees shall maintain strict confidentiality of all UPSI and business information of the Company, which shall not be communicated to any person except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations. All employees shall consult the Compliance Officer and the management before communicating with the media or the public.

XV. Power to Amend and Cautionary Statement

The Board of Directors shall have the power to make such changes or modifications to this Code as may be required from time to time to make it more effective and to bring it in line with any notification, amendment or modification made by SEBI. In the event of any inconsistency between this Code and the PIT Regulations (as amended), the provisions of the PIT Regulations shall prevail, and this Code shall be deemed to be amended accordingly.

This Code is the internal policy of the Company to prevent insider trading by Designated Persons and Connected Persons. It is, however, the responsibility of each Designated Person and Connected Person to ensure compliance with the provisions of the PIT Regulations and other applicable laws. The Company

shall not be responsible or liable for any violation or contravention, by any Designated Person or Connected Person, of the PIT Regulations or other related laws.

ANNEXURE 1
APPLICATION FOR PRE-CLEARANCE APPROVAL

To,
The Compliance Officer
Gujarat Terce Laboratories Limited
122/2, Ravi Estate, Bileshwarpura, Chhatral, Gandhinagar – 382729

Dear Madam,

Sub: Application for pre-clearance of dealing in securities of the Company

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct for Prohibition of Insider Trading, I seek approval to purchase / sell / subscribe to _____ equity shares of the Company, as per the details given below:

1.	Name of the Applicant	
2.	Designation	
3.	PAN	
4.	Number of securities held as on date	
5.	Folio No. / DP ID / Client ID No.	
6.	The proposal is for (a) Purchase / (b) Subscription / (c) Sale of securities	
7.	Proposed date of dealing 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 through stock exchange or off-market deal	
12.	Folio No. / DP ID / Client ID where securities will be credited / debited	

I am enclosing the Form of Undertaking duly signed by me. I declare that I am not in possession of any UPSI as on the date of this application.

Yours faithfully,

(Name / Employee ID / Designation) Date: _____

ANNEXURE 1A

UNDERTAKING (to accompany the application for pre-clearance)

To,

The Compliance Officer, Gujarat Terce Laboratories Limited

122/2, Ravi Estate, Bileshwarpura, Chhatral, Gandhinagar – 382729

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

I further declare that I am not in possession of, or otherwise privy to, any unpublished price sensitive information (as defined in the Company's Code of Conduct for Prohibition of Insider Trading) up to the time of signing this undertaking.

In the event that I have access to or receive any information that could be construed as UPSI 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 generally available.

I declare that I have not contravened the provisions of the Code as notified by the Company. I undertake to submit the necessary report within two (2) trading days of execution of the transaction, or a 'Nil' report if the transaction is not undertaken. I have made full and true disclosure in the matter.

Signature: _____

(Name / Employee ID / Designation) Date: _____

ANNEXURE 2
FORMAT FOR PRE-CLEARANCE ORDER

To,

Name: _____ Emp No.: _____ Designation: _____ Location:

This is to inform you that your request for dealing in _____ (nos.) shares of the Company, as mentioned in your application dated _____, is approved. Please note that the said transaction must be completed on or before _____ (date), which is within seven (7) trading days from today.

In case you do not execute the approved transaction on or before the aforesaid date, you will have to seek fresh pre-clearance before executing any transaction in the securities of the Company. Further, you are required to file the details of the executed transaction in the prescribed format within two (2) trading days from the date of transaction. In case the transaction is not undertaken, a 'Nil' report shall be necessary.

Yours faithfully,

For Gujarat Terce Laboratories Limited

Compliance Officer Date: _____

ANNEXURE 3**FORMAT FOR DISCLOSURE OF TRANSACTION (within 2 trading days of dealing)**

To,

The Compliance Officer, Gujarat Terce Laboratories Limited

122/2, Ravi Estate, Bileshwarpura, Chhatral, Gandhinagar – 382729

I hereby inform that I have not dealt / I have bought / sold / subscribed to _____ securities as mentioned below on _____ (date):

Name of the holder	No. of securities dealt with	Bought / Sold / Subscribed	DP ID / Client ID / Folio No.	Price (₹)

In connection with the aforesaid transaction(s), I undertake to preserve for a period of 3 years and produce to the Compliance Officer / SEBI, if required, the broker's contract note, proof of payment to/from brokers, extract of bank passbook/statement and copy of the delivery instruction slip (as applicable). I declare that the above information is correct and that no provisions of the Company's Code and/or applicable laws have been contravened for effecting the above transaction(s).

Date: _____ Signature: _____ Name: _____ Emp No.: _____ Location: _____

FORM A**SEBI (Prohibition of Insider Trading) Regulations, 2015 — Regulation 7(1)(a) read with Regulation 6(2)**

Details of securities held by Promoter, member of the promoter group, Key Managerial Personnel (KMP), Director and other such persons on the date these regulations came into force.

Name of the Company: _____ ISIN of the Company: _____

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoter/ KMP/ Director/ immediate relative/ others)	Securities held — Type	Securities held — Number	% of share-holding	Open Interest (Future) — Units & Notional value (₹)	Open Interest (Option) — Units & Notional value (₹)

Note: "Securities" shall have the meaning defined under Regulation 2(1)(i) of the PIT Regulations.

Signature: _____ Designation: _____ Date: _____ Place: _____

FORM B**Regulation 7(1)(b) read with Regulation 6(2)**

Details of securities held on appointment of KMP or Director, or upon becoming a Promoter / member of the promoter group of a listed company.

Name of the Company: _____ ISIN of the Company: _____

Name, PAN, CIN/DIN & address with contact nos.	Category of Person	Date of appointment / becoming Promoter	Securities held — Type & Number	% of share-holding	Open Interest — Future & Option (Units / Notional value ₹)

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**Regulation 7(2) read with Regulation 6(2) — Continual Disclosure**

Details of change in holding of securities of Promoter, member of the promoter group, Designated Person, Director or other such persons.

Name of the Company: _____ ISIN of the Company: _____

Name, PAN, CIN/DIN & address	Category of Person	Securities held prior (Type / No.)	Securities acquired / disposed (Type / No. / Value / Transaction type)	Securities held post (No. / %)	Date of allotment / acquisition / sale (From – To)	Date of intimation to Company	Mode of acquisition (market / off-market / etc.)	Exchange on which trade executed

Note: "Securities" shall have the meaning defined under Regulation 2(1)(i) of the PIT Regulations.

Signature: _____ Designation: _____ Date: _____ Place: _____

FORM D**Regulation 7(3) — Transactions by other Connected Persons as identified by the Company**

Name of the Company: _____ ISIN of the Company: _____

Name, PAN, CIN/DIN & address	Connection with Company	Securities held prior (Type / No. / %)	Securities acquired / disposed (Type / No. / Value / Transaction type)	Securities held post (No. / %)	Date of allotment / acquisition / sale (From – To)	Date of intimation to Company	Mode of acquisition / disposal

Note: "Securities" shall have the meaning defined under Regulation 2(1)(i) of the PIT Regulations.

Signature: _____ Designation: _____ Date: _____ Place: _____

FORM E
ANNUAL DISCLOSURE BY DESIGNATED / CONNECTED PERSON

Date: _____

To,

The Compliance Officer, Gujarat Terce Laboratories Limited

122/2, Ravi Estate, Bileshwarpura, Chhatral, Gandhinagar – 382729

Pursuant to the Code of Conduct of Gujarat Terce Laboratories Limited (“the Company”) for Prohibition of Insider Trading under the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time, I, _____, Designated Person / Connected Person of the Company, hereby declare that I and my immediate relatives / family members are holding _____ equity share(s) of the Company as on 31st March, _____.

Thanking you,

(Name & Signature)