

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

[Under Regulation 8(1) of Securities and Exchange Board of India (Prohibition of Insider Trading Regulations), 2015]

This Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (Code for Disclosure) shall come into force from 14th May 2015.

The Company shall ensure:

1. Prompt public disclosure of Unpublished Price Sensitive Information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. Uniform and universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure.
3. Prompt dissemination of Unpublished Price Sensitive Information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
4. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
5. Ensuring that information shared with analysts and research personnel is not Unpublished Price Sensitive Information.
6. Developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
7. Handling of all Unpublished Price Sensitive Information on a need-to-know basis.

Dissemination of information

1. The Company shall designate a senior officer as chief investor relations officer (“ Chief Investor Relations Officer ”) who, in consultation with the Compliance Officer/Joint Managing Director, shall deal with the dissemination of information and disclosure of Unpublished Price Sensitive Information.

STERLING BIOTECH (SBL)

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY
INSIDERS (THE “ CODE ”)

Approved by Board of Directors of SBL on 14th May 2015 Effective Date: 14TH May
2015

STERLING BIOTECH LIMITED (SBL)

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS (THE “ CODE ”)

[Under Regulation 9(1) of SEBI (Prohibition of Insider Trading Regulations), 2015]

Effective Date: 14th May 2015

1. INTRODUCTION

In the normal course of business, the Directors, certain Employees and Connected Persons may have access to or possess privileged information / Unpublished Price Sensitive Information (“UPSI”) relating to SBL’s operations. Therefore, such persons have an important ethical and legal obligation not to engage in acts prohibited under Securities and Exchange Board of India (Prohibition of Insider Trading), Regulations, 2015 (the “ Regulations ” or “ SEBI PIT Regulations ”). No Insider, including Designated Person, shall trade in the Company’s Securities that are listed or proposed to be listed on a stock exchange when in possession of, or having access to UPSI. However, an Insider may prove his innocence in the manner prescribed in the Regulations. Along with regulating, monitoring and reporting insider trading, the Regulation protects interest of the investors as well as ensures fair dealings in the securities market. Insider trading is a crime; therefore, the persons involved may be subject to criminal as well as civil liabilities.

As required under Chapter IV of the Regulations, SBL has formulated this Code with two fold objectives:

- a. to inform all the concerned within SBL of their duties under this Code and Regulations; and
- b. to establish additional safeguards for dealings by Directors, certain Employees and Connected Persons, as defined hereafter.

2. DEFINITIONS

In this Code, unless otherwise defined, the terms used have the meaning as defined under the Regulations:

- a. Code – Sterling Biotech Limited (the “ Company ” or “ SBL ”) Code of Conduct to regulate, monitor and report trading by Insiders, as approved and modified by Board of Directors of the Company from time to time.
- b. Compliance Officer - 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 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 the codes specified in the Regulations under the overall supervision of the board of directors of the listed company.

- c. Connected Persons - this term shall have the meaning given to it under Regulation 2(d) of the Regulations and shall also include the promoters and members of the promoter group of the Company and such other persons as may be identified by the Company from time to time.
- d. Designated Persons – Directors, Key Management Personnel, Connected Persons and employees as designated on the basis of their functional role in the Company. In this regard, the Board of Directors shall from time to time in consultation with the Compliance Officer/Joint Managing Director specify the Designated Persons to be covered under this Code.
- e. Generally available information – this means information that is accessible to the public on non- discriminatory basis. In this regard, information published on the website of the stock exchanges where the equity shares of the Company are listed as well as on the website of the Company would ordinarily be treated as generally available.
- f. Immediate Relative – means the spouse of the Designated Person and includes parent, sibling and child of such Designated Person or of the spouse, any of whom is either dependent financially on such Designated Person or consults such Designated Person in taking decisions relating to trading in Securities.
- g. Insider – this term shall have the meaning as assigned to it under Regulation 2(g) of the Regulations.
- h. Key Management Personnel - this term shall have the meaning as assigned to it under Section 2(51) of the Companies Act, 2013, as amended.
- i. Securities - this term shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 or any modification thereof except units of a mutual fund.
- j. Trade, Traded or Trading - means and includes subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell, deal in any Securities of the Company.
- k. Trading day - means a day on which the recognized stock exchanges are open for trading.

1. Unpublished Price Sensitive Information or UPSI - Any information which relates 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:
 - financial results;
 - dividends;
 - change in capital structure
 - mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
 - changes in Key Managerial Personnel; and
 - material events in accordance with the listing agreement.

- m. Working Day - working day of the Company.

3. APPLICABILITY & DECLARATION

- a. The Code is applicable to all Designated Persons and to the extent specified, to their Immediate Relatives.
- b. All Designated Persons are advised to carefully go through and familiarize themselves with and adhere to the Code.
- c. In case a Designated Person holds Securities jointly with any other person, related or not, such holding will be considered as the holding of the Designated Person. Accordingly, all the provisions of the Code shall be applicable in totality.
- d. All Designated Persons are required to give their understanding of and agreement to comply with the Code by signing a Declaration in the format prescribed in Annexure A – Declaration by Director / Designated Person .

4. COMPLIANCE OFFICER/JOINT MANAGING DIRECTOR & HIS RESPONSIBILITIES

- a. The Compliance Officer/Joint Managing Director shall be responsible for the implementation of the Code under the overall supervision of the Board of Directors of the Company. He shall also be responsible for setting forth policies and procedures for various activities mentioned in the Code, monitoring adherence to the rules for the preservation of UPSI, monitoring of trades and granting pre-trading approvals to the Designated Persons for trading in the Company's Securities, by them or their Immediate Relatives.
- b. The Compliance Officer/Joint Managing Director shall provide reports to the Chairman of the Audit Committee, if any or to the Chairman of the Board of Directors regarding details of Trading in the Securities by Designated Persons on a quarterly basis.

- c. The Compliance Officer/Joint Managing Director shall assist all Designated Persons in addressing any clarification regarding the Regulations or the Code.
- d. The Compliance Officer/Joint Managing Director shall maintain a record (either manual or in electronic form) of the Designated Persons and their Immediate Relatives and changes thereto on a quarterly basis.

5. PRESERVATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION

- a. All Designated Persons shall maintain confidentiality of all UPSI coming into their possession, or control or access.
- b. All information shall be handled within the Company on a need-to-know basis and no Insider shall communicate, provide or allow access to any UPSI except in furtherance of the Insider's legitimate purposes, performance of duties of his legal obligations.
- c. Files containing confidential information shall be kept secure. Computer files must have adequate security of login and password, etc.
- d. To prevent the misuse of UPSI, the Company shall follow the 'Chinese Wall' approach and separate those departments which routinely have access to such information, considered as "inside areas" from other departments, considered as "public areas". Employees in the inside areas shall not be allowed to communicate any UPSI to anyone in the public areas, except as may be required on a need-to-know basis in accordance with the Code and the Regulations.

6. TRADING WINDOW

All Designated Persons shall be subject to Trading restrictions as enumerated below:

- a. The "Trading Window" for the purpose of Code shall mean the period during which Trading is permitted.
- b. The Trading Window shall be closed when the Compliance Officer/Joint Managing Director determines that Designated Persons can reasonably be expected to have possession of UPSI, including for the following purposes-
 - 10 days before declaration of financial results (periodical or annual),
 - 10 days before declaration of dividends (interim or final),
 - change in capital structure,
 - mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions,
 - changes in key managerial personnel,
 - material events in accordance with the listing agreement, and
 - such other events as the Compliance Officer/Joint Managing Director may find appropriate.

The Trading Window shall re-open 48 hours after UPSI is announced to the Stock Exchanges.

- c. Designated Persons and their Immediate Relatives shall not, either directly or through their advisors including investment managers, brokers, or other persons Trading for or on behalf of their account, Trade in Securities when the trading window is closed.

7. PRE-CLEARANCE OF TRADES

- a. Every Designated Person shall obtain a pre-trading approval as per the procedure prescribed hereunder for any Trading in the Securities of the Company proposed to be undertaken by such Designated Person or his / her Immediate Relatives. Such pre-trading approval would be necessary, if the transactions (either single or aggregate) in any financial year exceeds Rs. 5,00,000/-.
- b. An application for pre-clearance along with an undertaking in favour of the Company shall be made in the format prescribed in Annexure B - Application cum Undertaking for Pre-clearance of Trade to the Compliance Officer/Joint Managing Director.
- c. No Designated Persons shall apply for pre-clearance of any proposed Trade by such Designated Person or his/her Immediate Relative if such Designated Person or his/her Immediate Relative is in possession of UPSI even if the trading window is not closed.
- d. The trades that have been pre-cleared would need to be executed by the Designated Persons or his/her Immediate Relative, within 7 (seven) Trading Days from the date of pre-clearance, failing which fresh pre-clearance would need to be sought from the Compliance Officer/Joint Managing Director.
- e. On receipt of the application, the Compliance Officer/Joint Managing Director shall scrutinize the application and grant his approval / rejection within three Working Days after the receipt of the application.
- f. The Designated Person or Immediate Relative, as the case may be, shall file within 2 (two) Trading days of the execution of the Trade, the details of such Trade, with the Compliance Officer/Joint Managing Director in the format prescribed in Annexure C – Reporting / Confirmation of execution of pre-cleared Trade . In case the transaction is not undertaken, a report to that effect shall be filed in the format prescribed in Annexure D – Reporting of non-execution of pre-cleared Trade within 2 (two) Trading days from the expiry of 7 (seven) Trading Days.
- g. The Compliance Officer/Joint Managing Director shall maintain a list of securities as a “ restricted list ” which shall be used as the basis for approving or rejecting applications for pre-clearance of trades. Such “ restricted list ” shall be kept confidential.

8. TRADING PLANS:

An Insider shall be entitled to formulate a trading plan for dealing in Securities of the Company and present it to the Compliance Officer/Joint Managing Director for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan. The Compliance Officer/Joint Managing Director shall only approve a Trading Plan in accordance with the applicable provisions of the Regulations.

9. QUIET PERIOD:

The Company shall have quiet period prior to release of its financial results every quarter. During the quiet period, the Company's authorized spokespersons are not permitted to discuss the financial performance, earnings expectations and any other sensitive business matters with any analysts, institutional investors, key customers, media or public in general. Usually, during quiet period the Company should avoid making any major change / developments. The Key Managerial Personnel of the Company are authorised to decide any exceptions in this regard during the quiet period and certain major UPSIs can be notified to the Stock Exchanges. E.g. Receipt of significant orders. The quiet period starts 10 days prior to the date of the Board Meeting for approval of quarterly / annual financial results and ends 48 hours after the announcement of the financial results to the Stock Exchanges.

10. OTHER RESTRICTIONS / MINIMUM HOLDING PERIOD

- a. All Designated Persons and their Immediate Relatives who are permitted to Trade shall not enter into an opposite transaction i.e. sell or buy any number of Securities during the next 6 months following the prior Trade.
- b. In case the sale of Securities of the Company is necessitated due to personal reasons like marriage or education expenses or due to medical emergencies the holding period referred to above may be waived by the Compliance Officer/Joint Managing Director after recording the reasons in this regard provided that such relaxation does not violate the Regulations. It may however, be noted that in terms of the Regulations, no such sale will be permitted when the Trading Window is closed. The format for application of waiver of minimum holding period is provided in Annexure E.
- c. Notwithstanding the above, should the Designated Person or his/her Immediate Relative executes an opposite transaction, inadvertently or otherwise, in violation of the restrictions set out above, the profits from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund administered by SEBI under the SEBI Act, 1992.

11. REPORTING REQUIREMENTS

- a. Every Promoter, Key Managerial Personnel and Director of the Company shall disclose his/her holding, and the holding of his/her Immediate Relatives

and of any other person for whom such person takes trading decisions, of the Company's Securities (including derivatives) to the Compliance Officer/Joint Managing Director within 30 (thirty) days of the Regulations taking effect (i.e., by June 13, 2015) in the format prescribed in Annexure F – Initial Disclosure by Promoter, Key Managerial Personnel and Director .

- b. Every person on appointment as a Key Managerial Personnel or Director of the Company or any person upon becoming a Promoter shall disclose his holding of securities of the Company as on the date of appointment or becoming a Promoter, to the Company within seven days of such appointment or becoming a Promoter. Such disclosure shall be made in the format prescribed in Annexure G – Initial Disclosure on appointment of Key Managerial Personnel or Director or upon becoming a Promoter .
- c. Every Promoter, Employee and Director of the Company shall disclose to the Company the number of such Securities acquired or disposed of within two Trading days of such transaction if the value of the Securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 5 Lacs. Such disclosure shall be made in the format prescribed in Annexure H – Continual Disclosure by Promoter, Key Managerial Personnel and Director .
- d. The Company shall notify the particulars of such trading to all Stock Exchanges on which the company is listed, within two Trading days of the receipt of the disclosure or from becoming aware of such information.
- e. The Compliance Officer / Joint Managing Director shall maintain records of all the declarations and disclosures in the appropriate form given by the Designated Persons for a minimum period of five years.
- f. The Compliance Officer/Joint Managing Director may require other Connected Persons to make disclosures of holdings and trading in securities of the Company in such form and frequency as he may determine.

12. CODE OF FAIR DISCLOSURE

- a. The Company has prepared a code of fair disclosure and conduct as required by the Regulations. The Code is uploaded on its website www.sterlingbiotech.in

13. PENALTY AND PROSECUTIONS FOR CONTRAVENTION OF THE CODE

- a. Insider Trading attracts severe monetary penalties and other consequences. The regulatory agencies as well as aggrieved third parties have the right to proceed against the person violating the Regulations by way of injunctive action, nullification of the Trading, etc.
- b. Any Designated Person who Trades in Securities of the Company or communicates any information for Trading in Securities of the Company in contravention of the Code shall be penalised and appropriate action shall be taken by the Board of Directors of the Company.

- c. The persons who violate the Code shall also be subject to disciplinary action by the Board of Directors of the Company, which may include wage freeze, suspension, ineligible for future participation in ESOP, etc.
- d. In case it is observed that there has been a violation of the Regulations, the Board of Directors of the Company shall report such violation to SEBI promptly.
- e. Under Section 15G of the SEBI Act, any Insider who indulges in insider trading in contravention of Regulation 3 is liable to a penalty which shall not be less than Rs. 10 lakhs but which may extend to Rs.25 crores or three times the amount of profits made out of insider trading, whichever is higher. Under Section 24 of the SEBI Act, anyone who contravenes the Regulations is punishable with imprisonment for a maximum period of ten years or with fine which may extend to Rs.25 crores or with both. Further, in case any person fails to pay the penalty imposed by the adjudicating officer or fails to comply with any of his directions or orders, he shall be punishable with imprisonment for a term which shall not be less than one month but which may extend to ten years, or with fine, which may extend to twenty-five crore rupees or with both.
- f. Under Section 195 of the Companies Act, 2013, any person, including Director or Key Managerial Personnel of a company, who enters into insider trading, shall be punishable with imprisonment for a term which may extend to five years or with fine which shall not be less than Rs. 5 lakhs (Rupees five lakhs) but which may extend to Rs. 25 crore (Rupees twenty-five crore) or three times the amount of profits made out of insider-trading, whichever is higher, or with both.

14. SCHEDULES

Schedule No.	Details
1	Letter to Director/Designated Persons

15. ANNEXURES

The following annexure as attached form part of Code.

Annexure No.	Details
A	Declaration by Director / Designated Person
B	Application cum Undertaking for Pre-clearance of Trade
C	Reporting / Confirmation of execution of pre-cleared Trade
D	Reporting of non-execution of pre-cleared Trade
E	Application for waiver of minimum holding period
F	Form A - Initial Disclosure by Promoter, Key Managerial Personnel and Director
G	Form B - Initial Disclosure on appointment of Key Managerial Personnel or Director or upon becoming a Promoter.
H	Form C - Continual Disclosure by Promoter, Key Managerial Personnel and Director

SCHEDULE 1
Draft Letter to Director / Designated Persons

Date:

To,
All Directors and Designated Persons as per list attached

**Sterling Biotech Limited (the “ Company ”) – Code of Conduct to regulate,
monitor, and report trading by insiders (THE “ CODE ”)**

Under the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, it is mandatory for all listed companies to adopt a Code of Conduct to regulate, monitor and report trading by its Designated Persons to achieve compliance with the Regulations. The attached Code, duly approved by the Board of Directors of the Company has been adopted by the Company in super session of earlier code. This new Code comes into effect from 14th May, 2015.

The Code is applicable to all the Directors, Employees and other Connected Persons of the Company identified as Designated Persons. Since you are a Director / have been identified as one of the Designated Persons, the provisions of Code are applicable and binding upon you. Please note that any violation of Code is an offence and shall be penalized and appropriate action shall be taken by the Company Board and / or SEBI, as the case may be.

You are required to give your understanding of and agreement to comply with Code by signing a Declaration in Annexure A as well as submit the Initial Disclosures in the format prescribed in Annexure F – Initial Disclosure by Promoter, Key Managerial Personnel and Director within 30 (thirty) days of this Code becoming effective

or

You are required to give your understanding of and agreement to comply with Code by signing a Declaration in Annexure A as well as submit the Initial Disclosures in the format prescribed in Annexure G – Initial Disclosure on appointment of Key Managerial Personnel or Director or upon becoming a Promoter within 7 (Seven) days of your joining.

The undersigned has been appointed as the Compliance Officer for the purpose of this Code. In case you need any clarifications regarding the Code, please contact the undersigned.

Yours Sincerely,
For Sterling Biotech Limited

Chetan Sandesara
Joint Managing Director
Sterling Biotech Limited
43, Atlanta,
Nariman Point,
Mumbai – 400 021.
Tel: 022-66306732;

DECLARATION BY DIRECTOR / DESIGNATED PERSON

To:
The Compliance Officer,
Sterling Biotech Limited (the “ Company ”)
43, Atlanta,
Nariman Point,
Mumbai – 400021

From:
Name :
Designation :
Employee No. :
Company Name :
Tel. No. & Email :

I, the undersigned, being a Director / Designated Person as defined under the Code, hereby declare and confirm as under:

1. I have received, read and understood the Code;
2. I agree to comply with Code and that I and my Immediate Relatives shall be bound by the Code to the extent applicable to us;
3. I agree to hold the Company harmless in the event of any investigation against me and / or my Immediate Relatives for any Insider Trading by the regulatory agencies;
4. I agree to compensate the Company for all economic losses, loss / damage to the Company's public image, fines imposed on the Company, any penalty imposed on the Company, suffered in or as a result of any investigation by regulatory agencies into my or my Immediate Relatives Trades; and
5. I agree to compensate the Company for all legal expenses incurred in defending itself in such investigations.

Date :
Place :

Signature :
Name & employee code :

ANNEXURE B

Application cum Undertaking for Pre-clearance of Trade
[Under Clause [7(b)] of the Code]

To:

The Compliance Officer,
Sterling Biotech Limited (the “ Company ”)
43, Atlanta,
Nariman Point,
Mumbai – 400021

Name :
Designation :
Employee No. :
Company Name :
Tel. No. & Email :

Pursuant to Clause [7(b)] of the Code, I, the undersigned, hereby seek your approval to Trade in the Securities of the Company as per details given below:

S.N.	Particulars	Remarks
1	Name of Designated Person proposing to Trade	
2	PAN of the person Trading in Securities of the Company	
3	Relationship with Director / Designated Person	
4	Nature of Securities	
5	Total No. of Securities held as of today	
6	Nature of Transaction – Purchase / Sale	
7	No. of Securities to be purchased / sold	
8	Client ID of person mentioned at S.N. 1 above	
9	DP ID & Name of the Depository	

I hereby declare that there will be no opposite transaction for 6 (six) months as per Clause [10(a)] of the Code.

I hereby further declare and undertake that:

- a. I do not have any access nor have I received “Unpublished Price Sensitive Information ” (UPSI) upto the date of this application.
- b. In the event of me having access to or receiving UPSI after the date of signing this application but before the execution of the transaction, I undertake to inform the Compliance Officer of the change in this position and shall completely refrain from Trading in the Company’s Securities till the time such information becomes public.
- c. I have not contravened the Code as notified by the Company from time to time.
- d. I have made full and true disclosure to the Company in the matter.

Date :

Signature :

Place :

Name & employee code :

Approval / Rejection of Pre-clearance of Trade

With reference to the above application for pre-clearance of Trade and on the basis of information submitted by you and relying entirely upon the application cum undertaking given by you in this regard, you are hereby granted permission to proceed with the Trading in _____ number of Securities of the Company. Kindly note that this approval is valid only for a period of 7 (seven) Trading days from the date of this approval and you are requested to proceed with the Trading within the specified time. In the event you are not able to proceed with the Trading within the specified time, you would be required to re-submit your application for fresh consideration.

OR

With reference to the above application, this is to inform you that your application has been rejected for following reasons:

Date :

Signature :

Place :

Compliance Officer :

ANNEXURE C

Reporting / Confirmation of execution of pre-cleared Trade
[Under Clause [7(f)] of the Code]

To:
The Compliance Officer,
Sterling Biotech Limited
43, Atlanta,
Nariman Point,
Mumbai – 400 021.

I, _____ (name) confirm that the Trade for which approval was granted by you on _____ (date) was done by me / Immediate Relative as per following details:

Number of securities purchased / sold	
Price per security	Rs.
Amount	Rs.
Date of Trade	
Private Trade / Trade through Stock Exchange	
Name of Stock Exchange	

Date :

Signature :

Place :

Name & employee code :

ANNEXURE D

Reporting of non-execution of pre-cleared Trade
[Under Clause [7(f)] of the Code]

To:
The Compliance Officer,
Sterling Biotech Limited
43, Atlanta,
Nariman Point,
Mumbai – 400 021.

I, _____ (name) wish to inform you that the
Trade for which approval was granted by you on _____, has not been
undertaken by me / Immediate Relative due to reasons given below:

Date :

Signature :

Place :

Name & employee code :

ANNEXURE E

Application for waiver of minimum holding period
[Under Clause [10(b)] of the Code]

To:

The Compliance Officer,
Sterling Biotech Limited (the “ Company ”)
43, Atlanta,
Nariman Point,
Mumbai – 400021

Name :
Designation :
Employee No. :
Company Name :
Tel. No. & Email :

I, the undersigned, request you to grant me waiver from the minimum holding period as required under Clause [10(b)] of the Code with respect to _____ (nos.) of _____ (Specify type of security) of the Company held by me / my Immediate Relative singly / jointly acquired on _____ [Date] by way of _____ (Bonus / Rights / ESOPs / etc).

I desire to sell the above securities on account of the following reasons:

I declare that the above details are true, correct and complete in all respects.

Date :

Signature :

Place :

Name & employee code :

Approval / Rejection by Compliance Officer

With reference to the above application, I approve / reject the selling of _____ (no. and description of securities) of the Company.

Date:

Signature:

Place:

Compliance Officer:

ANNEXURE - F

FORM A – Initial Disclosure by Promoter, Key Managerial Personnel and Director

[Under Clause [11(a)] of the Code and Regulation 7(1)(a) read with Regulation 6(2) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (a) read with Regulation 6 (2)]

Name of the company: Sterling Biotech Limited

ISIN of the company: INE324C01038

Details of Securities held by Promoter, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/ immediate relatives/others etc)	Securities held as on the date of regulation coming into force		% of Shareholding	Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option Contracts held as on the date of regulation coming into force	
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms
1	2	3	4	5	6	7		

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

Signature:

Designation:

Date:

Place

ANNEXURE - G

FORM B – Initial Disclosure on appointment of KMP or Director or upon becoming a Promoter

[Under Clause [11(b)] of the Code and Regulation 7(1)(b) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015
[Regulation 7 (1) (a) read with Regulation 6 (2)]

Name of the company: Sterling Biotech Limited

ISIN of the company: INE324C01038

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

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

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

Signature:

Designation:

Date:

Place

ANNEXURE H

FORM C – Continual Disclosure by Promoter, Key Managerial Personnel and Director

[Under Clause [11(c)] of the Code and Regulation 7(2) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

Name of the company: Sterling Biotech Limited

ISIN of the company: INE324C01038

Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN No., CIN/DIN, & address of Promoter/ Employee / Director with contact nos.	Category of Person (Promoters/ KMP Directors/ immediate relatives/ others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed		% of shareholding		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to company	Mode of acquisition (market purchase/public rights/preferential offer / off market/ Inter-se transfer etc.	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
		Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Pre transaction	Pre transaction	Form	To			Buy		Sell		
												Value	Number of units (contracts * lot size)	Value	Number of units (contracts * lot size)	
1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17

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

Signature:

Designation:

Date:

Place