

**CODE OF CONDUCT  
TO  
REGULATE, MONITOR AND REPORT TRADING BY  
DESIGNATED PERSONS**

**( Amended as on 31.01.2025)**

**Chapter-I**  
**PRELIMINARY**

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**1. Preamble**

- i. This Code shall be called as **‘CITY UNION BANK CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSONS.**
- ii. This Code is made pursuant to the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as notified by SEBI vide notification number No.LAD-NRO/GN/2014-15/21/85 dated 15<sup>th</sup> January 2015 and amended by the Board on pursuant to SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2024.
- iii. This Code is prepared pursuant to Schedule B of the amended regulations in order to regulate, monitor and report trading by its designated persons including their immediate relatives.
- iv. The Board of Directors of the Bank shall be empowered to amend, modify and interpret the code within the framework as prescribed by SEBI and such change shall be effective from such date the Board may notify in this behalf. Matters relating to interpretation of the code shall be referred to and adjudicated by the CIRO.

**2. Definitions**

In this code unless the context otherwise requires the following words, expressions and derivations there from shall have the meanings assigned to them as under:-

- i. **“Act”** means the Securities and Exchange Board of India Act, 1992 (15 of 1992).
- ii. **“Bank”** means City Union Bank Limited
- iii. **“Code”** means this City Union Bank Limited Code of Conduct to regulate, monitor and report trading by its Designated Persons.
- iv. **“Compliance Officer”**- the Company Secretary of the Bank shall be the Compliance Officer for the purpose of the Code. In his absence, any other person as designated by the Managing Director shall be the Compliance Officer for the purpose of this Code.

The Compliance Officer shall be responsible for setting forth policies, procedures, maintaining of records, monitoring adherence to code for the preservation of “Unpublished Price-Sensitive Information (UPSI)”, monitoring of trades and the implementation of codes under the overall supervision of the Board of the Bank.

The Compliance Officer shall maintain a record of the designated Employees and any changes made in such list.

v. **“Connected Person”** means:

- a. Any person who is or has during the six months prior to the concerned act been associated with a Bank,, 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 Bank or holds any position including a professional or business relationship between himself and the Bank 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.
- b. 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 (a); or
  - b) A holding company or associate company or subsidiary company, if any; or
  - c) An intermediary as specified in Section 12 of the Act or an employee or director thereof; or
  - d) An investment company, trustee company, asset management company or an employee or director thereof; or
  - e) An official of a stock exchange or of clearing house or corporation; or
  - f) A member of 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
  - g) A member of the Board of directors of the Bank or an employee, of a public financial institution as defined in Section 2(72) of the Companies Act, 2013; or
  - h) An official or an employee of a Self-Regulatory organization recognised or authorized by the Board; or
  - i) A concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of the Bank or his

immediate relative has more than ten per cent, of the holding or interest.

- vi. **“Dealing in Securities / Trading”** means an act of subscribing buying, selling or agreeing to subscribe, buy, sell or deal in any securities by any person either as principal or agent and ‘trade’ shall be construed accordingly.
- vii. **“Designated Person”** means and includes Connected persons who are:-
  - a. All Directors of the Bank, Dy. General Manger and above grade, all Employees in Secretarial, Finance and Accounts, Risk Management, Computer Systems Dept. and other departments having access to UPSI as may be identified by the Compliance Officer.
  - b. Any other connected persons designated by the Bank on the basis of their functional role.
  - c. Immediate Relatives of a and b above.
- viii. **“Director”** means a Director of the City Union Bank Limited under the provisions of the Companies Act 2013 and/or the Banking Regulation Act, 1949.
- ix. **“Employee”** means employee of the City Union Bank Limited and shall include any person deputed by the Bank.
- x. **“Financially literate”** shall mean a person who has the ability to read and understand basic financial statements i.e, balance sheet, profit and loss account and statement of cash flows.
- xi. **“Generally available information”** means information that is accessible to the public on a non-discriminatory basis.
- xii. **“Relative”** means
  - (i) spouse of the person;
  - (ii) parent of the person and parent of its spouse;
  - (iii) sibling of the person and sibling of its spouse;
  - (iv) child of the person and child of its spouse;
  - (v) spouse of the person listed at sub-clause (iii); and
  - (vi) spouse of the person listed at sub-clause (iv) and , any of whom is either dependent financially on such person or consults such person in taking decisions relating to trading in securities.
- xiii. **“Insider”** means Designated Person(s) and their immediate relative or any person who is a connected person or who is in possession of unpublished price sensitive information.

- xiv. **“Legitimate Purpose”** as per Annexure I to Chapter II.
- xv. **“Non Trading Periods”** means the periods before and after the meeting of the Board or shareholders of the Bank where UPSI is to be considered as provided under this code.
- xvi. **“Officer”** means any person as defined in Section 2(59) of the Companies Act, 2013 including an auditor of the Bank.
- xvii. **“Regulation”** means Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time.
- xviii. **“Securities”** shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund.
- xix. **“Specified”** means specified by the Board in writing.
- xx. **“Takeover Regulations”** means the SEBI (Substantial Acquisition of shares and Takeovers) Regulations, 2011 and any amendments thereto.
- xxi. **“Trading day”** means a day on which the recognized stock exchanges are open for trading.
- xxii. **“Trading Window”** is the period for trading in the securities of the Bank.
- xxiii. **“Unpublished Price-Sensitive Information”** means any information, which relates directly or indirectly to the bank or its securities and that is not generally available which upon becoming generally available, is likely to materially affect the price of securities of the bank and shall, ordinarily including but not restricted to, information relating to the following;
  - a. Periodical financial results of the Bank;
  - b. Intended declaration of dividends (both interim and final);
  - c. Change in capital structure;
  - d. Mergers, demergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
  - e. Changes in Key Managerial Personnel;

The words and expressions not defined in this code but defined in any other legislations viz. SEBI Act, 1992 (15 of 1992), the securities contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1956) or the Companies Act 2013 or listing agreement; shall have the meanings respectively assigned to them there under.

**Chapter- II**  
**CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF**  
**UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI)**

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This code is based on the following Principles:

1. Disclosure of UPSI would be done promptly when credible and concrete information is available for making the same generally available.
2. The Bank will endeavour to make uniform and universal dissemination of UPSI and will avoid making selective disclosure once the information is ready to be made generally available. Material events will be disseminated as mandated by the stock exchanges under Regulation 30 of the SEBI Listing Regulations, as amended from time to time.
3. In case the bank is required to make selective disclosure of UPSI, then the information will be promptly disseminated either in the form of notification to stock exchanges, press releases or upload of information in the website of the bank.
4. The Managing Director & CEO of the Bank shall be the Chief Investor Relations Officer (CIRO) to deal with dissemination of information and disclosure of UPSI.
5. The bank will ensure that the information shared with analysts or research personnel is not UPSI and in case any such information is shared that it will promptly make the information generally available.
6. The bank will make available the transcripts or records of the proceedings of the meetings with analysts and investor relation meetings, on the website of the bank promptly.
7. Responding to Market rumours:
  - a. The bank will subject to non-disclosure obligations, aim to provide appropriate and fair response to the queries on news reports and requests for verification of market rumours by regulatory authorities.
  - b. Any query on verification of market rumours by stock exchanges shall be immediately forwarded to the CIRO who shall decide on the response.
  - c. Employees of the Bank should not respond to stock exchanges, media or others, unless authorised by CIRO.

8. Legitimate Purpose:

UPSI handling will be on a need-to-know basis and for legitimate purposes only. A policy on Determination of Legitimate Purposes which forms part of this code appended hereto as **ANNEXURE 1**.

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**POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES**

Pursuant to Regulation 3(1) and 3(2) of the Regulations, UPSI relating to the Bank shall be communicated, provided or access allowed only for legitimate purposes for performance of duties or discharge of legal obligations of the discloser and also the recipient of the information and subject to compliance with the provisions of this code and also the Regulations. Similarly no person shall procure UPSI except for legitimate purposes for performance of the duties or discharge of legal obligations and he/she shall comply with the requirement of this code and also the Regulations.

The policy for determination of legitimate purposes shall be the following:

- a. The term legitimate purpose shall include 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 with whom the Bank is having business relationship and information is shared for the purpose of discharge of contractual obligations arising out of such relationship.
- b. Such sharing has not been carried out to evade or circumvent the prohibitions of the regulations.
- c. Any person in receipt of UPSI pursuant to a legitimate purpose shall be considered an insider for the purpose of these regulations.
- d. Any person who receives UPSI knowing it to be an UPSI shall be deemed to have received notice from the bank of the requirement to maintain confidentiality and shall be deemed to have agreed to such confidentiality requirements if he received such UPSI.
- e. The Company Secretary of the Bank shall be responsible to maintain a structured database of such persons or entities as the case may be with whom UPSI is shared for legitimate purposes along with PAN or any other relevant Identity authorised by law and ensure such internal controls and checks viz., time stamping / audit trails to ensure non-tampering of the same.

## **Chapter – III**

### **CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSONS**

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#### **1. Role of Compliance Officer**

- i. The Compliance Officer on a quarterly basis shall report details on insider trading to the Board of Directors of the Bank and in particular, shall provide reports to the chairman of the Audit Committee, if any, or to the Chairman of the Board of Directors.
- ii. The Compliance Officer shall assist all employees in addressing any clarifications regarding trading in the Securities of the Bank Pursuant to SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 and the Bank's Code of Conduct.

#### **2. Prohibition on communicating or procuring UPSI or Trading while in Possession of UPSI**

- i. All information's shall be handled in-house on need-to-know basis and no UPSI shall be communicated to any person except to the extent allowed under this code.
- ii. The insider shall not communicate, provide or allow access to any UPSI, relating to the Bank or its Securities to any person including other insiders except where such communication is in furtherance of legitimate purpose, performance of duties or discharge of legal obligations.
- iii. Where it is intended to communicate UPSI by virtue of certain substantial transactions (transactions that do not attract an open offer under the takeover regulations) viz., takeovers and acquisitions etc., the directors can enter into a confidentiality and Non-disclosure obligations with such parties.
- iv. No insider shall trade while in possession of UPSI, provided insider may prove his innocence by demonstrating the circumstances including the following:
  - a. The transaction is an off-market inter-se transfer between insiders who were in possession of same UPSI without being in breach of restrictions imposed on communication and Trading by insiders and both parties has made a conscious and informed trade decision.
  - b. The insiders make prompt reporting of trade to the Compliance Officer under this code in prescribed format.

### **3. Need to know**

- i. The UPSI will be shared with any person including other insiders who need the information in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.*
- ii. All non-public information's received by the employees should immediately be reported to the Compliance Officer.
- iii. No information shall be passed by the designated persons for effecting trading of Bank's securities.

### **4. PROCEDURE FOR INQUIRY IN CASE OF LEAK OF UPSI**

- i. Leak of any UPSI in contravention of SEBI regulations/ this code shall be viewed seriously by the Compliance Officer and any suspected leak shall be brought to the notice of the Compliance Officer.
- ii. The Compliance Officer shall initiate a preliminary inquiry.
- iii. Based on the findings, information's provided he shall constitute an Inquiry Committee (IC) to conduct investigation/ enquiry process.
- iv. The IC shall conduct detailed inquiry after collecting requisite evidence, documents and summoning of such individuals for personal appearance.
- v. The IC shall submit its reports to the CIRO. The report shall contain detailed findings supported by evidence, consequences of leak and quantum of punishment awarded.
- vi. The CIRO shall promptly on receipt of preliminary enquiry report pointing to any leak/ suspected leak of UPSI, cause information to be given to SEBI including the profits made out of the transaction.
- vii. The report of the IC shall be considered by CIRO in consultation with the Chairman of the Bank and he shall determine the quantum of punishment.
- viii. All the documents and other records relating to inquiry shall be handed over to the Compliance Officer for safe custody.

### **5. Digital database**

Company Secretary of the Bank shall be responsible to maintain a structured database of such persons or entities as the case may be with whom UPSI is

shared for legitimate purposes along with PAN or any other relevant Identity authorised by law and ensure such internal controls and checks viz., time stamping/ audit trails to ensure non-tampering of the same.

## **6. Non Trading Period**

- i. The Bank shall specify a period to be called as non trading period for trading in Banks securities. Any other period shall be trading period for the purpose of this code useless specifically restricted by due intimation to the stock exchanges.
- ii. During the Non-trading window, the designated persons or their immediate relatives shall not trade either directly or through Portfolio Manager(s), if any.
- iii. The Compliance Officer shall by way of and e-mail/ Notices / letter correspondence intimate the date of Board meeting and commencement of non-trading period to the designated persons. It shall be the onus of the designated persons to communicate the non-trading period to their immediate relatives.
- iv. The non trading period shall generally occur during the following events:
  - a. Declaration of Financial results (quarterly, half-yearly and annual)
  - b. Declaration of dividends (interim and final)
  - c. Issue of Securities by way of public/rights/bonus etc.
  - d. Any major expansion plans or execution of new projects
  - e. Amalgamation, mergers, takeovers and buy-back
  - f. Disposal of whole or substantially whole of the undertaking
  - g. *Changes in Key Managerial Personnel.*
- v. The trading window shall normally be opened not earlier than 48 hours after the information referred above becomes generally available and capable of assimilation by the market.
- vi. The time of re-opening of the trading window shall be determined by the Compliance Officer after taking into account various factors including UPSI in question which shall not be earlier than 48 hours after the information becomes generally available.
- vii. In case of ESOP, the exercise of option may be allowed in the period when the trading window is closed. However sale of shares allotted on exercise of ESOPs shall not be allowed when trading window is closed.

## 7. Trading Plan

- i. Trading Plan shall:
  - a. Not entail commencement of trading on behalf of the insider upto 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. for each 'Trade Execution' :
    - (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 for buy Trade: the upper price limit shall be between the closing price on the day before submission of trading plan and upto 20% higher than such closing price. For Sell Trade: the lower price limit, shall be between the closing price on the day before submission of trading plan and upto 20% lower than such closing price.

Insiders can split their trades over different dates with price limits set with an outer limit to this duration in order to enhance transparency and to prevent misuse.; and

- d. Not entail trading in securities for market abuse.
- ii. The Compliance Officer shall consider the Trading Plan made as above and shall approve it forthwith. However, he shall be entitled to take express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan as per provisions of the Regulations.
- iii. Insiders are now provided the flexibility to deviate from the trading plan in the case of permanent incapacity, bankruptcy or operation of law. 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.
- iv. However, the implementation of the trading plan shall not be commenced, if at the time of formulation of the plan, the Insider is in possession of any unpublished price sensitive information and the said information has not become generally available at the time of the commencement of implementation.

- v. The pre-clearance of trades shall not be required for a trade executed as per approved trading plan.
- vi. A designated person who is permitted to trade shall not execute a contra trade for not less than six months..
- vii. The compliance officer shall approve or reject the trading plan within two trading days of receipt of the trading plan and notify the approved plan to the stock exchanges on which the securities are listed, on the day of approval..
- Viii In case of non-implementation (full/partial) of trading plan due to inadequate liquidity in the Scrip or permanent incapacity or bankruptcy or operation of law, the insider shall intimate the same to the compliance officer within two trading days of end of tenure of the trading plan with reasons thereof and supporting documents, if any. The compliance officer place the same at the ensuing Audit Committee and the decision of the Audit Committee shall be notified by the compliance officer on the same day to the stock exchanges on which the securities are listed.

## **8. Pre-clearance of trades**

- i. All Designated Persons of the Bank who intend to deal in the securities of the Bank, when the trading window is open and the value of trade is above 10,000 shares or 10 lakh in value (market value) whichever is less, should get the transaction pre-cleared by Compliance Officer by submitting an application as per **Annexure I to this chapter** and an undertaking as per **Annexure 2**.The order of pre-clearance shall be as per **Annexure 3**.
- ii. The designated person shall not be entitled to apply for pre-clearance while in possession of UPSI.
- iii. The Compliance Officer shall not approve any proposed Trade by designated person if the Compliance Officer determines that such person is in possession of UPSI.
- iv. *The pre-clearance approval obtained shall be valid for a period of seven trading days within which the trade has to be executed after which the designated person must secure fresh pre-clearance of transaction.*
- v. *The designated person must report the details of trade within two trading days of execution in the format as per **Annexure 4**. In case the transaction is not undertaken, a nil report to that effect shall be filled in said form.*
- vi. All Designated Persons who trade in securities of the Bank shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction. All such persons shall

also not take positions in derivative transactions in the shares of the Bank at any time. In case of any contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

- vii. *The compliance officer may grant relaxation from strict application of the six months' time limit prescribed for opposite transaction, for reasons to be recorded in writing provided that such relaxation does not violate these regulations. Further, no such sale will be permitted when the trading window is closed*
- viii. Any trade by an Insider/ designated person in contravention to pre-clearance procedure as laid above shall attract penalties as envisaged in this code.

## **9. Reporting requirements for transactions in securities of the Bank**

### **i. Initial Disclosure**

- a. Every person on appointment as a Key Managerial Personnel or a director of the Bank shall disclose his/her holdings along with the holdings of his/her immediate relatives as on the date of appointment, to the Bank within seven days of such appointment, as per **Form B** set out in **Annexure 5**.

### **ii. Disclosure by other connected Persons**

The Compliance Officer may require any other connected Person to disclose the holdings and trading in securities of the Bank as per Form D set out in Annexure 6 at such frequency as he may determine.

### **iii. Disclosure by Designated Persons:**

*Designated Persons shall disclose the names and Permanent Account Number or any other identifier authorised by law of the following persons to the Bank on an annual basis and as when the information changes:*

- a) Immediate relatives*
- b) Persons with whom the designated person(s) share a material financial relationship*
- c) Phone / mobile numbers which are used by them*

*Further the following information on one-time basis*

- d) *Names of Educational institutions from which designated persons have graduated*
- e) *Names of their past employers*

## **10. Internal Controls**

- i. The Compliance Officer on a quarterly basis, shall, report trading by Insiders, if any, to the board of directors and in particular to the chairman of the Audit Committee, if any, or to the Chairman of the Board and that the trading have been executed in accordance with the pre-clearance procedure as envisaged in this code.
- ii. The Compliance Officer shall maintain an updated list of Designated Persons, records of disclosures, pre-clearance applications and undertakings for a period of five years.
- iii. The Audit Committee shall review Compliance with this regulation on a yearly basis and verify the effectiveness and adequacy of systems for ensuring internal control.
- iv. *Whenever an employee is brought inside by way of internal transfer or recruitment to the departments of Secretarial, Finance & Accounts, Taxation, Risk Management and Computer Systems Department having access to UPSI, the employee should be made aware of the duties and responsibilities attached to the receipt of Inside Information and the liability that attaches to misuse or unwarranted use of such information.*

## **11. Penalty for contravention of code of conduct**

- i. All designated persons shall be individually responsible for complying with the provisions of the Regulations and the code to the extent applicable.
- ii. *Any designated person who trades in securities of the Bank or communicates any information for trading in securities of the Bank in contravention of the Code of Conduct may be penalised and the Bank may take appropriate action, which shall include a penalty amount of Rs.10,000/- for each violation irrespective of the volume of trade in addition to the profits from such trade being disgorged for remittance to SEBI. The penalty levied under this Code shall be remitted by the designated person to the account of Investor Protection and Education Fund administered by SEBI and proof of remittance submitted to the Compliance Officer within the timelines stipulated by the Compliance Officer.*



- iii. The designated persons who violate the Code of Conduct shall also be subject to disciplinary action by the Bank which may include freeze of wages/emoluments, suspension/termination of service/contract, ineligibility for future participation in Employee Stock Option Plans or any other action as may be deemed fit by the Bank.
- iv. The action by the Bank shall not preclude SEBI from taking any action in case of violation of the Regulation.
- v. *In case it is observed that there has been a violation of these Regulations, the Compliance Officer shall promptly inform the Stock Exchanges in such form and such manner as may be specified by SEBI from time to time.*

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**APPLICATION FOR PRE-TRADING APPROVAL**

To,  
The Compliance Officer  
City Union Bank Ltd.

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations 2015 and the Banks Insider Trading code, I seek approval to purchase / sell / subscribe \_\_\_\_\_ equity shares of the Bank as per details given below:

<b>Sl.No.</b>	<b>Particulars</b>	<b>Remarks</b>
1.	Name of Applicant	
2.	Designation	
3.	Number of securities held as on date	
4.	Folio No. / DP ID / Client ID No.	
5.	The proposal is for; a. Purchase b. Subscription c. Sale	
6.	Proposed date of trading in securities	
7.	Estimated number of securities proposed to be purchased/subscribed/sold	
8.	Current market price (as on application date)	
9.	Whether the proposed transaction will be through stock exchange or off-market trade.	
10.	Folio No. / DP ID / Client ID No. Where the securities will be credited / debited.	

I enclose herewith the Undertaking signed by me.

Signature :

Name :

Date:

**UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR  
PRE-CLEARANCE**

To,

The Compliance Officer  
City Union Bank Limited

I, \_\_\_\_\_, \_\_\_\_\_ of the Bank r/o \_\_\_\_\_, am desirous of dealing in \_\_\_\_\_ shares of the Bank 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 Bank's Code of Conduct for prevention of Insider Trading (the Code) up to the time of signing this undertaking.

In the event that I have access to or received any information that could be construed as "Price Sensitive Information" as defined in the Code, after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Bank until such information becomes public.

I declare that I have not contravened the provisions of the Code as notified by the Bank from time to time.

I undertake to submit the necessary report within two *trading* days of execution of the transaction / a 'Nil' report if the transaction is not undertaken.

If approval is granted, I shall execute the deal within 7 *trading* days of the receipt of approval failing which I shall seek *fresh* pre-clearance.

I declare that I have made full and true disclosure in the matter.

Signature:  
Name :

Date:

**FORMAT FOR PRE - CLEARANCE ORDER**

Date:

To,  
Employee Name & ID:  
Designation :  
Place :

Dear Sir,

Your application for dealing in \_\_\_\_\_ of equity shares of the Bank is hereby approved and the same is valid for *7 trading* days from this letter date i.e., the transaction must be completed on or before \_\_\_\_\_.

Please ensure to report the details of executed transactions in a manner as prescribed under the code within *2 trading* days from the date of transaction / deal. In case the transaction is not undertaken a 'Nil' report shall be necessary in the said format as per the code.

Thanking you

Yours faithfully,  
For **City Union Bank Ltd.**

V RAMESH  
COMPLIANCE OFFICER

**Note:** \*The approval shall lapse after the said date.

**DISCLOSURE OF TRANSACTIONS**

(To be submitted within 2 days of transaction / trading in securities of the Bank)

To,  
The Compliance Officer,  
CITY UNION BANK LTD.

I hereby inform that I

- Have not bought / sold / subscribed any securities of the Bank.
- Have bought / sold/ subscribed to \_\_\_\_\_ securities as mentioned below on \_\_\_\_\_ (date).

(Strike our whichever is not applicable)

<b>Name holder</b>	<b>of</b>	<b>No. of securities traded</b>	<b>of</b>	<b>Bought / sold / subscribed</b>	<b>DP ID/ Client ID / Folio No.</b>	<b>Price (Rs.)</b>

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

Signature:

Name :

Date :

**FORM B**

Annexure - 5

**SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (1) (b) read with Regulation 6 (2)] - Disclosure on becoming a Director/ KMP/ Promoter / Member of the promoter group**

**Name of the Company: City Union Bank Ltd.**

**ISIN: INE491A01021**

<b>Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter or member of promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2)</b>					
<b>Name, PAN No., CIN / DIN &amp; Address with Contact nos.</b>	<b>Category of Person (KMP / Directors or Promoter or member of the promoter group/ immediate relatives/others etc)</b>	<b>Date of Appointment of KMP / Director/ or Date of becoming Promoter / member of the promoter group</b>	<b>Securities held at the time of appointment of KMP/Director or upon becoming promoter or member of the promoter group</b>		<b>% of Shareholding</b>
			<b>Type of security (For eg. – Shares, Warrants, Convertible debentures, Rights entitlement etc.)</b>	<b>No.</b>	
<b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>
Note : (i) "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.					
<b>Details of Open Interest (OI) in derivatives on the securities of the company held on appointment of KMP or Director or upon becoming a Promoter or member of the promoter group of a listed company ad immediate relatives of such persons and by other such persons as mentioned in Regulation 6 (2)</b>					
<b>Open Interest of the Future contracts held at the time of appointment of Director/ KMP or upon becoming promoter/member of the promoter group</b>			<b>Open Interest of the Option Contracts held at the time of appointment of Director/ KMP or upon becoming promoter/member of the promoter group</b>		
<b>Contract specifications</b>	<b>Number of units (contracts * lot size)</b>	<b>Notional value in Rupee terms</b>	<b>Contract specifications</b>	<b>Number of units (contracts * lot size)</b>	<b>Notional value in Rupee terms</b>
<b>7</b>	<b>8</b>	<b>9</b>	<b>10</b>	<b>11</b>	<b>12</b>

*Note: In case of options notional value shall be calculated based on premium + Strike price of options*

Designation

Date

Place

**FORM D (Indicative format)**

Annexure - 6

**SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (3) Transaction by Other connected persons as identified by the company**

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

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

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

Note : (i) "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015. (ii) Value of transaction excludes taxes / brokerage / any other charges

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

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
16	17	18	19	20	21	22

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

**Name :**

**Signature :**

**Place**