



# ON DOOR CONCEPTS LIMITED

Registered Office Address –1st and 2nd Floor, PLOT NO. 13, RAILWAY COLONY E-8, ARERA COLONY Trilanga,  
Bhopal, Madhya Pradesh, India. 462039 CIN: L52100MP2014PLC033570 Email id - info@ondoor.com  
GSTIN: 23AACCO0825C1Z5 Contact No. 0755-4509561

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## ONDOOR CONCEPTS LIMITED

*(Formerly known as Ondoor Concepts Private Limited)*

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



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## **1. REGULATORY PROVISIONS:**

In terms of the requirement stated under Regulation 9 of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("The Regulations"), mandate every Listed Company to formulate and maintain Code of Conduct to regulate, monitor and Report Trading by Designated Persons.

This Code has been reviewed and approved by the Board of Directors of the Ondoor Concepts Limited ("the Company") and shall come into effect from the date of listing of Equity Shares of the company.

Insider trading means dealing in securities of a listed company traded on any Stock Exchange in India by insiders which term includes Designated Persons of On Door Concepts Limited based on or when in possession of unpublished price sensitive information (UPSI). Such trading by Insiders erode the investors' confidence in the integrity of the management and is unhealthy for the capital markets. The SEBI, as part of its efforts to protect the interest of investors in general, had issued the SEBI (Prohibition of Insider Trading) Regulations, 2015, under the powers conferred on it by the SEBI Act, 1992, which is made applicable to all companies whose shares were listed on Indian stock exchanges

## **2. APPLICABILITY:**

This Code shall be applicable and binding on all the employees, officers, directors and those persons authorized to speak on behalf of the Company.

## **3. DEFINITIONS:**

(a) **"Compliance Officer"** means Company Secretary of the company.

(b) **"Connected person"** shall generally include – Directors, Key Managerial Personnel, Specified Employees and Promoters (referred to as "Designated Persons") who may have access to unpublished price sensitive information; and Immediate Relatives of the above;

(c) **"generally available information"** means information that is accessible to the public on a non-discriminatory basis;

(d) **"insider"** means any person who is: i) a connected person; or ii) in possession of or having access to unpublished price sensitive information;

(e) **"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;

(f) **"trading"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;

(g) **"trading day"** means a day on which the recognized stock exchanges are open for trading;





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(h) "**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, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.

Any person in receipt of unpublished price sensitive information pursuant to a "legitimate purpose" shall be considered an "insider" for purposes of these regulations and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with these regulations.

Words and expressions used and not defined in these Rules but defined in the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made there under shall have the meanings respectively assigned to them in those legislations.

(i) "**unpublished price sensitive information**" means any information, relating to a 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 restricted to, information relating to the following: –

- i. financial results;
- ii. dividends;
- iii. change in capital structure;
- iv. mergers, de-mergers, acquisitions, de-listings, disposals and expansion of business and such other transactions;
- v. changes in key managerial personnel; and

(j) Other terms not specifically defined here shall have the same meaning as assigned under the SEBI (Prohibition of Insider Trading) Regulations, 2015.

#### **4. COVERAGE:**

##### **A. Unpublished Price Sensitive Information:**

"Unpublished price sensitive information" means any information, relating to a company or its

securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: –

- a) Financial results;
- b) Dividends;
- c) Change in capital structure;
- d) Mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
- e) Changes in key managerial personnel;



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## **B. Material Information as specified under the Listing Regulations:**

Material information means any information relating to the business or affairs of the Company that results in, or would reasonably be expected to result in a significant change in the market price or value of the securities of the Company or that would reasonably be expected to have a significant influence on any reasonable investor's investment decisions.

## **5. BASIC PRINCIPLES OF DISCLOSURES:**

Procedures governing the disclosure of Material Information required to be disclosed shall provide that such disclosure shall be made in accordance with the following principles:

- A. Information should be disclosed immediately through the stock exchanges.
- B. Under certain circumstances, the Company may determine that such disclosure would be unduly detrimental to the Company (for example if release of the information would cause prejudice to negotiations in a corporate transaction), in such case, the information shall be kept confidential until the Company determines it may be publicly disclosed. Information should be disclosed only after there is credibility to the information and the information has concretized.
- C. Disclosures should be made in a timely manner.
- D. Disclosure must be complete in all material respects and should not be misleading.
- E. Unfavourable Material Information must be disclosed as promptly and completely as favourable information.
- F. Disclosure must be corrected immediately if the Company is subsequently made aware that its earlier disclosure contained a material error or omission at the time it was given.

## **6. DISCLOSURE OF MATERIAL INFORMATION:**

The Company shall disclose Material Information concerning its business and affairs to the public immediately, except when otherwise required for the purpose of maintaining the confidentiality of the information. This Code is to enable all persons investing in the securities of the Company to have the opportunity for equal and timely access to information that may affect their investment decision regarding those securities. This Code further provides that, once there is credibility to the information and once the information is reached to a level of concretization, the information would be disclosed by the Company in a timely manner.

## **7. PROCESS OF DISCLOSURES OF MATERIAL INFORMATION:**

In case any Functional Head becomes aware of some Material Information about the Company, the said Functional Head would contact the Compliance Officer or Managing Director of the Company. The Compliance officer and/or Managing Director would then determine whether the information requires disclosure to the stock exchanges or not in accordance with the Listing Agreements. Thereafter,

concerned functional head will prepare the content of the disclosure and determine the timing of the disclosures. Thereafter, the Company will disclose the said information to the stock exchanges.





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## **8. DELAY IN DISCLOSING MATERIAL INFORMATION:**

Under certain circumstances, the Company may keep Material Information confidential for a limited period of time because immediate disclosure may compromise certain strategic business opportunities of the Company or may not be disclosable due to third-party confidentiality restrictions or uncertainty of events. The determination of when not to disclose Material Information immediately shall be made by the Compliance officer and/or Managing Director of the Company.

## **9. NEED TO KNOW:**

- a. Disclosure of UPSI to be made only if it is in furtherance of Legitimate Purposes, performance of duties or discharge of legal obligations.
- b. Subject to applicable laws, PIT Code, Fair Disclosure Code and other codes and policies and any procedures framed by the Company, UPSI shall be shared only on a need to know basis, post executing the Non-Disclosure/ Confidentiality Agreement or on serving notices of confidentiality.

## **10. TRADING RESTRICTIONS**

**10.1** All Insiders including Designated Persons of the Company (including their immediate relatives) shall not deal in the securities of the Company when the trading window is closed. The period during which the trading window is closed shall be termed as prohibited period.

### **i The trading window shall be, inter alia closed at the time:-**

- a. Declaration of financial results (quarterly, half-yearly and annually).
  - b. Declaration of dividends (interim and final).
  - c. change in capital structure.
  - d. Any major expansion plans or execution of new projects i.e. Mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions.
  - e. Disposal of whole or substantially whole of the undertaking.
  - f. Any changes in policies, plans or operations of On Door Concepts Limited.
  - g. changes in key managerial personnel, and in any other matter which is likely to be price sensitive.
- ii. The trading window shall be closed when the compliance officer determines that a Designated Persons, can reasonably be expected to have possession of unpublished price sensitive information. Such closure shall be imposed in relation to such securities to which such unpublished price sensitive information relates.

Further, the Closure of trading window shall commence from the end of every quarter till 48 hours after the declaration of financial results.

- iii. The trading window shall be re-opened 48 hours after the information referred hereinabove, is made public.



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iv. All the Designated Persons shall strictly conduct all their Trading in the Securities of the Company only when the Trading Window is open and no Designated Person or their Immediate Relatives shall trade in the Securities of the Company during the period the Trading Window is closed or during any other similar period as may be specified by the Compliance Officer from time-to-time.

**10.2** All Designated Persons shall not engage in dealing in securities, whether on their own account or on behalf of the immediate relatives and shall ensure that their immediate relatives shall also not engage in Dealing in Securities on their own account, if such Designated Persons is in possession of any unpublished price sensitive information.

**10.3** The trading window restrictions mentioned in sub-clause iv of 10.1 shall not apply in respect of:

a) transactions specified in clauses (i) to (iv) and (vi) of the proviso to sub-regulation (1) of regulation 4 of the Regulations and in respect of a pledge of shares for a bonafide purpose such as raising of funds, subject to pre-clearance by the compliance officer and compliance with the respective regulations made by the Board; Explanation: In case of any pledge of shares (including by way of top-up) to be created by a designated person in order to meet the requirement under an agreement / preexisting commitment, the compliance officer shall respond to the pre clearance request within 24 hours.

b) transactions which are undertaken in accordance with respective regulations made by the Board such as acquisition by conversion of warrants or debentures, subscribing to rights issue, further public issue, preferential allotment or tendering of shares in a buyback offer, open offer, delisting offer or transactions which are undertaken through such other mechanism as may be specified by the Board from time to time.

## **11. TRADING PLAN**

An insider shall be entitled to formulate a trading plan and present it to the compliance officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.

**11.1** An insider shall formulate a trading plan and present it to the compliance officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.

**11.2** Insider shall submit trading plan before six months from commencement of trading.

**11.3** If another trading plan is already in existence no other plan shall not be accepted covering the same time period.

**11.4** Not entail trading in securities for market abuse.

**11.5** Insider in his trading plan shall set out number of Securities to be traded along with the nature of the trade and time gap between the trade and dates on which such trade shall be affected.

**11.6** The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of this Code or Regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.





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**11.7** 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.

**11.8** The Insider shall not execute the aforesaid trading plan if any unpublished price sensitive information in possession of the insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation and in such event, Insider shall execute trading plan when such information shall become public.

**11.9** After approval the trading plan, Compliance Officer shall inform to the Stock Exchanges on which the securities of the Company are listed about the approved trading plan and the same will be broadcast on Company's website.

**11.10** Insider shall submit trading plan along with the declaration and application in "Annexure – 1" or any other format specified by SEBI or Stock Exchanges.

Pre-clearance of trades shall not be required for a trade executed as per an approved trading plan. Trading window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.

## **12. TRADING WINDOW AND WINDOW CLOSURE**

**12.1** (i) The trading period, i.e. the trading period of the stock exchanges, called 'trading window', is available for trading in the Company's securities.

(ii) prior to the unpublished price sensitive information is published, the trading window shall be, inter alia, closed from time to time, as per the statutory requirement of the law.

(iii) When the trading window is closed, the all the Insiders and Designated Persons, shall not trade in the Company's securities in such period.

(iv) All the Insiders and Designated Persons shall conduct all their dealings in the securities of the Company only in a valid trading window and shall not deal in any transaction involving the purchase or sale of the Company's securities during the periods when the trading window is closed, as referred to in point no. (ii) above or during any other period as may be specified by the Company from time to time.

(v) In case of ESOPs, 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 is closed.

**12.2** The Compliance Officer shall immediately upload the information regarding the closure of trading window on the website of the Company.. It is the duty of the Insiders and Designated Persons to regularly check the website of the Company regarding window closure and also to inform the immediate relatives about the closure of trading window, as and when communicated by the Company and ensure that they do not deal in the securities of the Company. Such closure shall be imposed in relation to such securities to which such unpublished price sensitive information relates.





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**12.3** The Compliance Officer after taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, shall decide the timing for re-opening of the trading window, however in any event it shall not be earlier than forty-eight hours after the information becomes generally available.

**12.4** The trading window shall also be applicable to any person having contractual or fiduciary relation with the Company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the Company.

## **13. PRE-CLEARANCE OF TRADES**

Any Designated Person (including immediate relatives) of the Company, who intend to trade in the securities of the Company during free period, shall trade in Securities of the Company subject to pre-clearance by the Compliance Officer if the value of the proposed trades (including trading in derivatives of Securities, if permitted by law) whether in one transaction or a series of transactions in any calendar quarter exceeds Rs. 10 lakhs (market value).

**13.1** All Designated Persons who intend to deal in the securities of On Door Concepts Limited should pre-clear the transaction as per the pre-dealing procedure as described hereunder.

**13.2** An application may be made in prescribed format (Form C) to the Compliance Officer indicating the estimated number of shares that the Insider intends to deal in, the depository with which he/she has an account and the details as to his/her shareholding before and after the intended transaction.

**13.3** An undertaking shall be executed in favor of the company by such Designated Persons incorporating, inter alia, the following clauses, as may be applicable: a) That the Designated Persons do not have any access or has not received "Unpublished Price Sensitive Information" upto the time of signing the undertaking.

b) That in case the employee, director, officer has access to or receives "Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction he/she shall inform the Compliance Officer of the change in his position and that he/she would completely refrain from dealing in the securities of On Door Concepts Limited till the time such information becomes public.

c) That he/she has not contravened the code of conduct for prevention of insider trading as notified by On Door Concepts Limited from time to time.

d) That he/she has made a full and true disclosure in the matter.

## **14. MAINTAINING DIGITAL DATABASE**

**14.1** The board of directors or head(s) of the organisation of every person required to handle unpublished price sensitive information shall ensure that a structured digital database is maintained containing the nature of unpublished price sensitive information and the names of such persons who have shared the information and also the names of such persons with whom information is shared under this regulation along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such database shall not be outsourced and shall be maintained internally with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.





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**14.2** The board of directors or head(s) of the organisation of every person required to handle unpublished price sensitive information shall ensure that the structured digital database is preserved for a period of not less than eight years after completion of the relevant transactions and in the event of receipt of any information from the Board regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.

## **15. COMPLIANCE OFFICER TO MAINTAIN THE RECORD OF DESIGNATED PERSONS AND RELATED PERSONS TO THEM**

Compliance Officer is required to take the following details from Designated persons, immediate relatives and persons with whom such designated person(s) shares a material financial relationship.

### **I. ON ANNUAL BASIS (On further change of information):**

- i. Name of the immediate relatives and persons with whom such designated person(s) shares a material financial relationship;
- ii. Permanent Account Number or any other identifier authorized by law of the following persons to the company;
- iii. Phone, mobile and cell numbers which are used by them.

### **II. ON ONE TIME BASIS:**

- i. the names of educational institutions from which designated persons have graduated.
- ii. names of their past employers.

The term “material financial relationship” shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift during the immediately preceding twelve months, equivalent to at least 25% of such payer’s annual income but shall exclude relationships in which the payment is based on arm’s length transactions.

## **16. OTHER RESTRICTIONS**

**16.1** All Designated Persons shall execute their order in respect of securities of On Door Concepts Limited within one week after the approval of pre-clearance is given. If the order is not executed within one week after the approval is given, the directors, officers, Designated Persons must pre-clear the transaction again.

**16.2 Contra Trade:** All Designated Persons who buy or sell and number of shares of On Door Concepts Limited 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 Designated Persons shall also not take positions in derivative transactions in the shares of On Door Concepts Limited at any time. In the case of subscription in the primary market (initial public offers), the above-mentioned persons shall hold their investments for a minimum period as specified in the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009. The holding period would commence when the securities are actually allotted.



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The compliance officer may be empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate these regulations. Should a 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 Board for credit to the "Investor Protection and Education Fund" administered by the "Board" under the Act.

**16.3** In case the sale of securities is necessitated by personal emergency, the holding period may be waived by the Compliance Officer after recording in writing his/ her reasons in this regard. 8.4 DBL will have a process to ascertain how and when people are brought 'inside' on sensitive transactions. Proposed Insider 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.

## **17. CLARIFICATIONS:**

The Compliance Officer may be contacted for any queries.

## **18. MARKET RUMOURS:**

The Company shall not comment, affirmatively or negatively, on market rumors. Should a stock exchange request that the Company make a definitive statement in response to a market rumors that is causing significant volatility in the securities of the Company, the Compliance Officer and/or Managing Director shall consider the matter and content of the Company's response, such as confirming "no corporate development at this time".

## **19. UNIFORM AND UNIVERSAL DISSEMINATION OF UPSI TO AVOID SELECTIVE DISCLOSURE:**

a. UPSI will be disseminated uniformly and universally to all stakeholders through Stock Exchanges. Additionally, the same may also be posted on the official website of the Company as per Applicable Law.

b. In case any information is disclosed selectively, whether by inadvertence or otherwise, the Company shall take the necessary corrective action, including informing the Stock Exchanges, to make the information publicly available. This will be decided by the Compliance Officer in conjunction with the Managing Director.

## **20. DISCLOSURE RESPONSIBILITIES & FORMATS:**

### ***A. Initial Disclosures of holdings:***

Every person on appointment as a key managerial personnel or a director of the Company or upon becoming a promoter shall disclose (as per Form A) his holding of securities of the Company as on the date of appointment or becoming a promoter, to the Company within seven (7) days of such appointment or becoming a promoter.





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## ***B. Continual Disclosures of trades:***

Every promoter, employee and director of the Company shall disclose to the Company (as per Form B) the number of such securities acquired or disposed of within two (2) trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs.10,00,000/- (Rupees Ten lakh) or such other value as may be specified;

The Company shall within a period of two (2) working days from the date of receipt of such disclosures, inform the Stock Exchanges particulars of such trading.

## ***C. Other formats / disclosures, to monitor compliance with these Regulations would be as under:***

- Application-cum-undertaking for pre-clearance (as per Form C)
- Reporting of holdings in securities by Designated Persons as on 31 March, on an annual basis by 10 April (as per Form D)

The Compliance Officer shall place before the Board, on a quarterly basis all the details of the dealing in the securities by the Designated Persons with relevant documents that such persons had executed under the pre-dealing procedure as envisaged in this Code. He shall also provide the said details, on a quarterly basis, to the Chairman of the Audit Committee of the Board or to the Chairman of the Board.

## **21. Penalty for contravention of Code of Conduct:**

Any Designated Person contravening the Code will be liable to penalty and appropriate disciplinary action including remuneration freeze, suspension, dismissal etc. as may be decided by the Chairman of the Board in consultation with the Compliance Officer.

## **22. Applicability of the Code to certain persons:**

The Regulations apply to certain persons who by being in any contractual, fiduciary or employment relationship or holding any position including a professional or business relationship with the Company whether temporary or permanent have access, directly or indirectly, to unpublished price sensitive information or are reasonably expected to allow such access. They are advised to adhere to the Regulations strictly. In case it is observed by such persons required to formulate a code of conduct under sub-regulation (1) and sub-regulation (2) of regulation 9, that there has been a violation of these Regulations, they shall inform SEBI promptly, with a copy to the Company.

## **23. PRESERVATION OF UPSI:**

All UPSI is to be preserved and maintained in utmost confidentiality by everyone including those who are recipients of any UPSI. The Company shall maintain and store records in respect of disclosures made by it through any means under the relevant provisions of the Companies Act, 2013, rules made there under for audit and future reference.



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## 24. AMENDMENT:

The Board shall be responsible for the administration, interpretation, application and review of this policy. The Board shall be empowered to bring about necessary changes to this policy, if required at any stage in compliance with the prevailing laws.

## 25. DISSEMINATION OF THE POLICY:

The policy shall be hosted on the website of the Company i.e. [www.ondoor.com](http://www.ondoor.com).

*Effective Date: 25.09.2023*

*Date of Approval of Board of Directors: 25.09.2023*

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**Trading Plan**

(Under Code of Conduct of the Company read with SEBI Insider Trading regulation, 2015)

To,  
The Compliance Officer  
On Door Concepts Limited

Dear Sir /Madam

Ref: DP's name :.....

DP ID :.....

CLIENT ID :.....

Name of insider :.....

Address :.....

Your approval is solicited for proposed Trading Plan purchase & sale of securities of the Company in physical/demat form. I am furnishing details of trade to be made in six month after approval of the proposed trading plan:-

Sr. No.	Nature of trade	Number Securities made	of to be	Time intervals between Two Trades	Date of Propose trade

1. I confirm that I do not have access to the unpublished price sensitive information and also have not received unpublished price sensitive information till today;
2. that in case I have access to the price sensitive information or receives it after approving the trading plan I shall inform the change and refrain from dealing in securities till the information becomes public;
3. that I have not contravened the code of conduct for prevention of insider trading as notified by the Company;
4. that whatever is stated above is true and correct to the best of knowledge and nothing has been concealed;
5. Further I undertake to submit report on trade within 2 days from date of execution of trade or submit a 'Nil' report if no trade was executed.

Yours truly

Signature

Name.....

Designation.....

Employee Code no.....

FORM A

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

The Compliance Officer, Date: \_\_\_\_\_

On Door Concepts Limited

ISIN of the Company: \_\_\_\_\_

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 No.s	Category of Person (Promoters/KMP/ Directors/immedi ate relatives/others etc.)	Date of appointment of Director/KMP or Date of becoming Promoter	Securities held at the time of becoming Promoter/appointme nt of Director/KMP		% of Shareholding
			Type of Security	Number of Security	

Signature:

Designation:

Date:

Place:

*\*This form is required to be submitted within 7 days of appointment as a Key Managerial Personnel/  
Director or becoming a promoter*



**FORM B**

**Form for Reporting of Trades Executed In Excess of the Prescribed Threshold**

The Compliance Officer,

Date: \_\_\_\_\_

On Door Concepts Limited

ISIN of the Company: \_\_\_\_\_

Sub – Form for Reporting of Trades Executed In Excess of the Prescribed Threshold

I/We, the undersigned, hereby state that I/ my immediate relative(s)/we have sold/purchased shares of the Company in excess of the value of Rs. 10,00,000 during the quarter from 1st \_\_\_\_\_ to \_\_\_\_\_, 20\_\_\_\_\_, details of which are given below:

**I. Details of trades executed in excess of the prescribed threshold by me :**

Name of Seller/ Purchaser	No. of Shares Sold/ Purchased	Date of Trade	Sale/ Purchase Price (Rs.)	Sale/Purch ase Value (Rs.)	DP ID & Client ID	DP Name
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**II. Details of trades executed in excess of the prescribed threshold by immediate relatives/dependent(s) :**

Name of Seller/ Purchaser	Relationshi p with the employee	No. of Shares Sold /Purchased	Date of Trade	Sale/ Purchase Price (Rs.)	Sale/Purc hase Value (Rs.)	DP ID & Client ID	DP Name
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**Note:** Minimum threshold limit is trading of Rs.10,00,000/- per calendar quarter.

Kindly take the same on record.

Thanking you,

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\*This form is required to be submitted within 2 trading days of dealing in securities if value of securities (whether in one transaction or more transactions during a calendar quarter) is more than Rs. 10,00,000/-(Rupees Ten lakh).



FORM C

Application-cum-Undertaking for Pre-clearance of Trade

Date: \_\_\_\_\_

To

The Compliance Officer

On Door Concepts Limited

Registered Office- 1<sup>st</sup> and 2<sup>nd</sup> Floor, Plot No. 13 Railway Colony, E-8 Arera Colony,  
Bhopal, Madhya Pradesh- 462039

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Internal Code of Conduct for Regulating, Monitoring and Reporting of Trades under the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("**Code**"), I seek pre-clearance to Trade in \_\_\_\_\_ securities of the Company as per details given below:

Name

Designation

PAN

Location

Email Id.

Contact No.

**Preclearance sought for**

Self/ Immediate Relative

*If pre-clearance sought for Immediate Relative, then*

Name of the Immediate Relative for whom pre-clearance  
sought

Nature of Relationship

PAN of Immediate Relative

**Details of Security held by self/ Immediate Relative for whom the pre-clearance is sought**

No. Of Securities held as on date

In physical form

In dematerialized form

**Details of Proposed Transaction**

Nature of Proposed Transaction

Sale/ Purchase

No. of Securities proposed to be transacted

Value of Security – Market value on date of application

**Details of identified account**

Name & contact details of Broker with Account No.

Name of Depository Participant

DP ID

Client ID

**Details of previous pre-clearance, if any**

No. of Shares for which pre-clearance was taken

Date of approval of pre-clearance

Whether transaction was executed

If yes, No. of shares transacted & Value

Reasons if not traded

All capitalized terms used herein but not defined shall have the same meaning as has been assigned to the terms in the Code.

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**UNDERTAKING FOR PRE-CLEARANCE**

I hereby state that:

- a. I do not have access to nor do I have any "Unpublished Price Sensitive Information" ("UPSI") up to the time of signing this undertaking;
- b. In case, I receive any 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 public;
- c. I have not contravened the provisions of the Code as notified by the Company from time to time;
- d. I have made full and true disclosure in the matter;



e. I will execute the order in respect of the securities within 1 week after approval is granted by Compliance Officer, failing which I shall apply for pre-clearance again from the Compliance Officer;

f. I shall not execute a contra-trade for a minimum period of 6 months. If a contra trade is executed, inadvertently or otherwise, in violation of such a restriction, 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 Act.

Date & Signature of the Applicant \_\_\_\_\_

**Note:** Minimum threshold limit is trading of Rs.10,00,000/-, per calendar quarter.

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#### PRE-CLEARANCE ORDER

Please complete Purchase/ Sale of \_\_\_\_\_ shares by \_\_\_\_\_ (within seven days of approval granted). Please confirm the transaction by completing Feedback Form below and returning the same to the undersigned. Or In case, no trade was executed, you are required to submit a 'Nil' report.

In case, you (and/or your immediate relative) do not execute a trade before \_\_\_\_\_, you shall submit a fresh pre- clearance application before you (and/or your immediate relative) execute any transaction in the Securities of the Company.

Date & Signature of the Compliance Officer \_\_\_\_\_

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#### FEEDBACK ON OUTCOME OF THE APPLICATION

I confirm that the transaction of purchased / sale \_\_\_\_\_ (nos.) shares was completed on \_\_\_\_\_ (date).

Date & Signature of the Applicant \_\_\_\_\_

FORM-D

ANNUAL DISCLOSURE

To,  
The Compliance Officer,  
On Door Concepts Limited  
ISIN of the Company: INE00ER01015

Date: \_\_\_\_\_

**I. STATEMENT OF SHAREHOLDING OF DIRECTORS/KEY MANAGERIAL PERSONNEL/DESIGNATED EMPLOYEES**

Name	Designation	No. of Securities held on 1 <sup>st</sup> April, ____	No. of Securities bought during the year	No. of Securities sold during the year	No. of Securities held on 31 <sup>st</sup> March, ____ the year	Folio/DP ID/ Client ID

**II. DETAILS OF SHARES HELD BY DEPENDANTS**

Name	Relationship	No. of Securities held on 1 <sup>st</sup> April, ____	No. of Securities bought during the year	No. of Securities sold during the year	No. of Securities held on 31 <sup>st</sup> March, ____ the year	Folio/DP ID/ Client ID

I/We hereby declare that I/We have complied with the Code and SEBI Regulations with respect of the Securities purchased/ sold.

I/We further declare that the above disclosure is true and correct and is in accordance with the previous disclosure given to the Company.

Signature \_\_\_\_\_

Name \_\_\_\_\_

*\*This form is required to be submitted within 30 days from the end of the financial year.*