

**Mazagon Dock Shipbuilders Limited**

**Sub: Code of Internal Procedures and Conduct for Prohibition of Insider Trading (Closure of Trading Window under SEBI (PIT) Regulation, 2015) for the period ended on 30 Sep 2020.**

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1. SEBI had issued an amendment to the Securities and Exchange Board of India (Prohibition of Insider trading) (Amendment) Regulations, 2018 on 31 Dec 2018 effective from April 01, 2019.
2. The Board in its Meeting held on 05 Aug 2019 had approved the amended policy pertaining to 'The Code of Internal Procedures and Conduct for Prohibition of Insider Trading in Dealing with the Securities' (PIT code) in accordance with the SEBI Regulations, 2018. The modified policy in line with the "Securities and Exchange Board of India (Prohibition of Insider trading) (Amendment) Regulations, 2018" has been uploaded on the company website under investors tab and also in Intranet.
3. All employees of MDL are required to strictly adhere to the policy. The key highlight of the policy is identification of the designated persons. The "**Designated Persons**" shall include:
  - (a) All members of the Board of Directors, all executives of MDL of the level of Executive Directors, Advisers, Chief General Managers and General Managers;
  - (b) All key executives, not covered in (a) above, as identified by the Chairman & Managing Director of the Company from time to time;
  - (c) All employees of the offices of Chairman & Managing Director and all the Functional Directors of MDL;
  - (d) All Officers of Finance, Corporate Communications, Corporate Planning, Business Development and Marketing, and Company Secretary;
  - (e) Any other employee of MDL to be notified by the compliance officer, from



time to time, with the approval of the Board of Directors;

- (f) Insiders having possession of unpublished price sensitive information.
- (g) Spouse and other dependent family members of (a) to (e) above.

4. As per the policy, every Designated Person shall abide by the disclosure mentioned in the (PIT code) as applicable and mandatorily disclose his/her holdings of Securities of MDL within 30 (thirty) days from the end of financial year in APPENDIX-IV placed as part of the policy. The disclosure sought are in line with the statutory requirements and are as required under "Securities and Exchange Board of India (Prohibition of Insider trading) (Amendment) Regulations, 2018".
5. Please be informed that, pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 the Trading Window of the Company shall remain closed for dealing in securities of the Company for all the designated persons and their immediate relatives from Monday, October 19, 2020 till the completion of 48 hours after declaration of the Financial Results of the Company for the period ended September 30, 2020 (Board Meeting to be held on or before 15 November 2020 for approval of financial statements for the period ended on 30 Sep 2020).

  
Company Secretary

विजयालक्ष्मी कुमार  
VIJAYALAKSHMI KUMAR  
कंपनी सचिव  
COMPANY SECRETARY  
माझगांव डॉक शिपबिल्डर्स लिमिटेड  
MAZAGON DOCK SHIPBUILDERS LIMITED