



रेलटेल कॉर्पोरेशन ऑफ इंडिया लिमिटेड  
**RailTel Corporation of India Limited**

**INTERNAL CODE OF CONDUCT FOR PREVENTION OF INSIDER  
TRADING IN DEALING WITH SECURITIES OF RAILTEL  
CORPORATION OF INDIA LIMITED**

{PURSUANT TO REGULATION 9(1) OF SEBI (PROHIBITION OF INSIDER TRADING)  
REGULATIONS, 2015}

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# INTERNAL CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING IN DEALING WITH SECURITIES OF RAILTEL CORPORATION OF INDIA LIMITED

## **CHAPTER-I - PRELIMINARY:**

This Internal Code of Conduct for Prevention of Insider Trading is framed pursuant to the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("SEBI PIT Regulations") issued on 15<sup>th</sup> January 2015, as amended from time to time. This code shall be called the Internal Code of Conduct for Prevention of Insider Trading in dealing with Securities of RailTel Corporation of India Limited ("**RailTel**" or "**Company**") and are being framed with an aim that insiders of the Company shall not derive any benefit or assist others to derive any benefit from the access to of Unpublished Price Sensitive Information about the Company which is not in the public domain and thus constitutes insider information.

This Code shall apply to all Designated Employees/Persons and their immediate relatives as mentioned in this Code

## **CHAPTER-II - DEFINITIONS:**

- 2.1** "**Act**" means the Securities and Exchange Board of India Act, 1992.
- 2.2** "**Board**" means the Securities and Exchange Board of India.
- 2.3** "**CODE**" means this Internal Code of Conduct for prevention of Insider Trading in dealing with Securities of RailTel Corporation of India Limited including modification made thereto from time to time by the Company.
- 2.4** "**Company**" means RailTel Corporation of India Limited (RailTel).
- 2.5** "**Compliance Officer**" for the purpose of these regulations means the Company Secretary of the Company. In absence of the Company Secretary, the Board of Directors may authorize any other qualified Company Secretary of the Company to discharge the duties of Compliance Officer under these regulations.
- 2.6** "**Connected person**" means as defined under SEBI PIT Regulations, as amended from time to time.
- 2.7** "**Designated Employees**" means a person occupying any of the following position in the Company:
- (a) All Directors
  - (b) Chief Vigilance Officer (CVO), Chief Technology Officer (CTO) and Chief Information Security Officer (CISO)
  - (c) All Key Managerial Personnels (KMPs) as per Companies Act 2013 and/or identified and designated as KMPs by the Board of Directors of the Company.
  - (d) All Executives at E-8 Level and above i.e., PED/Executive Directors/GGMs/GMs etc.
  - (e) All Regional Heads/Heads of Finance of Units/Divisions/Regions irrespective of the level.
  - (f) All Officers working in Corporate Finance (including Regular/Contractual/Outsource/Re-employed etc.)
  - (g) All Officers working in Company Secretariat & Legal Department (including Regular/Contractual/Outsource/Re-employed etc.)
  - (h) All Officers working in Secretariat of CMD/Functional Directors (including

- Regular/Contractual/Outsource/Re-employed etc.)
- (i) Any support staff such as IT staff who have access to UPSI through ERP or any other source.
  - (j) Any other key person, who in the opinion of Compliance Officer be covered in the “Designated Employees” ;

**2.8 “Designated Person”** with regard to the Company means any of the following persons:

- (a) A Designated Employee of the Company
- (b) Employees of the Material Subsidiary of the Company, if any, so designated on the basis of their functional role/access to UPSI by their board of directors, but shall specifically include:
  - the Chief Executive Officer, Directors, Chief Financial Officer, Company Secretary; and
  - Employees upto two levels below Chief Executive Officer irrespective of their functional role or ability to have access to UPSI
- (c) Promoters/Promoter Group of the Company
- (d) Any other key person, who in the opinion of Compliance Officer be covered in the “Designated Person”

**“Generally available information”** means information that is accessible to the public on a non-discriminatory basis and shall not include unverified event or information reported in print or electronic media.

**NOTE:** It is intended to define what constitutes generally available information so that it is easier to crystallize and appreciate what constitutes unpublished price sensitive information is. Information published on the website of a stock exchange, would ordinarily be considered generally available.

**2.9 “Immediate Relative”** shall 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.

**2.10 “Insider”** means any person as defined under SEBI PIT Regulations, as amended from time to time.

**2.11 “Key managerial personnel”** (KMP), in relation to the Company, means key managerial personnel as defined under Section 2(51) of the Act.

**2.12 “Promoter”** shall have the meaning as defined under SEBI PIT Regulations, as amended from time to time.

**2.13 “Promoter Group”** shall have the meaning as defined under SEBI PIT Regulations, as amended from time to time.

**2.14 “Regulations”** means the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendment thereof.

**2.15 “Relative”** shall mean the following:

- (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)

NOTE: It is intended that the relatives of a "connected person" too become connected persons for the purpose of these regulations. It is a rebuttable presumption that a connected person had UPSI.

**2.16 "Securities"** shall have the meaning as defined under SEBI PIT Regulations, as amended from time to time.

**2.17 "Takeover regulations"** shall have the meaning as defined under SEBI PIT Regulations, as amended from time to time.

**2.18 "Trading"** means and includes subscribing, redeeming, switching, buying, selling, dealing, or agreeing to subscribe, redeem, switch, buy, sell, deal in any securities, and "trade" shall be construed accordingly.

**2.19 "Trading day"** means a day on which the recognized stock exchanges are open for trading.

**2.20 "Unpublished price sensitive information"** means any information as defined under the SEBI (Prohibition of Insider Trading) Regulations 2015, as amended from time to time.

**Interpretation:**

- i) All terms used in this CODE but not defined herein shall have the meanings assigned to them under the Regulation, Acts or the Companies Act, 2013 as the case may be.
- ii) Words importing the singular number shall include the plural and vice versa.
- iii) References to one gender shall include all genders.
- iv) The index hereto and headings herein shall not affect the construction of this CODE.
- v) Reference herein to any enactment shall be deemed to include reference to such enactment as re-enacted, amended or extended.
- vi) Any phrase introduced by the terms "including", "include" or any similar expression shall be construed as illustrative and shall not limit the sense of the words preceding those terms.
- vii) The Appendix and Forms are an integral and inseparable part of this CODE.

## **CHAPTER-III - RESTRICTION ON COMMUNICATION AND TRADING BY INSIDERS:**

### **1. Communication or procurement of unpublished price sensitive information**

No insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to the Company or securities listed or proposed to be listed, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to the Company or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

The board of directors of the Company shall make a policy for determination of "legitimate purposes" as a part of "Codes of Fair Disclosure and Conduct" formulated under regulation 8 of SEBI PIT 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.

Notwithstanding anything contained in this Code, an unpublished price sensitive information may be communicated, provided, allowed access to or procured, in terms of the provisions of SEBI PIT Regulations.

### **2. Structured Digital Database**

In terms of SEBI PIT Regulations, the board of directors of the Company shall ensure that a Structured Digital Database (SDD) 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 SEBI PIT 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.

Provided that entry of information, not emanating from within the Company, in structured digital database may be done not later than 2 calendar days from the receipt of such information.

Further, information containing UPSI processed through UPSI software /dedicated functionality develop in Company's ERP / Company's e-office process having adequate internal controls and checks shall be deemed to be part of SDD in relation to maintaining UPSI data.

The SDD is preserved for such period as defined under SEBI PIT Regulations, as amended from time to time.

### 3. Trading when in possession of unpublished price sensitive information

Subject to the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time, no insider shall trade in securities of the Company that are listed or proposed to be listed on any stock exchange when in possession of any unpublished price sensitive information.

**Explanation:** When a person who has traded in securities has been in possession of unpublished price sensitive information, his trades would be presumed to have been motivated by the knowledge and awareness of such information in his possession.

Provided that the insider may prove his innocence by demonstrating the circumstances as mentioned in the SEBI PIT Regulations.

For Designated Employees/Persons/Connected Persons, the onus of establishing that they were not in possession of unpublished price sensitive information shall be on the Designated Employees/Persons/Connected Persons.

### 4. Trading Plans

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 as per SEBI PIT Regulations.

The Trading Plan shall be as per SEBI PIT Regulations and Application for Trading Plan shall be given in **Form I** and Intimation of implementation or non-implementation of trading plan in **Form II**.

### 5. Trading Window

Designated Employees/Persons of RailTel shall not deal in any transaction involving the purchase or sale or Contra Trade of securities of RailTel either in their own name or in the name of their immediate relative during the periods mentioned below, when trading window shall remain closed:

The trading window shall remain closed as mentioned under:

#### A. Closure of Trading Window for Financial Results

Declaration of Financial Results for	Trading Window Closure Period	
	From	To
First Quarter	1 <sup>st</sup> July of the financial year	Upto 48 hours after declaration of financial results, as notified from time to time
Second Quarter/Half-Yearly Financial Results	1 <sup>st</sup> October of the financial year	
Third Quarter	1 <sup>st</sup> January of the financial year	
Fourth Quarter/Annual Financial Results	1 <sup>st</sup> April of the following financial year	

**B. Closure of Trading Window other than Financial Results shall be notified by the Compliance Officer, from time to time, depending upon the UPSI and SEBI requirements.**

**Explanation:**

- The trading window shall be opened 48 hours after the “unpublished price sensitive information”, becomes generally available.
- The notice of closure of trading window shall be intimated to the stock exchange and upload on the website of RailTel.

The remaining days of a year other than the days mentioned above shall be called **“Valid Trading Window”**.

The restrictions mentioned above shall not be applicable in respect of exercise of an option under ESOP. However, shares allotted on exercise of ESOP shall not be allowed to be sold when trading window is closed.

All Designated Persons shall conduct their dealings in the securities of the Company only in the “Valid Trading Window” period as mentioned above and shall not enter into **“Contra Trade”** i.e. opposite or reverse transactions i.e. buy or sell any number of shares (including shares allotted in IPO or any other public offer), in the securities of the Company during the next six months following the prior transaction. The Compliance Officer is 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.

## **6. Pre-Clearance Of Trades**

All Designated Employees/Persons, who intends to trade in the securities of RailTel, either in their own name or in the name of their immediate relative, above the minimum threshold limit of 5000 equity shares to be traded in a single transaction or 25,000 equity shares to be traded in series of transactions within a month, shall obtain pre-clearance of the transaction as per the pre-dealing procedure as described hereunder.

Application for pre-clearance shall be made only during valid trading period through Software procured for Compliance of SEBI (PIT) Regulations, 2015. Application submitted during closure of trading window shall be invalid.

No Designated Employees/Persons shall apply for pre-clearance of any proposed trade, if such Designated Employees/Persons is in possession of unpublished price sensitive information even if the trading window is not closed.

Immediately on receipt of the pre-clearance application, the date and time of the receipt of the same shall be recorded thereon. The Compliance Officer shall process the pre-clearance applications and if the pre-clearance application is in accordance and in compliance with the provisions of this CODE, the Compliance Officer shall endeavour to communicate the pre-clearance immediately but not later than 2 trading days from the time of receiving the application. In the

absence of the Compliance Officer, the officer authorized by the Compliance Officer shall give the pre-clearance. If the compliance officer doesn't respond within 2 trading days, it shall be deemed to be rejection of the application.

The Designated Employees/Persons shall, within seven trading days, execute the trade after the pre-clearance. If the trade is not executed within seven trading days after the pre-clearance is given, the Designated Employees/Persons shall obtain fresh pre-clearance.

Further, the Designated Employees/Persons shall enter the details regarding the execution or non-execution of the pre-approved transaction through the software procured for compliance with SEBI (PIT) Regulations, 2015 within two trading days. In case of execution of trade, such entry shall be made within two trading days from the date of execution of the trade. In case of non-execution of trade, the entry shall be made within two trading days from the expiry of seven trading days from the date of grant of pre-clearance.

**On the request of Designated Employees/Persons, the Compliance Officer may relax the aforesaid timelines i.e. 2 trading days, for entry of the transaction in the software.**

## **CHAPTER-IV – DISCLOSURE OF TRADING BY INSIDERS**

### **1. Initial Disclosures:**

<b>Sr. No</b>	<b>By Whom</b>	<b>What to be disclosed</b>	<b>When to be disclosed</b>	<b>Form</b>
(1)	Every Promoter, member of the promoter group, Director and KMP	Holding of Securities of the Company as on date of appointment or becoming Promoter or member of the promoter group	Within 7 days of such appointment or of becoming promoter,	In Form-B through Software procured for Compliance of SEBI (PIT) Regulations, 2015
(2)	Designated Persons	<p>1. Name &amp; PAN (or any other identifier authorized by law) of the following persons:</p> <p>a) Immediate Relatives</p> <p>b) Persons with whom the designated person shares a material financial relationship</p> <p>c) Phone, mobile &amp; cell numbers which are used by the above persons</p> <p>2. Names of educational institutions from which the designated person has graduated</p> <p>3. Names of past employers</p>	Within 30 days of becoming a Designated Person	In Form-E through Software procured for Compliance of SEBI (PIT) Regulations, 2015

## 2. On annual basis/ change in information:

Sr. No.	By Whom	What to be disclosed	When to be disclosed	Form
(1)	Every Promoter, member of the promoter group, Director, and Designated Person	Number of such securities acquired or disposed	<p>Within 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 lakh or such other value as may be specified.</p> <p>*disclosure of incremental transactions shall be made when transactions effected after the prior disclosure cross the threshold specified above.</p>	In Form-C through Software procured for Compliance of SEBI (PIT) Regulations, 2015
(2)	Company	Details of disclosure by the Promoter/Member of the Promoter Group/ Director/ Designated Person, received as per point (1) above.	Within 2 trading days of receipt of disclosure or from becoming aware of such disclosure.	In Form-C to the Stock exchange where securities are listed.
(3)	Designated Person to the Company	<p>Name &amp; PAN (or any other identifier authorized by law) of the following persons:</p> <p>a) Immediate Relatives</p> <p>b) Persons with whom the designated person shares a material financial relationship</p> <p>c) Phone, mobile &amp; cell numbers which are used by the above persons.</p>	<p>1. Within 30 days of the end of the financial year.</p> <p>2. Whenever the information changes vis- a'-vis their last disclosure, within 30 days from the change.</p>	In Form-E through Software procured for Compliance of SEBI (PIT) Regulations, 2015.

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 (from a designated person) during the immediately preceding 12 months, equivalent to at least 25% of the annual income of such designated person but shall exclude relationships in which the payment is based on arm's length transactions.

The disclosures to be made by any person mentioned above shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.

The disclosures of trading in securities shall also include trading in derivatives of securities and the traded value of the derivatives shall be taken into account for aforesaid purpose.

**Disclosure by other connected person:** The other connected person or class of connected persons may require to make disclosures of holdings and trading in securities of the Company in **Form D** and at such frequency as may be determined by the Compliance Officer with the approval of the Director (Finance), from time to time.

## **CHAPTER-V**

### **1. Miscellaneous**

The Compliance Officer shall be responsible for:

- (i) 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 CODE under the overall supervision of the Board of Directors of the Company.
- (ii) Report to the Board of Directors for the purpose of the Code and in particular, shall provide reports to the Chairperson of the Audit Committee and to the Chairperson of the Board annually.
- (iii) Maintenance of records of disclosures made under this CODE for a period of 5 years.

A record of the designated employees shall be maintained by the Corporate HR division under the overall supervision and control of the Compliance Officer and changes taking place in the list from time to time shall be incorporated therein.

Any change (Addition/Deletion/Transfer/Promotion etc.) in the list of designated employees/persons as defined under clause 2.7/2.8 of this code shall be informed by the HR Division to the CS Division on the same day of change along with the requisite details (Name, Employee Id, PAN, Level, Designation, Mobile Number, Address, Date of change or such other information as required under SEBI PIT Regulations or other SEBI Regulations, as amended from time to time), to enable the CS Department to comply with the SEBI PIT Regulations or other SEBI Regulations, as amended from time to time.

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

Any Director, Key Managerial Personnel or Designated Employees/Person, who trades in securities of the Company or communicates any unpublished price sensitive information in contravention of this CODE may be penalized and appropriate action may be taken by the Competent Authority as defined under Conduct, Discipline and Appeal Rules (CDA) of the Company and shall also be subject to disciplinary action by the Competent Authority. A Report on violation of the CODE and SEBI (PIT) Regulations, 2015 by the insiders is also submitted to the SEBI.

In case of violation of the CODE and SEBI (Prohibition of Insider Trading) Regulations, 2015, the following penalties shall be imposed on the Insiders:

<b>Sr. No.</b>	<b>Violation</b>	<b>Penalty*</b>
1.	Dealing in any transaction involving the purchase and sale of securities of RailTel either in name of the Insider or in the name of their immediate relative, when the trading window remains closed.	Rs. 5,000/- per occasion
2.	In case of entering into Contra Trade i.e. opposite or reverse transactions, in the securities of the RailTel during the next six months following the prior transaction	Rs. 5,000/- per occasion or the actual profit, whichever is higher.

3.	Non-Update of data on software as informed by the Company from time to time.	Rs. 2000/-. However, the same may be relaxed by the Compliance Officer depending on the case.
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\*In case of any instance of violation by the insider, the amount of penalty shall be deducted from the Salary/ outstanding bills of the insiders directly and be deposited to Investor Protection and Education Fund (IEPF) A/C of SEBI.

**Note:** The above penalty shall be in addition to the penalty, if any, imposed by the SEBI for violation of SEBI PIT Regulations, as amended from time to time.

### 3. Power of SEBI

The action by the Company shall not preclude SEBI and other authorities from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulation, 2015 as amended from time to time. In case the SEBI Regulation or any Statutory Provisions are more stringent than those contained in the CODE, the SEBI Regulations/ Statutory Provisions will prevail.

### 4. Clarifications

For all queries concerning this CODE, employees may please contact the Compliance Officer.

### 5. Web based software

The Company reserves the right to amend or replace the existing web-based software with any other of the same kind or develop its own software for digitizing the records of the insider. Insider shall adhere to and comply with the requirement of taking approval and submitting disclosures etc. Through the web-based software, non-adherence to which shall be treated as contravention of the CODE.

### 6. Amendment

The Chairman and Managing Director of RailTel is authorised by the Board of Directors to amend or modify this code from time to time and the same should be placed before the Board for their information. However, no such amendment or modification shall be inconsistent with the applicable provisions of law for time being in force.

### 7. Version

Version	Date of Board Meeting
1.0	09/02/2021
2.0	13/04/2026

### **Disclaimer**

THIS POLICY IS ONLY INTERNAL CODE OF CONDUCT AND ONE OF THE MEASURES TO AVOID INSIDER TRADING. EVERY INSIDER IS REQUIRED TO FAMILIARISE HIMSELF WITH THE SEBI REGULATION AS IT WILL BE THE RESPONSIBILITY OF EACH INSIDER (AND HIS RELATIVES) TO ENSURE COMPLIANCE OF THIS CODE, SEBI REGULATION AND OTHER RELATED STATUTES FULLY.

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## RAILTEL CORPORATION OF INDIA LIMITED

### FORM-I

#### APPLICATION FOR TSTRADING PLAN TO TRADE IN SECURITIES OF RAILTEL CORPORATION OF INDIA LIMITED

To

The Compliance Officer  
RailTel Corporation of India Limited  
Plate-A, 6<sup>th</sup> Floor, Office Block, Tower-2,  
East Kidwai Nagar,  
New Delhi-110023

Dear Sir,

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended, and the Company's Internal Code of Conduct and Procedures for Prevention of Insider Trading in Dealing in Securities and Code of Corporate Disclosure Practices, I seek approval for trading plan in Securities of RailTel Corporation of India Limited (give description) as per the details given below:

S. No.	Particulars	Details
1.	Name	
2.	Designation	
3.	Employee No.	
4.	PAN	
5.	Email ID	
6.	Department	
7.	DP ID & Client ID	
8.	Value of trade to be effected or the number of securities to be traded;	
9.	Nature of Trade (Buy/Sell etc.)	
10.	*Proposed Trading dates and Duration of the trading plan (Provide either specific date or time period not exceeding five consecutive trading days)	
11.	**Price limit (if applicable)	

*\*Date of commencement of trading shall only after 120 calendar days from the date disclosure to stock exchange/SEBI.*

*\*\*Price limit is an upper price limit for a buy trade and a lower price limit for a sell trade, subject to the range as specified below:*

- a. *for a buy trade: the upper price limit shall be between the closing price on the day before submission of the trading plan to the Stock Exchange/SEBI and upto 20% higher than such closing price;*
- b. *for a sell trade: the lower price limit shall be between the closing price on the day before submission of the trading plan and upto 20% lower than such closing price.*

*(The insider shall execute the trade only if the execution price of the security is within such limit. If price of the security is outside the price limit set by the insider, the trade shall not be executed.)*

**UNDERTAKING**

I hereby affirm/ solemnly confirm and declare:

- a) That I do not have access and/or have not received any “Unpublished Price Sensitive Information (UPSI)” up to the time of signing the undertaking
- b) That the trading plan once approved shall be irrevocable and I shall mandatorily implement the plan, without being entitled to either execute any trade in the securities outside the scope of the trading plan or to deviate from it except due to permanent incapacity or bankruptcy or operation of law.
- c) That the implementation of the trading plan shall not be commenced if any unpublished price sensitive information in my possession at the time of the formulation of the plan has not become generally available at the time of the commencement of implementation.
- d) That I have not contravened the Code of Conduct for Prevention of Insider Trading and Code of Corporate Disclosure Practices as notified by the Company from time to time.
- e) That I am aware that, I shall be liable to face penal consequences as set forth in the CODE including disciplinary action under the CODE of the Company, in case the above declarations are found to be misleading or incorrect at any time.
- f) That I hereby made a full and true disclosure in the matter.

**Date.....**  
**Place.....**

**Signature.....**

**FOR COMPLIANCE OFFICER’S USE**

- Serial number of the trading plan received:
- Date & time of receipt of the trading plan:
- Approval Status (Approved/Rejected):
- Signature of the Compliance Officer/Authorized Officer:

**FORM-II**

**INTIMATION OF IMPLEMENTATION OR NON-IMPLEMENTATION OF TRADING PLAN**

**To**

The Compliance Officer  
RailTel Corporation of India Limited  
Plate-A, 6<sup>th</sup> Floor, Office Block, Tower-2,  
East Kidwai Nagar,  
New Delhi-110023

Dear Sir,

This is with reference to my application for Trading Plan to trade in securities of RailTel Corporation of India Limited dated \_\_\_\_\_ submitted in Form I. In this regard, please find below details of implementation or non-implementation of trading plan:

S. No.	Particulars	Details
1.	Name	
2.	Designation	
3.	Employee No.	
4.	PAN	
5.	Email ID	
6.	Department	
7.	DP ID & Client ID	
8.	Value of trade executed as per trading plan	
9.	Nature of Trade (Buy/Sell etc.)	
10.	Date on which trade executed	
11.	Price per share	
12.	Reason for non-implementation of trading plan, if any	

Yours truly,

Signature: \_\_\_\_\_

Strike out whichever is not applicable.