

# **PH TRADING LIMITED**

**PERIODIC COMPLIANCES UNDER SEBI  
(Prohibition of Insider Trading)  
Regulations, 2015**

# PH TRADING LIMITED

CIN: L51109WB1982PLC035011

Reg. Office: Plot No.-62, Tower -II, 12th Floor, Salt Lake,  
Millennium City Information Technology Park, Sector -V, Block DN,  
Bidhannagar, Salt Lake, Kolkata -700064, West Bengal, India  
.Website: [www.phtradinglimited.com](http://www.phtradinglimited.com); E-mail: [csphtesting6@gmail.com](mailto:csphtesting6@gmail.com)

SEBI (Prohibition of Insider Trading Regulations, 2015 (Insider Trading Regulations) has stipulated several conditions and measures in prohibition of insider trading of securities of the Company.

In order to ensure compliances under Insider Trading Regulations and to encapsulate the restrictions, rules of conduct to be followed by the Designated Persons, Code of Conduct to regulate, monitor and report trading by insiders (“the Code”) has been formulated by the Company.

The Code prescribes the Designated Persons to forward to the Compliance Officer

- 1) Quarterly statement of transactions in securities of the Company within a period of 15 days from the end of calendar quarter. In case, there are no transactions during the calendar quarter, a Nil statement is required to be submitted by the Designated persons.
- 2) Annual statement of holdings in the Securities of the Company within 30 days from the closure of financial year.
- 3) The details of Immediate Relatives and persons with whom Designated Person shares material financial relationship, within 30 days of closure of financial year and within 15 days of any change in such information as submitted to the Company.

The Compliance Officer Shall Place before the Board

- a) Statement of transactions of the designated persons every quarter
- b) Statement of holding of securities of the designated persons every quarter
- c) Disclosure of statement of transaction of the designated persons every quarter

The Compliance Officer shall also place before the Board every quarter, the pre-clearance forms issued by him/her during the quarter along with the statements of holding of securities and transactions of the designated persons.

*for PH Trading Limited*

Sd/-

**Naveen Kumar Vanama**  
Managing Director  
DIN: 09243947

Place: Kolkata  
Date: September 5, 2024