Annexure-A

Operational Guidelines for marking ISIN Level Freeze on securities of promoters and promoter groups including their associates pursuant to SEBI (Buy-Back) Amendment Regulations, 2026.

Marking ISIN level Freeze in the demat accounts of promoter/promoter group and their associates: -

1. Issuer / R&T Agent shall submit the specimen form enclosed as **Annexure-Aa** on their letterhead and duly authorized by MD or CS.
2. The above-mentioned Request Letter shall be accompanied by the copy of draft offer document / offer document.
3. Issuers shall ensure that the above-mentioned documents shall be submitted to NSDL at the latest by T-1 day (T is date of passing resolution by Board of Directors or the special resolution).
4. Post receipt of the relevant documents, NSDL shall confirm to the Issuer the marking of the ISIN level freeze for the said securities, to the Issuer.
5. In case the promoter and promoter group including their associates willing to tender their shares or other specified securities in buy-back undertaken through the tender offer route, Issuer shall inform NSDL to remove the ISIN level freeze applied in the demat account allowing promoter and promoter group including their associates to tender their shares or other specified securities in buy-back undertaken through the tender offer route. It should be noted that the shares or other specified securities proposed to be tendered under buy-back shall be free from any incumbrances.
6. Upon completion of the procedure mentioned in point 5 above, Issuer shall once again request NSDL through **Annexure-Aa** to mark ISIN level freeze in the demat accounts of promoter and promoter group including their associates for the applicable freezing period.

Marking 'Non-Transferability / Lock-in' on securities of promoter/promoter group and their associates which are in Pledged status: -

1. For the specified securities in respect of the promoters/promoter group and their associates held under pledged status, Issuers shall in addition to the above-mentioned **Annexure-Aa,** send a request to NSDL to mark such pledged securities as 'non-transferable / Lock-in' in NSDL system for duration of the applicable ISIN freeze period by submitting duly filled and signed Request Letter for marking securities "Non-Transferable / Lock-in" (format enclosed as **Annexure-Ab**).
2. The above-mentioned Request Letter shall be accompanied by the copy of draft offer document / offer document. Issuers shall also pay relevant applicable fees to NSDL as applicable.
3. Issuers shall ensure that the above-mentioned documents shall be submitted to NSDL at the latest by T-1 day (T is date of passing resolution by Board of Directors or the special resolution).
4. Upon receipt of the instruction from the Issuer, NSDL will mark such pledged securities as 'non-transferable / Lock-in' in NSDL depository system for duration of the applicable lock-in period and will provide confirmation to the Issuer.
5. Subsequent to the closure / invocation of the pledge before expiry of the specified freezing period, the securities will be automatically locked-in in the demat account of Pledgor / Pledgee as the case may be for the remaining period as required under the Buback amendment 2026 Regulations.