

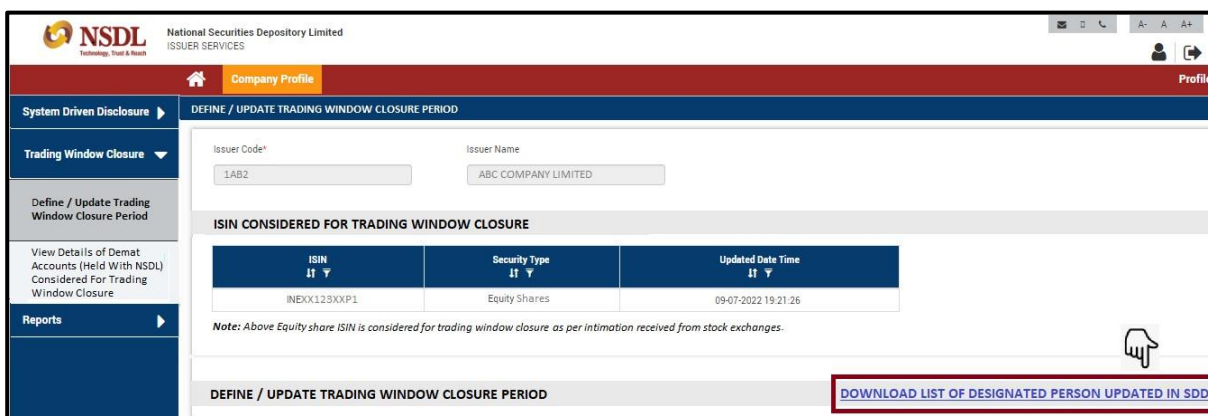
Annexure – A

Operational guidelines for listed companies to implement ‘Trading Window Closure Period’ i.e. ‘Commencement Date’ and ‘End Date’ for its Designated Persons (“DPs”) and their Immediate Relatives along with its salient features:

1. Review of Designated Persons list as available on Issuer Portal:

As per SEBI circular dated July 19, 2023, Designated Depository (DD) appointed by the listed company/Issuers shall auto-populate PAN and name of the Designated Persons (DPs) as per the last updated information under system-driven disclosure (SDD) uploaded by the Issuer with DD.

Accordingly, Listed Issuer after log-in to NSDL Issuer Portal, shall review the list of existing designated persons updated in NSDL Issuer portal under SDD by clicking on “Company Profile” → “Trading Window Closure” → “Define / Update Trading Window Closure Period” as exhibited below,



ISIN	Security Type	Updated Date Time
INEXX123XXP1	Equity Shares	09-07-2022 19:21:26

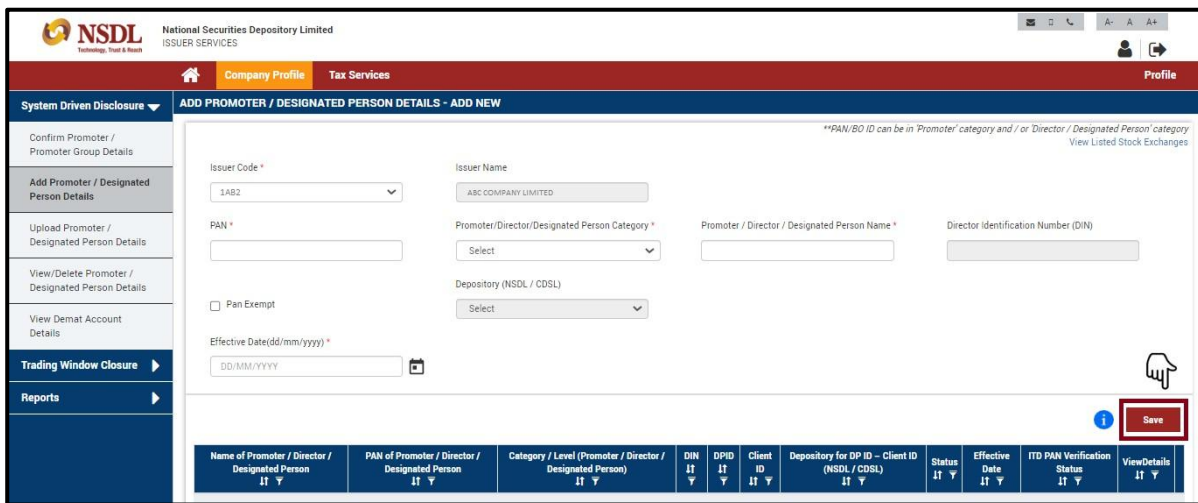
Note: Above Equity share ISIN is considered for trading window closure as per intimation received from stock exchanges.

[DOWNLOAD LIST OF DESIGNATED PERSON UPDATED IN SDD](#)

2. Addition/deletion of Designated Persons (DPs):

Addition/deletion of designated persons (DP) as authorized by the compliance officer of the Issuer may be updated as follows:

- Addition of DPs under SDD:** To add new DP (in list of existing DPs), user shall click on “Company Profile” → “System Driven Disclosure” → “Add promoter / Designated Person Details” tab and “Add” the DP as exhibited below:



ADD PROMOTER / DESIGNATED PERSON DETAILS - ADD NEW

Issuer Code * 1AB2 Issuer Name ABC COMPANY LIMITED

PAN * Promoter/Director/Designated Person Category * Promoter / Director / Designated Person Name * Director Identification Number (DIN)

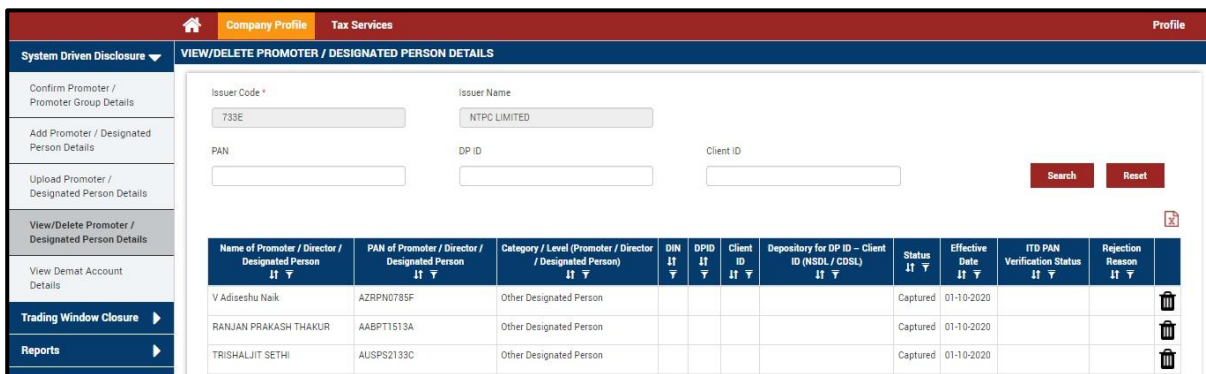
☐ Pan Exempt Depository (NSDL / CDSL)

Effective Date(dd/mm/yyyy) *

Save

Name of Promoter / Director / Designated Person	PAN of Promoter / Director / Designated Person	Category / Level (Promoter / Director / Designated Person)	DIN	DPID	Client ID	Depository for DP ID - Client ID (NSDL / CDSL)	Status	Effective Date	ITD PAN Verification Status	ViewDetails
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ii. **Deletion of Designated Persons (DP) under SDD:** To delete the existing DP (from list of existing DPs), user will have to click on “Company Profile” → “System Driven Disclosure” → “View / delete Promoter / Designated Person Details” and “Delete” as exhibited below:



VIEW/DELETE PROMOTER / DESIGNATED PERSON DETAILS

Issuer Code * 733E Issuer Name NTPC LIMITED

PAN DP ID Client ID

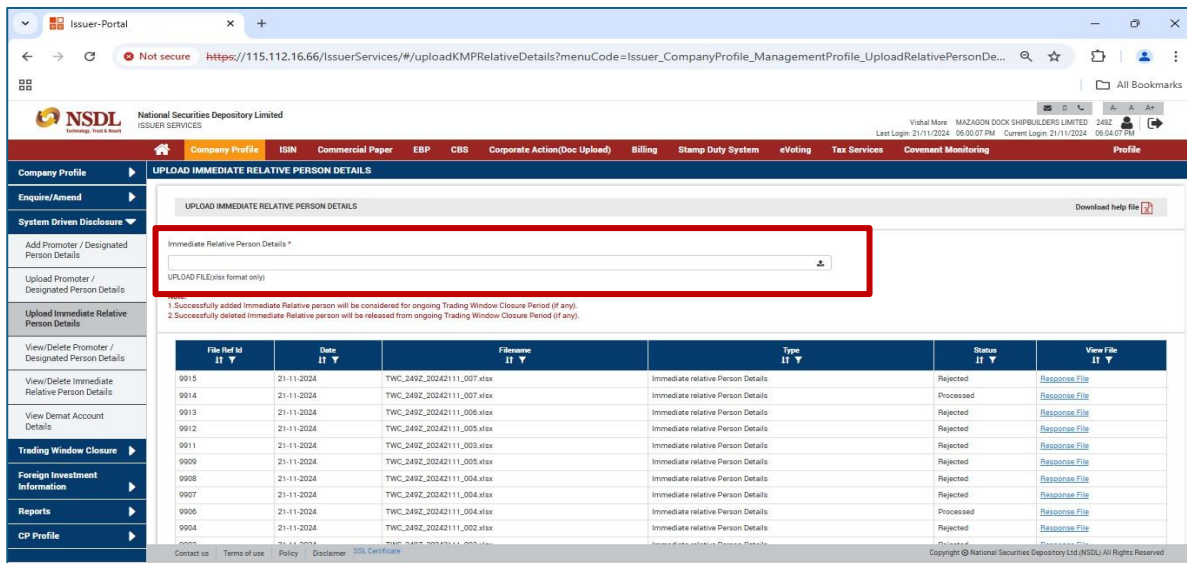
Search Reset

Name of Promoter / Director / Designated Person	PAN of Promoter / Director / Designated Person	Category / Level (Promoter / Director / Designated Person)	DIN	DPID	Client ID	Depository for DP ID - Client ID (NSDL / CDSL)	Status	Effective Date	ITD PAN Verification Status	Rejection Reason
V Adishesu Naik	AZRPNG785F	Other Designated Person					Captured	01-10-2020		
RANJAN PRAKASH THAKUR	AABPT1513A	Other Designated Person					Captured	01-10-2020		
TRISHALJIT SETHI	AUSP2133C	Other Designated Person					Captured	01-10-2020		

On successful deletion of Designated Person, kindly ‘Remove’ the deleted Designated Person(s) from ongoing Trading Window Closure Period.

3. Adding/Deleting Immediate Relative

i. To Add immediate relatives, user shall click on “Company Profile” → “System Driven Disclosure” → “Upload Immediate Relative Person Details” tab.



Company Profile | **Company Profile** | **ISIN** | **Commercial Paper** | **EBP** | **CBS** | **Corporate Action(Doc Upload)** | **Billing** | **Stamp Duty System** | **eVoting** | **Tax Services** | **Covenant Monitoring** | **Profile**

Company Profile | **UPLOADED IMMEDIATE RELATIVE PERSON DETAILS**

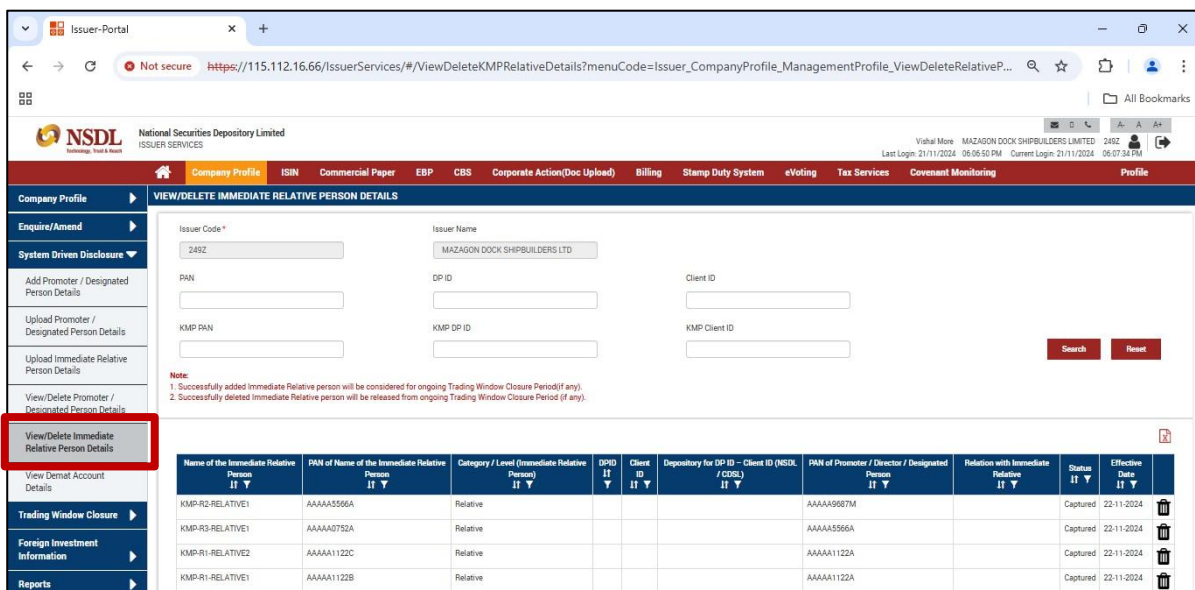
Immediate Relative Person Details *

UPLOAD FILE(Excel format only)

1. Successfully added Immediate Relative person will be considered for ongoing Trading Window Closure Period (if any).
2. Successfully deleted Immediate Relative person will be released from ongoing Trading Window Closure Period (if any).

File Ref Id	Date	Filename	Type	Status	View File
9915	21-11-2024	TWC_2492_20242111_007.xlsx	Immediate relative Person Details	Rejected	Response File
9914	21-11-2024	TWC_2492_20242111_007.xlsx	Immediate relative Person Details	Processed	Response File
9913	21-11-2024	TWC_2492_20242111_006.xlsx	Immediate relative Person Details	Rejected	Response File
9912	21-11-2024	TWC_2492_20242111_005.xlsx	Immediate relative Person Details	Rejected	Response File
9911	21-11-2024	TWC_2492_20242111_003.xlsx	Immediate relative Person Details	Rejected	Response File
9909	21-11-2024	TWC_2492_20242111_005.xlsx	Immediate relative Person Details	Rejected	Response File
9908	21-11-2024	TWC_2492_20242111_004.xlsx	Immediate relative Person Details	Rejected	Response File
9907	21-11-2024	TWC_2492_20242111_004.xlsx	Immediate relative Person Details	Rejected	Response File
9906	21-11-2024	TWC_2492_20242111_004.xlsx	Immediate relative Person Details	Processed	Response File
9904	21-11-2024	TWC_2492_20242111_002.xlsx	Immediate relative Person Details	Rejected	Response File

- ii. To delete the existing Immediate Relative (from list of existing Immediate Relatives), user will have to click on “Company Profile” → “System Driven Disclosure” → “View / delete Immediate Relative Person Details and “Delete” as exhibited below:



Company Profile | **Company Profile** | **ISIN** | **Commercial Paper** | **EBP** | **CBS** | **Corporate Action(Doc Upload)** | **Billing** | **Stamp Duty System** | **eVoting** | **Tax Services** | **Covenant Monitoring** | **Profile**

Company Profile | **VIEW/DELETE IMMEDIATE RELATIVE PERSON DETAILS**

Issuer Code *
2492

Issuer Name
MAZAGON DOCK SHIPBUILDERS LTD

PAN
DP ID
Client ID

KMP PAN
KMP DP ID
KMP Client ID

Search Reset

Note:
1. Successfully added Immediate Relative person will be considered for ongoing Trading Window Closure Period (if any).
2. Successfully deleted Immediate Relative person will be released from ongoing Trading Window Closure Period (if any).

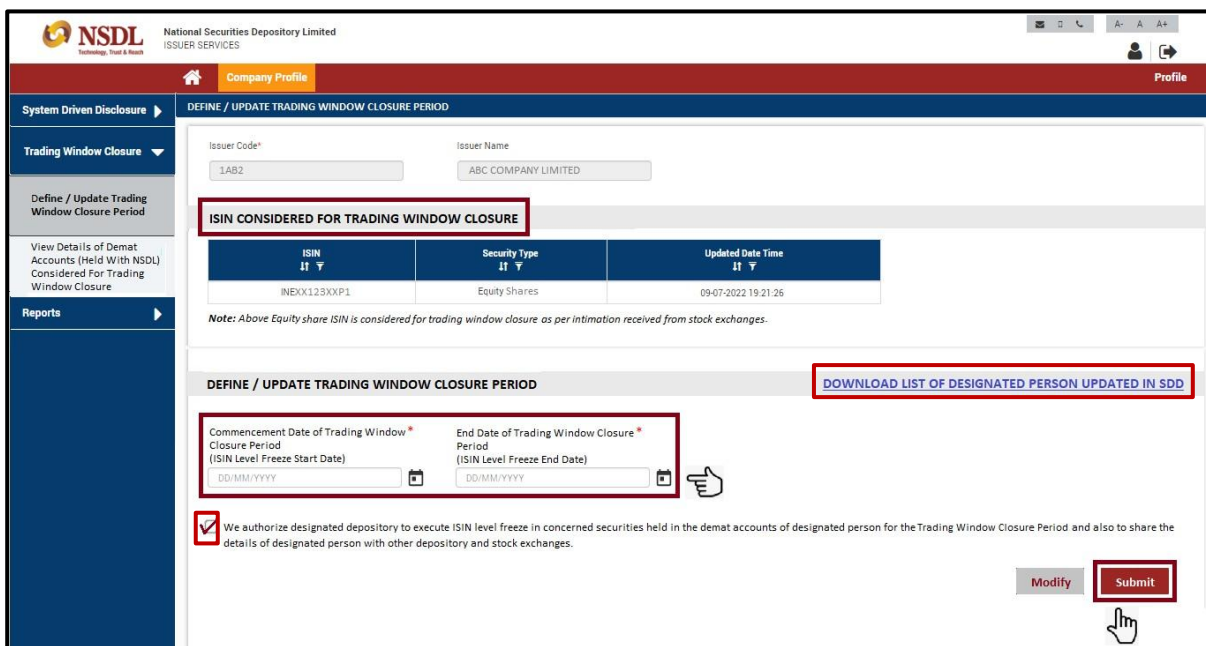
Name of the Immediate Relative Person	PAN of Name of the Immediate Relative Person	Category / Level (Immediate Relative Person)	DPID	Client ID	Depository for DP ID - Client ID (NSDL / CDSL)	PAN of Promoter / Director / Designated Person	Relation with Immediate Relative	Status	Effective Date
KMP-R2-RELATIVE1	AAAAA5566A	Relative				AAAAA55667M		Captured	22-11-2024
KMP-R3-RELATIVE1	AAAAA0752A	Relative				AAAAA5566A		Captured	22-11-2024
KMP-R1-RELATIVE2	AAAAA1122C	Relative				AAAAA1122A		Captured	22-11-2024
KMP-R1-RELATIVE1	AAAAA1122B	Relative				AAAAA1122A		Captured	22-11-2024

4. Setting up ‘Trading Window Closure Period’:

- i. Initiation of trading window closure period for the quarter:

User shall,

- Click on “Company Profile” → “Trading Window Closure” → “Define / Update Trading Window Closure Period” C select the appropriate “Quarter Ended”.
- Provide ‘Commencement date’ and ‘End date’ of trading window closure period for Designated Persons by clicking on ‘Calendar’ icon, click on ‘Download List of Designated Person updated in SDD’ for review and click “Submit” as exhibited below.
- Upon submission of request a message “Your request for trading window closure of designated persons has been successfully accepted” will be displayed on the screen.
- Based on trading window closure period details provided by the issuer, depositories shall initiate freeze on concerned ISIN in the demat account(s) of Designated Persons held with Depositories which were identified against the PAN of Designated Persons across holders (i.e. sole/Joint Holder) on T-Day (i.e., commencement date of trading window closure period provided by the Issuer).



NSDL National Securities Depository Limited
ISSUER SERVICES

Company Profile

System Driven Disclosure

Trading Window Closure

Define / Update Trading Window Closure Period

View Details of Demat Accounts (Held With NSDL) Considered For Trading Window Closure

Reports

Profile

DEFINE / UPDATE TRADING WINDOW CLOSURE PERIOD

Issuer Code* 1AB2 Issuer Name ABC COMPANY LIMITED

ISIN CONSIDERED FOR TRADING WINDOW CLOSURE

ISIN	Security Type	Updated Date Time
INEXX123XXX.P1	Equity Shares	09-07-2022 19:21:26

Note: Above Equity share ISIN is considered for trading window closure as per intimation received from stock exchanges.

DEFINE / UPDATE TRADING WINDOW CLOSURE PERIOD

[DOWNLOAD LIST OF DESIGNATED PERSON UPDATED IN SDD](#)

Commencement Date of Trading Window Closure Period (ISIN Level Freeze Start Date) DD/MM/YYYY

End Date of Trading Window Closure Period (ISIN Level Freeze End Date) DD/MM/YYYY

☒ We authorize designated depository to execute ISIN level freeze in concerned securities held in the demat accounts of designated person for the Trading Window Closure Period and also to share the details of designated person with other depository and stock exchanges.

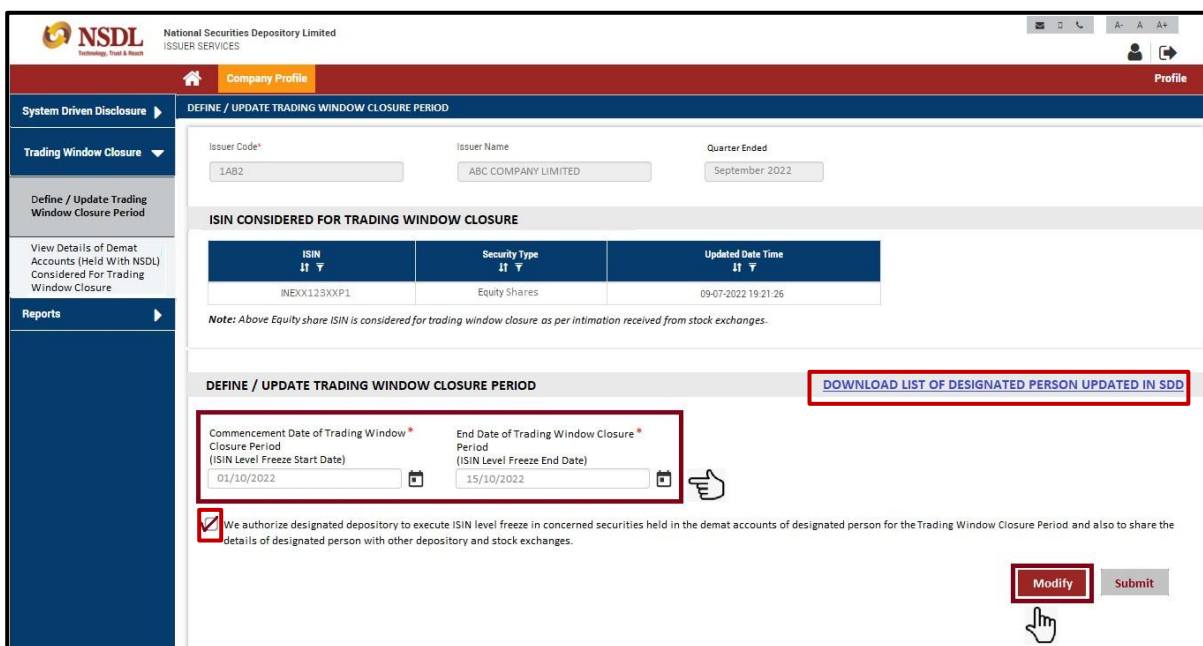
Modify Submit

ii. Pre-ponement / postponement of trading window closure end date (already initiated for a quarter):

If required, Issuer's may prepone/postpone the trading window closure period end date provided earlier on NSDL Issuer portal by clicking on “Company Profile” → “Trading Window Closure” → “Define / Update Trading Window Closure Period” and click on “Modify” as exhibited below. Upon

clicking on “Modify” button, the trading window closure “End date” will be enabled for modification.

Issuers shall provide the aforesaid modification request at least two (2) trading days in advance (T – 2 basis) on NSDL Issuer Portal before the existing end date e.g if existing end date of trading window closure period is May 10, 2024, so the latest date on which issuer can provide modification request would be May 08, 2024 in our example based on the concept of T – 2 basis.



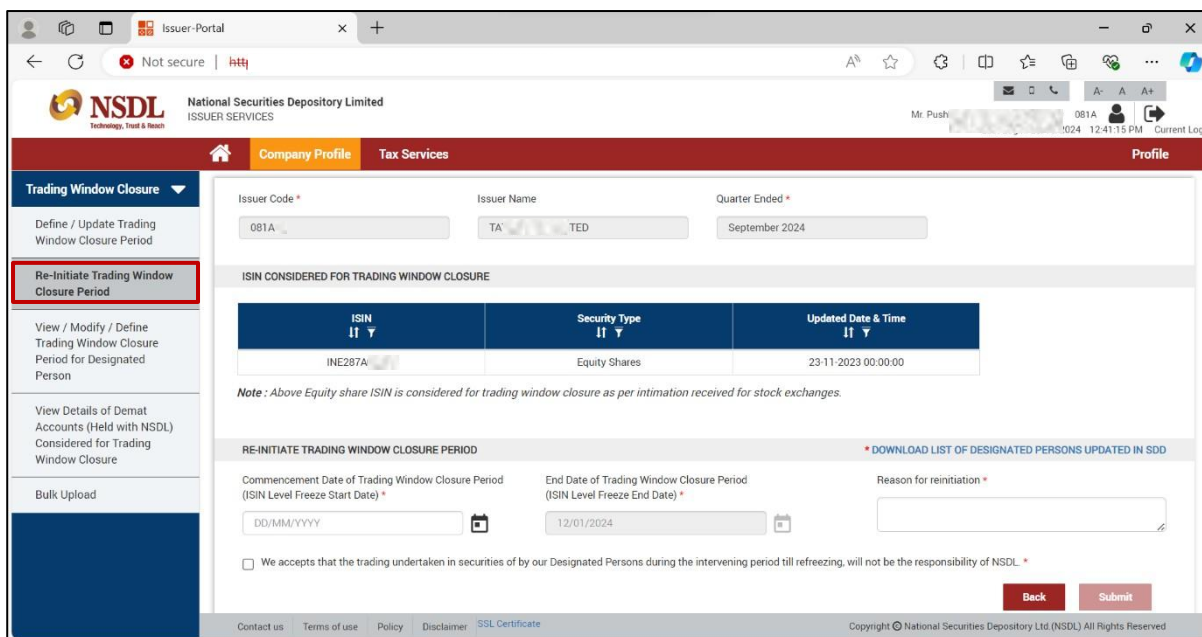
iii. Re-initiation of trading window closure period for the quarter

If the prior modification request, in case of postponement, of trading window closure period is not provided least two (2) trading days in advance (T – 2 basis) on NSDL Issuer Portal before the existing end date and if the trading window closure period is erroneously ended, the issuer can re-initiate the trading window closure period for the quarter.

User shall,

- “Company Profile” → “Trading Window Closure” → “Re-initiate Trading Window Closure Period”
C select the appropriate “Quarter Ended”.
- Provide ‘Commencement date’ and ‘End date’ of trading window closure period for Designated Persons by clicking on ‘Calendar’ icon, click on ‘Download List of Designated Person updated in SDD’ for review and click “Submit” as exhibited below.

- c. Upon submission of request a message “Your request for trading window closure of designated persons has been successfully accepted” will be displayed on the screen.
- d. Based on trading window closure period details provided by the issuer, depositories shall initiate freeze on concerned ISIN in the demat account(s) of Designated Persons held with Depositories which were identified against the PAN of Designated Persons across holders (i.e. sole/Joint Holder) on T-Day (i.e., commencement date of trading window closure period provided by the Issuer).

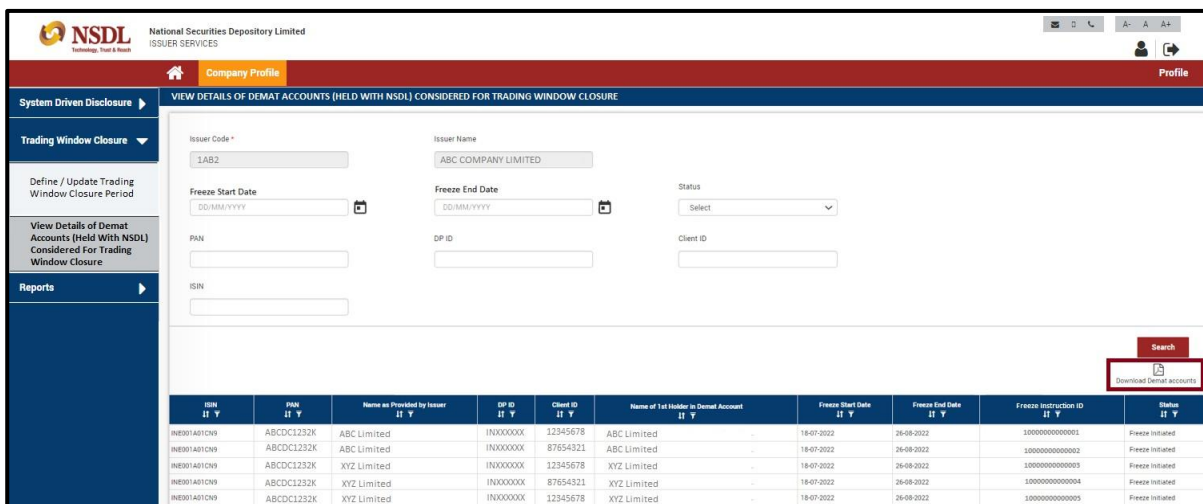


The screenshot shows the NSDL Issuer Portal interface. The left sidebar contains a menu with options: 'Trading Window Closure', 'Define / Update Trading Window Closure Period', 'Re-Initiate Trading Window Closure Period' (highlighted with a red box), 'View / Modify / Define Trading Window Closure Period for Designated Person', 'View Details of Demat Accounts (Held with NSDL) Considered for Trading Window Closure', and 'Bulk Upload'. The main content area is titled 'RE-INITIATE TRADING WINDOW CLOSURE PERIOD' and includes a table for 'ISIN CONSIDERED FOR TRADING WINDOW CLOSURE' with columns for ISIN, Security Type, and Updated Date & Time. Below the table, there is a form for 'RE-INITIATE TRADING WINDOW CLOSURE PERIOD' with fields for 'Commencement Date of Trading Window Closure Period (ISIN Level Freeze Start Date)', 'End Date of Trading Window Closure Period (ISIN Level Freeze End Date)', and 'Reason for reinitiation'. A checkbox at the bottom states: 'We accept that the trading undertaken in securities of by our Designated Persons during the intervening period till refreezing, will not be the responsibility of NSDL'. The form has 'Back' and 'Submit' buttons.

5. Report on list of Demat accounts (held with Participants of NSDL) of Designated Persons where the ISIN level freeze imposed based on trading window closure period provided by Issuer:

Once the trading window closure period is initiated by Issuer by following the procedure mentioned at point no.3 above, Issuers will be able to view/download the details of Demat accounts (held with Participants of NSDL) considered for security (ISIN) level freeze during trading window closure period along with status (i.e. Freeze Captured, Freeze Initiated, Unfreeze Initiated and Unfrozen) on Issuer portal. This report shall be available with effect from one trading day prior to the commencement of the trading window closure date (T-1 day).

Issuers should view/download the aforesaid report available at “Company Profile” → “Trading Window Closure” → “View Details of Demat Accounts held with NSDL considered for Trading Window Closure Period” tab as exhibited below:

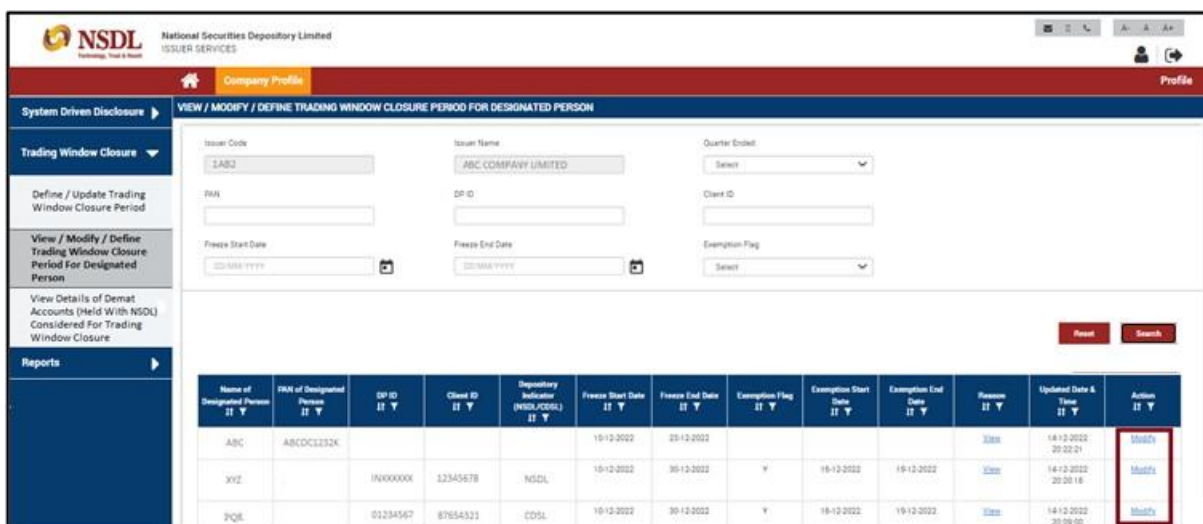


ISIN II Y	PAN II Y	Name as Provided by Issuer II Y	DP ID II Y	Client ID II Y	Name of 1st Holder in Demat Account II Y	Freeze Start Date II Y	Freeze End Date II Y	Freeze Instruction ID II Y	Status II Y
INE901A01CM9	ABCD1232K	ABC Limited	INXXXXXX	12345678	ABC Limited	18-07-2022	24-08-2022	10000000000000000000	Freeze Initiated
INE901A01CM9	ABCD1232K	ABC Limited	INXXXXXX	87654321	ABC Limited	18-07-2022	24-08-2022	10000000000000000002	Freeze Initiated
INE901A01CM9	ABCD1232K	XYZ Limited	INXXXXXX	12345678	XYZ Limited	18-07-2022	24-08-2022	10000000000000000003	Freeze Initiated
INE901A01CM9	ABCD1232K	XYZ Limited	INXXXXXX	87654321	XYZ Limited	18-07-2022	24-08-2022	10000000000000000004	Freeze Initiated
INE901A01CM9	ABCD1232K	XYZ Limited	INXXXXXX	12345678	XYZ Limited	18-07-2022	24-08-2022	10000000000000000005	Freeze Initiated

Issuers are advised to intimate Designated Persons regarding the trading window closure period and freezing of concerned ISIN in their demat account(s).

6. Facility for providing exemption to Designated Persons during trading window closure period on NSDL issuer portal

To provide exemption/ remove specific DP during trading window closure period, user will have to click on “Company Profile” → “Trading Window Closure” → “View / Modify / Define Trading Window Closure Period for Designated Person” as exhibited below:

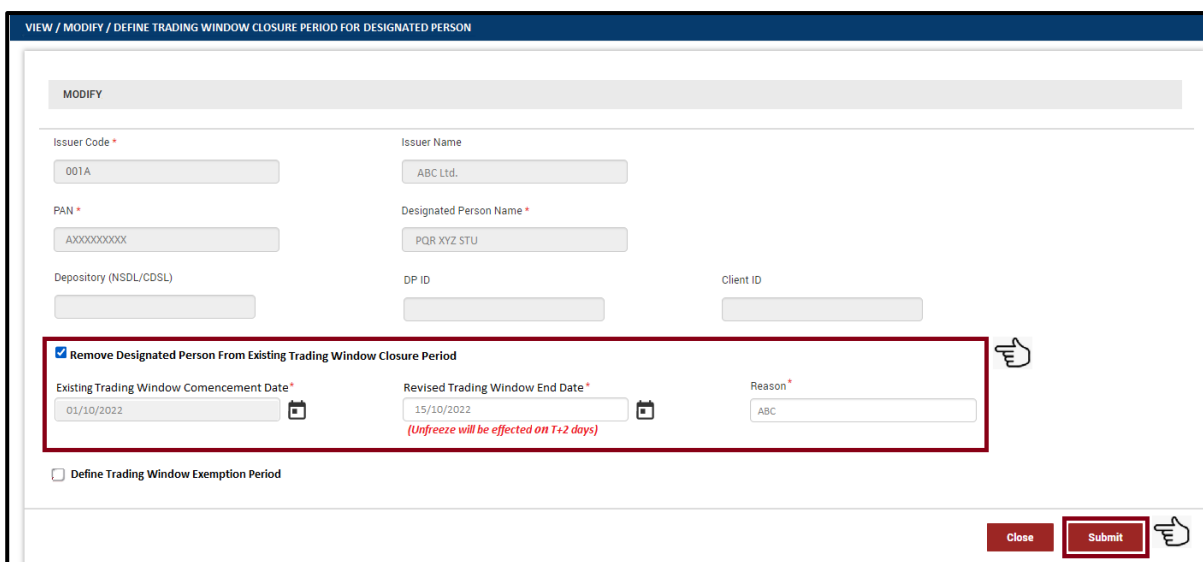


Name of Designated Person II Y	PAN of Designated Person II Y	DP ID II Y	Client ID II Y	Depository Indicator (NSDL/CDSE) II Y	Freeze Start Date II Y	Freeze End Date II Y	Exemption Flag II Y	Exemption Start Date II Y	Exemption End Date II Y	Reason II Y	Updated Date & Time II Y	Action II Y
ABC	ABCD1232K				18-12-2022	29-12-2022				None	18-12-2022 20:22:21	Search
XYZ		INXXXXXX	12345678	NSDL	18-12-2022	30-12-2022	Y	18-12-2022	18-12-2022	None	18-12-2022 20:20:18	Modify
JKL		01234567	87654321	CDSE	18-12-2022	30-12-2022	Y	18-12-2022	18-12-2022	None	18-12-2022 20:20:00	Modify

On “View / modify / define trading window closure period for Designated Person” screen, user will have to search the specific DP (for which changes are required to be made) based on PAN (or DP ID- Client ID in case of pan exempt cases) as exhibited above. Once the required DP is displayed on screen, user will have to click on “modify” button available in the “Action” column as exhibited above. Upon clicking “modify” button, below mentioned two options will be displayed through which user will be able to provide exemption to any specific DP or remove any specific DP from trading window closure period as mentioned below:

i. Remove DP during Trading Window Closure Period:

In order to remove any DP from trading window closure period, user will have to tick the check box namely “Remove Designated person from existing trading window closure period” available on screen as exhibited below. Upon clicking “Remove Designated person from existing trading window closure period” check box, calendar field will get enabled on screen. In calendar field, user will have to select/define the ‘Revised trading window end date’ i.e., the date from which the DP need to be removed from the trading window closure. User will also require to mention the reason for removal of DP from trading window closure in ‘Reason’ field and click on ‘Submit’ button as exhibited below:

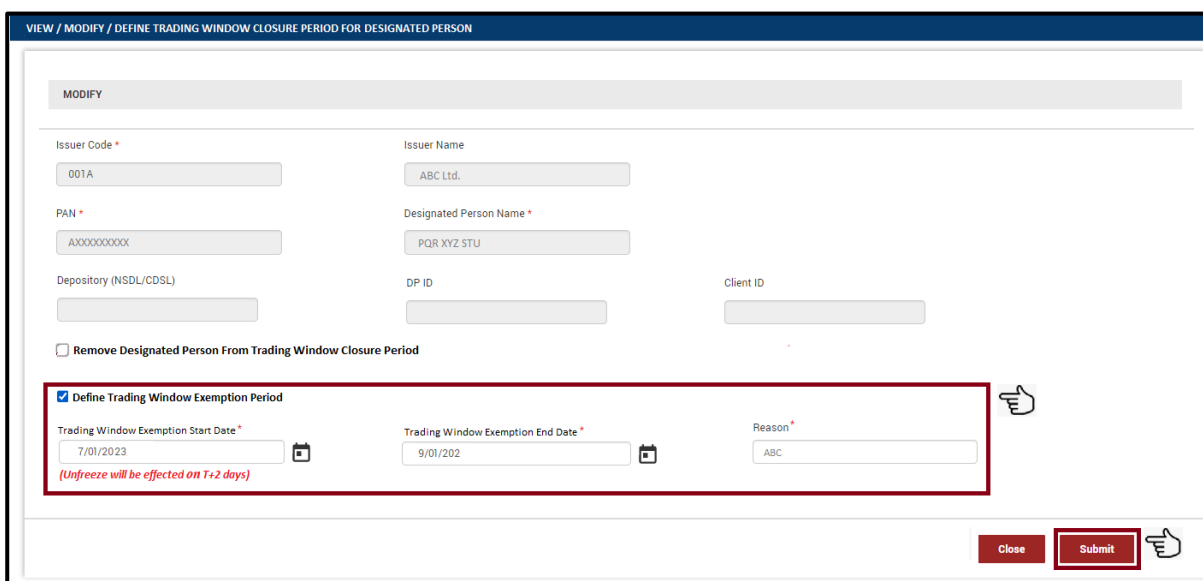


Upon clicking on ‘Submit’ button, request for removal of DP from trading window closure will be submitted to NSDL.

Issuers shall provide the aforesaid request at least 2 trading days in advance (T-2) on NSDL Issuer Portal. E.g., if Issuer intent to remove any DP from trading window closure on April 13, 2024, then Issuer need to give aforesaid request on April 11, 2024. Based on request from Issuer, the change i.e., de-freeze/removal of trading restriction for DP shall be affected on April 13, 2024.

ii. Provide exemption to DP during Trading Window Closure period:

- a. In order to provide exemption to any DP from trading window closure period (for specific period during trading window closure period) through front-end, user will have to tick the second check box ☒ namely “Define trading window exemption period” as exhibited below. Upon clicking “Define trading window exemption period” check box, calendar field will get enabled on screen. In calendar field, user will have to select/define the ‘trading window exemption start date’ and ‘trading window exemption end date’ i.e. the date during which the DP need to be exempted from the trading window closure. User will also require to mention the reason for exemption to DP from trading window closure period under ‘Reason’ field and click on ‘Submit’ button as exhibited below:



The screenshot displays the 'VIEW / MODIFY / DEFINE TRADING WINDOW CLOSURE PERIOD FOR DESIGNATED PERSON' interface. The 'MODIFY' tab is active. The form contains the following fields:

- Issuer Code: 001A
- Issuer Name: ABC Ltd.
- PAN: AXXXXXXXX
- Designated Person Name: PQR XYZ STU
- Depository (NSDL/CDSL):
- DP ID:
- Client ID:

Below these fields, there are two checkboxes:

- ☐ Remove Designated Person From Trading Window Closure Period
- ☒ Define Trading Window Exemption Period

The 'Define Trading Window Exemption Period' section includes:

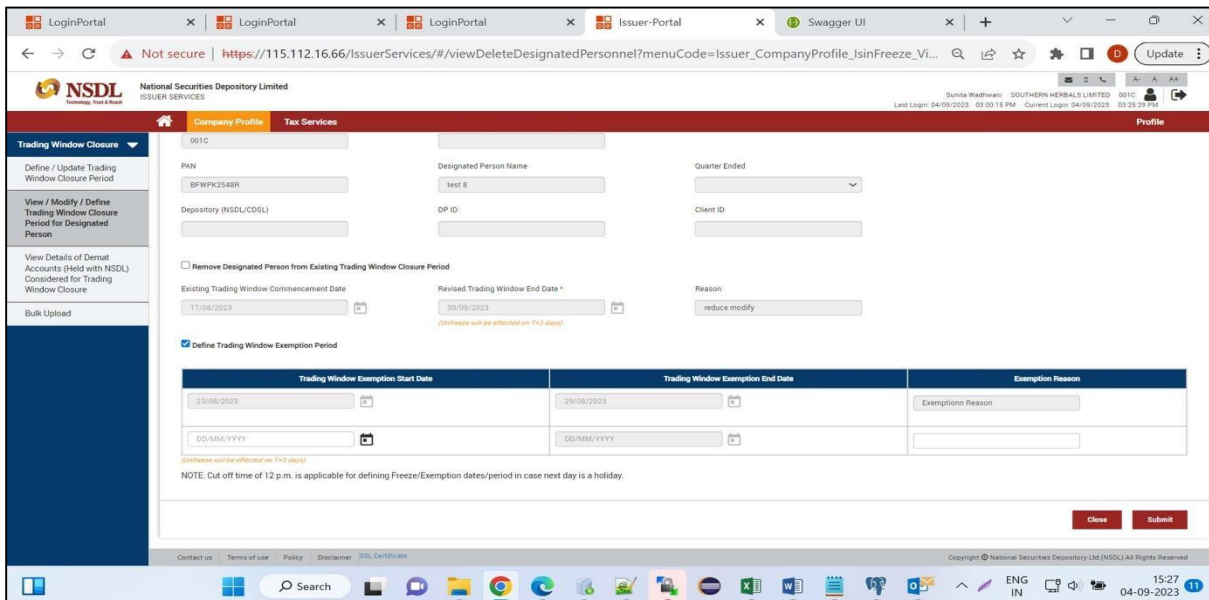
- Trading Window Exemption Start Date: 7/01/2023 (with a calendar icon)
- Trading Window Exemption End Date: 9/01/2023 (with a calendar icon)
- Reason: ABC

A red box highlights the exemption period section. A red text note at the bottom left of this section states: "(Unfreeze will be effected on T+2 days)". At the bottom right, there are 'Close' and 'Submit' buttons, with a hand icon pointing to the 'Submit' button.

Upon clicking on 'Submit' button, request for exemption of DP from trading window closure period will be submitted to Designated Depository.

Issuers shall provide the aforesaid request at least 2 trading days in advance (T-2) on NSDL Issuer Portal e.g. the trading window closure period is April 01 to April 15, 2024 and an exemption to be

provided to a DP from trading window closure period from April 7, 2024 to April 9, 2024, then Issuer shall select/define the 'trading window exemption start date' as April 7, 2024 and 'trading window exemption end date' as April 9, 2024 on T-2 day i.e. April 05, 2024. Based on request from Issuer, the change i.e., de-freeze/exemption of trading restriction for DP shall be affected on April 7, 2024. The restrictions shall be re-introduced automatically on April 10, 2024.



The screenshot shows the NSDL Issuer Services portal. The main form is titled 'Trading Window Exemption'. It includes the following fields and sections:

- Designated Person Name:** test 8
- Quarter Ended:** (dropdown menu)
- Depository (NSDL/CDSL):** (dropdown menu)
- DP ID:** (text field)
- Client ID:** (text field)
- Remove Designated Person from Existing Trading Window Closure Period:** (checkbox)
- Existing Trading Window Commencement Date:** 17/08/2023
- Revised Trading Window End Date:** 20/09/2023
- Reason:** reduce modify
- Define Trading Window Exemption Period:** (checkbox, checked)
- Trading Window Exemption Start Date:** 23/08/2023
- Trading Window Exemption End Date:** 29/08/2023
- Exemption Reason:** (text field)

NOTE: Cut off time of 12 p.m. is applicable for defining Freeze/Exemption dates/period in case next day is a holiday.

b. In order to provide multiple exemption to any DP from trading window closure period (for specific period during trading window closure period), user will get an auto enabled line on the last day of the trading window exemption end date to define further exemption period for the DP, calendar field will get enabled on screen. In calendar field, user will have to select/define the 'trading window exemption start date' and 'trading window exemption end date' i.e. the date during which the DP need to be exempted from the trading window closure. User will also be required to mention the reason for exemption to DP from trading window closure period under 'Reason' field and click on 'Submit' button. Upon clicking on 'Submit' button, request for exemption of DP from trading window closure period will be submitted to Designated Depository.

Issuers shall provide the aforesaid request at least 2 trading days in advance (T-2) on NSDL Issuer Portal e.g the trading window closure period is April 01 to 30, 2024 and an exemption has already been provided to the DP from April 07 to April 10 2024 then in order to provide another exemption to the said DP, issuer will get and auto enabled field on April 10, 2024 to define another exemption for the said DP, which will also be based on the concept of T-2 so the latest date on which he can provide another exemptions for the said DP would be April 12, 2024 in our example.