

Steel Authority of India Limited

INTERNAL CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING IN DEALING WITH SECURITIES OF STEEL AUTHORITY OF INDIA LIMITED

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

CHAPTER- I

1.0 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. This Code shall be called the Internal Code of Conduct for Prevention of Insider Trading in Dealing with Securities of Steel Authority of India Limited ("SAIL" or "Company") and is 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Company shall not derive any benefit or assist others to derive any benefit from the access to and possession of any Unpublished Price Sensitive Information about the Company which is not in the public domain and thus, constitutes insider information.

The existing Code of Internal Procedures and Conduct for Prevention of Insider Trading in dealing with the shares of SAIL shall be repealed with this new Internal Code of Conduct for Prevention of Insider Trading in Dealing with Securities of SAIL "CODE" coming into effect.

CHAPTER- II

2.0 (A) Definition: _

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 Steel Authority of India Ltd. including modifications made thereto from time to time by the Company, and the words and expressions used in the Code but not defined will have the same meaning as in SEBI Insider Trading Regulations 2015.

2.4 "Company" means Steel Authority of India Limited.

2.5 'Compliance Officer' for the purpose of this Code and Code of Corporate Fair Disclosure Practice for Prevention of Insider Trading means the Company Secretary of the Company. In absence of the Company Secretary, the Chairman may authorize any other officer of the Company to discharge the duties of Compliance Officer under the Regulations.

2.6 "Connected person" means:-

(i) any person who is or has during the six months prior to the concerned Act been associated with the Company, directly or indirectly, in any capacity including by

reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the Company or holds any position including a professional or business relationship between himself and the Company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.

(ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories and associated with SAIL shall be deemed to be connected persons unless the contrary is established:-

- (a) an immediate relative of connected persons specified in clause (i); or
- (b) a holding company or associate company or subsidiary company; or
- (c) an intermediary as specified in section 12 of the Act or an employee or director thereof; or
- (d) an investment company, trustee company, asset management company or an employee or director thereof; or
- (e) an official of a stock exchange or of clearing house or corporation; or
- (f) a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
- (g) a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
- (h) an official or an employee of a self-regulatory organization recognised or authorized by the Board (SEBI); or
- (i) a banker of the Company; or
- (j) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of the Company or his immediate relative or banker of the Company, has more than ten per cent of the holding or interest;

2.7 "Designated Employees" shall include:

- (a) Chairman
- (b) All Directors including Chief Executive Officers (CEO) of Plants and Chief Vigilance Officer (CVO)
- (c) Key Managerial Personnel
- (d) All Executive Directors
- (e) All General Managers
- (f) All Heads of Finance of Plants/Units
- (g) All employees working in Accounts, Budget, Financial Service and Direct Taxation Sections of Plants/Units and Corporate Finance;

- (h) All employees working in Board & Company Affairs.
- (i) All employees working in Secretariat of CMD/Functional Directors/CEOs/CVO
- (j) Any other key person, who may be nominated by the Compliance Officer from time to time, with the approval of Reporting Officer.

2.8 "Designated Persons" shall include:

- (i) Connected Persons
- (ii) Designated Employees

2.9 "Generally available information" means information that is accessible to the public on a non-discriminatory basis.

2.10 "Immediate Relative" shall mean 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.

2.11 "Insider" means any person who is:

- i) a Designated Person; or
- ii) in possession of or having access to unpublished price sensitive information.

2.12 "Key Managerial Personnel" (KMP), in relation to the Company, means—

- i) The Chairman & Managing Director;
- ii) The Whole-Time Director;
- iii) The Chief Executive Officer;
- iv) the Company Secretary;
- v) Such other officer as may be prescribed under the Companies Act, 2013.

2.13 'Regulations' means the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and any amendment thereof.

2.14 'Reporting Officer' means person to whom Compliance Officer reports.

2.15 "Securities" includes the following Securities issued by the Company from time to time:

- (a) shares, bonds, debentures or other marketable securities of a like nature;
- (b) any kind of derivatives in the Securities of the Company; and
- (c) such other instruments recognized as securities under the Securities Contracts (Regulation) Act, 1956 and issued by the Company from time-to-time;

2.16 "Trading" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly.

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

2.18 "Unpublished price sensitive information" means any information, relating to the Company or its securities, directly or indirectly, that is not generally available and which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily include but not restricted to, information relating to the following:

(i) financial results; (ii) dividends; (iii) change in capital structure; (iv) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions; (v) changes in Key Managerial Personnel; and (vi) material events in accordance with the Listing Agreement. Compliance Officer may decide any other matter also as Price Sensitive Information (likely to materially affect the price of the securities); All other words and phrases will have the same meaning as defined under the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time.

(B) Interpretation:

- (i) All terms used in this CODE but not defined herein shall have the meanings assigned to them under the Regulations, the Act 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 here to 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

3.0 Restriction on Communication and trading by insiders

3.1 Communication or procurement of unpublished price sensitive information

(i) 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.

(ii) 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.

3.2 Trading when in possession of unpublished price sensitive information

(i) Subject to the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015, no insider shall either on his own behalf or on behalf of any other person, 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.

(ii) The onus of establishing that they were not in possession of unpublished price sensitive information shall be on the insider.

3.3 Trading Plans

3.3.1 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.

3.3.2 Such Trading Plan shall:

- (i) not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
- (ii) not entail trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced by the issuer of the securities and the second trading day after the disclosure of such financial results;
- (iii) entail trading for a period of not less than twelve months;
- (iv) not entail overlap of any period for which another Trading Plan is already in existence;
- (v) set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
- (vi) not entail trading in securities for market abuse.
- (vii) Application for Trading Plan shall be given in **Form I**.

3.3.3 The Compliance Officer shall review the Trading Plan to assess whether the plan would have any potential for violation of these Regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.

3.3.4 The Trading Plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the Trading Plan.

Provided that the implementation of the Trading Plan shall not be commenced if any unpublished price sensitive information in possession of the insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation and in such event the Compliance Officer shall confirm that the commencement ought to be deferred until such unpublished price sensitive information becomes generally available information so as to avoid a violation of clause 3.2 (i) above.

3.3.5 Upon approval of the Trading Plan, the Compliance Officer shall notify the plan to the stock exchanges on which the securities are listed.

3.3.6 Letter of intimation of approval of Trading Plan is at **Form II**.

3.3.7 Such Insider is required to intimate the Compliance Officer regarding execution of Trading Plan within two trading days of each transaction intimated under the Trading Plan as per proforma provided in **Form III**.

3.3.8 The Compliance Officer shall maintain a register of Trading Plan of securities by the Insiders and notification to Stock as given in **REG-I**.

3.4 Trading Window

3.4.1 No Designated Person and their immediate relative shall trade securities of the Company when the "Trading Window" is closed. The Trading Window shall be closed :

- (a) Seven Trading days prior to Board meeting for declaration of quarterly, half-yearly financial or annual financial results;
- (b) Seven Trading days prior to Board meeting for declaration of dividend (interim/Final);
- (c) Seven Trading days prior to Board meeting for change in capital structure like issue of securities by way of public/right/bonus, buy-back etc;
- (d) Seven Trading days prior to the Board Meeting held to approve any mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
- (e) For such period and for any such other material event (in accordance with the listing agreement) as may be deemed fit by the Compliance Officer;

However, if the circumstances so warrant, the time for closing the window may be increased or decreased with the approval of Chairman.

3.4.2 The trading window shall be opened 48 hours after information referred to in clause 3.4.1 becomes generally available.

3.4.3 The remaining days of a year other than the days mentioned under para 3.4.1 above shall be called "**Valid Trading Window**".

3.4.4 All Designated Persons shall conduct all their trading in the securities of the Company only in a valid trading window and shall not trade in Company's securities during the periods when trading window is closed, as referred to in clause 3.4.1 or during any other period as may be specified by the Company from time to time.

3.4.5 All Designated Persons shall conduct their dealings in the securities of the Company only in the "Valid Trading Window" period as mentioned above at clause 3.4.2 and shall not enter into "**Contra Trade**" i.e. opposite or reverse transactions, 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.

3.4.6 The Compliance Officer shall maintain a register of the periods of "Closed Trading Window", wherein he shall record the date of closure and opening of the trading window and the purpose for which trading window is closed. A Proforma of the register of periods of closure of Trading Window is given in **REG-II**.

3.5 PRE-CLEARANCE OF TRADES

3.5.1 A Designated Person, who intends to trade in the securities of the Company above the minimum threshold limit of 20,000 equity shares to be traded in a single transaction or 25,000 equity shares to be traded in series of transactions within one week, shall obtain pre-clearance of the transaction as per the procedure as described hereunder.

3.5.2 Application for pre-clearance shall be made only during valid trading period in **Form IV**. Application submitted during closure of trading window shall be invalid.

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

3.5.4 A Designated Person shall make a pre-clearance application to the Compliance Officer in the prescribed format along with an undertaking stating that the insider has not contravened the provision of this CODE.

3.5.5 Letter of intimation of preclearance is at **Form II**.

3.5.6 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 endeavor to communicate the pre-clearance immediately but not later than 48 hours 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.

3.5.7 The Compliance Officer shall maintain a register of pre-clearance of securities by the Designated Person as given in **REG-III**.

3.5.8 The Designated Person 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 Person shall obtain fresh pre-clearance. Such Designated Person is required to intimate the Compliance Officer regarding execution/ non-execution of pre-cleared transaction within two trading days as per proforma provided in **Form III**.

CHAPTER- IV

4.0 Disclosure of Trading by Insiders

4.1 Initial Disclosures:

Every Promoter, Key Managerial Personnel and Director of the Company and any other person for whom such person takes trading decisions shall disclose his holding of securities of the Company within 30 days in **Form A** as on the date of these Regulations taking effect.

Every person on appointment as a Key Managerial Personnel or a Director of the Company or Designated Employee or upon becoming a Promoter shall disclose his holding of securities of the Company and any other person for whom such person takes trading decisions as on the date of appointment or becoming a promoter, to the Company within seven days of such appointment or becoming a Promoter in **Form B**.

4.2 Continual Disclosures:

Every Promoter, Designated Employee and Director of the Company shall disclose to the Company the number of such securities acquired or disposed of within two 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 ten lakh rupees or such other value as may be specified by the Compliance Officer from time to time in **Form C**.

Compliance Officer will notify the particulars of such trading to the stock exchange on which the securities are listed within two trading days of receipt of the disclosure or from becoming aware of such information.

4.3 Annual Disclosures:

Every Promoter, Designated Employee and Director of the Company is required to give annual disclosure within 30 days from the end of Financial Year in the prescribed **Form E**.

Explanation: It is clarified for the avoidance of doubts that the disclosure of the incremental transactions after any disclosure under this clause, shall be made when the transactions effected after the prior disclosure cross the threshold specified above.

4.4 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 Reporting Officer, from time to time.

CHAPTER- V

5.0 Miscellaneous:

5.1 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) Putting up a report to the Audit Committee and the Board of Directors at the end of the Financial Year regarding the compliance of the CODE. The details to be maintained in register for disclosure of shareholding by all the KMPs/ Directors/ Designated Employees and any other person for whom such person takes trading decisions.

(iii) Maintenance of records of disclosures made under this CODE for a period of 5 years.

5.2 PENALTY FOR CONTRAVENTION OF CODE OF CONDUCT

Any Director, Key Managerial Personnel or Designated Employee, 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.

5.3 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) Regulations, 2015. In case, the SEBI Regulations or any Statutory Provisions are more stringent than those contained in the CODE, the SEBI Regulations / Statutory Provisions will prevail.

5.4 CLARIFICATIONS:

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

Disclaimer

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

without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the Trading Plan.

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 as notified by the Company from time to time.

d) that I shall adhere to Clause 3.4.5 of the CODE.

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.

Pre-clearance may kindly be accorded in terms of provisions of the CODE.

Date.....

Signature:.....

Place.....

Name & Designation:.....

FOR OFFICE USE

Serial number of the application received:

Date & time of receipt of the Application:

Date & time of communication of the pre-clearance or otherwise:

Reasons for not giving pre-clearance:

Signature of the Compliance Officer/ Authorised Officer

Steel Authority Of India Limited
New Delhi

FORM-II

Letter of intimation of pre-clearance/Trading Plan

Name.....
Address.....
Employee No.....
Designation.....

Dear Sir,

With reference to your above application seeking approval for undertaking transactions in Securities detailed therein, please be informed that you are hereby authorised/not authorised to undertake the transaction(s) as detailed in your said application for approval of Trading Plan/ Pre-clearance.

It may be noted that in terms of the Internal Code of Conduct for Prevention of Insider Trading in Dealing in Securities of SAIL (the Code), the above mentioned transaction is to be completed within i.e. within seven trading days of the pre-clearance, in case of pre-clearance.

In case of approval of Trading Plan, such plan shall be irrevocable and you have to mandatorily implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the Trading Plan.

This approval is being issued to you based on the various declarations, representations and warranties made by you in your said application.

Further, you are required to file the details of the executed transactions in the attached format within two {2} trading days from the date of transaction/deal.

Kindly also note that in terms of the Code the Securities shall be held for a minimum holding period as specified under Clause 3.4.5 of the CODE.

In case of pre-clearance, the above sanction automatically stands withdrawn if subsequently the trading window is declared closed involving the period of sanction therein.

For & on behalf of SAIL
Compliance Officer/Authorised Officer

Steel Authority Of India Limited
New Delhi

FORM III

FORMAT FOR DISCLOSURE OF PRE-APPROVED/ TRADING PLAN TRANSACTIONS

(To be submitted within two trading days of transaction/Dealing in Securities of the Company)

Date: _____

To,

The Compliance Officer
Steel Authority of India Limited
Ispat Bhavan,
Lodi Road,
New Delhi-110 003

Dear Sir,

DETAILS OF PRE-APPROVED/ TRADING PLAN TRANSACTION

Ref: Your Approval letter No. _____ dated _____

I hereby inform you that I

have not traded any Securities, (in case of pre-clearance only)

have traded to the _____ Securities (give description) as mentioned below on _____ (insert date)

Name of holder	First or joint holder	No. of Securities dealt with	Bought / Sold/ Subscribed	DP ID/CLIENT ID or Folio no.	Price (Rs)

** "F" first holder "J" joint holder

In connection with the aforesaid transaction(s), I hereby undertake to preserve, for a period of 3 (Three) years and produce to the Compliance Officer/SEBI any of the following documents:

1. Broker's contract note
2. Proof of payment to/from brokers
3. Extract of bank passbook/statement (to be submitted in case of demat transactions).
4. Copy of Delivery instruction slip (applicable in case of sale transaction)

I declare that the above information is correct and that no provisions of the Company's Internals Code of Conduct for prevention of Insider Trading in Dealing with Securities of SAIL and/or applicable laws/Regulations have been contravened for effecting the above said transaction(s).

I agree to hold the above Securities for minimum holding period as specified under Clause 3.4.5 of the Code.

Yours truly,

Signature:

Name:

Per No:

Department:

Plant/Unit:

Strike out whichever is not applicable.

**Steel Authority Of India Limited
New Delhi**

FORM-IV

**APPLICATION FOR PRE-CLEARANCE TO TRADE IN SECURITIES OF
STEEL AUTHORITY OF INDIA LIMITED**

To

**The Compliance Officer
Steel Authority of India Limited
Ispat Bhavan,
Lodi Road,
New Delhi-110 003**

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 of SAIL (the Code), I seek approval for Pre-Clearance of Trade in Securities of SAIL (give description) as per the details given below:

Plant/Unit :

Name :

Designation & Per. No.:

PAN No:

Place Of Posting:

Department:

Email ID:

S.NO.	No. of Securities held (including that of the immediate relative as on the date of application)	Folio No. / DP ID & Client ID	Nature of new transaction for which approval is sought	Estimated number of Securities to be dealt

Estimated consideration value	Whether proposed transaction under self name or by immediate relative	Name of the immediate relative, if the transaction is made by Immediate Relatives	Proposed Date Of Trades/ Date of allotment	Previous approval no. and date of purchase/ allotment

UNDERTAKING

In this connection I solemnly confirm and declare:

a) that I do not have access and/or have not received any "Unpublished Price Sensitive Information" 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 deviate from it or to execute any trade in the securities outside the scope of the Trading Plan.
- 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 as notified by the Company from time to time.
- d) that I shall adhere to Clause 3.4.5 of the CODE.
- 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.

Pre-clearance may kindly be accorded in terms of provisions of the Code.

Date.....

Signature:.....

Place.....

Name & Designation:.....

FOR OFFICE USE

Serial number of the application received:

Date & time of receipt of the Application:

Date & time of communication of the pre-clearance or otherwise:

Reasons for not giving pre-clearance:

Signature of the Compliance Officer/ Authorised Officer

Steel Authority Of India Limited
New Delhi

FORM E

PROFORMA FOR ANNUAL DISCLOSURE OF SECURITIES HOLDING TO BE
SUBMITTED BY THE PROMOTER, DIRECTOR, DESIGNATED EMPLOYEES OR
ANY OTHER PERSON

To

The Compliance Officer
Steel Authority of India Limited
Ispat Bhavan,
Lodi Road,
New Delhi-110 003

Dear Sir,

I, the Promoter, Director, Designated Employees or any other person furnish below the details of transaction(s) in the Securities, during the financial year as well as shareholding as on 31st March.....

Name, Designation & Per. No.:

Plant/Unit, Department:

Date of Joining/ becoming the Promoter, Director, Designated Employees or any other person:

I. Details of transaction/shareholding in own name

No. of Securities held as on 01.04.20	Details of Securities purchased during the year No & Value	Details of Securities sold during the year No & Value	No. of Securities Held as on 31.03.20	Folio No./ DPID & Client ID
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II. Details of transaction/shareholdings of immediate relative

Name of the Immediate Relative	Relationship	No. of Securities held as on 01.04.20	Details of Securities purchased during the year No & Value	Details of Securities sold during the year No & Value	No. of Securities Held as on 31.03.20	Folio No./ DPID & Client ID
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1. I declare that I have complied with the requirement of minimum holding period as specified under Clause 3.4.5 of the CODE.

Signature

Date:

Place:

**Steel Authority Of India Limited
New Delhi**

REG-I

**REGISTER OF APPROVAL OF TRADING PLAN IN SECURITIES AND
NOTIFICATION TO STOCK EXCHANGES**

S. No	NAME	DESIGNATION	PLANT/UNIT & DEPARTMENT	DATE & TIME OF RECEIPT OF TRADING PLAN APPLICATION	NATURE OF TRANSACTION	ESTIMATED NUMBER OF SECURITIES INDICATED IN THE APPLICATION

ESTIMATED CONSIDERATION VALUE INDICATED IN THE APPLICATION	NAME OF THE IMMEDIATE RELATIVE IF THE TRANSACTION IS IN THE NAME OF THE IMMEDIATE RELATIVE	DATE OF COMMUNICATION OF THE APPROVAL BY THE COMPLIANCE OFFICER	REASONS FOR NON APPROVAL, IF NOT CLEARED	NUMBER OF SECURITIES ACTUALLY TRADED	DATE OF NOTIFICATION TO STOCK EXCHANGES	REMARKS

Steel Authority Of India Limited
New Delhi

REG-II

REGISTER OF PERIODS OF CLOSER OF TRADING WINDOW

S. No.	DATE OF NOTIFYING CLOSER OF TRADING WINDOW, IF ANY	START DATE OF CLOSER OF TRADING WINDOW	DATE OF OPENING OF TRADING WINDOW	PURPOSE FOR WHICH TRADING WINDOW CLOSED	REMARKS
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Steel Authority Of India Limited
New Delhi

REG-III

REGISTER OF PRE-CLEARANCE FOR TRADE IN SECURITIES

S. No	NAME	DESIGNATION	DEPARTMENT	DATE & TIME OF RECEIPT OF PRECLEARANCE APPLICATION	NATURE OF TRANSACTION (PURCHASE OR SALE)	ESTIMATED NUMBER OF SECURITIES INDICATED IN THE APPLICATION
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ESTIMATED CONSIDERATION VALUE INDICATED IN THE APPLICATION	NAME OF THE IMMEDIATE RELATIVE IF THE TRANSACTION IS IN THE NAME OF THE IMMEDIATE RELATIVE	DATE OF COMMUNICATION OF THE CLEARANCE BY THE COMPLIANCE OFFICER	REASONS FOR NON CLEARANCE, IF NOT CLEARED	DATE OF PLACEMENT BEFORE COMMITTEE	NUMBER OF SECURITIES ACTUALLY TRADED	REMARKS
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Steel Authority Of India Limited
New Delhi

REG-IV

**REGISTER OF DISCLOSURE OF SHAREHOLDING BY PROMOTER, DIRECTOR,
DESIGNATED EMPLOYEE**

Name, Designation & Per. No.:

Plant/Unit Department:

PAN No:

Date of Joining Date of Joining/ becoming the Promoter, Director, Designated Employee:

INITIAL DISCLOSURE

SI No	DATE OF RECEIPT OF INFORMATION	NUMBER OF SECURITIES	DATE OF ACQUISITION	CONSIDERATION VALUE	NAME OF THE IMMEDIATE RELATIVE IF SECURITIES HELD IN THE NAME OF IMMEDIATE RELATIVE

CHANGE IN HOLDING

DATE OF RECEIPT OF INFORMATION	NUMBER OF SECURITIES	DATE OF TRANSACTION	NATURE OF TRANSACTION (PURCHASE OR SALE)	CONSIDERATION VALUE	NAME OF THE IMMEDIATE RELATIVE IF SECURITIES HELD IN THE NAME OF IMMEDIATE RELATIVE

YEAR END DISCLOSURE

DATE OF RECEIPT OF INFORMATION	NUMBER OF SECURITIES	AGGREGATE VALUE	NAME OF THE IMMEDIATE RELATIVE IF SECURITIES HELD IN THE NAME OF IMMEDIATE RELATIVE	REMARKS

Steel Authority Of India Limited
New Delhi

REG-V

REGISTER OF ALL THE PROMOTERS, DIRECTORS, DESIGNATED
EMPLOYEES

S. No	NAME	DESIGNATION	DEPARTMENT	PER NO	PAN

DATE OF BECOMING DESIGNATED EMPLOYEE/PROMOTER/ DIRECTOR	DATE OF CESSATION AS DESIGNATED EMPLOYEE/PROMOTER/ DIRECTOR	DP ID OR FOLIO NO.	REMARKS