

CODE OF CONDUCT FOR PROHIBITION OF TRADING BY INSIDERS

PREFACE

Securities and Exchange Board of India (SEBI) vide Gazette notification no. LAD-NRO/GN/2014-15/21/85 dated 15th January 2015 has issued **Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015**. As per the said guidelines, the board of directors of every company, whose securities are listed on a stock exchange, shall formulate a code of conduct to regulate, monitor and report trading by its employees and other connected persons.

The Board of Directors (the “**Board**”) of Union Bank of India (the “**Bank**”) has adopted this **Code of Conduct for Prohibition of Trading by Insiders** (the “**Code**”) to regulate, monitor and report trading by insiders. The Audit Committee of the Board (the “**ACB**”) is empowered to review and amend this Code from time to time.

OBJECTIVE

This Code is framed as per the requirements of the SEBI (Prohibition of Insider Trading) Regulations, 2015. It will repeal the Union Bank of India Directors and Employees Code of Conduct for Prohibition of Insider Trading from the date of its coming into force.

APPLICABILITY

The Code shall come into force with effect from the date from which Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 will come into force i.e. 15th May, 2015. The Code shall be applicable to Designated Persons as described in the Code or as may be specified by the Board of Directors in consultation with the Compliance Officer.

DEFINITION

In the Code, unless the context otherwise requires, the following words, expressions and derivations there from shall have the meanings assigned to them as under:-

“**Act**” means the Securities and Exchange Board of India Act, 1992;

“**Bank**” means Union Bank of India;

“**Compliance Officer**” means any senior officer, designated so and reporting to the Board of Directors or Chairman & Managing Director, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in the SEBI (Prohibition of Insider Trading) Regulations, 2015

under the overall supervision of the Board of Directors of the Bank or Chairman & Managing Director of the Bank, as the case may be;

"Connected person" means, -

- (i) any person who is or has during the six months prior to the concerned act been associated with the Bank, 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 Bank or holds any position including a professional or business relationship between himself and the Bank 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 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; 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 a company or his immediate relative or banker of the company, has more than ten percent of the holding or interest;

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

"Immediate relative" means any of the following who is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities-

- Spouse
- Father

- Mother
- Brother
- Sister
- Son (including step-son)
- Daughter (including step-daughter)

"Insider" means any person who is:

- i) a connected person; or
- ii) in possession of or having access to unpublished price sensitive information;

"Promoter" shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2009 or any modification thereof;

"Regulation" means the "Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015".

"Securities" shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 or any modification thereof except units of a mutual fund;

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

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

"Unpublished price sensitive information (UPSI)" means any information, relating to Bank or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following -

- (i) Financial results;
- (ii) Dividends;
- (iii) Change in capital structure;
- (iv) Mergers, de-mergers, acquisition, 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."

Words and expressions used and not defined in these regulations but defined in the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made there under shall have the meanings respectively assigned to them in those legislation.

CODE

1. Compliance Officer

Chief Compliance Officer of the Bank shall be designated as the **Compliance Officer** under this Code who shall report to the Board of Directors of the Bank.

Duties of Compliance Officer

- a. The Compliance Officer shall maintain a record of the designated employees and changes, if any, from time to time.
- b. The Compliance Officer shall be responsible for setting forth policies, procedures, monitoring and adherence to the rules for the preservation of “Unpublished Price Sensitive Information”, pre-clearance of trades of designated employees and their dependents (directly or through respective department heads as decided by the Bank), monitoring of trades and the implementation of the Code of Conduct under the overall supervision of the Board of Directors of the Bank.
- c. The Compliance Officer may in consultation with the Officer designated as Chief Investor Relations Officer (CIRO) under the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information and Chairman & Managing Director/Executive Directors, specify prohibited period from time to time and immediately make an announcement thereof to all concerned.
- d. The Compliance Officer shall maintain a record of Prohibited Period specified from time to time.
- e. The Compliance Officer shall maintain records of all the declarations submitted in the appropriate form given by the Directors and Designated Employees for a minimum period of three years.
- f. The Compliance Officer shall assist all the Designated Employees in addressing any clarification regarding the Regulations and the Bank’s Code.
- g. The Compliance Officer shall report on quarterly basis on compliance of the Code to the Audit Committee.
- h. The Compliance Officer shall confidentially maintain a list of such securities as a “restricted list” which shall be used as the basis for approving or rejecting applications for pre clearance of trades.

2. Designated Persons

The following class of persons/entities will be treated as “**Designated Persons**” for the purpose of the Code:

- (i) All the Directors on the Board of Directors of the Bank;
- (ii) All the employees of the Bank in the management cadre’ viz. Scale V, VI and VII.
- (iii) All the employees of Central Accounts Department, Board Secretariat, CMD’s Secretariat, ED’s Secretariat and Secretaries of all GMs of the Bank; and
- (iv) All the connected persons and persons deemed to be connected as defined in the Code.

*The employees referred above in column (ii) and (iii) are hereinafter referred to as “**Designated Employees**” for the purpose of the Code.

3. Trading Restrictions

Trading Window is the period during which the purchase or sale of transactions is allowed by the Directors and Designated Employees of the Bank subject to their satisfying the conditions laid down by the Code.

The period prior to declaration of price sensitive information is particularly sensitive for transactions in the Bank’s securities. This sensitivity is due to the fact that the Directors and Designated Employees will, during that period, often possess unpublished price sensitive information. During such sensitive times, the Directors and Designated Employees will have to forego the opportunity of trading in the Bank’s securities. The Directors and Designated Employees of the Bank shall not deal in the securities of the Bank when the trading window is closed.

The Compliance Officer shall decide the period during which Trading Window shall be closed taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, which in any event shall not be earlier than 48 hours after the information becomes generally available.

The trading window shall also be applicable to any person having contractual or fiduciary relation with the Bank, such as auditors, accountancy firms, law firms, analysts, consultants etc. assisting or advising the Bank.

In case any director or employee has to be allotted securities in terms of ESOP/ESPS of the Bank, there shall be no restriction on allotment of securities even during the Trading Window closure period. However, the employee shall not be permitted to dispose off the securities during the Trading Window closure period.

The Compliance Officer may announce closure of Trading Window for securities of the Bank when any of the following events occurs -

- a) Declaration of Financial results (quarterly, half-yearly and annual)
- b) Declaration of dividends (interim and final)
- c) Issue of securities by way of public/rights/bonus, etc.
- d) Any major expansion plans or execution of new projects
- e) Amalgamation, mergers, takeovers and buy-back
- f) Disposal of whole or substantially whole of the undertaking
- g) Any changes in policies, plans or operations of the Bank

Trading when in possession of unpublished price sensitive information.

No insider shall trade in securities that are listed or proposed to be listed on a stock exchange when in possession of unpublished price sensitive information without taking prior approval of trading plan.

Trading Plans

- (i) 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.
- (ii) Such trading plan shall:-
 - a. not entail commencement of trading on behalf of the insider earlier than six months from the public disclosure of the plan;
 - b. 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;
 - c. entail trading for a period of not less than twelve months;
 - d. not entail overlap of any period for which another trading plan is already in existence;
 - e. 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
 - f. not entail trading in securities for market abuse.
- (iii) 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.

- (iv) 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.

- (v) Upon approval of the trading plan, the compliance officer shall notify the plan to the stock exchanges on which the securities are listed.

4. Pre-Clearance of Trades

- 4.1. Designated Person can deal in the securities of the Bank only when the trading window is open and Designated Person is not in the possession of any unpublished price sensitive information.
- 4.2. If the traded value of securities is less than or equal to **Rs. 10,00,000 (Rupees Ten Lakhs)** no pre clearance is required but if the value of securities is more than **Rs. 10,00,000 (Rupees Ten Lakhs)** than pre-clearance by the Compliance Officer is required.
- 4.3. Designated Person has to apply for pre-clearance of trades to Compliance Officer in the **Form 1** and has to provide an undertaking to the effect that the applicant for pre-clearance is not in possession of any unpublished price sensitive information in **Form 2**.
- 4.4. The Compliance Officer may grant the pre-clearance in **Form 3** after -
- seeking such information as may be necessary from the applicant;
 - confirming the accuracy of declaration submitted by applicant that he is not in the possession of unpublished price sensitive information;
 - confirming that the applicant has not done any prior contra trade within the period of six months;
 - confirming that the securities for which pre-clearance has been sought is not covered under the restricted list;
- 4.5. The pre-clearance shall be valid for a period of seven days and within which trades that have been pre-cleared have to be executed by the

designated person, failing which fresh pre-clearance would be needed for the trades to be executed.

- 4.6. Designated Person shall inform the Compliance Officer in **Form 4** of execution of trade for which pre-clearance was sought within 2 days from the execution of trade.
- 4.7. In case the Designated Person decides not to execute the trade after securing pre-clearance, he/she shall inform the Compliance Officer of such decision alongwith reasons thereof immediately in **Form 4**.
- 4.8. A Designated Person who is permitted to trade (buy or sell) shall not execute a contra trade (sell or buy) any number of securities for the next six months following the prior transaction unless permission in this regard has been sought from Compliance Officer in **Form 5**.
- 4.9. The Compliance Officer may grant relaxation to a contra trade for reasons recorded in writing provided that such relaxation does not violate the Code or Regulations, on receipt of application from Designated Person in **Form 6**.
- 4.10. In case a contra trade is executed within 6 months inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the SEBI for credit to the Investor Protection and Education Fund administered by the SEBI under the Act.

5. Disclosures of Trading by Insiders

5.1 Initial Disclosures

- a) Every Director and Designated Employee of the Bank shall disclose his as well as his immediate relatives' holding of securities of the Bank as on the date of the regulations taking effect, to the Bank within thirty days of these regulations taking effect in **Form 7**;
- b) Every person on appointment as a Director or Designated Employee of the Bank shall disclose his as well as his immediate relatives' holding of securities of the Bank as on the date of appointment, to the Bank within seven days of such appointment in **Form 8**.

5.2 Continual Disclosures

- a) **To Bank** - Every Director and Designated Employee of the Bank shall disclose to the Bank 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 **Rs.10,00,000 (Rupees Ten Lakhs) in Form 9;**

- b) **To Stock Exchanges** - Compliance Officer shall 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.

Note: The disclosure of the incremental transactions after any aforesaid disclosure shall be made when the transactions effected after the prior disclosure cross the threshold limit of Rs.10,00,000 (Rupees Ten Lakhs).

5.3 Disclosures by other connected persons

Board of Directors of the Bank may, at its discretion require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the Bank in **Form 10** and at such frequency as may be determined by the Bank in order to monitor compliance with these regulations.

6. Disclosure of holding of Bank's Securities by Directors/Designated Employees

All the Directors/Designated Employees are required to submit Disclosure of holding of Bank's Securities in their name and in name of their immediate relatives in **Form 11** for every quarter within 30 days from the end of quarter.

7. Online submission of Forms

Department of Information Technology (DIT) in consultation with Department of Personnel and Compliance Officer shall evolve mechanism to enable Designated Employees to submit the forms required under this Code online in Union Parivar or any other software package as DIT may deem fit.

All designated employees shall submit the forms available online through online mode only and no physical forms will be accepted in such cases.

8. Penalty and punishment for contravention of code of conduct:

Any Designated Person and any other person considered as an Insider who deals in securities or communicates any price sensitive information, in violation / contravention of the Code may be penalized by the Bank. The Bank may take appropriate disciplinary action including wage freeze, suspension, ineligibility for future participation in employee stock option plans etc.

Such a person shall also be subject to any action that may be taken by SEBI for violation of the Code.

9. Information to SEBI in case of non compliance

The Bank/Compliance Officer shall inform SEBI of all violations of Regulations observed by them.

10. Disclosure on Website of the Bank

This code and any amendments thereto shall be made available on the website of the Bank.

List of Forms

Particulars	Form No.
Application for Pre-Clearance of trades	1
Declarations to be submitted along with application for pre-clearance	2
Pre-Clearance Order	3
Confirmation of Execution of Trade/Information Regarding Decision not to execute the Deal	4
Application for seeking permission for contra trade within 6 months	5
Initial Disclosure of Holding of Securities of Bank	6
Approval for Executing Contra Trade Within 6 Months	7
Disclosure of Holding of Securities of Bank on Appointment	8
Continual Disclosure of Holding of Securities of Bank by Designated Persons	9
Continual Disclosure of holding of securities of bank by Connected Persons	10
Statement of Disclosure of shares held in the Bank	11

FORM - 1
APPLICATION FOR PRE-CLEARANCE OF TRADE IN BANK'S SECURITIES
(If the traded value of securities is more than Rs. 10 lakhs)

Date:

To,

The Compliance Officer,
Union Bank of India

Dear Sir/Madam,

Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Code of Conduct for Prohibition of Trading by Insiders of the Bank, I seek your approval to subscribe to/ purchase / sale / deal as an agent / principal in securities of the Bank in my name or on behalf of my immediate relatives as per the details given below:

Name of Director / Designated Employee	
PF No. (in case of Designated Employees)	
Department	
Name of Relative & Relationship (if transaction on behalf of immediate relatives)	Name: _____ Relation: _____

Nature of Transaction (<i>Buy / Sell / Subscribe</i>)	
Type of Security	
No. of Securities	
Market Price	
Name of the Proposed Buyer/Seller (<i>for off-market trade</i>)	
Date by which trade is proposed to be executed	
Folio No./DP ID & Client ID No. along with the name of Depository	
Present Holding (No. of Securities)	

I enclose herewith the Declaration in Form-2 duly signed by me.

I request you to kindly pre-clear the above transaction.

Yours faithfully,

(Signature)

For Office Use only

Form received on:

Verified on:

Verified by:

Signature of Verifying Officer

Approved / Declined

Chief Compliance Officer

Form - 2

UNDERTAKING TO BE SUBMITTED ALONG WITH APPLICATION FOR PRE-CLEARANCE

Date:

To,

The Compliance Officer,
Union Bank of India

Dear Sir/Madam,

I, _____ a Director / Designated Employee of the Bank in relation to my application dated _____ for pre-clearance of the trade hereby declare & undertake that:

- a. I have no access to nor I am in possession of any unpublished price sensitive information at the time of signing this undertaking.
- b. In the event that I have In case, I get access to or receive any “Price Sensitive Information” after signing this undertaking but before the execution of the transaction for which approval is sought, I shall inform the Compliance Officer of the same in writing and shall completely refrain from trading in securities of the Bank until such information is made public.
- c. I have not contravened the Bank’s Code of Conduct for Prohibition of Trading by Insiders and Code for Fair Disclosure of Unpublished Price Sensitive Information.
- d. In case the traded value exceeds Rs. 10 lakh or any such other value as may be specified, disclosures required under the Code of Conduct for Prohibition of Trading by Insiders will be immediately furnished by me.
- e. I hereby agree to indemnify and keep the Bank and its Board indemnified from and against all and any penalties/fines that may be imposed on them by the SEBI and/or any other Statutory Authorities as a result of violation by me of the Regulation of the Codes prescribed by the Bank.
- f. I hereby declare that I shall execute my order in respect of the securities for which pre-clearance is sought within one week after the approval is given. If the order is not executed within one week after the approval, I undertake to obtain fresh pre-clearance.
- g. I have not done any prior contra trade within the period of six months and shall not execute a contra trade for a period of 6 months from the date of current transaction.
- h. I have made full and true disclosure in the above matter.

(Signature)

Name of Designated Employee: _____
PF No: _____

Department: _____

Form - 3
PRE-CLEARANCE ORDER

Ref No.:

Date:

To,

Dear Madam/Sir,

Ref: Your application dated _____ for pre-clearance of transaction for
shares/securities of the Bank in your name / in the name of
_____.

With reference to your application seeking pre-clearance of your transaction in shares of the Bank, we hereby accord our approval to the proposed transaction.

You may kindly note that pursuant to said Code of Conduct, the aforesaid transaction shall be executed within one week from the date of receipt of this approval letter, failing which, an application seeking pre-clearance to the proposed transaction together with undertaking in the prescribed format, shall be made afresh.

As stipulated in the Code of Conduct, you shall not execute a contra trade for a period of 6 months from the date of current transaction i.e. the securities purchased shall be held for a minimum period of six months from the date of acquisition and securities sold shall not be repurchased within a minimum period of six months from the date of sale.

Thanking you,

Yours faithfully,

For Union Bank of India

Compliance Officer

Form - 4
CONFIRMATION OF EXECUTION OF TRADE
INFORMATION REGARDING DECISION NOT TO EXECUTE THE TRADE

From:

Name of Director/Designated Employee	
PF No.	
PAN No.	
Department	
Location	

To,

The Compliance Officer,
Union Bank of India

Dear Sir/Madam,

I hereby confirm that the execution of trade for which approval was granted on _____ was completed on _____. Details of the transactions are given in Form-8 attached with this letter.

OR

I like to inform you that due to the reasons mentioned here below, I will not be executing the trade for which pre-clearance was granted vide order no. _____ dated _____ -

(Strike out whichever is not applicable)

Place:

Date:

(Signature)

Encl.: Duly filled in and signed Form - 8

For Office Use only

Form received on:

Verified on:

Compliance Officer:

FORM - 5

APPLICATION FOR SEEKING PERMISSION FOR CONTRA TRADE WITHIN 6 MONTHS

From:

Name of Director/Designated Employee	
PF No.	
PAN No.	
Department	

To,

The Compliance Officer,
Union Bank of India

Dear Sir/Madam,

Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Code of Conduct for Prohibition of Trading by Insiders of the Bank, approval to trade in _____ (Nature of Bank's Securities) was given to me/my immediate relative _____ (Name of Relative) vide your order no. _____ dated _____.

I desire to deal in the said shares on account of _____
(give reasons) and request you to allow me to execute a contra trade of _____
(Nature & Number of securities).

Thanking you,

(Name of the Applicant)

For Office Use only

Form received on:

Verified on:

Compliance Officer:

Form - 6

APPROVAL FOR EXECUTING CONTRA TRADE WITHIN 6 MONTHS

Ref No.:

Date:

To,

Dear Madam/Sir,

Ref: Your application dated _____ for seeking permission for contra trade

With reference to your application seeking approval for execution of contra trade within 6 months of transaction for which pre-clearance was given, we hereby accord our approval to the contra trade considering the reason mentioned by you as a special case.

You may kindly note that the aforesaid transaction shall be executed within one week from the date of receipt of this approval letter, failing which, an application seeking approval for contra trade shall be made afresh.

Thanking you,

Yours faithfully,

For Union Bank of India

Compliance Officer

FORM - 7
INITIAL DISCLOSURE OF HOLDING OF SECURITIES OF BANK
(As on the date of regulations taking effect
to be submitted within 30 days from regulations taking effect)

To,

The Compliance Officer,
Union Bank of India

Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Code of Conduct for Prohibition of Trading by Insiders of the Bank, I am here below submitting the Initial Disclosure of my as well as my immediate relatives' holdings of Bank's securities:

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/ immediate relatives/others etc)	Securities held as on the date of regulation coming into force		% of Share-holding	Open Interest of the Future contracts held as on the date of regulation coming into force		Open Interest of the Option Contracts held as on the date of regulation coming into force	
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms

Add more rows if necessary.

Place:

Date:

(Signature)

Name of Director/Designated Employee: _____

Please submit the following additional details in case of employees:

Designation: _____

PF No.: _____

Department: _____

FORM - 8
DISCLOSURE OF HOLDING OF SECURITIES OF BANK ON APPOINTMENT
(As on the date of appointment
to be submitted within seven days of appointment)

To,

The Compliance Officer,
Union Bank of India

Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Code of Conduct for Prohibition of Trading by Insiders of the Bank, I am here below submitting the Initial Disclosure of my as well as my immediate relatives' holdings of Bank's securities:

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP / Directors/ immediate relatives/ others etc)	Date of appointment of Director /KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/ appointment of Director/KMP		% of Share-holding	Open Interest of the Future contracts held at the time of becoming Promoter/ appointment of Director/KMP		Open Interest of the Option Contracts held at the time of becoming Promoter/ appointment of Director/KMP	
			Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms

Add more rows if necessary.

Place:

Date:

(Signature)

Name of Director/Designated Employee: _____

Please submit the following additional details in case of employees:

Designation: _____

PF No.: _____

Department: _____

FORM - 9

CONTINUAL DISCLOSURE OF HOLDING OF SECURITIES OF BANK BY DESIGNATED PERSONS
(Regulation 7(2) read with Reeregulation 6(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015)

Disclosure to be submitted with two trading days from the date of transaction or the date when aggregate transaction (purchase and sales) exceeds Rs. 10.00 lakhs in a quarter)

Name of the Company: Union Bank of India
ISIN of the Company: INE692A01016

Details of change in holding of Securities of Promoter, Employee or Director of a listed company and other such persons as mentioned in Regulation 6(2).

Name, PAN No., CIN/DIN & address of Promoter/ Employee/ Director with contact nos.	Category of Person (Promoters/ KMP / Directors/im mediate relatives/oth ers etc)	Securities held prior to acquisition/ disposal		Securities acquired/ Disposed		% of shareholding		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to Bank	Mode of acquisition (market purchase /pub lic/ rights/ preferen tial offer / off market/ Inter-se transfer etc.)	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For eg. - Shares, Warrants Conve- rtible Debenture etc.)	No.	Pre transa ction	Post transa ction	From	To			Buy		Sell		
												Value	No. of units (contracts * lot size)	Value	No. of units (cont racts * lot size)	

Add more rows if necessary.

Place:

Date:

(Signature)

Name of Director/Designated Employee: _____

Please submit the following additional details in case of employees:

Designation: _____

PF No.: _____

Department: _____

FORM - 10

CONTINUAL DISCLOSURE OF HOLDING OF SECURITIES OF BANK BY CONNECTED PERSONS

Name of the Company: Union Bank of India

ISIN of the Company: INE692A01016

Regulation 7(3)

Name, PAN No., CIN/DIN & address of connected persons, as identified by the Bank with contact nos.	Category of Person (Promoters/ KMP / Directors/ immediate relatives/ others etc)	Securities held prior to acquisition/ disposal		Securities acquired/ Disposed		% of shareholding		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of intimation to Bank	Mode of acquisition (market purchase /public/ rights/ preferential offer / off market/ Inter-se transfer etc.)	Trading in derivatives (Specify type of contract, Futures or Options etc)				Exchange on which the trade was executed
		Type of security (For eg. - Shares, Warrants, Convertible Debentures etc.)	No.	Type of security (For eg. - Shares, Warrants Convertible Debenture etc.)	No.	Pre transaction	Post transaction	From	To			Buy		Sell		
												Value	No. of units (contracts * lot size)	Value	No. of units (contracts * lot size)	

Add more rows if necessary.

Place:

Date:

(Signature)

Form - 11

STATEMENT OF DISCLOSURE OF SHARES HELD IN THE BANK
(To be submitted for every quarter within 30 days from the quarter end)

Name of Director/Designated Employee	
PF No.	
PAN No.	
Department	
Location	
For the Quarter ended (Please tick whichever is applicable)	March / June / September / December
Year	

Details of securities held by me:

Type of Securities	No. of securities held	Folio No./ DP ID Client ID
Equity Shares		

Details of securities held by Immediate Relative(s):

Particulars		Particulars of Shareholding	
Name of Relative	Relation	Folio No./ DP ID Client I.D.	No. of shares held

Add more rows if necessary.

Place:

Date:

(Signature)

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