



CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING IN SECURITIES OF LISTED ENTITIES

Version	Approval Date	Approving Authority	Owner
1.0	05/08/2022	Board	Secretarial Department
2.0	03/05/2023	Board	Secretarial Department
2.1	02/02/2024	Board	Secretarial Department

STATEMENT OF CHANGES

<u>Particulars of Change</u>	<u>Justification</u>
The entire Code is replaced with new Code to include the minimum standards for Code of Conduct for Intermediaries and Fiduciaries to Regulate, Monitor and Report Trading by Designated Persons.	Since Bank has received delisting notice from BSE Limited, the provisions of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as applicable for Listed securities are no longer applicable.

**CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING IN SECURITIES OF LISTED ENTITIES
PURSUANT TO THE REQUIREMENTS OF THE SECURITIES AND EXCHANGE BOARD OF INDIA
(PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015**

PART - A

PREAMBLE

UNITY SMALL FINANCE BANK LIMITED (hereinafter referred to as “the Bank” or “UNITY”) had introduced a Code of Conduct for prohibition of Insider Trading (this Code) in accordance with the requirements of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as “Regulations”). The said Code was approved by the Board of Directors at their meeting held on August 05, 2022 and subsequently amended by the Board at its meeting held on May 03, 2023. This Code specifies minimum standards for Code of Conduct for Intermediaries and Fiduciaries to Regulate, Monitor and Report Trading by Designated Persons. Also, this Code is to be read in conjunction with the Insider Trading Code adopted by the listing holding company for dealing in securities of the said listing holding company. This Code is applicable to the Directors, Designated Persons of the Bank and the connected persons and shall be effective from the date it is approved by the Board of Directors of the Bank.

The Policy and Obligations

The Regulations, *inter-alia*, stipulates the Board of Directors of the Bank to formulate a Code of conduct to regulate, monitor and report trading by its Promoters, Directors, employees, Designated Person and other connected persons towards achieving compliance with the Regulations, while adopting the minimum standards set out in the Regulations without diluting their provisions in any manner.

**PART - B
DEFINITIONS**

For the purposes of this code, the words and expressions given below shall carry the meaning as stated hereinafter.

- B.1.** “Act” means the Securities and Exchange Board of India Act, 1992 (15 of 1992).
- B.2.** “Board” shall mean the Securities Exchange Board of India.
- B.3.** “Board of Directors” means the Board of Directors of the Bank.
- B.4.** “Bank” means Unity Small Finance Bank Limited;
- B.5.** “Compliance Officer” means the Secretary of the Bank or any other person designated by the Board of Directors as Compliance Officer from time to time;
- B.6.** “Connected person” means-

- i. any person who is or has during the six months prior to the concerned act been associated with a 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) above; 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 Bank; or
 - j. a concern, firm, trust, Hindu undivided family, Bank or association of persons wherein a director of a Bank or his immediate relative or banker of the Bank, has more than ten per cent of the holding or interest;
 - k. Any person being representative of the investors who attends the Board and Committee meetings of the Bank on behalf of the investor or any person having access to the Board and Committee meetings of the Bank
- B.7.** “Designated Person” (abbreviated as “DP”) shall include –
- a. All Directors on the Board;
 - b. CEO/ CFO/ CS;
 - c. All employees in the cadre of Senior Vice President and above;
 - d. All Employees in the Finance, Accounts, Compliance and Secretarial Department as may be determined by the Compliance Officer;
 - e. All employee who are attached to Directors/MD & CEO’s office;
 - f. Other employees upto two levels below CEO of the Bank, irrespective of their functional role in the Bank or ability to have access to unpublished price sensitive information;
 - g. Any support staff of the Bank such as IT staff or secretarial staff who have access to unpublished price sensitive information;
 - h. Internal Auditors, Statutory Auditors, Secretarial Auditors, Consultants and Advisors of the

Company as may be determined by the Compliance Officer;

- i. Promoter who are individual or investment Company
- j. Immediate relative of (a) to (i) above;

Any other person who on the basis of their role and function in the Bank is expected to have access to the Unpublished Price Sensitive Information(s) relating to the Bank as may be designated by the Compliance Officer from time to time.

- B.8.** "generally available information" means information that is accessible to the public on a non-discriminatory basis;
- B.9.** "immediate relative" means 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;
- B.10.** "insider" means any person who is:
 - i. a connected person; or
 - ii. in possession of or having access to unpublished price sensitive information;
- B.11.** "Key Managerial Person" means person as defined in Section 2(51) of the Companies Act, 2013.
- B.12.** "Listed Entities" means entities listed on recognized Stock Exchanges;
- B.13.** "Promoter" and "Promoter Group" shall have the meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof;
- B.14.** "Regulations" shall mean the SEBI (Prohibition of Insider Trading) Regulations, 2015.
- B.15.** "Restricted List/Grey List" is a confidential list of Securities about whom/ which any Insider or the Company may receive/ have received Unpublished Price Sensitive Information, usually concerning a proposed transaction or assignment for which the Bank may be engaged.

The Bank shall maintain a Restricted Trade List ("RTL") comprising of the Securities of those companies for or in respect of whom the Company is handling any assignment or which makes insider privy to any Unpublished Price Sensitive Information in regard to the same. The Compliance Officer/Compliance Team may remove a company from the RTL after a relevant transaction which the Company is advising on or is involved in has been publicly announced or otherwise becomes a matter of public record. The placement of a company on the RTL generally restricts trading in the securities of that company.

The RTL /GL shall be used as the basis for approving or rejecting applications for pre-clearance of trades.

It shall be the responsibility of the Heads of various divisions of the Company to provide the names of companies to be placed on GL / RTL and to keep the GL / RTL updated at all times. Immediately on receiving any information that may be deemed "confidential" or "non-public", the respective Head shall intimate the Compliance Officer/ Compliance Team to put such a company on the GL / RTL. This shall also be accompanied by the names of persons who are likely to have the information and to whom restrictions on trading in securities of such company shall apply. On receipt of the

information, the Compliance Officer shall put the name of such company on the Grey List / Restricted Trade List. This list will be reviewed every month. The securities may be removed from the Grey List/ Restricted Trade List in consultation with the Compliance Officer / Compliance Team after a relevant transaction which the Company is advising on or is involved in as an intermediary or fiduciary has been publicly announced or otherwise becomes a matter of public record.

The Grey List /Restricted Trade List shall be considered highly confidential information and shall not be communicated, directly or indirectly, to anyone.

- B.16.** "securities" shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof;
- B.17.** "takeover regulations" means the Securities and Exchange Board of India (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;
- B.18.** "trading" means and includes subscribing, redeeming, switching, buying, selling, dealing, or agreeing to subscribe, redeem, switch, buy, sell, deal in any securities, and "trade" shall be construed accordingly;
- B.19.** "trading day" means a day on which the recognized stock exchanges are open for trading;
- B.20.** "Unpublished Price Sensitive Information" (abbreviated as "UPSI") means any information, relating to Listed entities or their securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities of listed entities 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, acquisitions, delisting, disposals and expansion of business and such other transactions;
 - v. changes in key managerial personnel;

PART – C

APPLICABILITY

This Code is applicable to all insiders as defined at B.10 including Designated Persons of the Bank and their immediate relatives, in respect of their dealing in securities of listed entities to the extent it is provided by this Code.

For dealing in securities of Centrum Capital Limited, Ultimate Holding Company, the Code of Conduct of Centrum Capital Limited, as may be amended from time to time, will apply.

PART - D

RESTRICTION ON COMMUNICATIONS AND TRADING BY INSIDERS

D.1. Communication or procurement of Unpublished Price Sensitive Information.

- a. No Designated Person or insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to Listed entities or securities of listed entities or securities proposed to be listed by other entities, to any person including other insiders except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- b. No person shall procure from or cause the communication by any Designated Persons or insider of unpublished price sensitive information, relating to securities of the listed entities or securities proposed to be listed by the other entities, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

PART E

DISCLOSURE OF TRADING BY INSIDERS

E.1 General Provisions

- a. Every public disclosure shall be made in the Form/s as prescribed under the Regulations from time to time.
- b. The disclosures to be made by any person under this code shall include those relating to trading by such person's immediate relatives, and by any other person for whom such person takes trading decisions.
- c. The disclosure of trading in securities shall also include trading in derivatives of securities and traded value of the derivatives shall be taken into account. Provided that trading in derivatives of securities is permitted by any law for the time being in force.
- d. The disclosures made under this Part shall be maintained by the Bank, for a minimum period of five years, in such form as may be specified.

PART-F

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING IN SECURITIES

F.1. Duties of Compliance Officer

- (a) He shall maintain a record of Designated Person and any changes made therein.
- (b) He shall be responsible for setting forth Policies, Procedures, Monitoring adherence to the rules for the preservation of 'Price-Sensitive Information', 'pre-clearing of Designated employees' and their immediate relatives' trades, Monitoring of trades and the implementation of this Code under the overall supervision of the Board of Directors of the Bank.
- (c) He shall maintain records of all the declarations submitted in the appropriate form given by Designated Person for a minimum period of five years.
- (d) He shall be responsible for overseeing and co-ordinating and educating staff on disclosure policies and procedure.
- (e) He shall confidentially maintain a list of such securities as a "restricted list" (as and when applicable/ relevant) which shall be used as the basis for approving or rejecting application for pre clearance of trades

F.2. Minimum Standards for Code of Conduct to regulate, monitor and report trading by designated persons

1. The Compliance Officer shall report to the board of directors and in particular, shall provide reports to the Chairman of the Audit Committee, if any, or to the Chairman of the board of directors at such frequency as may be stipulated by the board of directors, but not less than once in a year.
2. All information shall be handled within the organization on a need-to-know basis and no UPSI shall be communicated to any person except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
3. Designated Persons and immediate relatives of designated persons in the organization shall be governed by an internal code of conduct governing dealing in securities.
4. Designated persons may execute trades subject to compliance with these regulations.
5. Trading by designated persons shall be subject to pre-clearance by the compliance officer, if the value of the proposed trades is in excess of **Rs. 10 Lakh in a calendar quarter**.
6. Prior to approving any trades, the compliance officer shall be entitled to seek declarations in **Form A** to the effect that the applicant for pre-clearance is not in possession of any UPSI. He shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.
7. Designated persons shall be required to disclose names and Permanent Account Number or any other identifier authorized by law of the following persons to the Bank in **Form D** on an annual basis and as and when the information changes:
 - a) immediate relatives

- b) persons with whom such designated person(s) shares a material financial relationship
- c) Phone, mobile and cell numbers which are used by them

In addition, the names of educational institutions in **Form E** from which designated persons have graduated and names of their past employers shall also be disclosed on a one time basis.

Explanation – The term “material financial relationship” shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift from a designated person during the immediately preceding twelve months, equivalent to at least 25% of the annual income of such designated person but shall exclude relationships in which the payment is based on arm’s length transactions.

- 8. The Bank shall inform promptly to the stock exchanges where the concerned securities are traded, in such form and such manner as may be specified by the Board from time to time if the Bank observes that there has been a violation of regulations.
- 9. The Bank should clearly identify the people who are privy to sensitive and confidential transactions and make sure that the recipients of such information are made aware of the duties and responsibilities attached to the receipt of Inside Information, and the liability that attaches to misuse or unwarranted use of such information.

F.3. Preservation of "Price Sensitive Information"

Designated Persons shall maintain the confidentiality of all Price Sensitive Information. Designated Persons shall not pass on such information to any person directly or indirectly by way of making a recommendation for the purchase or sale of securities of the Bank. Following practices should be followed in this regard.

1. Need to know

Unpublished Price Sensitive Information is to be handled on a "need to know" basis, i.e., Price Sensitive Information should be disclosed only to those within the Bank who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of information.

2. Limited access to confidential information

Files containing confidential information shall be kept secure. Computer files must have adequate security of login and pass word, etc. Files containing confidential information should be deleted / destroyed after its use. Shredder should be used for the destruction of physical files.

F.4. Prohibition on Dealing, Communicating or Counselling on Matters Relating to Insider Trading

No Insider shall –

- (a) either on his own behalf, or on behalf of any other person, trade in securities of listed entities when in the possession of any unpublished price sensitive information;
- (b) communicate, counsel or procure, directly or indirectly any unpublished price sensitive information to any person. However, these restrictions shall not be applicable to any communication required in the ordinary course of business or under any law.
- (a) either on his own behalf, or on behalf of any other person, trade in securities of listed entities which is forming part of restricted list.

F.5. Pre-clearance of trades/Transactions which require prior approval

Any Designated Person of the Bank, who intend to trade in the securities of Listed entities exceeding market price of Rs.10,00,000/- shall require to pre-clear the transactions as per the pre-dealing procedure as described hereunder. The Compliance Officer is authorised to change the limit of market dealing of Rs.10,00,000/- from time to time.

No Director/ Designated Person shall apply for pre-clearance of any trade if such person is in possession of Unpublished Price Sensitive Information.

1. Pre-dealing Procedure

An application for pre-clearance of trade shall be made in **Form 'A'** to the Compliance Officer alongwith an undertaking (UT) in favour of the Bank by such Designated Person incorporating, inter alia, the following clauses, as may be applicable:

- (a) That the Designated Person does not have any access or has not received "Price Sensitive Information" up to the time of signing the undertaking.
- (b) That in case the Designated Person has access to or receives "Price Sensitive Information" after the signing of the undertaking but before the execution of the transaction he or she shall inform the Compliance officer of the change in his position and that he or she would completely refrain from dealing in the securities of the Bank till the time such information becomes public.
- (c) That he or she has not contravened the provisions of this Code or Regulations as amended from time to time.
- (d) That he or she has made a full and true disclosure in the matter.
- (e) The Compliance Officer shall on receiving an application provide the Designated Person with an acknowledgement on the duplicate of the application.
- (f) The Compliance Officer shall grant approval within 2 days from the date of acknowledgement.
- (g) The Compliance Officer shall retain copies of all applications and acknowledgements.
- (h) In exceptional circumstances consent may not be given if the Compliance officer is of the opinion that the proposed trade is on the basis of possession of any unpublished Price sensitive information. There shall be no obligation to give reasons for any withholding of consent.
- (i) If so requested by the Compliance Officer, Designated Person must ensure that his stockbroker is authorised to disclose to the Bank all matters relevant to his share dealings.

2. Other restrictions

The Designated Person shall execute their order in respect of securities of listed entities

within one week after the approval of pre-clearance is given. If the order is not executed within one week after the approval is given, the Designated Person must pre clear the transaction again.

The Designated Person shall hold their investments in securities for a minimum period of six months irrespective of mode of acquisition in order to be considered as being held for investment purposes. The Designated Person permitted to trade in securities of listed entities shall not be permitted to execute a contra trade within a period of six months from the date of said trade. Further, in case of units of mutual funds the said period for executing the contra trade shall be two months from the date of said trade.

Provided that this shall not be applicable for trades pursuant to exercise of stock options.

In case the sale of securities is necessitated by personal emergency, the Compliance Officer may waive the holding period after recording in writing his or her reasons in this regard. An application for waiver of holding period shall be made to the Compliance Officer in **Form 'B'**.

If the contra trade is executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to credit to the Investor Protection and Education Fund administered by the Board under the Act.

3. Transactions allowed without prior approval

Designated Persons who (or whose Dependents) intend to trade in securities of listed entities in a calendar quarter (either in one transaction or in a series of transactions) of a consideration price below Rs. 10,00,000/- (Rupees Ten Lakhs) for such Securities, no prior approval is required.

F.6. Half yearly / Annual Disclosures

Within thirty days from the closure of the half year i.e. 30th September and 31st March, all the Designated Person of the Bank shall disclose in **Form C** to the Bank, the number of such securities acquired or disposed of, if the said securities constitutes more than 1% of total paid up share capital of respective listed entity.

F.7. Chinese Wall and crossing over the Chinese wall

To prevent the misuse of confidential information the Bank has separated those areas of the Bank which routinely have access to confidential information, considered as "inside areas" from those areas which do not have such access, considered as "Public areas".

The employee in the Inside area shall not communicate any price sensitive information to anyone in public area. However, in exceptional circumstances employee from the public areas may be brought "over the walls" and shall communicate confidential information on 'need to know' basis, under the intimation to the Compliance Officer. In case any designated person has to cross over the wall and seek any information from inside area, he shall apply for such access in writing along with rationale for seeking the said information.

The Compliance Officer after recording the reason in writing may grant such approval to designated person to seek requisite information from inside area.

F.8. Institutional Mechanism for Prevention of Insider trading

- (1) The Chief Executive Officer, Managing Director or such other analogous person of Bank shall put in place adequate and effective system of internal controls to ensure compliance with the requirements given in Regulations to prevent insider trading.
- (2) The internal controls shall include the following:
 - (a) all employees who have access to unpublished price sensitive information are identified as designated person;
 - (b) all the unpublished price sensitive information shall be identified and its confidentiality shall be maintained as per the requirements of regulations;
 - (c) adequate restrictions shall be placed on communication or procurement of unpublished price sensitive information as required by these regulations;
 - (d) lists of all employees and other persons with whom unpublished price sensitive information is shared shall be maintained and confidentiality agreements shall be signed or notice shall be served to all such employees and persons;
 - (e) all other relevant requirements specified under these regulations shall be complied with;
 - (f) periodic process review to evaluate effectiveness of such internal controls.
- (3) The board of directors of Bank shall ensure that the Chief Executive Officer or the Managing Director or such other analogous person ensures compliance with regulation 9 and sub-regulations (1) and (2) of this regulation.
- (4) The Audit Committee of Bank shall review compliance with the provisions of these regulations at least once in a financial year and shall verify that the systems for internal control are adequate and are operating effectively.

F.9. Penalty for contravention of this Code

Any Designated Person, who trades in securities or communicates any information for trading in securities, in contravention of this Code may be penalized and appropriate action will be taken by the Bank.

Designated Person of the Bank who violate this Code shall also be subject to disciplinary action by the Bank, which may include wage salary freeze, suspension, recovery, withholding of promotions, etc. The action by the Bank shall not preclude SEBI from taking any action in case of violation of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Any amount collected under this clause shall be remitted for credit to the Investor Protection and Education Fund.

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Form A

Application for Pre-clearance of trading in securities of Listed entities

From

Name:-

Director / Designated Person:

Designation:-

DIN/ Employees Code:-

PAN :-

Address:-

Date :-

To

The Compliance Officer

Unity Small Finance Bank Limited

Centrum House, C.S.T. Road,

Vidyanagari Marg, Kalina,

Santacruz (East), Mumbai – 400098

Sir,

With reference to above, I wish to inform you that I propose to purchase/ sale _____ equity shares/ other securities of _____ from the open market/ private arrangement, details of the same are as mentioned below:-

Sr. No.	Heading	Particulars
1	Existing holding of the shares/ other securities	
2	Folio No./ DP_ID and CL_ID	
3	Nature of new transaction : Sale / Purchase	
4	Quantity want to purchase/ Sale	
5	Price at which you want to purchase/ Sale	
6	Estimated consideration	
7	Mode of transaction – private / Open market	
8	Purpose of Purchase / Sale	
9	In whose name (with relation) the transactions will take place	

I/ We declare that I/ we are not in possession of any Unpublished price sensitive information ('UPSI') in regards to the aforesaid securities and I /we have complied with the requirements of Bank's "Code of conduct to regulate, monitor and report trading in securities of listed entities" based on the Securities and Exchange Board of India (SEBI) (Prohibition of Insider Trading) Regulations, 2015. I am executing an Undertaking as required and enclose herewith.

You are requested kindly to give your permission to trade in the equity shares/ other securities of _____ as requested above.

Signature: _____

(Name : _____)

Encl. Duly executed Undertaking.

Undertaking

From

Name:-

Director / Designated Person:

Designation:-

DIN/ Employees Code:-

PAN :-

Address:-

To

Date :- _____

The Compliance Officer

Unity Small Finance Bank Limited

Centrum House, C.S.T. Road,

Vidyanagari Marg, Kalina,

Santacruz (East), Mumbai – 400098

Sir,

With reference to my application dated _____ for pre-clearance of trade for purchase/ Sale of _____ equity shares/ other Securities of the _____, I confirm, declare and undertake as follow :-

- (a) That I do not have any access or has not received “Price- sensitive information” up to the time of signing the Undertaking.
- (b) That in case I have access to or receive “Price- sensitive information” after the signing of the Undertaking but before the execution of the transaction, I shall inform you the change in my position and I shall completely refrain from trading in the securities of the Bank till such information becomes public.
- (c) That I have not contravened the Code of conduct to regulate, monitor and report trading in securities of listed entities pursuant to the requirements of the Securities and Exchange Board of India (SEBI) (Prohibition of Insider Trading) Regulations, 2015 (Code) as notified by the Bank from time to time.
- (d) That I hereby confirm that I abide by the provisions of the Code with regard to time norms for execution and holding of securities.

I hereby solemnly declare that I have made a full and true disclosure in this regard to the best of my knowledge and belief.

Signature: _____

(Name : _____)

Form B

Application for waiver of holding period

From

Name:-

Director / Designated Person:

Designation:-

DIN/ Employees Code:-

PAN :-

Address:-

Date :- _____

To

The Compliance Officer

Unity Small Finance Bank Limited

Centrum House, C.S.T. Road,

Vidyanagari Marg, Kalina,

Santacruz (East), Mumbai – 400098

Sir,

With reference to above, I wish to inform you that I had purchased _____ equity shares/ other Securities of _____ on _____, the details are as mentioned below:-

Sr. No.	Heading	Particulars
1	No. of equity shares/ other Securities purchased	
2	Folio No./ DP_ID and CL_ID	
3	Date of purchase and price of purchase	
4	From whom purchased	
5	Existing total holding	
6	Quantity want to sale	
7	Reason for early selling	
8	Price at which you want to sale	
9	Mode of transaction – private / Open market	

I understand that as provisions of the Code of conduct to regulate, monitor and report trading in securities of listed entities pursuant to the requirements of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (Code), I need to hold this Investment for a minimum period of six months, but, due to reason as mentioned above, I need to sell the same before prescribed period.

You are requested kindly to give your permission to sale aforesaid Securities as requested.

Signature: _____

(Name : _____)

FORM C

Form for disclosure of holdings of equity shares/ other securities of listed entities

From

Name:-

Director / Designated Person:

Designation:-

DIN/ Employees Code:-

PAN

Address:-

Date :- _____

To

The Compliance Officer

Unity Small Finance Bank Limited

Centrum House, C.S.T. Road,

Vidyanagari Marg, Kalina,

Santacruz (East), Mumbai – 400098

Sir,

With reference to above, I wish to inform you that I am working as _____ (Director / Designated employees) and declare that have read the “Code of conduct to regulate, monitor and report trading in securities of listed entities pursuant to the requirements of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015”(Code) of the Bank and declare that I alongwith my immediate relatives are holding more than 1% paid up share capital of the entities mentioned below:-

I Statement of holdings in my name:

Name, PAN, Address with Contact details	Name of entity in which I hold more than 1% of total paid up share capital of said listed entity	Folio No./ DP ID/ Client ID	Type and No. of Securities	Date on which purchased

II Details of holding by my immediate relatives:

Name of Relative and PAN	Relationship	Name of entity in which my relative hold more than 1% of	Folio No./ DP ID/ Client ID	Type and No. of Securities	Date on which purchased

		total paid up share capital of said listed entity			

I also confirm that whatever I have declared above is true.

Signature: _____

(Name : _____)

FORM D

Form for disclosure of details of Immediate Relative and person with whom DP shares Material Financial Relationship

From

Name:-

Director / Designated Person:

Designation:-

DIN/ Employee's Code:-

PAN :-

Address:-

Date: _____

To

The Compliance Officer

Unity Small Finance Bank Limited

Centrum House, C.S.T. Road,

Vidyanagari Marg, Kalina,

Santacruz (East), Mumbai – 400098

Sir,

With reference to above, I wish to inform you following are the details of my immediate relatives and Person with whom I share Material Financial Relationship:

Name	PAN	Relationship with Designated Person	Contact No.
Immediate Relatives:			
Person with whom DP shares Material Financial Relationship:			

I also confirm that whatever I have declared above is true.

Explanation:

Immediate relative” means 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;

Material Financial Relationship” shall mean a relationship in which one person is a recipient of any kind of payment such as by way of a loan or gift from a designated person during the immediately preceding twelve months, equivalent to at least 25% of the annual income of such designated person but shall exclude relationships in which the payment is based on arm’s length transactions.

Signature: _____

(Name : _____)

FORM E

Form for disclosure of details Education Institution and Past Employers

From

Name:-

Director / Designated Person:

Designation:-

DIN/ Employee's Code:-

PAN :-

Address:-

Date:_____

To

The Compliance Officer

Unity Small Finance Bank Limited

Centrum House, C.S.T. Road,

Vidyanagari Marg, Kalina,

Santacruz (East), Mumbai – 400098

A. Name of Educational Institution from which I am Graduated

B. Name of Past Employers:

Signature: _____

(Name : _____)