

UFO MOVIEZ INDIA LIMITED

Regd. Office: Valuable Techno Park, Plot #53/1, Road #7, MIDC, Marol, Andheri (E), Mumbai – 400093

Tel: +91 22 40305060; Email: corporate@ufomoviez.com

Website: www.ufomoviez.com; CIN: L22120MH2004PLC285453

**CODE OF CONDUCT TO REGULATE, MONITOR AND
REPORT TRADING BY DESIGNATED PERSONS AND
IMMEDIATE RELATIVES OF DESIGNATED PERSONS**

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CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSONS AND IMMEDIATE RELATIVES OF DESIGNATED PERSONS

In accordance with the Regulations (as defined below), UFO Moviez India Limited (the “**Company**”) has, *inter alia*, framed this code of conduct to regulate, monitor and report trading by Designated Persons and immediate relatives of Designated Persons of the Company (this “**Code**”).

INTRODUCTION

This Code is applicable to all Designated Persons (as defined below) and their Immediate Relatives (as defined below) For purposes of this code, Designated Persons at all times shall include Immediate Relatives of such Designated Persons unless specially set out herein.

DEFINITIONS

- 1.1. “**Compliance Officer**” shall mean the person designated as the compliance officer of the Company to administer this Insider Code, compliance of policies, procedures, maintenance of records and other requirements under the Regulations.
- 1.2. “**Connected Person**” shall mean –
 - (i) any person who is or has been, during the six months prior to the concerned act, associated with a company, in any capacity, directly or indirectly, 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, whether temporary or permanent, with the company, that allows such a person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.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) 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 relative or banker of the company, has more than ten per cent. of the holding or interest;
- (k) a firm or its partner or its employee in which a connected person specified in sub-clause (i) is also a partner; or
- (l) a person sharing household or residence with a connected person specified in sub-clause (i)

1.3. **“Designated Persons”** means any person who the board of directors or such other analogous authority shall in consultation with the compliance officer specify such person to be covered by the Code on the basis of role and function would provide to Unpublished Price Sensitive Information in addition to seniority and professional designation:

- (i) All promoters of the Company and promoters who are individuals;
- (ii) All directors of the Company and directors of its material subsidiaries;
- (iii) Chief Executive Officer and employees upto two levels below Chief Executive Officer of the Company, irrespective of their functional role in the company or ability to have access to Unpublished Price Sensitive Information;
- (iv) Employees of the Company, designated on the basis of their functional role or access to Unpublished Price Sensitive Information;
- (v) Any support staff of the Company, such as IT staff or secretarial staff who has access to Unpublished Price Sensitive Information;
- (vi) Employees of material subsidiaries of the company designated on the basis of their functional role or access to Unpublished Price Sensitive Information in the organization by their board of directors;

Explanation: For the purpose of clause b (iv) and (v), employees and support staff of the Company shall who have access to Unpublished Price Sensitive Information shall be decided by the Managing Director / Executive Director / Chief Financial Officer / Compliance Officer of the Company.

1.4. **“Enquiry Committee”** means, a Committee constituted under this Code, comprising of the below officials:-

- i) Chairman of the Audit Committee;
- ii) Executive Director;

- iii) Chief Financial Officer, and;
- iv) Company Secretary.

The quorum for the Enquiry Committee meeting shall be any Two (2) out of the above.

- 1.5. **“Immediate Relative”** with respect to any person, means a spouse of a person, and includes parents, siblings, spouse, children, children of the spouse (whether minors or adults) of such person who are either financially dependent on such person or consult with such person while taking decisions relating to trading in securities.
- 1.6. **“Legitimate Purpose”** shall include sharing of Unpublished Price Sensitive Information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of Regulations.”
- 1.7. **“Listing Regulations”** means Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, as amended.
- 1.8. **“Promoter” and “Promoter group”** shall have the same meaning as assigned to them in the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018, as amended.
- 1.9. **“Regulations”** mean the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992 or the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as applicable and amended from time to time.
- 1.10. **“Securities”** shall have the same meaning as assigned to them in the Regulations with respect to the Company and shall include shares and derivatives of the Company.
- 1.11. **“Unpublished Price Sensitive Information”** means any information, relating to a company 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, acquisitions, delisting, disposals and expansion of business, award or termination of order/contracts not in the normal course of business and such other transactions; and
 - (v) changes in key managerial personnel , other than due to superannuation or end of term, and resignation of a Statutory Auditor or Secretarial Auditor;
 - (vi) change in rating(s), other than ESG rating(s);
 - (vii) fund raising proposed to be undertaken;
 - (viii) agreements, by whatever name called, which may impact the management or control of the company;
 - (ix) fraud or defaults by the company, its promoter, director, key managerial personnel, or subsidiary or arrest of key managerial personnel, promoter or director of the company, whether occurred within India or abroad;

- (x) resolution plan/ restructuring or one time settlement in relation to loans/borrowings from banks/financial institutions;
- (xi) admission of winding-up petition filed by any party /creditors and admission of application by the Tribunal filed by the corporate applicant or financial creditors for initiation of corporate insolvency resolution process against the company as a corporate debtor, approval of resolution plan or rejection thereof under the Insolvency and Bankruptcy Code, 2016;
- (xii) initiation of forensic audit, by whatever name called, by the company or any other entity for detecting mis-statement in financials, misappropriation/ siphoning or diversion of funds and receipt of final forensic audit report;
- (xiii) action(s) initiated or orders passed within India or abroad, by any regulatory, statutory, enforcement authority or judicial body against the company or its directors, key managerial personnel, promoter or subsidiary, in relation to the company;
- (xiv) outcome of any litigation(s) or dispute(s) which may have an impact on the company;
- (xv) giving of guarantees or indemnity or becoming a surety, by whatever named called, for any third party, by the company not in the normal course of business;
- (xvi) granting, withdrawal, surrender, cancellation or suspension of key licenses or regulatory approvals.

Explanation 1 : For the purpose of sub-clause (ix):

- a. 'Fraud' shall have the same meaning as referred to in Regulation 2(1)(c) of Securities and Exchange Board of India (Prohibition of Fraudulent and Unfair Trade Practices relating to Securities Market) Regulations, 2003.
- b. 'Default' shall have the same meaning as referred to in Clause 6 of paragraph A of Part A of Schedule III of Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

Explanation 2 : For identification of events enumerated in this clause as unpublished price sensitive information, the guidelines for materiality referred at paragraph A of Part A of Schedule III of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 as may be specified by the Securities and Exchange Board of India from time to time and materiality as referred at paragraph B of Part A of Schedule III of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 shall be applicable.

1.12. **"Working days / Trading days"** shall mean the working day when the regular trading is permitted on the concerned stock exchanges where the Securities are listed.

All the other terms used in this Insider Code shall have the same meaning as assigned to them under the Regulations, Listing Regulations, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made thereunder.

COMPLIANCE OFFICER

The Company Secretary of the Company, has been designated as the Compliance Officer of the Company by the board of directors of the Company. The Compliance Officer shall report to the board of directors of the Company 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 or, if required under the Regulations, to the managing director/executive director/chief executive officer.

HANDLING OF UNPUBLISHED PRICE SENSITIVE INFORMATION

Designated Persons when in possession of any Unpublished Price Sensitive Information, as defined in the Regulations, shall

- a) Not trade or deal in Securities, either on their own behalf or on behalf of any other person, except as provided in the Regulations;
- b) Not communicate, counsel, procure, provide or allow access, directly or indirectly, to any Unpublished Price Sensitive Information to/from any person, except in furtherance of a legitimate purposes, performance of duties or discharge of legal obligations; and
- c) take reasonable steps to prevent inadvertent leakage, spread or misuse of UPSI and shall maintain appropriate Chinese wall.
- d) Maintain the confidentiality of all Unpublished Price Sensitive Information.

Any person who has been brought inside on any proposed or ongoing sensitive transaction and in receipt of UPSI shall be considered an “insider” for purposes of this Code and the Company shall:

- a) make such an individual aware that the information shared is or would be confidential;
- b) instruct such an individual to maintain confidentiality of UPSI in compliance with these Regulations;
- c) make such an individual aware about the duties and responsibilities attached to the receipt of such information and the liability attached to misuse or unwarranted use of such information.

CHINESE WALLS PROCEDURE

- a) To prevent the dissemination and misuse of UPSI, the Company will endeavor to separate those departments which routinely have access to UPSI (“Inside Areas”) from those who do not have such access (“Public Areas”)
- b) The establishment of Chinese Walls is not intended to suggest that within Insider Areas UPSI can circulate freely. Within inside areas, the information shall be shared only on ‘need-to-know’ basis.
- c) Any person, who needs access to Inside Areas shall first seek prior approval of the Managing Director/Executive Director/ Chief Financial Officer and also give reasons for seeking entry into the Inside Areas.
- d) Designated Persons within a Chinese Wall have a responsibility to ensure the Chinese Wall is not breached deliberately or inadvertently. Known or suspected breaches of the Chinese Wall must be referred to the Compliance Officer immediately.
- e) Any information shared for legitimate purposes, performance of duties or discharge of legal obligations shall not be construed as “crossing the wall” under this Code. For this purpose, the Board of Directors of the Company has made a policy for determination of “legitimate purposes” as a part of the “Code of Fair Disclosures and Conduct”.

TRADING WINDOW AND TRADING RESTRICTION

Designated Persons and their immediate relatives shall not trade in Securities during closure of the “Trading Window”, i.e., the period during which trading in the Securities is prohibited. It shall be the onus of designated persons to communicate the non-trading period to their immediate relatives. The exercise by a Designated Person of an option pursuant to an employees’ stock option plan shall be permitted during the closure of a Trading Window; however, sale of shares allotted pursuant to such exercise shall not be permitted during the closure of the Trading Window.

The Trading Window shall be closed during the following periods:

- a) From the end of every quarter until 48 hours after the announcement of the financial results for the relevant period to the stock exchanges or until a later date as may be determined by the Compliance Officer, for all the designated persons, provided that if the Regulations require the Trading Window to be opened at an earlier date, then the Trading Window shall be opened at such earlier date.
- b) From the date of circulation of the agenda for a meeting of the board of directors of the Company, in which any material, price sensitive or unpublished event, including any of the items mentioned in para 1.10 above, is proposed, for the identified class of designated persons who might have access to such information.

The Trading Window shall open 48 hours after the close of the board meeting at which decisions in respect of any of the above events are taken or after the information in respect of the above events is made public, whichever is later, or at a later date as may be determined by the Compliance Officer, provided that if the Regulations require the Trading Window to be opened at an earlier date, then the Trading Window shall be opened at such earlier date.

- c) Any other periods when the Compliance Officer determines that a Designated Person or class of Designated Persons can reasonably be expected to have possession of Unpublished Price Sensitive Information.
- d) Trading window restrictions shall not be applicable for pledge of securities for a bonafide purpose such as raising of funds, subject to preclearance by the Compliance Officer.
- e) Trading window restrictions shall not be applicable for i) transactions undertaken in accordance to respective regulations made by SEBI, such as acquisition by conversion of warrants or debentures, subscribing to rights issue, further public issue, preferential allotment or tendering of shares in a buyback offer, open offer, delisting offer, or transactions as may be specified by the Securities and Exchange Board of India from time to time. ii) transactions entered into pursuant to approved Trading Plans, off-market inter-se transfer or a transaction carried out through block deal window mechanism between Insiders or other transactions specified from time to time.
- f) Trading window may not be closed for unpublished price sensitive information not emanating from within the Listed Company.

PROCEDURE OF PRE-CLEARANCE

- a) When the Trading Window is open, Designated Persons shall require prior clearance from the Compliance Officer in respect of purchase/sale of Securities, where the value of the Securities exceeds Rs.5,00,000/- (Rupees Five Lacs Only) or the quantity exceeds 1,000 (one thousand) Securities, whichever is lower in a month (either in one transaction or in a series of transactions) in **Form P1**. Purchase/sale of Securities by the Compliance Officer shall require prior clearance from the managing director/joint managing director of the Company. The application for prior clearance shall be accompanied by an undertaking/declaration in **Form P2** which shall *inter alia* state that the applicant is not in possession of any Unpublished Price Sensitive Information.
- b) When the Trading Window is closed, Designated Persons shall require prior clearance from the Compliance Officer in respect of pledge of Securities.
- c) Purchase/sale transactions, for which prior clearance has been obtained, shall be executed within seven Working Days of such prior clearance, failing which prior clearance shall be required afresh.
- d) Persons covered under the pre-clearance requirement shall file the details of the transaction in the format prescribed under **Form P3** with the Compliance Officer within 30 (thirty) days of the exercise of the trade. Even in cases where the transaction has not been undertaken, the same should be reported in the above format.

TRADING PLAN

- a) A Designated Person shall be entitled to formulate a Trading Plan that complies with the SEBI Regulations (“Trading Plan”) and present it to the Compliance Officer for approval and public disclosure. The Trading Plan may be executed only after the plan is approved by the Compliance officer and disclosed to the stock exchanges on which the Securities of the Company are listed.
- b) Designated Person may delegate discretionary authority to his/her broker, but in no event Designated Person may consult with the broker regarding executing transactions, or otherwise disclose information to the broker concerning the Company that might influence the execution of transactions, under the Trading Plan after it commences.
- c) The Trading Plan once approved shall be irrevocable and the Designated Person 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 as otherwise provided under the SEBI regulations. However, the implementation of the Trading Plan shall not be commenced, if at the time of formulation of the plan, the Designated Person is in possession of UPSI and the said information has not become generally available information at the time of the commencement of implementation. The commencement of the Trading Plan shall be deferred until such UPSI becomes generally available information.

MINIMUM HOLDING PERIOD

Designated Persons who buy or sell any number of equity shares of the Company shall not enter into an opposite transaction, i.e., sell or buy any number of equity shares, during the next six months following the prior transaction. To the extent permitted under the Regulations, the Compliance Officer may, in his discretion, grant relaxations from this restriction for reasons to be recorded in writing provided that such relaxation does not violate the Regulations. Should an opposite transaction be executed, inadvertently or otherwise, in violation of such restriction, the profits from such trade shall be liable to be disgorged for remittance to the Securities and Exchange Board of India (“SEBI”) for credit to the Investor Protection and

Education Fund administered by it under the Securities and Exchange Board of India Act, 1992, as amended.

Notwithstanding anything contained in the aforesaid paragraph, the Contra Trade Restrictions do not apply to any sale of shares acquired pursuant to exercise of ESOPs as clarified by the SEBI vide its Guidance Note on SEBI (Prohibition of Insider Trading) Regulations, 2015 dated August 24, 2015.

In case of subscription for Securities in the primary market (initial public offers) and to the extent required under the Regulations, Designated Persons shall hold their investments for a specified minimum period commencing from the allotment of the relevant Securities to such Designated Persons.

THRESHOLD LIMIT AND DISCLOSURE

Designated Persons shall make the following disclosures of shares and other Securities held in the Company by them to the Compliance Officer:

- a) **Initial Disclosure**
Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a promoter, shall disclose holding of securities of the Company, Permanent Account Number or any other identifier authorised by law; phone and mobile numbers of self and immediate relatives, the names of educational institutions from which Designated Persons have graduated and names of their past employers within 7 days of such appointment or becoming a Promoter in the enclosed Form A.
- b) **Annual Disclosure**
The Designated Person within 30 days from the end of every Financial Year, shall disclose to the Company in Form P4 information regarding name of Immediate Relatives, persons with whom such designated person shares a Material Financial Relationship; their Permanent Account Number or any other identifier authorized by law; phone and mobile numbers of self.

Explanation: “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 during the immediately preceding twelve months, equivalent to at least 25% of such payer’s annual income but shall exclude relationships in which the payment is based on arm’s length transactions.

- c) **Continual Disclosure**
Designated Persons shall be required to inform any changes to the disclosure provided on an annual basis with respect to Immediate Relatives, persons with whom such Designated Person(s) shares a material financial relationship.

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.

INSTITUTIONAL MECHANISM FOR PREVENTION OF INSIDER TRADING

The Managing Director/Executive Director of the Company shall put in place adequate and effective system of internal controls to ensure compliance with the requirements given in these Regulations and such internal controls shall inter alia include the following:

- a) all employees who have access to Unpublished Price Sensitive Information are identified as designated employees;
- b) all the Unpublished Price Sensitive Information shall be identified, and its confidentiality shall be maintained as per the requirements of these 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.

Audit Committee 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.

RECORDS

The Compliance Officer shall maintain records of all the declarations made in the appropriate form for a minimum period of five (5) years.

The Compliance Officer shall also maintain a record of the Designated Persons and any changes made in the list of the Designated Persons.

The Company will maintain a digital database of such persons or entities with whom information is shared under these Regulations along with PAN or any other identifier authorized by law where PAN is not available. There will be adequate internal controls and check such as time stamping and audit trails to ensure non-tampering of database.

The entry of information, not emanating from within the organisation, in structured digital database shall be done not later than 2 calendar days from the receipt of such information.

PENALTIES FOR CONTRAVENTION

- a) Persons governed by this Code who trade in Securities or communicate any information for trading in Securities in contravention of the provisions of this Code shall be penalised and appropriate action may be taken as may deem fit by the Enquiry Committee.
- b) Persons governed by this Code who violate the provisions of this Code shall be subject to disciplinary action as may deem fit by the Enquiry Committee, which may include issuing of warning letter, levy of penalties, wage freeze, suspension, recovery, clawback and ineligibility for future participation in the Company's employee stock option scheme, etc. Any amount collected under this clause shall be remitted to the Securities and Exchange Board of India for credit to the Investor Protection and Education Fund administered by the Securities and Exchange Board of India.

- c) It is hereby clarified that notwithstanding any penal action taken as may deem fit by the Enquiry Committee, it shall not in any way preclude the SEBI from taking any action for violation of the Regulations or any other applicable laws and enactments. The Company shall promptly inform the stock exchanges where securities of the Company are traded in case it is observed that there has been a violation of the Regulations.
- d) Any material contravention of this Code shall be placed before the board of directors and actions shall be initiated after due consultation with the managing director/executive director of the Company.

PROTECTION OF EMPLOYEES AGAINST RETALIATION AND VICTIMIZATION

Employee who reports any alleged violations of insider trading laws in accordance with the Informant mechanism introduced vide SEBI (Prohibition of Insider Trading) (Third Amendment) Regulations, 2019 or as amended from time to time, will be protected against any discharge, termination, demotion, suspension, threats, harassment, directly or indirectly or discrimination.

SCOPE LIMITATION, AMENDMENT

In the event of any conflict between the provisions of this Policy and of the Listing Regulations / Companies Act, 2013 or any other statutory enactments or rules, the provisions of the Listing Regulations / Companies Act, 2013 or statutory enactments or rules shall prevail over this Policy. The Policy shall stand amended to the extent of any such subsequent amendment / modification to the applicable law from the effective date of such amendment.

The Board of Directors may from time to time make such alterations to this Policy as considered appropriate, in line with the applicable regulations.

GENERAL

A copy of the Regulations is enclosed. Designated Persons are advised to peruse the Regulations carefully and acquaint themselves and their Immediate Relatives with all the provisions contained therein. The Compliance Officer will be available for clarification/assistance that may be necessary.

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Form P1

APPLICATION FOR PRE-CLEARANCE OF TRADE IN SECURITIES

The Compliance Officer
UFO Moviez India Limited

Pursuant to the Company's Code to prevent, regulate, monitor and report trading by insiders (the “**Insider Code**”) and the Regulations (as defined in the Insider Code), I seek approval for purchase/sale/subscription of the Securities of the Company as per details given below:

1	Name of the applicant	
2	Designation	
3	Employee code (if applicable)	
4	Number and value of Securities held (including through Immediate Relatives) as on the date of application	
5	Folio No. / DPID and Client	
6	Nature of transaction (purchase / subscription / sale)	
7	Proposed date of transaction	
8	Estimated number of Securities to be dealt	
9	Price at which transaction is proposed	
10	Current market price (as on the date of application)	
11	Name of the Immediate Relative and relation, if the transaction is in the name of the Immediate Relative	
12	Previous approval No. and date of purchase/allotment	

Place:

Date:

(Signature)

Name:

Designation:

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Form P2

The Compliance Officer
 UFO Moviez India Limited

UNDERTAKING

Pursuant to the Company's code of conduct to prevent, regulate, monitor and report trading by insiders (the “**Insider Code**”) and the Regulations (as defined in the Insider Code) and in connection with my application no. _____ dated _____ for pre-clearance of trade in Securities of the Company, I undertake that:

- a) I have no access to nor do I have any information that could be construed as Unpublished Price Sensitive Information (as defined in the Regulations) at the time of signing this undertaking;
- b) In the event that I have access to or receive any information that could be construed as Unpublished Price Sensitive Information after the signing of this undertaking but before executing the transaction for which approval is sought, I shall promptly inform the Compliance Officer that I have access to or have received such information and shall completely refrain from dealing in the Securities of the Company until such information becomes public;
- c) I shall hold the Securities for a minimum period of 6 months from the date of purchase and shall not enter into opposite transaction within 6 months/I have complied with the requirement of the minimum holding period of 6 months with respect to shares sold;
- d) I have not contravened the provisions of the Insider Code; and
- e) I have made full and true disclosure in the matter.

I hereby declare that I shall execute my order in respect of the Securities within seven Working Days (as defined in the Regulations) after the approval of pre-clearance is given. If the order is not executed within such time, I undertake that I shall not execute my order until and unless I obtain pre-clearance for the transaction again and shall also file details of the unexecuted transaction with the Company in Form P3.

Place:

Date:

(Signature)

Name & Designation:

FOR OFFICE USE ONLY	
Serial number of the application received	
Date and time of receipt of the application	
Date and time of communication of the pre-clearance/rejection	
Reasons for not giving pre-clearance	
_____ Signature of the Compliance Officer	

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Form P3

The Compliance Officer
UFO Moviez India Limited

FORMAT FOR FILING DETAILS OF TRANSACTION

1.	Name	
2.	Designation	
3.	Employee code (if applicable)	
4.	Approval number and date	
5.	Date of transaction	
6.	Nature of transaction (purchase / subscription / sale)	
7.	Number and value of Securities held (including through Immediate Relatives) before the transaction	
8.	Number and value of Securities held (including through Immediate Relatives) after the transaction	
9.	Price at which transaction was conducted	
10.	Name of the Immediate Relative and relation, if the transaction is in the name of the Immediate Relative	

Place:

Date:

(Signature)

Name:

Designation:

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**Form P4
Annual Disclosure**

Employee Code: _____

Date: _____

Designation: _____

Email: _____

The Compliance Officer,
UFO Moviez India Limited

A. DETAILS OF SHARES AND OTHER SECURITIES HELD BY DESIGNATED PERSON /PERSON BELONGING TO PROMOTER GROUP IN OWN NAME

Name	PAN	Folio No. / DP ID / Client	No. of Shares held on	No. of Shares bought during the year	No. of Shares sold during the year	No. of Shares Held on

B. DETAILS OF SHARES AND OTHER SECURITIES HELD BY IMMEDIATE RELATIVES OF DESIGNATED PERSON / PERSON BELONGING TO PROMOTER GROUP

Name	Relationship*	PAN*	Folio No. / DP ID / Client (if PAN is not available)	No. of Shares held on	No. of Shares bought during the year	No. of Shares sold during the year	No. of Shares Held on

I / we declare that I / we alongwith my immediate relatives have complied with the requirement of the minimum holding period of 6 months with respect to shares sold.

I / we declare that the above disclosure is true and correct and is in accordance with the previous disclosure given to the Company.

* PAN/Relationship is mandatory

Name & Signature

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FORM A

SEBI (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (1) (b) read with Regulation 6(2) – Disclosure on becoming a Key Managerial Personnel/Director/Promoter/Member of the promoter group]

Name of the company: UFO Moviez India Limited

ISIN of the company: INE527H01019

Details of Securities held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).

Name, PAN, CIN/DIN & Address with contact nos.	Category of Person (KMP / Director or Promoter or member of the promoter group/ Immediate relative to/others, etc.)	Date of appointment of KMP/Director / OR Date of becoming Promoter/ member of the promoter group	Securities held at the time of appointment of KMP/Director or upon becoming Promoter or member of the promoter group		% Shareholding of
			Type of securities (For eg. – Shares, Warrants, Convertible Debentures, Rights entitlements, etc.)	No.	
1	2	3	4	5	6

Note: "Securities" shall have the meaning as defined under regulation 2(1)(i) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Details of Open Interest (OI) in derivatives on the securities of the company held on appointment of KMP or Director or upon becoming a Promoter or member of the promoter group of a listed company and immediate relatives of such persons and by other such persons as mentioned in Regulation 6(2).

Open Interest of the Future contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group			Open Interest of the Option Contracts held at the time of appointment of Director/KMP or upon becoming Promoter/member of the promoter group		
Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms	Contract specifications	Number of units (contracts * lot size)	Notional value in Rupee terms
7	8	9	10	11	12

Note: In case of Options, notional value shall be calculated based on premium plus strike price of options

Name & Signature: _____

Designation: _____

Date:

Place: