



Central Depository Services (India) Limited

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COMMUNIQUE TO REGISTRAR & TRANSFER AGENTS

CDSL/OPS/RTA/POLCY/2024/241

December 24, 2024

TRADING WINDOW CLOSURE PERIOD UNDER CLAUSE 4 OF SCHEDULE B READ WITH REGULATION 9 OF SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015 (“PIT REGULATIONS”) – EXTENDING FRAMEWORK FOR RESTRICTING TRADING BY DESIGNATED PERSONS (“DPS”) BY FREEZING PAN AT SECURITY LEVEL TO ALL LISTED COMPANIES.

Issuers / RTAs are advised to refer SEBI Circular no. **SEBI/HO/ISD/ISD-PoD-2/P/CIR/2023/124** dated **July 19, 2023**, and CDSL communique no. **CDSL/OPS/RTA/POLCY/2024/160** dated **September 23, 2024** regarding Trading Window closure period under Clause 4 of Schedule B read with Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015 (“PIT Regulations”) – **Extending framework for restricting trading by Designated Persons (“DPs”) by freezing PAN at security level to all listed companies.**

The operational guidelines are as given below:

1. The said functionality has been released live for all the listed issuers.
2. The functionality is applicable to all listed companies only for equity ISINs.
3. The listed issuers who have appointed CDSL as their Designated Depository (DD) will be shown the menu “No Trading Window Period” in their issuer login on CDSL portal.
4. Issuer needs to assign below privileges to the user from his **admin login** to view the “No Trading Window Period” tab.
 - No Trading
 - No Trading Setup
 - No Trading Inquiry
 - Exemption Inquiry
5. Issuer needs to click on menu “No Trading Window Period” → Setup.
 - System display page with following details
 - Issuer ID – Pre-populated
 - ISIN – Pre-populated
 - Trading restriction period shall be made applicable from the end of every quarter till 48 hours after the declaration of financial results.
 - Freeze Start Date – Date control (Issuer needs to select the freeze start date (T Day) from date greater than 2 business date i.e., T-2 days).



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- Freeze End Date – Date control (Date should be always greater than Freeze Start Date i.e., T+ n... days). The Issuer can select a notional end date initially and modify it later after the confirmation of date of their board meeting.
 - List of DP/s already uploaded by the issuer for the purpose of System Driven Disclosure (SDD) will be displayed along with pre-populated Freeze Start date and Freeze end date as entered in the date fields above.
 - Issuer to verify the data, can exclude details of Immediate Relatives (if updated on SDD portal of DD) and click on submit button to confirm the BO – ISIN level freeze for debit and credit to be applied.
6. Once the details are submitted by issuer, system will identify the sole / joint holder demat accounts of DP/s based on the PAN entered by Issuer and freeze for debit and credit at BO – ISIN level in the respective demat account/s on Start of Day (SOD) of freeze start date.
 7. The Demat accounts where first holder PAN is of non-DP, but the joint holder PAN is of the DP, still the specific ISIN in identified demat account will be frozen at BO-ISIN level for both i.e. debit and credit.
 8. The freeze reason code no. “25” and reason description “Trading Window Closure Period” will be used for this BO-ISIN level freeze in CDSL depository systems.
 9. During the freeze period, no debit or credit will be allowed in the demat account of the DP/s for the specified ISIN as stated in point nos. 7 & 8 above.
 10. Issuers need to inform their DPs / joint holders accordingly.
 11. Any trades done prior to “No trading window period” should be settled by way of giving early pay-in instruction in favor of their CM on the trade date i.e. T Day itself.
 12. In case of any exemptions provided to be allowed to DP during trading window closure period, the DP / BOs & Issuer need to update the exemption details in the system.
 13. Any exemptions provided to DP/s by Issuer during the “No Trading Window Period” needs to be entered in the Issuer login minimum 2 days (T-2 days) prior to the exemption start date along with the proper reason for providing exemption.
 14. Demat accounts of DP/s who are provided with exemptions will be unfreezed on SOD of exemption start date and will be again freezed on the End of Day (EOD) of exemption end date. The settlement process as mentioned in point no. 11 needs to be followed.
 15. DP/s need to give early / normal pay-in instruction on the trade date itself, to settle the trade obligation and avoid the shares being auctioned.
 16. Trading window closure exemption end date should be after 2 days from the last exempted trade date on exchange/s.



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Steps to setup freeze: -

- For freeze setup click on “No Trading window period” tab → setup.

Issuer ID: 902190 Issuer Name: ENVAR ELECTRODYNE LIMITED (FORMERLY KIRLOSKAR ELECTRODYNE LTD) Issuer Type: Setup

List of Director/Employee details uploaded as per system driven disclosure for Prohibition of Insider Trading

Exchange Codes: 1 - NSE, 2 - BSE, 3 - MSEI
Category: 1 - Director, 2 - CEO with Directorship, 3 - CEO - without Directorship, 4 - Employees upto two levels below CEO, 5 - Promoter, 6 - Promoter Group, 7 - Other Designated Person

Issuer Code	DIN	Exchange	Name of Director/ Employee	PAN of Director/ Employee	BOID	Employee Category	Effective Date	Action
601C		2	RAHUL SAWANT	ADCPK2004H		5	20-Jul-2023	
601C		2	PRATIM GURAV	CCAAA2400C		5	24-Jul-2023	
601C		1,2	RAMDEO AGARWAL	PKJSK2003A		4	26-Jul-2023	
601C		1,2	VIJAY MALLYA	JVAKC2135B		5	26-Jul-2023	

Showing 11 to 14 of 14 entries

- Click on select all to update freezes for all updated PANs.

Issuer ID: 003013 Issuer Name: PRANAVADITYA SPINNING MILLS LIMITED Issuer Type: User

KMP Setup

Issuer Id: 003013
ISIN: IN8569D01019
From Date: Select date
To Date: Select date

Select All

Pan / Boid	UserName
AABPV4459R	VISWANATHAN LAKSHMANAN
AACPA0500F	SUSHILKUMAR KRISHNA AGRAWAL
AAFP0776Q	KALA AGARWAL



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- Set up the Date range of Trading window closure and select the DP/s whose PAN is to be freeze for the given period. Click on select all to update freezes for all updated PANs and submit.

Issuer ID: 003013 Issuer Name: PRANAVADITYA SPINNING MILLS LIMITED Issuer Type: User

KMP Setup

Issuer Id: 003013

ISIN: IN8569D01019

From Date: 01-Oct-2023

To Date: 31-Oct-2023

Search:

Select	Pan / BoId	UserName
☒	AABPV4459R	VISWANATHAN LAKSHMANAN
☒	AACPA0500F	SUSHILKUMAR KRISHNA AGRAWAL
☐	AAFP0776Q	KALA AGARWAL

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- Freezing PANs for DP/s in Depository system will be at BO-ISIN level.
- After freezing you can check the “Freeze status” for the records in the “KMP Freeze Inquiry” page under “No Trading Window period” tab.

Foreign Investment Limit | Prohibition of Insider Trading | Download Annual Bill | Evolving Schedule | Update Issuer Detail | Modification Issuer Details | Buyback setup | Issuer Upload Inquiry

No Trading Window Period | Debt Instrument | Default debt ISIN status

Issuer ID: 003013 Issuer Name: PRANAVADITYA SPINNING MILLS LIMITED Issuer Type: User

KMP Inquiry

Export to Excel

Search:

Select	Process Id	Issuer Code	ISIN	PAN	BO ID	User Name	No Trade Start Date	No Trade End Date	Process Status
☐	1112	569D	IN8569D01019	AABPV4459R		VISWANATHAN LAKSHMANAN	04-Sep-2023	30-Sep-2023	Pending for freeze
☐	1114	569D	INE569D01010	AACPA0500F		SUSHILKUMAR KRISHNA AGRAWAL	04-Sep-2023	30-Sep-2023	Pending for freeze
☐	1115	569D	INE569D01028	ABPPM6622E		KAMAL SUKHAMOY MITRA	04-Sep-2023	30-Sep-2023	Pending for freeze

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Steps to setup end date modification: -

- Go to “KMP Freeze Inquiry” page under No Trading Window Tab and select the DP/s whose end date you want to modify and click the MODIFY button.

Select	Process Id	Issuer Code	ISIN	PAN	BO ID	User Name	No Trade Start Date	No Trade End Date	Process Status
☐	1138	528G	INE528G01019	AINPS7185F		PARTHA PRATIM SENGUPTA	04-Sep-2023	21-Sep-2023	Pending for freeze
☐	1136	528G	INE528G01019	BJDPK4002H		BHAGYASHRI JAGTAP	04-Sep-2023	09-Sep-2023	Freeze done
☐	1137	528G	INE528G01019	PGKPQ2003H		PRATIM GURAV	04-Sep-2023	29-Sep-2023	Freeze done

The interface also shows a search bar, a 'CDSL News' section, and a footer with links to About Us, Copyright Policy, Hyperlinking Policy, Privacy Policy, Terms and Conditions, and Contact Us.

- Select the new end date and click on submit.
- Further, process id will be the same for all the records to modify end date.

Select	Process Id	Issuer Code	ISIN	Trade End Date	Process Status	Last Modification Date	Business Date
☐	525	601C	INE601C01019	10-Nov-2023	Freeze done	11/1/2023 4:58:27 PM	27-Oct-2023
☐	525	601C	INE601C01019	10-Nov-2023	Freeze done	11/1/2023 12:17:39 PM	27-Oct-2023
☐	525	601C	INE601C01019	10-Nov-2023	Freeze done	11/2/2023 6:21:35 PM	27-Oct-2023
☐	525	601C	INE601C01019	10-Nov-2023	Freeze done	11/2/2023 12:25:48 PM	27-Oct-2023
☐	525	601C	INE601C01019	10-Nov-2023	Freeze done	11/2/2023 6:21:39 PM	27-Oct-2023
☐	526	601C	INE601C01013	02-Nov-2023	Freeze done	11/1/2023 7:12:17 PM	01-Nov-2023
☐	526	601C	INE601C01013	02-Nov-2023	Freeze done	11/1/2023 7:12:17 PM	01-Nov-2023
☒	526	601C	INE601C01013	02-Nov-2023	Freeze done	11/1/2023 7:12:21 PM	01-Nov-2023
☐	525	601C	INE601C01013	10-Nov-2023	Pending for freeze	11/1/2023 4:58:36 PM	01-Nov-2023
☐	527	601C	INE601C01013	30-Nov-2023	Freeze done	11/2/2023 3:39:15 PM	02-Nov-2023

The dialog box also shows a 'Close' button and a 'Submit' button. A red arrow points to the 'Modify' button at the bottom left of the table.



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Steps to setup exemption: -

- Go to “KMP Freeze Inquiry” page under No Trading Window Tab and select the DP/s whose PAN you want to exempt and click the EXEMPTION button.

The screenshot shows the CDSL Issuer Centre interface. The top navigation bar includes links like 'Prohibition of Insider Trading', 'Download Annual Bill', 'Evoting Schedule', 'Update Issuer Detail', 'Modification Issuer Details', 'Buyback setup', and 'Issuer Upload Inquiry'. The 'No Trading Window Period' tab is selected, and the 'Exemption Inquiry' button is highlighted in the left sidebar. The main content area displays a table of issuers with columns for Select, Process Id, Issuer Code, ISIN, PAN, BO ID, User Name, No Trade Start Date, No Trade End Date, and Process Status. The table lists three issuers: PARTHA PRATIM SENGUPTA, BHAGYASHRI JAGTAP, and PRATIM GURAV. The bottom of the page shows the CDSL News section and a footer with links to 'About Us', 'Copyright Policy', 'Hyperlinking Policy', 'Privacy Policy', 'Terms and Conditions', and 'Contact Us'.

- Select the exemption start and end date. Enter the reason for exemption in accordance with the SEBI circular and click on submit.

The screenshot shows the CDSL Issuer Centre interface with the 'Exemption' dialog box open. The dialog box has fields for 'From date', 'To date', and 'Remark'. The 'From date' is set to 10-Oct-2023, the 'To date' is set to 16-Oct-2023, and the 'Remark' is 'Resigned from the company'. The 'Submit' button is highlighted. The background shows the same table of issuers as the previous screenshot, but it is dimmed. The bottom of the page shows the CDSL News section and a footer with links to 'About Us', 'Copyright Policy', 'Hyperlinking Policy', 'Privacy Policy', 'Terms and Conditions', and 'Contact Us'.



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- Go to “KMP Exemption Inquiry” page and check the “Exemption status” of the records entered.

Issuer ID: 005025 Issuer Name: YES BANK LIMITED Issuer Type: User

KMP Exemption Inquiry

Export to Excel

Process Id	Issuer Code	ISIN	PAN	BO ID	User Name	No Trade Start Date	No Trade End Date	Exemption Start Date	Exemption End Date	Remark	Process Status	Last Modification Date
1136	528G	INE528G01019	BJDPK4002H		BHAGYASHRI JAGTAP	04-Sep-2023	24-Sep-2023	10-Sep-2023	11-Sep-2023	test	Exemption done	08-09-2023 14:46:30
1146	528G	INE528G01019	SAKPFJ3001J		SHEETAL AMRUTSAGAR	06-Sep-2023	30-Sep-2023	07-Sep-2023	14-Sep-2023	ESOP	Exemption done	07-09-2023 16:39:53

Showing 1 to 2 of 2 entries

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In the view of above, all the issuers / RTAs are requested that the PAN, Promoters, Promoter Group, Directors etc. details of DP/s should be updated regularly on DD portal for SAST and PIT regulations should be latest details. These details should be in line with the required criteria of SAST & PIT regulations. Issuers are requested to verify the updated data through their login credentials and immediately confirm that the said details are properly updated.

Issuers / RTAs are advised to take note of the same and ensure compliance.

Queries regarding this communiqué may be addressed to CDSL - SDD: on telephone numbers (022) 6234 3609/ 3610 and Emails may be sent to: sdd@cdslindia.com.

For and on behalf of

Central Depository Services (India) Limited

sd/-

Nilesh Shah

Asst. Vice President – Operations