



Central Depository Services (India) Limited

Convenient + Dependable + Secure

COMMUNIQUE TO REGISTRAR & TRANSFER AGENTS

CDSL/OPS/RTA/GENRL/2024/96

June 25, 2024

TRADING WINDOW CLOSURE PERIOD FOR RESTRICTING TRADING BY DESIGNATED PERSONS

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 **CDSL/OPS/RTA/POLCY/2024/24** dated **March 15, 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") –**framework for restricting trading by Designated Persons ("DPs") by freezing PAN at security level to all listed companies.**

The operational guidelines are given below:

1. The said functionality has been released on live for all the listed issuers from quarter ending March 2024.
2. The functionality is applicable to all listed companies for only equity ISINs.
3. The listed issuers who have appointed CDSL as their designated depository 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)
 - Freeze End Date – Date control (Date should be always greater than Freeze Start Date i.e., T+ n... days). The Issuer may select a notional end date initially and modify it later after the confirmation of date of their board meeting.



Central Depository Services (India) Limited

Convenient + Dependable + Secure

COMMUNIQUE TO REGISTRAR & TRANSFER AGENTS

-
- List of DPs already uploaded by the issuer for the purpose of SDD will be displayed along with pre-populated freeze start date and freeze end date entered in the date fields as mentioned above.
 - Issuer to verify the data and click on submit button to confirm the BO – ISIN level freeze for both - debit and credit to be applied.
6. Once the details are submitted by issuer, system will identify the demat accounts of sole / joint holder DPs based on the PAN entered by Issuer and freeze for both - 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-designated person, 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 - debit and credit.
 8. The freeze reason code no. “25” and reason description “Trading Window Closure Period” will be used for said 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 DPs 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 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 DPs / BOs & issuer need to update the exemption details in the system.
 13. Any exemptions provided to DPs 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 reason for providing exemption.
 14. Demat accounts of DPs who are provided with exemptions will be unfreezed on SOD of exemption start date and will be again frozen on the EOD of exemption end date. The settlement process as mentioned in point no. 11 needs to be followed.
 15. Trading window closure exemption end date should be after 2 days from the last exempted trade date on exchange/s.

Steps to setup freeze: -

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



Central Depository Services (India) Limited

Convenient + Dependable + Secure

COMMUNIQUE TO REGISTRAR & TRANSFER AGENTS

Issuer ID: 002198 Issuer Name: ENVAIR ELECTRODYNE LIMITED (FORMERLY KIRLOSKAR ELECTRODYNE LTD) Issuer Type: [Red Arrow points to 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	ADCFK2004H		5	20-Jul-2023	[Icon]
601C		2	PRATIM GURAV	CCAA2400C		5	24-Jul-2023	[Icon]
601C		1,2	RAMDEO AGARWAL	PKJSK2003A		4	26-Jul-2023	[Icon]
601C		1,2	VIJAY MALLYA	JVAKC2135B		5	26-Jul-2023	[Icon]

Showing 11 to 14 of 14 entries

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

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

KMP Setup

Issuer Id: 003013
ISIN: IN859D01019
From Date: Select date
To Date: Select date

[Red Arrow points to Select All]

Select	Pan / Boid	UserName
☐	AABPV4459R	VISWANATHAN LAKSHMANAN
☐	AACPA0500F	SUSHILKUMAR KRISHNA AGRAWAL
☐	AAFP07760	KALA AGARWAL

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



Central Depository Services (India) Limited

Convenient + Dependable + Secure

COMMUNIQUE TO REGISTRAR & TRANSFER AGENTS

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

CDSL News

About Us | Copyright Policy | Hyperlinking Policy | Privacy Policy | Terms and Conditions | Contact Us

Copyright © 2018 Central Depository Services (India) Ltd. All rights reserved.

- Freezing PANs for designated persons 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.

Central Depository Services (India) Limited

Convenient + Dependable + Secure

isuser_3013 Logged as: isuser_3...

Logout

Foreign Investment Limit | Prohibition of insider Trading | Download Annual Bill | Evoting 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

CDSL News

About Us | Copyright Policy | Hyperlinking Policy | Privacy Policy | Terms and Conditions | Contact Us

Copyright © 2018 Central Depository Services (India) Ltd. All rights reserved.

Steps to setup end date modification: -

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



Central Depository Services (India) Limited

Convenient $\oplus$ Dependable $\oplus$ Secure

COMMUNIQUE TO REGISTRAR & TRANSFER AGENTS

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

Steps to setup exemption: -

- Go to "KMP Freeze Inquiry" page under No Trading Window Tab and select the designated person whose PAN you want to exempt and click the EXEMPTION button.



Central Depository Services (India) Limited

Convenient Dependable Secure

COMMUNIQUE TO REGISTRAR & TRANSFER AGENTS

The screenshot shows the CDSL Issuer Centre web application. The user is logged in as 'isuruser_25'. The 'No Trading Window Period' dropdown menu is open, showing options: 'Setup', 'KMP Freeze Inquiry', and 'Exemption Inquiry'. A red arrow points to 'Exemption Inquiry'. Below the menu, a table displays the following data:

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

- 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 'Exemption' modal form. The 'From date' is 10-Oct-2023, 'To date' is 16-Oct-2023, and the 'Remark' is 'Resigned from the company'. A red arrow points to the 'Exemption' button. The background shows a table with the following data:

Select	Process Id	Issuer Code	ISIN	PAN	BO ID	User Name	No Trade Start Date	No Trade End Date	Process Status
☐	1146								
☐	1151								
☐	1152								
☐	1152								
☐	1152								
☐	1152								

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



Central Depository Services (India) Limited

Convenient • Dependable • Secure

COMMUNIQUE TO REGISTRAR & TRANSFER AGENTS

The screenshot displays the Issuer Centre portal for Central Depository Services (India) Limited. The user is logged in as 'isuser_25'. The main menu includes options like 'Prohibition of Insider Trading', 'Download Annual Bill', 'Evoting Schedule', 'Update Issuer Detail', 'Modification Issuer Details', 'Buyback setup', and 'Issuer Upload Inquiry'. The current view is 'KMP Exemption Inquiry' for Issuer ID: 005025 and Issuer Name: YES BANK LIMITED. A table shows two entries for KMP Exemption Inquiry, both with a status of 'Exemption done'. A red arrow points to the 'Process Status' column header.

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	SAKPJ3001J		SHEETAL AMRUTSAGAR	06-Sep-2023	30-Sep-2023	07-Sep-2023	14-Sep-2023	ESOP	Exemption done	07-09-2023 16:39:53

In the view of above, all the issuers / RTAs are requested that the PAN, Promoters, Promoter Group, Directors etc. details of designated persons (DPs) should be updated regularly on designated depository 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 communicate may be addressed to CDSL – SDD team through e-mail on sdd@cdslindia.com or call us on 022-6234 3609 / 3610.

For and on behalf of

Central Depository Services (India) Limited.

sd/-

Nilesh Shah

Asst. Vice President - Operations