

# **United Bank of India- Code of Conduct for Prohibition of Insider Trading**

[Framed under Securities and Exchange Board of India  
(Prohibition of Insider Trading) Regulations, 2015]

*(Last Reviewed on April 4, 2019)*



**UNITED BANK OF INDIA**  
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## United Bank of India Code of Conduct for Prohibition of Insider Trading

### **CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT INSIDER TRADING UNDER THE (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015**

#### **1. SHORT TITLE, APPLICABILITY AND COMMENCEMENT:**

- a. This Code may be called as 'United Bank of India ('the Bank') Code of Conduct for Prohibition of Insider Trading' ("Code").
- b. This Code shall be applicable to all designated persons, relatives of designated persons, employees/ intermediaries/fiduciary having access to Unpublished Price Sensitive Information, employees of material subsidiaries, having access to Unpublished Price Sensitive Information, promoter(s) of the Bank its subsidiaries and fiduciaries, CEO and up to two levels below the CEO of the Bank its subsidiaries and fiduciaries, any support staff of the Bank (e.g. IT Officer, Stenographer etc., personal/executive secretary etc.).
- c. This Code of Conduct comes into force with effect from June 23, 2015 i.e. the date it is approved by the Board of Directors of the Bank replacing the earlier "Code of Conduct for Prevention of Insider Trading in Shares of United Bank of India by its Directors & Employees."

#### **2. DEFINITIONS:**

In this Code, unless the context otherwise provides:

- a. "**Act**" means the Securities and Exchange Board of India Act, 1992, as amended from time to time and as applicable for the time being in force.
- b. "**Bank**" means United Bank of India.
- c. "**Board**" means Board of Directors of the United Bank of India, as constituted from time to time.
- d. "**Code**" means 'United Bank of India Code of Conduct for Prohibition of Insider Trading', as modified from time to time.
- e. "**Compliance Officer**" means the Company Secretary or such other person who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under the Regulations who may be appointed by the Board as the Compliance Officer.
- f. "**Connected Person**" means
  - i. any person who is or has during the 6 months prior to the concerned act, been associated with the Bank, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the Bank or holds any position including a professional or business relationship between himself

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and the Bank whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.

- ii. Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established -
  - a) an immediate relative of connected persons specified in clause (i); or
  - b) a holding company or associate company or subsidiary company or an employee or director thereof; 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 recognized or authorized by the Board; or
  - i) a banker of the Bank; or
  - j) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of the Bank or his immediate relative or banker, has more than ten per cent of the holding or interest;
- g. **“Designated Employees”** means
  - i. All General Managers, Functional Heads, and employees in the grade Scale V and VI posted at Head Office/Corporate Office only,
  - ii. All Employees in the Departments of Corporate Accounts (including Taxation), Planning, Treasury, Board Secretariat, Company Secretary, and Corporate Legal functions.
  - iii. All Executive Assistants (EAs) and Personal Assistants (PAs) to the Wholetime Directors and General Managers.
  - iv. Connected persons as identified by the Compliance Officer in consultation with the Board of Directors, who in the opinion of the Board can come in possession of unpublished price sensitive information based on their functional areas and/or has the possibility to generate such information including debtors, creditors, professionals, consultants and other such outsiders.

The aforesaid definition of ‘Designated Employees’ shall also include any employee of the Bank who is reasonably expected to have access to or could access Unpublished Price Sensitive Information of the Bank by virtue of any connection that would put them in

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position to access the same.

- ga. **“Designated Persons”/ “DP”** means “Designated Employees” and/ or “Connected Persons” as defined under this Code.
- h. **“Director”** means member of the Board of Directors of the Bank.
- i. **“Functional Head(s)”** shall mean Head of the Departments / Functions who are in-charge of relevant areas of the Bank's operations.
- j. **“Fiduciary/Fiduciaries”** Professionals and firms of professionals such as auditors, chartered accountancy firms, company secretary, law firms, analysts, insolvency professional entities, consultants, banks etc., assisting or advising the Bank shall be individually referred to as Fiduciary and collectively referred to as fiduciaries for the purpose of this Code.
- k. **“Financially literate”** shall mean a person who has the ability to read and understand basic financial statements i.e. balance sheet, profit and loss account, and statement of cash flows.
- l. **“Generally Available Information”** means information that is accessible to the public on a non-discriminatory basis;
- m. **“Immediate Relative”** means Spouse, parents, sibling or children of the Designated Employee/Connected Person who is either financially dependent on the Designated Employee/ Connected Person or consults such person for dealing in the securities.
- n. **“Insider”** means any person who is:
- a designated person; or
  - in possession of or having access to unpublished price sensitive information including receipt of such information pursuant to a legitimate purpose
- o. **“Insider Trading”** shall have the same meaning as mentioned in Explanation (a) to Section 195 of the Companies Act, 2013 and Rules framed there under, which presently reads as under:

*“insider trading means –*

- (i) *an act of subscribing, buying, selling, dealing or agreeing to subscribe, buy, sell or deal in any securities by any director or key managerial personnel or any other designated employee/officer of the Bank either as principal or agent if such director or key managerial personnel or designated employee/officer of the Bank is reasonably expected to have access to any non-public price sensitive information in respect of securities of the Bank; or*
- (ii) *an act of counselling about procuring or communicating directly or indirectly any non-public price-sensitive information to any person.”*

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- p. **“Key Managerial Personnel”** as defined in Section 2(51) of the Companies Act 2013, means,
- Managing Director & CEO;
  - Whole-time Director(s);
  - Chief Financial Officer (CFO);
  - Company Secretary, and
  - such other persons as prescribed under SEBI Guidelines from time to time.
- q. **“Legitimate purpose”** shall have the same meaning as defined in United Bank of India Code of Practices & Procedures for Fair Disclosure of Unpublished Price Sensitive Information and 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 this Code.
- r. **“Material financial relationship”** means 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.
- s. **“Officer”** means and includes Director, Board Secretary, Company Secretary or any person in accordance with whose directions or instructions the Board of Directors or any one or more of the directors are accustomed to act including an auditor of the Bank. Officers comprise the top tiers of the bank management and all employees in Accounts/ Board/ Secretarial Departments.
- t. **“Price Sensitive Information”** shall have the same meaning as mentioned in Explanation (b) to Section 195 of the Companies Act, 2013 and Rules framed there under, which presently reads as under:
- “price sensitive information” means any information which relates, directly or indirectly, to Bank and which if published is likely to materially affect the price of securities of the Bank.”*
- u. **“Promoter/ Promoter Group”** shall have meaning assigned to it under the Securities and Exchange Board of India (Issue of Capital and Disclosure Requirements) Regulations, 2018 or any modification thereof;
- v. **“SEBI”** means the Securities and Exchange Board of India;
- w. **“Securities”** shall have the meaning assigned to it under Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund;
- x. **“Specified”** means specified by the Securities and Exchange Board of India in writing;
- y. **“Takeover Regulations”** means SEBI (Substantial Acquisition of Shares and Takeovers) Regulations, 2011 and any amendments thereto;

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- z. **"The Regulations"** means SEBI (Prohibition of Insider Trading) Regulations, 2015 as may be amended from time to time;
- aa. **"Trading"/ "Trading in securities"** means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly;
- bb. **"Trading day"** means a day on which the recognized stock exchanges are open for trading;
- cc. **"Trading Plan"** means the Trading Plans as described in Regulation 5 of the Regulations;
- dd. **"Trading Window"** means a period to be specified by the Bank on closure of which Designated Persons either directly or through their relatives/dependants are not allowed to trade in Bank securities. Trading Window shall be used as an instrument for monitoring trade by Designated Persons of the Bank.
- ee. **"Unpublished Price Sensitive Information"/ "UPSI"** means any information, relating to the Bank or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: –
- I. financial results;
  - II. dividends;
  - III. change in capital structure;
  - IV. mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
  - V. changes in key managerial personnel; and
  - VI. material events in accordance with the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 which includes:-
    - i. Change in the general character or nature of business.
    - ii. Disruption of operations due to natural calamity.
    - iii. Commencement of Commercial Production/Commercial Operations.
    - iv. Developments with respect to pricing/realization arising out of change in the regulatory framework.
    - v. Litigation/dispute with a material impact.
    - vi. Revision in Ratings.
    - vii. Any other information having bearing on the operation/performance of the Bank as well as price sensitive information, which shall include but not be restricted to;
      - Issue of any class of securities.
      - Acquisition, merger, de-merger, amalgamation, restructuring, scheme of arrangement, spin off or selling divisions of the Bank, etc.
      - Change in market lot of the Bank's shares, sub-division of equity shares.
      - Voluntary delisting by the Bank from the stock exchange(s).
      - Forfeiture of shares.
      - Any action, which will result in alteration in the terms regarding redemption/cancellation/retirement in whole or in part of any securities issued by the Bank.

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- Information regarding opening, closing of status of ADR, GDR, or any other class of securities to be issued
- Cancellation of dividend/rights/bonus, etc

Words and phrases not specifically defined herein but defined under SEBI Guidelines or Acts, Rules, Regulations governing the Bank shall have the meaning respectively assigned to them in those legislations. Words importing the singular number shall include the plural number and the words importing the masculine gender shall where the context admits, include the feminine and neutral gender.

### **3. ROLE OF THE MANAGEMENT**

- a. The Wholetime Director(s) shall put in place adequate and effective system of internal controls to comply with the requirements under these codes and prevent insider trading.
- b. The Wholetime Directors shall ensure that the internal control system shall cover all employees having access to UPSI, identify all UPSI and maintain their confidentiality, restrict adequately the communication and procurement of UPSI, maintain a list of all employees and other persons with whom UPSI are shared and enter into a confidentiality agreement with each of those, review the effectiveness of the systems and controls put in place.
- c. The Wholetime Directors shall ensure implementation and maintenance of a structured digital database with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database, containing the names of such persons or entities as the case may be with whom information is shared under the Regulations along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available.
- d. The Wholetime Director(s) shall, in consultation with the compliance officer decide to the extent access to unpublished price sensitive information may be provided to a role and function in addition to seniority and professional designation
- e. The Board of Directors shall ensure that the Code of Conduct to protect UPSI and prevent insider trading is put in place by the Management and shall be reviewed by the Board of Directors at regular interval.
- f. The Board of Directors shall ensure that the Whistleblower Policy has been implemented which shall be reviewed at regular intervals.
- g. The Audit Committee of the Board shall review the status of compliance to the Code of Conduct and efficacy of system and procedures once a financial year.
- h. The Wholetime Directors shall ensure proper dissemination of this Code to make aware Bank's directors, employees, stakeholders, fiduciaries and other individuals/entities who fall/may fall under the category of Designated Person, of the duties and responsibilities attached to the receipt of Inside Information, and the liability attached to the misuse or unwarranted use of such information.

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- i. The Board of Directors of the Bank shall refer any matter of interpretation to SEBI to remove any difficulty(ies) in the interpretation or application of the provision of the PIT Regulations and/ or these Codes of Conduct and to issue directions through guidance notes/ circulars, provided such directions where issued in respect of a specific case relating to interpretation of any provisions under PIT Regulations or these Codes, shall be issued so after giving the concerned persons a reasonably opportunity of being heard and after recording the reasons of such direction.

### **4. ROLE OF THE COMPLIANCE OFFICER**

- a. The Compliance Officer shall administer this Code and other requirements under the Regulations, shall report to the Board of Directors of the Bank and shall provide reports on compliances of the Regulations to the Chairman of the Audit Committee once a financial year.
- b. The Compliance Officer shall maintain lists of all employees and other persons with whom unpublished price sensitive information is shared based on the information received from the departmental heads, directors or any employee of the Bank who has shared such unpublished price sensitive information.

[Note: The responsibility of the Compliance Officer shall be limited to information specifically shared in prescribed form/ in writing by the aforesaid persons and not to collect, assume or presume out of any corporate developments/events.]

- c. The Compliance Officer shall upon coming to know of any contravention of the Code or Regulations, promptly bring the same to the Notice of the Chairman of the Audit Committee and also notify SEBI/ Stock Exchanges about the contravention.
- d. The Compliance Officer shall provide clarifications sought under the SEBI (Prohibition of Insider Trading) Regulations, 2015 to all concerned, to the extent possible.
- e. The Compliance Officer shall notify the particulars of off-market trades by the insiders to the stock exchange on which the securities of the Bank are listed within two trading days from receipt of the disclosure or from becoming aware of such information.

[Note: The Compliance Officer shall be deemed to be aware of such information only upon receipt of the specific information of off-market trade from either party concerned.]

- f. The Compliance Officer shall preserve the disclosures received and submitted to the Stock Exchanges concerned for a minimum period of five years.
- g. Discharge such other duties, functions and responsibilities as may be assigned under this Code/ the Regulations.



**5. RESTRICTIONS ON COMMUNICATION AND TRADING BY INSIDERS**

- a. No Insider shall communicate, provide or allow access to any Unpublished Price Sensitive Information relating to the Bank or its securities 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 insider of unpublished price sensitive information relating to the Bank or securities listed or proposed to be listed, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.
- c. Any person in receipt of unpublished price sensitive information pursuant to a "legitimate purpose" shall be considered an "insider" for purpose of this Code and due notice shall be given to such persons by the concerned departmental heads of the Bank, on case to case basis, to maintain confidentiality of such unpublished price sensitive information in compliance with the Regulations and to simultaneously inform the Compliance Officer for making necessary entries in the records.
- d. An UPSI may be communicated, provided, allowed access to or procured, in connection with a transaction that would:
  - (i) entail an obligation to make an open offer under the takeover regulations where the Board of Directors of the Bank is of informed opinion that sharing of such information is in the best interests of the Bank;
  - (ii) not attract the obligation to make an open offer under the takeover regulations but where the Board of Directors of the Bank is of informed opinion that sharing of such information is in the best interests of the Bank and the information that constitute unpublished price sensitive information is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected in such form as the Board of Directors may determine to be adequate and fair to cover all relevant and material facts.
- e. For the purpose of Code 5.d, the Board of Directors shall require the parties to execute agreements as per **Form – J** to contract confidentiality as non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for the purpose of Code 5.d., and shall not otherwise trade in securities of the Bank when in possession of unpublished price sensitive information.

**6. TRADING WINDOW**

- a. Designated Persons or immediate relatives of the designated persons shall not deal in securities of the Bank when the Trading Window is closed. It is the duty of the Designated Persons to inform their immediate relatives about the closure of Trading Window and ensure that they do not deal in the securities of the Bank.

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- b. The Compliance Officer or Company Secretary of the Bank should announce closure of Trading Window when any of the following events occur:
- (i) Declaration of Financial Results;
  - (ii) Recommendation/ Declaration of Dividends
  - (iii) Change in Capital Structure
  - (iv) Merger, De-merger, acquisition, de-listing, disposals and expansions of business;
  - (v) Material events in accordance with SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015; and
  - (vi) such other event or incident in their respective functional areas which the concerned departments/ functional heads feel and believe are material and/or has the potential to alter the share pricing of the Bank on the Stock Exchange(s) beyond a reasonable limit.
- c. The Trading Window shall remain closed from the end of every quarter till 48 hours after the declaration of financial results or for such period as may be decided by the Compliance Officer in accordance with the applicable regulations/guidelines.

Provided that the Trading Window shall be closed when the Compliance Officer determines that a Designated Person/Insider or a class of Designated Persons/Insider is reasonably expected to have access to Unpublished Price Sensitive Information and shall be reopened not earlier than 48 hours after the price sensitive information becomes generally available.

[Creation/invocation of pledge is allowed during the closure of Trading Window provided that the pledgor and pledgee demonstrate the bona-fide and prove their innocence as mentioned in Code 7.a. The value for the purpose of determination of threshold limit of disclosure shall be the market value on the pledge/ invocation.]

- d. The Compliance Officer will communicate to the Designated Persons about closure and opening of Trading Window through such approved mode of communication as mentioned in (f) hereunder. When the trading window is open, trading by designated persons shall be subject to pre-clearance by the Compliance Officer in case the quantum of trade is in excess of Rs.10,00,000/- (Rupees Ten Lac only).
- e. The information about closure of trading window shall be posted on Bank's Website, circulated as internal circular and informed to the Stock Exchanges on which Bank's securities are listed for dissemination.

## **7. TRADING WHEN IN POSSESSION OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

- a. No insider shall trade in securities of the Bank that are listed or proposed to be listed on a Stock Exchange when in possession of unpublished price sensitive information;

Trades by any person in securities of the Bank while in possession of unpublished price sensitive information, would be presumed to have been motivated by the knowledge and awareness of such information in his possession.

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Provided that the insider may prove his innocence by demonstrating the circumstances including the following –

- (i) the transaction is an off-market *inter-se* transfer between insiders who were in possession of the same unpublished price sensitive information without being in breach of Code 5 and both parties had made a conscious and informed trade decisions;

Provided that such unpublished price sensitive information was not obtained under Code 5.d of this Code.

Provided further that such off-market trade was reported by the insider to the Bank within two working days.

- (ii) the transaction was carried out through the block deal window mechanism between persons who were in possession of the unpublished price sensitive information without being in breach of Code 5 and both parties had made a conscious and informed trade decision;

Provided that such unpublished price sensitive information was not obtained by either person under Code 5.d of this Code.

- (iii) the transaction in question was carried out pursuant to a statutory or regulatory obligation to carry out a bona fide transaction.

- (iv) the transaction in question was undertaken pursuant to the exercise of stock options in respect of which the exercise price was pre-determined in compliance with applicable regulations.

- (v) In the case of non-individual insiders –

(a) The individuals who were in possession of the such unpublished price sensitive information were different from the individuals taking trading decisions and such decision making individuals were not in possession of such unpublished price sensitive information when they took the decision to trade; and

(b) Appropriate and adequate arrangements were in place to ensure that these codes are not violated and no unpublished price sensitive information was communicated by the individuals possessing the information to individuals taking the trading decisions and there is no evidence of such arrangements having been breached.

- (vi) The trades were pursuant to a trading plan set up in accordance with Code 10.

b. In the case of connected persons the onus of establishing that they were not in possession of unpublished price sensitive information shall be on such connected persons and in other cases the onus would be on the Board of Directors or SEBI, as the case may be;

c. SEBI may specify such standards and requirements from time to time as it may deem necessary for the purpose of this Code;

**8. “CHINESE WALL” PROCEDURE**

- a. To prevent the misuse of confidential information the Bank shall adopt the “Chinese Wall” policy which separates those areas of the functions which routinely have access to confidential information, considered “inside areas” from those areas which deal with branch banking/ sale/ marketing/investment advice or other departments providing support services, considered “public areas”.
- b. The employees in the inside area shall not communicate any Price Sensitive Information to anyone in public area. The employees in inside area may be physically segregated from employees in public area.
- c. In exceptional circumstances employees from the public areas may be brought “over the wall” and given confidential information on the basis of “need to know” criteria, under intimation to the compliance officer.

**9. TRADING IN SECURITIES BY DESIGNATED EMPLOYEES/ CONNECTED PERSONS:**

The Designated Persons may trade in equity shares of the Bank subject to compliance of the following procedure:

- (i) The DP may be of two types - (i) who possesses any Unpublished Price Sensitive Information and (ii) who doesn't have any Unpublished Price Sensitive Information. The DP who is in possession of any Unpublished Price Sensitive Information is prohibited from trading. In the event of DP not possessing any Unpublished Price Sensitive Information trading is permitted. However, the DP shall require a pre-clearance from the Compliance Officer in case the quantum of trade is in excess of Rs.10,00,000/- (Rupees Ten Lac only). The DP may submit a Trading Plan to the Compliance Officer in compliance of the requirements of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and upon approval thereof may execute the trade within 7 trading days from the date of receipt of such approval.
- (ii) The DP has to make an application to the Compliance officer in **Form – E** asking for a pre-clearance along with the undertaking in **Form – F**. Once received the Compliance officer needs to grant permission within 2 trading days in **Form - H**, if found in order in all respects.
- (iii) The Compliance Officer shall grant pre-clearance in **Form – H** after seeking such information as he may consider necessary in **Form – G**, ensuring that the applicant is not in possession of Unpublished Price Sensitive Information, confirming that the request for trade is in accordance with the Trading Plan submitted by the applicant earlier, confirming that the applicant has not done any prior contra trade within the previous period of 6 months and ensuring that the declaration, if any, made at the time of seeking pre-clearance is correct;

Provided that pre-clearance of trades shall not be required for a trade executed as per an approved trading plan.

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[The Board of Directors shall be the approving authority for the trades done by the compliance officer or his relative(s).]

- (iv) Pre-clearance shall be valid for a period of days as may be granted by the Compliance Officer and in no event for more than 7 trading days. In case of failure to execute trade within the stipulated period, fresh application has to be made.
- (v) Pre-clearance shall be required even if the transaction is only in the nature of transfer of beneficiary rights to any of the immediate relative of the applicant;
- (vi) The DP has to inform the Bank about his transaction after receiving the pre-clearance approval within 2 trading days of execution of transaction in **Form - C**. In case the DP doesn't trade he/she has to submit a NIL report stating reasons as to why no transaction was executed.
- (vii) The applicant shall not execute a contra trade for a period of 6 months within which a trade is permitted.

[Exercise of ESOP shall not be considered to be "trading" except for the purpose of Chapter III of the Regulations i.e. "Disclosure of Trading by Insiders". However, other provisions of the Regulations shall apply to the sale of shares so acquired.]

[Any trading (including Contra Trade) opted under a trading plan can be done only to the extent of and in the manner disclosed in the plan.]

[Restriction of Contra Trade shall not apply to buy back offers, rights issue, FPO, bonus, exit offers etc.]

[Restriction of Contra Trade shall also apply to the designated employees of the market intermediaries.]

[Trading Window norms and restrictions on contra trade shall not be applicable for trades carried out in accordance with an approved trading plan.]

- (viii) The DP can trade without taking a pre-clearance from the Compliance Officer in case the trade value is below Rs.,.10,00,000/- (Rupees Ten Lac Only), but no contra trade shall be permitted for a period of 6 months of the prior transaction.
- (ix) The Compliance Officer may grant relaxation to a contra trade for reasons recorded in writing in **Form – I**, provided that such relaxation does not violate the Code or the Regulation.
- (x) In case a contra trade is executed inadvertently or otherwise, in violation of such a restriction, profit from such trade shall be liable to be disgorged for remittance to SEBI for credit to the Investor Protection and Education Fund administered by it.
- (xi) In case any Director or employee has to be allotted securities in terms of the schemes of ESOP/ESPS of the Bank, there shall be no restriction on allotment of securities even

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during the Trading Window Closure period. However, the employee shall not be allowed to dispose off the securities during the Trading Window Closure Period.

### 10. TRADING PLANS

- a. A Designated Person or an Insider shall be entitled to formulate a trading plan and present it to the compliance officer for approval and public disclosure pursuant to which trades may be carried out on his behalf in accordance with such plan.
- b. Such trading plan shall:–
  - (i) not entail commencement of trading earlier than 6 months from the public disclosure of the plan;
  - (ii) not entail trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced by the issuer of the securities and the second trading day after the disclosure of such financial results;
  - (iii) entail trading for a period of not less than 12 months;
  - (iv) not entail overlap of any period for which another trading plan is already in existence;
  - (v) set out either the value of trades to be effected or the number of securities to be traded along with the nature of the trade and the intervals at, or dates on which such trades shall be effected; and
  - (vi) not entail trading in securities for market abuse.
- c. The compliance officer upon receipt of trading plan will review the trading plan to assess whether the plan would have any potential for violation of the Regulations. The Compliance Officer will be entitled to seek such express undertakings (including undertaking in **Form – F**) as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.
- d. The Compliance officer will endeavor to approve the trading plan within 7 working days of receipt of the trading plan together with necessary undertakings and declarations.
- e. The trading plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to either deviate from it or to execute any trade in the securities outside the scope of the trading plan.
- f. The implementation of the trading plan shall not be commenced if any unpublished price sensitive information in possession of the designated person/ insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation and in such event the compliance officer shall confirm that the commencement ought to be deferred until such unpublished price sensitive

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information becomes generally available information so as to avoid a violation of Code 7.a.

- g. Upon approval of the Trading Plan, the compliance officer shall notify the plan to the Stock Exchanges on which the securities issued by the Bank are listed;

### 11. DISCLOSURES OF TRADING BY INSIDERS

- a. Every disclosure under this Code shall be made in such form as may be specified;
- b. The disclosure 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 disclosures of trading in securities issued by the Bank shall also include trading in derivatives of securities, if any issued by the Bank and the traded value of the derivatives shall be taken into account for the purposes of this Code.  
Provided that trading in derivatives of securities is permitted by any law for the time being in force;
- d. The disclosure made under this Code shall be maintained by the Bank, for a minimum period of 5 years, in such form as may be specified;

### 12.1. INITIAL DISCLOSURE:

- a. Every promoter, member of the Promoter Group, Key Managerial Personnel and Director of the Bank shall disclose his holding of securities of the Bank as on the date of the Regulations taking effect, to the Bank, within thirty days of the Regulations taking effect in **Form - A**.
- b. Every person on appointment as a Key Managerial Personnel or a Director of the Bank or upon becoming a promoter or member of the Promoter Group shall disclose his holding of securities of the Bank as on the date of appointment or becoming a promoter, to the Bank within 7 days of such appointment or becoming a promoter in **Form - B**.
- c. Every Designated Person shall disclose names and Permanent Account Number or any other identifier authorized by law of its immediate relatives and/or persons with whom such designated person(s) shares a material financial relationship and Phone, mobile and cell numbers which are used by them to the Bank on an annual basis and as and when the information changes in **Form - K**.

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

## 12.2. CONTINUOUS DISCLOSURE

- a. Every promoter, member of the Promoter Group, designated person and director of the Bank shall disclose in **Form – C** to the Bank the number of such securities acquired or disposed of within 2 trading days of such transaction if the value of the securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs.10,00,000/- or such other value as may be specified;
- b. Bank shall notify the particulars of such trading to the stock exchanges on which the Bank's securities are listed within 2 trading days of receipt of the disclosure or becoming aware of such information.

[disclosure of any incremental transactions after any disclosure under this sub-code, shall be made when the transactions effected after the prior disclosure exceed the threshold limit under clause (a) of this sub-code.]

## 12.3 DISCLOSURE BY OTHER CONNECTED PERSON

The Bank may, at its discretion and at such intervals as may be determined by the Bank, require any other connected person or class of connected person as it may think fit, to make disclosure of holdings / trading in securities of the Bank in **Form – D** in order to monitor compliance with this Code / the Regulations.

## 13. VIOLATION OF THE CODE OF CONDUCT

- a. Contravention of the Code of Conduct would attract disciplinary actions including wage freeze, suspension, recovery, clawback etc., as may be imposed and decided by the Chairman of the Audit Committee.
- b. Such a person shall also be subject to any action as may be taken by SEBI for violation of the Code in accordance with the provisions of the Act.
- c. It is the duty of the Compliance Officer to keep the Board informed regarding any non-compliance of this code of conduct.

## 14. LEAKAGE OF UPSI AND ENQUIRY

- a. The Compliance Officer or any departmental head in consultation with Compliance Officer shall identify whether any unpublished information leaked or shared by any designated person or insider in contravention to the provisions of this Code or the Regulations with any outsider/public, falls within the purview of Price Sensitive Information.



## United Bank of India Code of Conduct for Prohibition of Insider Trading

- b. Upon coming to conclusion that the information leaked/shared is a Price Sensitive one, the same shall be immediately brought to the notice of the Executive Director in charge of the respective vertical.
- c. Upon being satisfied that the information leaked is actually a UPSI, the matter along with evidence of leakage, views of the executive director/ compliance officer as the case may be, representation of the concerned employee along with documentary submission if any, shall be placed to the Chairman of the Audit Committee within 15 days.
- d. The Chairman of the Audit Committee shall after considering the complaint, submission by both the sides i.e. Bank and the concerned employees, evidences and documents submitted by both sides and after giving concerned person/ employee an opportunity of being heard, determine, decide and communicate his decision as to whether any leakage of UPSI has taken place.
- e. The Chairman, Audit Committee shall have the power to reprimand the concerned persons, recommend disciplinary action in terms of Bank's rules and regulations in case the offender is an employee (including where the offence is committed by the relative of the employee), recommend severance of business relationship with, discontinuation of empanelment, delisting of the concerned person and/or his organization temporarily or permanently.
- f. The Compliance Officer upon receipt of the decision of the Chairman of the Audit Committee in writing shall promptly inform SEBI about the leakage of UPSI, details of the inquiry/investigation done and the result of the inquiry.
- g. The decision of the Chairman of the Audit Committee shall be then placed before the Audit Committee of the Board of Directors for its noting. The ACBOD while noting shall have the power to suggest alteration in the extent of punishment given by the Chairman and also examine the efficacy of the systems and procedures and to suggest the ways and means to the Bank to ensure such leakage does not recur in future.
- h. The Chairman of the Audit Committee shall endeavor to complete the proceeding at the earliest but not later than 15 days from the date of reference to him/her. His decision shall be placed in the next succeeding meeting of the Audit Committee of the Board.
- i. Any person aggrieved by the order passed by the Chairman, of the Audit Committee or any alteration by the Audit Committee, shall have the right to appeal before the Board of Directors of the Bank within 30 days of receipt of such decision/alteration as the case may be.
- j. The appeal of the concerned person shall be placed to the Board at its next succeeding meeting along with all relevant evidences, documents, decisions and orders. The decision of the Board in this matter shall be final and binding.
- k. Till the time the proceeding or appellate proceeding as the case may be continues the Bank shall withdraw access to any UPSI to such person (in case of employee), withhold dealing with such person (fiduciary).

**United Bank of India Code of Conduct for Prohibition of Insider Trading**

**15. FORMATS**

The formats of various forms/applications referred to in the code are annexed.

**16. REVISIONS**

The Managing Director & CEO or in his absence the Executive Directors of the Bank shall have the power to amend/revise the Code and relevant forms and formats specified thereunder, subject to ratification of the same by the Board at its immediate next meeting. The Code shall be subjected to revision from time to time in line with the amendments in the Regulations, if any. Any subsequent amendment / modification in the Regulations (including any circular, notification, press release) governing this Code, shall automatically apply upon the Code and the Code will be deemed to be modified to that extent, without requiring approval of the Board for the amendments during this period on case to case basis.

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**United Bank of India Code of Conduct for Prohibition of Insider Trading**

**FORM A**

**SEBI (Prohibition of Insider Trading) Regulations, 2015  
[Regulation 7 (1) (a) read with Regulation 6 (2) – Initial disclosure to the Bank]**

(Under Code 12.1.a)

Name of the company: \_\_\_\_\_  
ISIN of the company: \_\_\_\_\_

**Details of Securities held by Promoter, Member of Promoter Group, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)**

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP/ Directors/ immediate relative to/ others etc)	Securities held as on the date of regulation coming into force		% of Shareholding
		Type of security (For eg. –Shares, Warrants, Convertible Debentures etc.)	No.	
1	2	3	4	5

**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 of the Bank held by Promoter, Member of Promoter Group, Key Managerial Personnel (KMP), Director and other such persons as mentioned in Regulation 6(2)**

Open Interest of the Future contracts held as on the date of regulation coming into force			Open Interest of the Option Contracts held as on the date of regulation coming into force		
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
6	7	8	9	10	11

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

Name & Signature: \_\_\_\_\_

Designation: \_\_\_\_\_

Date: \_\_\_\_\_

Place: \_\_\_\_\_

**United Bank of India Code of Conduct for Prohibition of Insider Trading**

**FORM B**  
**SEBI (Prohibition of Insider Trading) Regulations, 2015**  
**[Regulation 7 (1) (b) read with Regulation 6 (2) – Disclosure on becoming a Director/KMP/Promoter]**

(Under Code 12.1.b)

Name of the company: \_\_\_\_\_  
ISIN of the company: \_\_\_\_\_

**Details of Securities held on appointment as a Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of the Bank and other such persons as mentioned in Regulation 6(2).**

Name, PAN, CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP/ Directors/ immediate relative to/ others etc)	Date of appointment of Director/ KMP OR Date of becoming Promoter	Securities held at the time of becoming Promoter/ appointment of Director/ KMP		% of Shareholding
			Type of security (For eg. –Shares, Warrants, Convertible Debentures 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 of the Bank held on appointment of Key Managerial Personnel (KMP) or Director or upon becoming a Promoter of the Bank and other such persons as mentioned in Regulation 6(2).**

Open Interest of the Future contracts held at the time of becoming Promoter/appointment of Director/KMP			Open Interest of the Option Contracts held at the time of becoming Promoter/appointment of Director/KMP		
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: \_\_\_\_\_

**United Bank of India Code of Conduct for Prohibition of Insider Trading**

**FORM C**  
**SEBI (Prohibition of Insider Trading) Regulations, 2015**  
**[Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]**  
 (Under Code 10.2.a)

Name of the company: \_\_\_\_\_

ISIN of the company: \_\_\_\_\_

**Details of change in holding of Securities of Promoter, Employee or Director of the Bank and other such persons as mentioned in Regulation 6(2).**

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoters/ KMP / Directors/immediate relative to/others etc.)	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of Intimation to Bank	Mode of acquisition / disposal (on market/public/ rights/ preferential offer / off market/ Inter-se transfer, ESOPs etc.)
		Type of security (For eg.– Shares, Warrants ,Convertible Debentures etc.)	No. and % of shareholding	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge / Revoke/ Invoke)	Type of security (For eg. – Shares, Warrants , Convertible Debentures etc.)	No. and % of shareholding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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

**United Bank of India Code of Conduct for Prohibition of Insider Trading**

**Details of trading in derivatives of the company by Promoter, Employee or Director of the Bank and other such persons as mentioned in Regulation 6(2).**

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
15	16	17	18	19	20	21

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

Name & Signature:

Designation:

Date:

Place:

**United Bank of India Code of Conduct for Prohibition of Insider Trading**

**FORM D**

**SEBI (Prohibition of Insider Trading) Regulations, 2015  
[Regulation 7 (3) – Transactions by Other connected persons as identified by the Bank]**

(Under Code 10.3)

**Details of trading in securities by other connected persons as identified by the Bank.**

Name, PAN, CIN/DIN, & address with contact nos. of other connected persons as identified by the Bank	Connection with the Bank	Securities held prior to acquisition/disposal		Securities acquired/Disposed				Securities held post acquisition/disposal		Date of allotment advice/ acquisition of shares/ sale of shares specify		Date of Intimation to Bank	Mode of acquisition / disposal (on market/public/ rights/ preferential offer / off market/ Inter-se transfer, ESOPs etc.)
		Type of security (For eg.– Shares, Warrants ,Convertible Debentures etc.)	No. and % of shareholding	Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No.	Value	Transaction Type (Buy/ Sale/ Pledge / Revoke/ Invoke)	Type of security (For eg. – Shares, Warrants , Convertible Debentures etc.)	No. and % of shareholding	From	To		
1	2	3	4	5	6	7	8	9	10	11	12	13	14

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

**United Bank of India Code of Conduct for Prohibition of Insider Trading**

**Details of trading in derivatives by other connected persons as identified by the Bank.**

Trading in derivatives (Specify type of contract, Futures or Options etc)						Exchange on which the trade was executed
Type of contract	Contract specifications	Buy		Sell		
		Notional Value	Number of units (contracts * lot size)	Notional Value	Number of units (contracts * lot size)	
15	16	17	18	19	20	21

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

Name:

Signature:

Date:

Place:



**United Bank of India Code of Conduct for Prohibition of Insider Trading**

**FORM – E**

*(Application form for pre-clearance of trades in Bank's Securities)*

(Under Code 9.a.ii)

Date:

To,  
**The Compliance Officer,**  
United Bank of India  
11, Hemanta Basu Sarani  
Kolkata – 700001

Dear Sir/Madam,

**Application for Pre-clearance of trade in equity shares of the Bank**

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the **Bank's Code of Conduct for Prohibition of Insider Trading**, I seek approval to purchase/ sale/ subscription of \_\_\_\_\_ Equity shares of the Bank as per details given below:

1.	Name of the applicant	
2.	Relationship with the applicant	
3.	Designation	
4.	Number of Securities held as on date	
5.	Folio No. / DPID/ Client Id	
6.	The Proposal is purchase/ subscription/ sale	
7.	Proposed date of dealing in securities	
8.	No. of Securities involved	
9.	Market/ Off-Market Transaction	
10.	Price (in case of off-market transactions)	
11.	Current Market Price (if market transaction)	
12.	BSE/NSE	

I enclose herewith the Undertaking signed by me in the prescribed format.

Request you to kindly pre-clear the transaction at the earliest.

Yours faithfully,

-----  
(Signature of the Applicant)

**United Bank of India Code of Conduct for Prohibition of Insider Trading**

**Form – F**

*(Format of Undertaking to be accompanied with the application for pre-clearance)*

(Under Code 9.a.ii)

To,  
**The Compliance Officer,**  
United Bank of India  
11, Hemanta Basu Sarani  
Kolkata-700001

I, \_\_\_\_\_, \_\_\_\_\_ of the Bank residing at \_\_\_\_\_, am desirous of dealing in \_\_\_\_\_ shares of the Bank/ Stock Derivatives as mentioned in my application dated \_\_\_\_\_ for pre-clearance of the transaction and in that connection confirm and undertake that –

- a. I am not in possession of or otherwise privy to any Unpublished Price Sensitive Information (as defined in the Bank's Code of Conduct on Prohibition of Insider Trade ("the Code")) up to the time of signing this Undertaking.
- b. In the event I have access to or received any information that could be construed as "Price Sensitive Information" as defined in the Code, after the signing of this undertaking but before executing the transaction for which approval is sought, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Bank until such information becomes public.
- c. I shall not pass on such information to any person directly or indirectly by way of making recommendation for purchase or sale of the Bank's securities on the basis of such information.
- d. I shall maintain strict confidentiality of any Unpublished Price Sensitive Information to which I may have access during the course of discharge of my official duties as \_\_\_\_\_ of the Bank
- e. I shall submit the necessary report within **two** days of execution of the transaction / a 'Nil' report if the transaction is not undertaken.
- f. If approval is granted, I shall execute the deal within **seven** days of the receipt of approval failing which I shall seek pre-clearance.
- g. I have not contravened any provisions of 'United Bank of India (the Bank)' Code of Conduct for Prohibition of Insider Trading" as notified by the Bank from time to time and shall ensure compliance of the same in future.
- h. I declare that I have made full and true disclosure in the matter.

Date :

Signature : -----

Name:

SPF No.

**United Bank of India Code of Conduct for Prohibition of Insider Trading**

**Form – G**

*(Statement of shares held in the Bank at the time of pre- clearance order)*

(Under Code 9.iii)

Name	
SPF No.	
Department	
Location	
For the Period ended	

Particulars		Particulars of shareholding	
Name	Relation	DP ID/ Client ID/ Folio No.	No. of Shares

*(Please add rows as per requirement)*

I/we declare that I/we have complied with the minimum holding period of 30 days with respect to the shares sold.

Name:  
Date:  
Place:

Signature

**United Bank of India Code of Conduct for Prohibition of Insider Trading**

**Form – H**

*(Draft Approval Letter from the Compliance Officer)*

(Under Code 9.iii)

Date:

To:

Dear Sir/ Madam,

**Sub: Pre-clearance of trade in Bank's Securities**

Ref.: Your application for pre-clearance of transaction for shares of the Bank in the name of Mr./ Mrs.  
\_\_\_\_\_

With reference to your above application pursuant to Code 8.a.ii. of United Bank of India Code of Conduct for Prohibition of Insider Trading, seeking pre-clearance of your transaction in shares of the Bank, we hereby accord our approval to the proposed transaction.

You may kindly note that pursuant to provisions of Code 9.ii. of the said Code of Conduct, the aforesaid transaction shall be executed within 7 trading days from the date of receipt of this approval letter, failing which, an application seeking pre-clearance to the proposed transaction together with undertaking in the prescribed format, shall be made afresh within four days from the conclusion of the week stated here in above. As stipulated in Code 8.vii. of the Code of Conduct, you shall not execute any contra trade for a period of 6 months with in which the trade was permitted.

You may also note that a statement as per Form D in respect of the transactions in the securities of the Bank executed by you is to be submitted to the Compliance Officer, within two days from the date of such transactions. Non-submission of this statement will be in violation / contravention of the above code of conduct.

Thanking you,

Yours faithfully,  
For **United Bank of India**

Compliance Officer

**United Bank of India Code of Conduct for Prohibition of Insider Trading**

**Form – I**

*(Draft application for waiver of contra trade)*

(Under Code 8.a.viii)

To:

**The Compliance Officer**  
United Bank of India  
11, Hemanta Basu Sarani  
Kolkata – 700001

From:

Name:	
SPF No.	
Department:	
Location:	

Dear Sir,

Request you to kindly grant me waiver under Code 9.viii. of 'United Bank of India - Code of Conduct for Prohibition of Insider Trading' to execute contra trade proposed to be done in the name of \_\_\_\_\_ (Relation: \_\_\_\_\_) to buy/sell \_\_\_\_\_ equity shares of the Bank against the original trade transaction done to buy/sell of \_\_\_\_\_ equity shares of the Bank done in the name of \_\_\_\_\_ (Relation: \_\_\_\_\_) executed on \_\_\_\_\_.

I desire to deal in the said shares on account of \_\_\_\_\_.

Thanking you,

Yours faithfully,

\_\_\_\_\_  
Signature

Date:

Place:

**United Bank of India Code of Conduct for Prohibition of Insider Trading**

**Form – J**  
*(Confidentiality Agreement)*

(Under Code 5.e)

This Agreement is made on this \_\_\_\_\_ Day of \_\_\_\_\_ between \_\_\_\_\_ of the first part and United Bank of India having its Corporate Office, 11, Hemanta Basu Sarani, United Tower, Kolkata – 700 001 (hereinafter referred to as the Bank) on the second part.

WHEREAS the Bank has formed a code of conduct known as the 'United Bank of India Code of Conduct for Prohibition of Insider Trading' pursuant to Securities & Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended.

In compliance of which I agree to the following covenants that I shall not –

1. at any time without the consent of the Bank disclose, divulge make public or pass on such Unpublished Price Sensitive Information to any person directly or indirectly by way of making a recommendation for the purchase or sale of securities of the Bank based on the same.
2. disclose Unpublished Price Sensitive Information to family members, friends, business associates or any other individual.
3. discuss Unpublished Price Sensitive Information in public places.
4. disclose Unpublished Price sensitive Information to any employee who does not need to know the information for discharging his or her duties.
5. recommend to any one that they may undertake dealing in securities of the Bank while being in possession, control or knowledge of Unpublished Price Sensitive Information.
6. be seen or perceived to be dealing in securities of the Bank on the basis of Unpublished Price Sensitive Information.

<i>Signed &amp; Delivered by</i>	
<i>In presence of within named witness</i>	
<i>For United Bank of India – Compliance Officer</i>	
<i>In presence of within named witness</i>	

**United Bank of India Code of Conduct for Prohibition of Insider Trading**

**Form – K**

*(Format for submission of details of immediate relatives and/or persons with whom a designated person(s) shares a material financial relationship)  
(Under Code 12.1.c)*

<b>Name of the Designated Person:</b>				
<b>Relationship with the Bank (tick (✓) the appropriate one and provide the details sought underneath) :-</b>				
<input type="radio"/> <b>Officer</b>		<input type="radio"/> <b>Staff</b>		<input type="radio"/> <b>Sub-Staff</b>
SPF :	Department :	Branch/RO/HO :	Contact No.:	
Educational Qualification:				
Name of the past employer(s), if any:				
<input type="radio"/> <b>Others</b>				
PAN :	Nature of Relationship:		Contact No.:	
Residential/ Office Address:				
Educational Qualification:				
Name of the past employer(s), if any:				
<b>Details of immediate relatives and/or persons with whom shares a material financial relationship (Please add rows if required) :-</b>				
Sl. No.	Name	PAN/ Aadhar	Contact No.	Relation

Name:  
Date:  
Place:

Signature: