

Dated, 1 July 2020  
REF: ETL/CTW2/20-21

**Notice for Closure of Trading Window**

Dear Sir/Madam,

Notice is hereby Given that as per the Company's Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons and Immediate Relatives of Designated Persons framed pursuant to SEBI (Prohibition of Insider Trading) Regulation, 2015, the Trading Window for dealing in shares of the Company will be closed for the purpose for the announcement of Financial Results for the quarter and period ended **30 June 2020** for all the Connected/Designated persons and their immediate relatives on and from **01 July 2020 (Wednesday)** and will open 48 (Forty-eight) hours after the announcement of the Financial Results of the Company for the quarter and period ending **30 June 2020** to the Stock Exchanges. The date of Board Meeting for approving the financial results shall be informed in due course.

Accordingly you are hereby requested not to enter into any transaction involving shares of the company, Eastern Treads Limited during the aforesaid period of closure of trading window either in your name or in the name of your immediate relatives.

**"Designated Persons"** means :

- a) All Directors;
  - a. Board of Directors of the Company;
  - b. Chief Executive Officer (CEO) and employees of the company up to 2 levels below CEO level of the Company; Key Managerial Personnel (KMP's) as per Companies Act, 2013
  - c. all the employees in Accounts, Finance, legal and Secretarial department;
  - d. All its promoters and promoters group;
    - a. All employees who have access to possession of Unpublished Price Sensitive Information.
    - e. Any other employee as may be determined and informed by the Compliance Officer from time to time;
    - f. Employees of Material Subsidiary companies of listed company designated as Manager and above;
    - g. Persons in contractual, fiduciary or advisory relationship with the Company i.e. consultants, retainers, auditors, law firms, analysts etc.
    - h. Other persons as designated by the Board of Directors in consultation with Compliance Officer of the Company, from time to time; and
    - i. Immediate relative of (a) to (h) above and have access to UPSI.

**"immediate relative"** means:

Spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities;

**"Trading"** means and includes subscribing, buying, selling, dealing (including pledging), or agreeing to subscribe, buy, sell, deal in any securities of the Company and "trade" shall be construed accordingly

for Eastern Treads Limited

**Eastern Treads Ltd.**

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CS Baiju T  
Company Secretary