



Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons

(Effective from January 23, 2021)

PRELIMINARY

This code shall be known as “**Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons of Hero Housing Finance Ltd.**” (“**Code**”) made voluntarily pursuant to applicable provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015 (“**PIT Regulations**”) and any other applicable laws, rules, statutes. This Code is being framed with an aim that Designated Persons of the Company and their Dependents shall not derive any benefit or assist others to derive any benefit from the access to and possession of **Price Sensitive Information** about the Company which is not in the public domain and thus constitutes Insider Information.

DEFINITIONS

1. “**Code**” means this Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons including modifications made there to from time to time by the Company.
2. “**Company**” means Hero Housing Finance Ltd.
3. “**Compliance Officer**” means Compliance Officer of the Company and in his absence any other senior officer, designated so and reporting to the Board of Directors as mentioned in the Regulations provided that Compliance Officer shall be financially literate i.e. he/she has the ability to read and understand basic financial statements i.e. balance sheet, profit and loss account and statement of cash flows. Compliance Officer shall deal with the queries of investors and responsible for the administration and implementation of the Code under the overall supervision of the Board of Directors of the Company and to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. “**Dealing in Securities**” means an act of subscribing, buying, selling or agreeing to subscribe, buy, sell or deal in securities of the Company either as principal or agent.
5. “**Designated Employee**” shall include:
 - a) All Directors of the Company;
 - b) Promoter and Promoter Group of the Company
 - c) Executive Directors of the subsidiary of the Company;
 - d) All Key Managerial Personnel of the Company and its subsidiaries;
 - e) All Senior Managerial Personnel;
 - f) Employees comprising Senior Associates and above;
 - g) the employees designated by the Company to whom these trading restrictions shall be applicable, keeping in mind the objectives of this Code i.e.
 - i. Assistant Manager (old designations) and above in the Finance / Treasury / Information Technology / Legal / Human Resource / Analytics / Strategy / MD & CEO Office and the Compliance & Secretarial Department.
 - ii. Such other employee as may be determined and informed by the Compliance Officer from time to time

6. **“Dependent”** means Spouse, dependent parents and dependent children of Directors and Designated Employees.
7. **“Declaration”** means any Disclosure given by the Designated Person of the Company in prescribed forms under this code.
8. **“Key Managerial Personnel”** means key managerial personnel as defined in the Companies Act, 2013 and includes (a) Chief Executive Officer; (b) Managing Director; (c) Manager; (d) Company Secretary; (e) Whole-Time Director; (f) Chief Financial Officer
9. **“Free period”** means any period during which Trading Window is not closed.
10. **“Insider”** means any person who is or has during the six months prior to the concerned act been associated with a Company, directly or indirectly, and who is reasonably expected to have access to unpublished Price Sensitive Information in respect of securities of Company or who has received or has had access to such unpublished Price Sensitive Information;
11. **“Insider Trading”** when insider uses unpublished Price Sensitive Information to arrive at securities trading (including buying as well as selling) decisions, the action is referred to as Insider Trading.
12. **“Material Financial Relationship”** means a relationship in which one person is recipient of any kind of payment such as by way of 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.”
13. **“Unpublished Price Sensitive Information (UPSI)”** means any information which relates directly or indirectly to a Company and which if published is likely to materially affect the price of securities of Company.

Explanation - The following shall be deemed to be Price Sensitive Information: -

- a) Periodical financial results of the Company;
 - b) Intended declaration of dividends (both interim and final);
 - c) Issue of securities or buy-back of securities;
 - d) Any major expansion plans or execution of new projects;
 - e) Amalgamation, mergers or takeovers;
 - f) Disposal of the whole or substantial part of the undertaking; and
 - g) Significant changes in policies, plans, operations of the Company
 - h) Changes in “Key Managerial Personnel”
14. **“Trading Window”** means the period during which a Designated person may buy / sell the securities of the Company, subject to this Code and applicable SEBI rules / regulations / law.
 15. **“Securities”** shall have the meaning assigned to it under the Securities Contracts (Regulations) Act, 1956 or any modification thereof except units of a mutual fund,

“Securities” include—

- i) shares, scrips, stocks, bonds, debentures, debenture stock or other marketable securities of a like nature in or of any incorporated company or other body Corporate

- a) Derivatives;
 - b) Security receipt as defined in clause (zg) of section 2 of the Securitisation and Reconstruction of Financial Assets and Enforcement of Security Interest Act, 2002
 - c) Units or any other such instrument issued to the investors under any mutual fund scheme
 - (ii) Government securities;
- Such other instruments as may be declared by the Central Government to be securities; and
- (iii) Rights or Interest in securities;

Words and expressions used and not defined in this code but defined in the SEBI (Prohibition of Insider Trading) Regulations, 2015, Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislation

Words and expressions not defined here shall have the same meaning as contained in SEBI (Prohibition of Insider Trading) Regulations, 2015 and applicable provisions of the Companies Act, 2013.

Unless the context requires otherwise, employee shall mean employee of the Company

APPLICABILITY

This Code shall be applicable to and binding on all Designated Persons of the Company for dealing in securities.

COMPLIANCE OFFICER

The Company has designated Mr. Vikas Gupta, Company Secretary as the Compliance Officer for the purpose of this Code.

The Compliance Officer shall be responsible for setting forth policies and procedures and monitoring adherence to the rules for the preservation of price sensitive information, maintaining digital database containing details of Designated persons and details of such persons/ entities with whom price sensitive information is shared, pre-clearing of all Designated Persons and their Dependents trades, monitoring of trades and implementation of this Code under the overall supervision of the Board of the Company.

The database shall be maintained internally with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database, as per provisions contained in PIT regulations and shall not be outsourced. Database shall be preserved for a period of not less than eight years after completing of relevant transactions and in the event of receipt of any information from the Board regarding any investigation or enforcement proceedings, the relevant information in the digital database shall be preserved till the completion of such proceedings.

The Compliance Officer shall maintain a record of the designated persons and any changes made in the list of designated persons.

The Compliance Officer shall assist all employees, Designated Persons, Insiders of the Company in addressing any clarification regarding PIT Regulations and the Company's Code.

The Compliance Officer shall report to the Board of Directors and shall provide reports to the Chairman of the Audit Committee of the Company, on a periodical basis whenever required.

TRADING RESTRICTIONS

All Designated Persons of the Company shall be subject to trading restrictions as enumerated below:-

Trading Window

The Company shall specify a trading period, to be called "Trading Window", for trading in the Company's Securities.

The Designated Persons of the Company shall not trade in the Securities of the Company when trading window is closed.

The trading window shall be, inter alia, closed at the time:-

1. Declaration of financial results (quarterly, half-yearly and annually).
 2. Declaration of dividends (interim and final).
 3. Issue of securities by way of public/rights/bonus etc.
 4. Any major expansion plans or execution of new projects.
 5. Amalgamation, mergers, takeovers and buy-back.
 6. Disposal of whole or substantially whole of the undertaking.
 7. Any changes in policies, plans or operations of the Company.
 8. Changes in Key Managerial Personnel;
- a) The Trading Window shall be closed from the 1st day immediately following the relevant calendar quarter till the conclusion of 48 hours after the price sensitive information is made public or becomes generally available.
- b) Such other period as may be specified by the Compliance Officer from time to time in consultation with the Chairman & Managing Director of the Company.

All Designated Persons of the Company shall conduct all their dealings in the securities of the Company only in a valid trading window and shall not deal in any transaction involving the purchase or sale of the Company's securities during the periods when trading window is closed.

No Designated Person shall take positions in derivative transactions in the Securities of the Company at any time.

TRADING RESTRICTIONS

No Insider shall trade in Securities when in possession of UPSI.



All Designated persons and their dependents who intend to deal in the securities of the Company should seek pre-clearance of the transaction/trade as per the pre-dealing procedure as described hereunder.

Pre-clearance of Trades

All Designated Persons and their Dependents who intend to deal in the Securities of the Company shall pre-clear the intended transactions including those of 'Dependent' in the Securities of the Company as per the pre-dealing procedure described hereunder.

Such pre-clearance of trade would be applicable wherever any Designated Person /his Dependent intends to deal in the Securities of the Company in excess of the minimum threshold limit of market value exceeding Rs. 5,00,000/- or 500 Securities whichever is less in one or more tranche in any one quarter. **However, Directors of the Company have to pre-clear their all intended transactions irrespective of value or number of Securities involved.** Trades of the Compliance Officer which require pre-clearance in terms of the above shall be approved by the Managing Director or Chief Executive Officer or in their absence by any Whole Time Director of the Company.

An application in “**Form I**”, as prescribed in the Code, shall be made to Compliance Officer, after obtaining the approval of departmental head, if any, indicating the estimated number of Securities that Designated Person intends to deal in and details of depository with which he has a depository account and such other details as may be required by any rule made by the Company in this behalf.

An undertaking in “Form I” shall be executed in favour of the Company by such Designated Person.

An undertaking in the prescribed form shall be executed in favour of the Company by such Designated person incorporating, inter alia, the following clauses, as may be applicable:

- a) That the employee/Director does not have any access or has not received “Price Sensitive Information” upto the time of signing the undertaking.
- b) That in case the employee/Director has access to or receives “Price Sensitive Information” after the signing of the undertaking but before the execution of the transaction, he/she shall inform the Compliance Officer of the change in his position and that he/she would completely refrain from dealing in the securities of the Company till the time such information becomes public.
- c) That he/she has not contravened the Code of Conduct for prevention of Insider Trading as notified by the Company from time to time.
- d) That he/she has made a full and true disclosure in the matter.

Approval

The Compliance Officer shall process the pre-clearance applications and if pre-clearance application is in accordance and in compliance with provisions of this code, the Compliance Officer shall endeavor to communicate the pre-clearance immediately but not later than 48 hours from the time of receiving the application.

OTHER RESTRICTIONS

All Designated Persons and their dependents shall execute their order in respect of securities of the Company within seven trading days after the approval of pre-clearance is given. If the order is not executed within one week after the approval is given, the employee/Director must pre-clear the transaction again.



All Designated Persons and their dependents who buy or sell any number of shares of the Company shall not enter into an opposite transaction i.e. sell or buy any number of shares during the next six months following the prior transaction.

In the case of subscription in the primary market (Initial Public Offers), the above mentioned persons shall hold their investments for a minimum period of 3 months. The holding period would commence when the securities are actually allotted and credited in the demat account.

In case of ESOPs, exercise of option may be allowed in the period when the trading window is closed. However, sale of shares allotted on exercise of ESOP's shall not be allowed when trading window is closed.

In case the sale of securities is necessitated by personal emergency, the holding period may be waived by the Compliance Officer after recording in writing his/her reasons in this regard.

REPORTING REQUIREMENTS FOR TRANSACTIONS IN SECURITIES

Furnishing of details of Securities

All Designated Persons of the Company shall be required to forward following details of their securities transactions including the statement of dependent to the Compliance Officer:

Initial Disclosure

All Designated Persons shall be required to forward their details (including details of their Dependents and persons with whom such Designated Person shares a Material Financial Relationship) and details of all holdings in Securities or voting rights held and positions taken in derivatives by such person to the Compliance Officer as per "**Form II**" prescribed in the Code alongwith a Non-Disclosure Agreement within 7 days of joining/appointment or becoming the Designated Person, whichever is applicable.

Continual Disclosure

All Designated Persons shall be required to forward following details: -

- 1) Designated Person of the Company shall disclose to the Company the number of such Securities acquired or disposed of within 2 trading days of such transaction in "**Form III**".
- 2) Annual statement in "**Form IV**", as prescribed in Code of all holdings in Securities within 30 days from the end of the financial year.
- 3) Details of Dependents and persons with whom they have Material Financial Relationship in "Part II of Form II", as prescribed in Code within 30 days from the end of financial year and within seven days for any change therein.

Event Based Disclosure

Disclosures by Designated Persons

Every Designated Persons shall disclose to the Company the number of such Securities acquired or disposed of within two 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. 10,00,000.00 (Rupees Ten Lakh) or such other value as may be specified by Board in such format as specified under PIT Regulations.

Provided that if Designated Person does any off- market trade in Securities of the Company, he shall disclose the details of such trade within two working days to the Company in such format as specified under PIT Regulations.

Records

The Compliance Officer shall maintain records of all the declarations in the appropriate form given by the Designated Persons for a period of not less than eight years.

The Compliance Officer shall place before the Managing Director on a quarterly basis all the details of the dealing in the securities by Designated person of the Company and the accompanying documents that such persons had executed under the pre-dealing procedure as envisaged in this code.

Protection against retaliation and victimization

Retaliation for reporting suspected violations either under the WB Policy or to the Board under SEBI (Prohibition of Insider Trading) Regulations, 2015 is strictly prohibited under this Code. Employee who Protection against retaliation and victimization 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 dated 17 September 2019, will be protected against any discharge, termination, demotion, suspension, threats, harassment, directly or indirectly or discrimination irrespective of whether the information is considered or rejected by the Board or he or she is eligible for a Reward under these regulations, by reason of:

- (i) filing a Voluntary Information Disclosure Form under these regulations;
- (ii) testifying in, participating in, or otherwise assisting or aiding the Board in any investigation, inquiry, audit, examination or proceeding instituted or about to be instituted for an alleged violation of insider trading laws or in any manner aiding the enforcement action taken by the Board; or
- (iii) breaching any confidentiality agreement or provisions of any terms and conditions of employment or engagement solely to prevent any employee from cooperating with the Board in any manner.

PENALTY

Any Designated person of the Company who trades in securities or communicates any information for trading in securities in contravention of the Code of Conduct may be penalized and appropriate action may be taken by the Company.



Designated person of the Company who violate the Code of Conduct shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, ineligible for future participation in employee stock option plans, etc.

The action by the Company shall not preclude SEBI from taking any action in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Information to SEBI in case of violation of SEBI (Prohibition of Insider Trading) Regulations, 2015

In case it is observed by the Company/Compliance Officer that there has been a violation of SEBI (Prohibition of Insider Trading) Regulations, 2015 SEBI shall be informed by the Company.

PRELIMINARY

This Code is being framed voluntarily with an aim to ensure timely and adequate disclosure of unpublished price sensitive information and the manner in which the price sensitive information shall be given by Hero Housing Finance Limited to statutory authorities, if required and disseminate on a continuous and immediate basis.

OVERSEEING AND CO-ORDINATING DISCLOSURE

The Company has designated Mr. Vikas Gupta, Company Secretary as the Compliance Officer for the purpose of this Code. The Compliance Officer shall be responsible for ensuring that the Company complies with continuous disclosure requirements, overseeing and co-coordinating disclosure of price sensitive information to statutory authorities, analysts, shareholders and media and educating staff on disclosure policies and procedure.

All disclosure or dissemination of any information (except disclosure required to be made under any law / statute) on behalf of the Company **may be approved in advance by the Compliance Officer.**

In case the information is accidentally disclosed without prior approval, the person responsible shall inform immediately to the Compliance Officer, even if the information is not considered price sensitive.

RESPONDING TO MARKET RUMOURS

All the queries or requests for verification of market rumours by exchanges shall be directed to the Compliance Officer. The Compliance Officer on receipt of such requests shall consult with the Managing Director of the Company and shall respond to the same without delay.

The Compliance Officer in consultation with the Managing Director for deciding whether a public announcement is necessary for verifying or denying rumours and then making such disclosure.

TIMELY REPORTING OF SHAREHOLDING/OWNERSHIP AND CHANGES IN OWNERSHIP

The Compliance Officer shall be responsible for ensuring that disclosure of shareholdings/ownership by major shareholders and disclosure of changes in ownership as provided under any Regulations made under the Act and the listing agreement shall be made in a timely and adequate manner.

DISCLOSURE/DISSEMINATION OF PRICE SENSITIVE INFORMATION WITH SPECIAL REFERENCE TO ANALYSTS, INSTITUTIONAL INVESTORS

All Designated persons of the Company should follow the guidelines given hereunder while dealing with Analysts and Institutional Investor:

- (i) Only Public information to be provided – The Directors, Employees or any other Authorized person shall provide only public information to the analyst/research persons/large investors like institutions.
- (ii) Recording of discussion – The Compliance Officer or any other authorized person may attend all the meetings with Analysts, brokers or Institutional Investors. The Compliance Officer in order to avoid misquoting or misrepresentation, shall preferably arrange for recording the discussion at the meeting.
- (iii) Handling of unanticipated questions – The Compliance Officer shall be careful when dealing with analysts' questions that raise issues outside the intended scope of discussion. Unanticipated questions shall be noted by the Compliance Officer and be responded later after consultation with Managing Director. If the answer includes price sensitive information, a public announcement should be made before responding to the same.
- (iv) Simultaneous release of Information – Whenever the Company proposes to organize meetings with analysts etc. the Compliance Officer shall ensure to make a press release or post relevant information on its website after every such meet. The Company may also consider live webcasting of analyst meets.

MEDIUM OF DISCLOSURE / DISSEMINATION

The Company shall ensure that

- a) Disclosure/dissemination of information is being done through various media so as to achieve maximum reach and quick dissemination;
- b) Disclosure to stock exchanges are made promptly;
- c) Disclosure may also be facilitated through the use of its dedicated Internet / website;
- d) Its websites may provide a means of giving investors a direct access to analyst briefing material, significant background information and questions and answers;

- e) The information filed with exchanges under continuous disclosure requirement shall be made available on the Company's website.

DISSEMINATION BY STOCK EXCHANGES

- (i) The disclosures made to stock exchanges may be disseminated by the exchanges to investors in a quick and efficient manner through the stock exchange network as well as through stock exchange websites.
- (ii) Information furnished by the Companies under continuous disclosure requirements, should be published on the website of the exchange instantly.
- (iii) Stock exchanges should make immediate arrangement for display of the information furnished by the Companies instantly on the stock exchange website.



Form 1

APPLICATION FOR PRE-CLEARANCE OF TRADE IN SECURITIES

The Compliance Officer
Hero Housing Finance Limited

Pursuant to the Company's Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons, I seek approval for purchase/sale/subscription of the Securities of the Company as per details given below:

I. DETAILS OF SECURITIES HOLDING OF DESIGNATED PERSONS HELD IN THEIR OWN NAME

Name	Designation	Department	No. of securities Held (with Folio No/DP ID/Client ID)	Nature of Transaction for which Approval is sought [Purchase/Sell/Others (Pls. Specify)]	No. of securities to be dealt	Aggregate value of the Transaction (Rs.) (approx.)

II. DETAILS OF SECURITIES HELD BY DEPENDANTS

Name	Relationship	No. of securities Held (with Folio/DP ID/Client ID)	Nature of Transaction for which Approval is sought [Purchase/Sell/Others (Pls. Specify)]	No. of securities to be dealt	Aggregate value of the Transaction Aggregate value of the Transaction (Rs.) (approx.)



Please tick the appropriate case:

I/We hereby declare that I have not purchased any securities in last 6 months (If approval is sought for selling of securities)	
I/We hereby declare that I have not sold any securities in last 6 months (If approval is sought for purchase of shares)	
The Shares to be dealt in are allotted under ESOP Scheme of the company and are not subject to lock in period of 6 month.	

Signature

Name of Designated Person

Name of Department Head

Signature

**In case the sale of securities is necessitated by personal emergency, Designated Person shall specify the reasons.

Reasons

Enclosure: Undertaking



UNDERTAKING

In relation to the Dealing in Shares 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 Code upto the time of signing this undertaking;
- b) In the event that 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 Company until such information becomes public;
- c) I shall hold the Shares 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 code of conduct for prevention of insider trading as notified by the Company from time to time;
- e) I have made full and true disclosure in the matter.
- f) I hereby declare that I shall execute my order in respect of securities of the Company within one week after the approval of pre-clearance is given. If the order is not executed within one week after the approval is given, I undertake to obtain preclearance for the transaction again.

Place:

Date: _____

(Signatures)

Name & Designation

Form II

Part I

Details of Individual

Emp. Code	PAN No.	Official email id	Personal email id	Mobile Number	Date of Becoming Designated Person	Name and address of Educational Institution from which Highest Professional Course is completed	Names of Past three employers	Demat Account Details	Non Disclosure Agreement signed (Yes/No)

Part II

Details of Dependent

Name of Dependent	Address	Relation	PAN No. or in case of No PAN then Aadhar no./ Passport No/ Driving License No.	Personal email id	Mobile Number	Demat Account Details

Details of Persons with whom there if Material Financial Relationship

Name of Dependent	Address	Relation	PAN No. or in case of No PAN then Aadhar no./ Passport No/ Driving License No.	Personal email id	Mobile Number	Demat Account Details

“*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 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.

Part III

Securities and Exchange Board of India (Prohibition of Insider Trading)
Regulations, 2015 [Regulation 7 (1) (b) read with Regulation 6(2)-
Disclosure on becoming a director/KMP/Promoter]

Name of the company: _____

ISIN of the company: _____

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

Name, PAN No., CIN/DIN & Addresses with contact nos.	Category of Person (Promoters / KMP / Directors/ immediate relatives/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 Security holding	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	
			Type of security (For eg. – Shares, Warrants, Convertible Debentures etc.)	No		Number of units (contracts * lot size)	Notional value in Rupee terms	Number of units (contracts * lot size)	Notional value in Rupee terms

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

Signature:

Designation:

Date:



Form III

CONTINUAL DISCLOSURE / DISCLOSURE OF CHANGE IN HOLDING

To,
The Compliance Officer
Hero Housing Finance Limited

Date: _____

I. DETAILS OF CHANGE IN SHAREHOLDING OF DIRECTOR / DESIGNATED EMPLOYEE HELD IN HIS OWN NAME

Name	Designation	Department	Folio No. / DP ID / Client ID	Date of Transaction	No. of Shares held before the Transaction	Purchase / (Sale) (Current Transaction)	No. of Shares held after the Transaction	Whether approval obtained /Date of Approval

II. DETAILS OF CHANGE IN SHAREHOLDING HELD BY DEPENDENTS

Name of the Dependent	Relationship	Department	Folio No. / DP ID / Client ID	Date of Transaction	No. of Shares held before the Transaction	Purchase / (Sale) (Current Transaction)	No. of Shares held after the Transaction	Whether approval obtained /Date of Approval

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

Signature _____

Name



Form IV

To
The Compliance Officer
Hero Housing Finance Limited

Date:

**ANNUAL
DISCLOSURE**

I. STATEMENT OF SECURITYHOLDING OF DESIGNATED PERSONS

Name	Designation	Department	No. of Securities Held on 01st April 20____	No. of Securities Bought during Year	No. of Securities Sold during Year	No. of Securities held on 31st March 20__	Folio/DP ID/Client ID

II. DETAILS OF SECURITIES HELD BY DEPENDANTS

Name	Relationship	No. of Securities Held on 01st April 20____	No. of Securities Bought during the year	No. of Securities Sold during the year	No. of Securities held on 31st March 20____	Folio/DP ID/Client ID

I/We hereby declare that I/We have complied with the Code and SEBI Regulations with respect of the Securities purchased/ sold.

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

Signature

Name