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## Ironwood Education Limited

### Code of Conduct of Ironwood Education Limited to Regulate, Monitor and Report of trading by Designated Persons

Ironwood Education Limited (the “Company”) is a public company whose equity shares are listed on BSE Limited and subject to the rules and regulations issued by the Securities and Exchange Board of India (SEBI).

The Board of Directors of the Company have adopted this Insider Trading Policy (the “Policy”) to comply with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015 including any statutory modification or re-enactment thereof for the time being in force). (“SEBI Regulations”)

The SEBI Regulations prohibit an Insider from Trading in the securities of a company listed on any stock exchange on the basis of any unpublished price sensitive information.

Unpublished Price Sensitive Information (“UPSI”) means any information which relates directly or indirectly, to the Company or its securities, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities of the Company.

“Generally available” information means information that is accessible to the public on a non-discriminatory basis.

The SEBI Regulations prohibit the communication of Unpublished Price Sensitive Information (UPSI) to any person except as required under law. Further, procuring any person to Trade in the securities of any company on the basis of UPSI is also prohibited under the SEBI Regulations and the securities laws. Violations of the SEBI Regulations and the securities laws subject Insiders to severe penalties including fines and imprisonment.

#### 1. Rules

The rules shall be called ‘Rules for Trading in the securities of Ironwood Education Limited by an Insider’ (“Rules”). These Rules shall come into force with immediate effect.

#### 2. Definitions

Words and expressions used but not defined in this Code shall have the same meaning assigned to them in the SEBI (Prohibition of Insider Trading) Regulations, 2015 or the Securities and Exchange Board of India Act, 1992, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and the rules and regulations made thereunder, as the case may be or in any amendment thereto.

In this rules unless the context otherwise requires, the following words, expressions and derivations therefrom shall have the meanings assigned to them as under:–

**2.1 “Board”** means the Board of Directors of the Company.

**2.2 “Company”** means Ironwood Education Limited.

**2.3 “Insider Trading Policy”** means Insider Trading Policy as approved by the Board of Directors of the Company as amended from time to time.

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### **3. Prohibition on communicating or procuring UPSI**

An Insider shall not –

- i. communicate, provide, or allow access to any UPSI, relating to the Company or its securities, to any person including other insiders, except to the extent allowed by these Rules;
- ii. procure from or cause the communication by an Insider of UPSI, relating to the Company or its securities;

Provided that nothing contained above shall be applicable when an UPSI is communicated, provided, allowed access to or procured:

- (i) in furtherance of legitimate purposes, performance of duties or discharge of legal obligations pursuant to appropriate confidentiality and non-disclosure agreements being executed; or
- (ii) in the event the Board of Directors direct or cause the public disclosure of UPSI in the best interest of the Company; or
- (iii) within a group of persons if such persons have been identified and secluded within a “chinese wall” or information barrier by the Compliance Officer from the rest of the Company for a particular purpose or for a specified period of time in furtherance of legitimate purposes, performance of duties or discharge of legal obligations, and are subjected to, among other conditions, additional confidentiality obligations, information barriers designed to prevent exchanges of UPSI outside the “chinese wall”, and the execution of an undertaking by such persons to abstain and / or forego Trading during such seclusion or till the UPSI no longer constitutes UPSI.

### **4. Prohibition on Insider Trading**

An Insider shall not, directly or indirectly: –

- i. Trade in securities that are listed or proposed to be listed when in possession of UPSI;
- ii. Trade in securities of the Company except when the Trading Window is open and the Insider is not in possession of UPSI.

Provided the restriction in 4 (i) above shall not apply to:

- (a) A transaction that is an off-market inter-se transfer between Promoters who were in possession of the same UPSI without being in breach of these Rules and both parties had made a conscious and informed trade decision; and
- (b) Trades pursuant to a Trading Plan set up in accordance with these Rules.

### **5. Trading Window**

- 5.1** The trading period, i.e. the trading period of the stock exchanges, called ‘trading window’, is available for trading in the Company’s securities.
- 5.2** The trading window shall be, inter alia, closed 7 days prior to and during the time the UPSI.
- 5.3** When the trading window is closed, the Designated Persons shall not trade in the Company’s securities in such period.
- 5.4** All Designated Persons 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 the trading window is closed or during any other period as may be specified by the Company from time to time.

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**5.5** The Compliance Officer shall intimate the closure of trading window to all the designated persons of the Company when he determines that a designated person or class of designated persons can reasonably be expected to have possession of UPSI. Such closure shall be imposed in relation to such securities to which such UPSI relates.

**5.6** The Compliance Officer after taking into account various factors including the UPSI in question becoming generally available and being capable of assimilation by the market, shall decide the timing for re-opening of the trading window, however in any event it shall not be earlier than 48 hours (Forty eight hours) after the information becomes generally available either through BSE or newspaper publication whichever is earlier.

**5.7** The trading window shall also be applicable to any person having contractual or fiduciary relation with the Company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the Company.

## **6. Pre- clearance of Trading**

1) Designated Persons may Trade in the securities of the Company when the trading window is open, after obtaining approval of the Compliance Officer by submitting an application as per **Annexure 1** and an undertaking as per **Annexure 2**.

2) The Compliance Officer shall not approve any proposed Trade by Designated Person if the Compliance Officer determines that such Designated Person is in possession of UPSI even though the trading window is open.

3) The Compliance Officer may, after being satisfied that the application and undertaking are true and accurate, approve Trading by a Designated Person, on the condition that the Trade so approved shall be executed within seven trading days following the date of approval as per **Annexure 3**.

4) The Designated Person shall, within two days of the execution of the Trade, submit the details of such Trade to the Compliance Officer as per **Annexure 4**. In case the transaction is not undertaken, a report to that effect shall be filed in the said form.

5) If the pre-cleared Trade is not executed within seven trading days after the approval is given, the Designated Person must secure pre-clearance of the transaction again.

6) A Designated Person who Trades in securities without complying with the pre-clearance procedure as envisaged in these Rules or gives false undertakings and/or makes misrepresentations in the undertakings executed by him/her while complying with the pre-clearance procedure shall be subjected to the penalties as envisaged in these Rules.

7) Nothing in this rule shall apply to any Trade involving a value less than Rs. 50 Lakhs or 1,00,000 shares or 1% of total shareholding whichever is higher as may be specified by the Board of Directors from time to time (a "de minimis Trade") provided the Designated Person is no in possession of UPSI while executing the de minimis Trade.

## **7. Additional trading restrictions on Designated Persons**

1) No Director or Key Managerial Personnel shall enter into derivative transactions in respect of the securities of the Company.

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- 2) All Designated Persons who Trade in the securities of the company shall not enter into an opposite transaction during the next six months following the prior transaction. In case of any contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the SEBI for credit to the Investor Protection and Education Fund administered by SEBI.

#### **8. Trading Plan**

- 1) A Designated Person shall be entitled to formulate a Trading Plan that complies with the SEBI Regulations (a "Trading Plan") and present it to the Compliance Officer for approval and public disclosure pursuant to which Trades may be carried out in his behalf in accordance with such plan.
- 2) The Compliance Officer shall review and approve the Trading Plan if it complies with the SEBI Regulations and shall disclose the Trading Plan to the stock exchanges.
- 3) The Trading Plan once approved shall be irrevocable and the Designated Person 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. However, the implementation of the Trading Plan shall not be commenced, if at the time of formulation of the plan, the Designated Person is in possession of UPSI and the said information has not become generally available at the time of the commencement of implementation. The commencement of the Trading Plan shall be deferred until such UPSI becomes generally available information. Further, the Designated Person shall also not be allowed to Trade in securities of the Company, if the date of Trading in securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.

#### **9. Penalty for Insider Trading**

- 1) An Insider who acts in contravention of these Rules shall be liable to have his services or relationship with the Company, as the case may be, terminated.
- 2) Directors, Officers and employees of the Company who violate these rules shall be subject to disciplinary action by the Company, which may include wage freeze, suspension, in eligibility for future participation in the Company's stock option plans or termination.
- 3) The SEBI or any other appropriate regulatory authority would also be informed of the violation of these Rules so that appropriate action may be taken.

#### **10. Disclosure requirements**

##### **10.1 Initial Disclosure:**

- a. Every Promoter, Member of the Promoter group, Key Managerial Personnel, Director of the Company and each of their Immediate Relatives shall disclose his holding of securities of the Company within thirty days of these Rules taking effect as per **Form A** set out in **Annexure 5**.
- b. Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter or Member of the Promoter group shall disclose his / her and Immediate Relatives' holding of securities of the Company as on the date of appointment or becoming a promoter or Member of the Promoter group, to the Company within seven days of such appointment or becoming a promoter Member of the Promoter group, as per **Form B** set out in **Annexure 6**.

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## 10.2 Continual Disclosure

- a. Every Promoter, Member of the Promoter group, Employee, Director of the Company and each of their Immediate Relatives shall disclose as per **Form C** set out in **Annexure 7** 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. Ten lakhs.
- b. The disclosure shall be made within two working days of:
  - I. the receipt of intimation of allotment of shares, or
  - II. the acquisition or sale of shares or voting rights, as the case may be.

## 10.3 Disclosure to the Stock Exchange:

The Compliance Officer shall notify the stock exchanges, particulars of the Trades, within two trading days of the receipt of the Continual Disclosure or from becoming aware of such information.

## 10.4 Disclosures by other Connected Persons:

The Compliance Officer may, require any other Connected Person to disclose the holdings and trading in securities of the Company as per **Form D** set out in **Annexure 8** at such frequency as he may determine.

## 10.5 Half yearly disclosures:

All Designated Person dealing in securities of the company shall be required to forward the following details of their securities transactions including the holdings of the dependent family members to the Compliance Officer in **Form E** set out in **Annexure 9**.

- 10.5.1 All holdings in securities of the Company by the designated persons and their dependent family members at the time of joining the Company.
- 10.5.2 Statement of any transactions in securities of the Company, whether pre-clearance of trade was obtained or not, in **Form E** on Half yearly basis within 30 days from the end of half year of each Financial Year.
- 10.5.3 Half yearly Statement of all holdings in securities of the Company in **Form E** as on September 30 & March 31 of every year are to be made on or before October 30 & April 30 of that year.

## 11. Miscellaneous

- 1) The Board of Directors shall be empowered to amend, modify, interpret these Rules and such Rules shall be effective from such date that the Board may notify in this behalf.
- 2) The Compliance Officer shall provide the Audit Committee of the Board, on a quarterly basis, all the details of Trading in securities by the Designated Persons including any violations of the Rules.

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- 3) The Compliance Officer shall maintain (a) updated list of Designated Persons, (b) records of disclosures and pre-clearance applications and undertakings for a period of five years and (c) a confidential list of any 'restricted securities' to which the Compliance Officer may require Designated Persons to seek pre-clearance before Trading in such 'restricted securities'.
  - 4) The Company shall require all Connected Persons to formulate and adhere to a code of conduct to achieve compliance with these Rules. In case such persons observe that there has been a violation of these Rules, then they shall inform the Board of Directors of the Company promptly.
  - 5) The Company has adopted the 'Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information' available at [www.ironwoodworld.com](http://www.ironwoodworld.com) to regulate the Company's practices and procedures for fair disclosure of UPSI.

### Forms for reporting requirements

Forms	Particulars	Compliance & Time Line
<b>Annexure 1</b>	<b>APPLICATION FOR PRE-TRADING APPROVAL</b>	Designated Person intending to deal in securities in excess of Rs. 50 Lakhs (market value) or 1,00,000 shares or 1% of total shareholding, whichever is higher shall apply for pre-clearance with the Compliance Officer.
<b>Annexure 2</b>	<b>UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-CLEARANCE</b>	Designated person should submit the undertaking along with Application for Pre-Trading Approval.
<b>Annexure 3</b>	<b>PRE-CLEARANCE ORDER</b>	The Compliance Officer after being satisfied with the application for pre-clearance from the Designated Person may grant pre-clearance order.
<b>Annexure 4</b>	<b>DISCLOSURE OF TRANSACTIONS</b>	Designated Person shall disclose within 2 days of transaction/ dealing in securities the trading details to the Compliance Officer.
<b>Annexure 5</b>	<b>Form A –</b> Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (1) (a) read with Regulation 6 (2) – Initial disclosure to the company]	Initial Disclosure
<b>Annexure 6</b>	<b>Form B –</b> 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]	Disclose within 7 days of Appointment as a Director/ Key Managerial Personnel or becoming a promoter.
<b>Annexure 7</b>	<b>Form C –</b> Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 [Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]	Disclose within 2 trading days – Every promoter(s)/ designated person/ director is required to inform of trading/ dealing in securities if value of securities (whether in one transaction or more transactions during a calendar quarter) is more than Rs. 10,00,000/- (Rupees Ten lakh)
<b>Annexure 8</b>	<b>Form D -</b> Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 Regulation 7(3)–Transactions by other connected persons as identified by the company	Disclose within 2 trading days – Connected person is required to inform of trading/ dealing in securities if value of securities (whether in one transaction or more transactions during a calendar quarter) is more than Rs. 10,00,000/- (Rupees Ten lakh)
<b>Annexure 9</b>	<b>Form E –</b> Half Yearly Statement	Designated Person to report securities held as on 30 <sup>th</sup> September & 31 <sup>st</sup> March on a half yearly basis by 30 <sup>th</sup> October & 30 <sup>th</sup> April.

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**Annexure 1**  
**APPLICATION FOR PRE-TRADING APPROVAL**

**To,**  
**The Compliance Officer,**  
**Ironwood Education Limited.**

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Insider Trading Policy, I seek approval to purchase / sell / subscribe \_\_\_\_\_ equity shares of the Company as per details given below:

1.	Name of the Applicant	
2.	Designation	
3.	Number of securities held as on date	
4.	Folio No. / DP ID / Client ID No.	
5.	The proposal is for	(a) Purchase of securities (b) Subscription to securities (c) Sale of securities
6.	Proposed date of trading in securities	
7.	Estimated number of securities proposed to be purchased/subscribed/sold	
8.	Current market price (as on date of application)	
9.	Whether the proposed transaction will be through stock exchange or off-market trade	
10.	Folio No. / DP ID / Client ID No. where the securities will be credited / debited	

I enclose herewith the Undertaking signed by me.

**Signature:** \_\_\_\_\_

**Name:**

**Date:**

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**Annexure 2**  
**UNDERTAKING TO BE ACCOMPANIED WITH THE APPLICATION FOR PRE-CLEARANCE**

**To,**  
**The Compliance Officer,**  
**Ironwood Education Limited**

I, \_\_\_\_\_, \_\_\_\_\_ of the Company residing at \_\_\_\_\_, am desirous of trading in \_\_\_\_\_ shares of the Company as mentioned in my application dated \_\_\_\_\_ for pre-clearance of the transaction.

I further declare that I am not in possession of any unpublished price sensitive information up to the time of signing this Undertaking.

In the event that I have access to or receive any unpublished price sensitive information 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 trading in the securities of the Company until such information becomes public.

I declare that I have not contravened the provisions of the Rules as notified by the Company from time to time.

In the event of this transaction being in violation of the Rules or the applicable laws, (a) I will, unconditionally, release, hold harmless and indemnify to the fullest extent, the Company and its directors and officers, (the 'indemnified persons') for all losses, damages, fines, expenses, suffered by the indemnified persons, (b) I will compensate the indemnified persons for all expenses incurred in any investigation, defense, crisis management or public relations activity in relation to this transaction and (c) I authorize the Company to recover from me, the profits arising from this transaction and remit the same to the SEBI for credit of the Investor Protection and Education Fund administered by the SEBI.

I undertake to submit the necessary report within two days of execution of the transaction / a 'Nil' report if the transaction is not undertaken.

If approval is granted, I shall execute the Trade within seven days of the receipt of approval failing which I shall seek pre-clearance afresh.

I declare that I have made full and true disclosure in the matter.

**Signature:** \_\_\_\_\_  
**Name:**  
**Date:**

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**Annexure 3**  
**PRE-CLEARANCE ORDER**

To  
Name \_\_\_\_\_  
Designation \_\_\_\_\_  
Place \_\_\_\_\_

This is to inform you that your request for dealing in \_\_\_\_\_(nos) shares of the Company mentioned in your application dated \_\_\_\_\_ is approved. Please note that the said transaction must be completed on or before \_\_\_\_\_ (date) that is seven days from today.

In case you do not execute the approved transaction/ deal on or before the aforesaid date you will have to seek fresh pre-clearance before executing any transaction/deal in the securities of the Company. Further, you are required to fill the details of the executed transactions in the attached format within 2 trading days from the date of aforesaid transaction/deal. In case the transaction is not undertaken a "NIL" Report, along with reasons for non-execution of transaction shall be necessary.

Yours Faithfully,

**For Ironwood Education Limited**

**Compliance Officer**

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

Encl.: Format for submission of details of transaction.

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**Annexure 4**  
**DISCLOSURE OF TRANSACTIONS**  
**(To be submitted within 2 days of transaction /trading in securities of the Company)**

**To,**  
**The Compliance Officer,**  
**Ironwood Education Limited**

I hereby inform that I

- have not bought / sold/ subscribed any securities of the Company
  - have bought/sold/subscribed to \_\_\_\_\_ securities as mentioned below on \_\_\_\_ (date)
- (strike out whichever is not applicable)

Name of holder	No. of securities traded	Bought / sold / subscribed	DP ID/Client ID/Folio No.	Price (Rs.)

I declare that the above information is correct and that no provisions of the Company's Rules and/or applicable laws/regulations have been contravened for effecting the above said transactions(s).

**Signature:** \_\_\_\_\_

**Name:**

**Date:**

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**Annexure 5  
Form A**

**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015  
[Regulation 7 (1) (a) read with Regulation 6 (2) – Initial disclosure to the company]**

To,  
The Compliance Officer,  
Ironwood Education Limited  
(ISIN: \_\_\_\_\_)

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

Name, PAN No., CIN/DIN & address with contact nos.	Category of Person (Promoters/ KMP /Directors/ immediate relatives/ 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.	

**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 company held by Promoter, 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

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

**Name & Signature:**  
**Designation:**

**Date:**  
**Place:**

**Annexure 6  
Form B**

**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]]**

To,  
The Compliance Officer,  
Ironwood Education Limited  
(ISIN: \_\_\_\_\_)

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

Name, PAN No., CIN/DIN address 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 Shareholding
			Type of security (For eg.–Shares, Warrants, Convertible Debentures etc.)	No.	

**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 company 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).**

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

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

**Name & Signature:**  
**Designation:**  
**Date:**  
**Place:**

**Annexure 7  
FORM C**

**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015  
[Regulation 7 (2) read with Regulation 6(2) – Continual disclosure]**

**To,  
The Compliance Officer,  
Ironwood Education Limited (ISIN: \_\_\_\_\_)**

**Details of change in holding of Securities of Promoter, Designated Person or Director of a listed company and other such persons as mentioned in Regulation 6(2) of the SEBI Regulations.**

Name, PAN, CIN/DIN, & address with contact nos.	Category of Person (Promoters/ KMP / Director s/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 company	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		

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

**Details of trading in derivatives of the company by Promoter, Employee or Director of a listed company 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)	

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

**Name & Signature:**  
**Designation:**  
**Date:**  
**Place:**

**Annexure 8  
FORM D**

**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015  
Regulation 7(3)–Transactions by other connected persons as identified by the company**

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

Name, PAN, CIN/ DIN, & address with contact nos.	Connection with company	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 company	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		

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

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

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)	

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

**Name & Signature:**

**Designation:**

**Date:**

**Place**

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**Annexure 9  
FORM E  
(HALF YEARLY STATEMENT)**

To  
**The Compliance Officer,  
Ironwood Education Limited,**

I, \_\_\_\_\_, in my capacity as \_\_\_\_\_ of the Company hereby submit the following details of change in holding of securities of the Company as on \_\_\_\_\_

**I. Details of securities held by me;**

No of shares held on _____ (01 <sup>st</sup> April/ 01 <sup>st</sup> October)	No of shares bought during the half year ended _____	No of shares sold during the half year ended _____	No of shares held on _____ (30 <sup>th</sup> September/ 31 <sup>st</sup> March)	Folio No./ DP ID/Client ID

**II. Details of shares held by each relatives/ Dependent Family Members (as applicable)**

Name of Relatives/ Dependent Family Members	Relationship	No of shares held on _____ (01 <sup>st</sup> April/ 01 <sup>st</sup> October)	No of shares bought during the half year ended _____	No of shares sold during the half year ended _____	No of shares held on _____ (30 <sup>th</sup> September/ 31 <sup>st</sup> March)	Folio No./ 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.

**Name:** \_\_\_\_\_

**Signature:** \_\_\_\_\_

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