



**CIRCULAR**  
**Date: 30 Dec 2023**

To,  
All the Directors, KMP's and Designated Employees  
RKEC Projects Limited

**CLOSURE OF TRADING WINDOW**

Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 and Company's Internal Code of Conduct and Procedures: Directors, KMP's and Designated Employees may deal in shares of the Company on any working day during the trading hours as prescribed by Stock Exchange (this shall be called "Trading Window") except during the closure of Trading Window.

Further, Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended and Clarification given by National Stock Exchange of India Limited vide Circular No. NSE/CML/2019/11 dated 02 April 2019 and pursuant to the Company's Code of Conduct, the Trading Window for dealing in the securities of the Company has issued a clarification in this regard in consultation with SEBI, inter alia, as follows:-

*"4. As discussed with SEBI, this amendment has to be read in conjunction with the existing provision of Clause 4 of the Schedule B (wherein compliance officer determines that a designated person or class of designated persons can reasonably be expected to have possession of unpublished price sensitive information). In any case, the trading restriction period is required to commence not later than end of every quarter till 48 hours after the declaration of financial results. { Highlighted by NSE}"*

In view of the above mentioned Regulation, Trading Window shall remain close on and from 31 Dec 2023 till 48 hours after the declaration of Unaudited Financial Results of the Company for the Quarter ended 31 Dec 2023.

*(Prohibited period)*

All the Directors, KMPs and Designated Employees are advised not to deal in the shares of the Company either directly or indirectly during the closure of Trading Window.

For RKEC Projects Limited  
Deepika Rathi  
Company Secretary and Compliance Officer



Note:

1. Designated Employees includes Board of Directors and Employees holding any of the following designations in the Company e.g. Directors, KMP's, General Manager & Manager of all the Departments and all employees of Accounts/Finance Department, Secretarial Department and their immediate relatives.
2. All the connected persons, including the Statutory, Internal and Secretarial Auditors, Designated Employees of the Banks and Share Transfer Agent, etc, and their immediate relatives.
3. Dealing in the equity shares, means an act of buying, selling or agreeing to buy, sell or deal in any shares of the Company by any Designated Employees either as principal or agent.

**RKEC Projects Limited**

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