

April 29, 2025

Ref: NIVABUPA/EQ/2025-26/12

Τo,

National Stock Exchange of India Limited Exchange Plaza, C-1, Block G Bandra Kurla Complex Bandra (E), Mumbai – 400 051 **BSE Limited** Phiroze Jeejeebhoy Towers Dalal Street, Mumbai – 400 001

Symbol: NIVABUPA

Scrip Code: 544286

#### Sub: Reporting of incidence under the SEBI (Prohibition of Insider Trading) Regulations, 2015

Dear Sir/Madam,

This is in reference to the Code of Conduct to Regulate, Monitor and Report Trading by Designated Persons and Immediate Relatives ('the Code'), formulated under the SEBI (Prohibition of Insider Trading) Regulations, 2015, please find enclosed herewith the report related to the violation of the Code marked as **Annexure-A**, in the format as prescribed under SEBI Master Circular No. SEBI/HO/ISD/ISD-PoD-2/P/CIR/2023/039 dated March 23, 2023.

Kindly take the same on records.

Thanking You, Yours' Sincerely For **Niva Bupa Health Insurance Company Limited** 

Rajat Sharma Company Secretary and Compliance Officer Membership No.: F7069



#### Annexure-A

# Report by Niva Bupa Health Insurance Company Limited for violations related to Code of Conduct under SEBI (Prohibition of Insider Trading) Regulations, 2015

Sr. No.	Particulars	Details				
1.	Name of the listed company <del>/</del> Intermediary/Fiduciary	Niva Bupa Hea	lth Insurar	nce Compan	y Limited	
2.	Please tick appropriate checkbox Reporting in capacity of: ✓ Listed Company	Listed Compan	У			
	□ - Fiduciary					
3.	A. Details of Designated Person (DP)					
	i. Name of the DP	Mr. Akshat Misr	а			
	ii. PAN of the DP	BL*****6C	•			
	iii. Designation of DP	Vice President &	k Head - G	rowth Mark	eting	
	iv. Functional Role of DP	Marketing			<u> </u>	
	v. Whether DP is Promoter or belongs	No				
	to Promoter Group					
	B. If Reporting is for immediate relative o	f DP				
	i. Name of the immediate relative of DP	Ms. Aastha Ajm	ani			
	ii. PAN of the immediate relative of DP	BP*****7P				
	C. Details of transaction(s)					
	i. Name of the scrip	Niva Bupa Heal 544286/ NSE – I		-	y Limited	(BSE -
	ii. No of shares traded and value (Rs.) (Date- wise)	Date of the Transaction	Nature	No. of shares involved	Price per share in ₹	
		December 03, 2024	Sell	2,800	82.30	
	D. In case value of trade(s) is more than R	s.10 lacs in a cale	endar qua	rter		
	<ul> <li>Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015</li> <li>Date of intimation of trade(s) by Company to stock exchanges under</li> </ul>	Y 7 Not Applicable Y				
	regulation 7 of SEBI (PIT) Regulations, 2015	Mc Apetho Air		2 800 000	tu charac	of the
4.	Details of violations observed under Code of Conduct	Ms. Aastha Ajn Company (Cons on December 03	ideration 3, 2024, wi	aggregating thout seekin	to ₹ 230, ng pre-clea	440/-) rance.
5.	Action taken by Listed company/ Intermediary/ Fiduciary	Ms. Aastha was Conduct; hence a penalty of ₹ instructed to en	, it was tho 5,000/- ar	ought appro nd issue wa	priate to ir rning lette	mpose er and



6. Reasons recorded in writing for taking Mr. Akshat has confirmed t action stated above possession of any Unp	that ivis. Aastha was not in
	ublished price consitive
information, while tradir	-
Company.	ig in securities of the
Considering the amount of	f trade is insignificant and
the trade was not made w	_
PIT Regulations and the Coc	
The Company adopts a strict	
of its Code of Conduct and	
Company believes that the	0
suitable course of action to	address the incidence and
will act as a deterrent agair	nst any future instances by
Designated Persons or their	r immediate relatives.
7. Details of the previous instances of NONE	
violations, if any, since last financial year	
8. If any amount collected for Code of	
Conduct violation(s)	
i. Mode of transfer to SEBI - IPEF Online	
(Online/Demand Draft)	
ii. Details of transfer/payment	
	etails
	iva Bupa Health
	surance Company
	mited SBC Bank,
	SBC Bank, arakhamba Road.
	ew Delhi-110001
	51050888004
	SBCN11938552704
reference Number	
	pril 29, 2025
Transaction Amount 5,	.000
(in ₹)	
9. Any other relevant information -	

Rajat Sharma Company Secretary and Compliance Officer PAN: BB\*\*\*\*\*9L Email id: investor@nivabupa.com



Sr. No.	Particulars	Details		
1.	Name of the listed company Intermediary/Fiduciary	Niva Bupa Health Insurance Company Limited		
2.	Please tick appropriate checkbox Reporting in capacity of: ✓ Listed Company	Listed Company		
3.	A. Details of Designated Person (DP)			
	i. Name of the DP	Mr. Gaurav Singh		
	ii. PAN of the DP	BD****8E		
	iii. Designation of DP	Senior Vice President & Head - Technology Products		
	iv. Functional Role of DP	Technology		
	v. Whether DP is Promoter or belongs to	No		
	Promoter Group			
	B. If Reporting is for immediate relative of			
	i. Name of the immediate relative of DP	Mr. Hemant Kumar Singh		
	ii. PAN of the immediate relative of DP	AF*****7C		
	C. Details of transaction(s)			
	i. Name of the scrip	Niva Bupa Health Insurance Company Limited (BSE - 544286/ NSE – NIVABUPA)		
	ii. No of shares traded and value (Rs.) (Date- wise)	Date of the TransactionNature NatureNo. of shares involvedPrice per share in ₹		
		November         Buy         1         75.00           14, 2024		
		December         Buy         400         78.00           20, 2024		
		January 10, Buy 200 76.00 2025		
	D. In case value of trade(s) is more than Rs.	10 lacs in a calendar quarter		
	<ul> <li>i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015</li> <li>ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015</li> </ul>	Not Applicable		
4.	Details of violations observed under Code of Conduct	Mr. Hemant Kumar Singh bought shares (Consideration aggregating to ₹ 46,475/-). Mr. Hemant bought shares from the open market in three tranches, out of which two trades were executed during trading window closure period		



5.Action taken by Listed company/ Intermediary/FiduciaryMr. Hemant was in violation of the Company Code of Conduct; hence, it was thoug appropriate to issue warning letter and instructed to ensure all compliances of the Code6.Reasons recorded in writing for taking action stated aboveMr. Gaurav has confirmed that Mr. Hemant we not in possession of any Unpublished pri sensitive information, while trading in securiti of the Company. The amount involved in t trade is miniscule.7.Details of the previous instances ofNONE			
5.       Action taken by Listed company/ Intermediary/Fiduciary       Mr. Hemant was in violation of the Company Code of Conduct; hence, it was thoug appropriate to issue warning letter an instructed to ensure all compliances of the Code of any Unpublished pri sensitive information, while trading in securiti of the Company. The amount involved in the trade is miniscule.         6.       Reasons recorded in writing for taking action stated above       Mr. Gaurav has confirmed that Mr. Hemant wa not in possession of any Unpublished pri sensitive information, while trading in securiti of the Company. The amount involved in the trade is miniscule.         The Company adopts a strict stance against a breach of its Code of Conduct and SEBI F Regulations. The Company believes that the aforementioned action is a suitable course action to address the incidence and will act as deterrent against any future instances Designated Persons or their immediate relatives         7.       Details of the previous instances of NONE	l l		and one was executed without seeking pre-
Intermediary/ FiduciaryCode of Conduct; hence, it was thoug appropriate to issue warning letter and instructed to ensure all compliances of the Code6.Reasons recorded in writing for taking action stated aboveMr. Gaurav has confirmed that Mr. Hemant w not in possession of any Unpublished pri sensitive information, while trading in securiti of the Company. The amount involved in t trade is miniscule. The Company adopts a strict stance against a breach of its Code of Conduct and SEBI F Regulations. The Company believes that t aforementioned action is a suitable course action to address the incidence and will act as deterrent against any future instances Designated Persons or their immediate relative7.Details of the previous instances of NONE			clearance.
6.Reasons recorded in writing for taking action stated aboveMr. Gaurav has confirmed that Mr. Hemant w not in possession of any Unpublished pri sensitive information, while trading in securiti of the Company. The amount involved in t trade is miniscule.6.Reasons recorded in writing for taking action stated aboveMr. Gaurav has confirmed that Mr. Hemant w not in possession of any Unpublished pri sensitive information, while trading in securiti of the Company. The amount involved in t trade is miniscule.7.Details of the previous instances of NONENONE	5.	Action taken by Listed company/	Mr. Hemant was in violation of the Company's
6.Reasons recorded in writing for taking action stated aboveMr. Gaurav has confirmed that Mr. Hemant w not in possession of any Unpublished pri sensitive information, while trading in securiti of the Company. The amount involved in the trade is miniscule.7.Details of the previous instances of NONENONE		Intermediary/ Fiduciary	Code of Conduct; hence, it was thought
<ul> <li>Reasons recorded in writing for taking action stated above</li> <li>Mr. Gaurav has confirmed that Mr. Hemant work not in possession of any Unpublished prisensitive information, while trading in securities of the Company. The amount involved in the trade is miniscule.</li> <li>The Company adopts a strict stance against a breach of its Code of Conduct and SEBI F. Regulations. The Company believes that the aforementioned action is a suitable course action to address the incidence and will act as deterrent against any future instances Designated Persons or their immediate relative</li> <li>Details of the previous instances of NONE</li> </ul>			appropriate to issue warning letter and
action stated abovenot in possession of any Unpublished pri sensitive information, while trading in securiti of the Company. The amount involved in t trade is miniscule. The Company adopts a strict stance against a breach of its Code of Conduct and SEBI F Regulations. The Company believes that t aforementioned action is a suitable course action to address the incidence and will act as deterrent against any future instances Designated Persons or their immediate relative7.Details of the previous instances of NONE			instructed to ensure all compliances of the Code.
<ul> <li>sensitive information, while trading in securities of the Company. The amount involved in the trade is miniscule.</li> <li>The Company adopts a strict stance against and breach of its Code of Conduct and SEBI FRegulations. The Company believes that the aforementioned action is a suitable course action to address the incidence and will act as deterrent against any future instances Designated Persons or their immediate relative</li> <li>Details of the previous instances of NONE</li> </ul>	6.	Reasons recorded in writing for taking	Mr. Gaurav has confirmed that Mr. Hemant was
<ul> <li>of the Company. The amount involved in the trade is miniscule.</li> <li>The Company adopts a strict stance against a breach of its Code of Conduct and SEBI FRegulations. The Company believes that the aforementioned action is a suitable course action to address the incidence and will act as deterrent against any future instances Designated Persons or their immediate relative</li> <li>7. Details of the previous instances of NONE</li> </ul>		action stated above	not in possession of any Unpublished price
<ul> <li>trade is miniscule.</li> <li>The Company adopts a strict stance against a breach of its Code of Conduct and SEBLE Regulations. The Company believes that the aforementioned action is a suitable course action to address the incidence and will act as deterrent against any future instances Designated Persons or their immediate relative</li> <li>7. Details of the previous instances of NONE</li> </ul>			sensitive information, while trading in securities
<ul> <li>The Company adopts a strict stance against a breach of its Code of Conduct and SEBLE Regulations. The Company believes that the aforementioned action is a suitable course action to address the incidence and will act as deterrent against any future instances Designated Persons or their immediate relative</li> <li>7. Details of the previous instances of NONE</li> </ul>			of the Company. The amount involved in the
<ul> <li>breach of its Code of Conduct and SEBLE Regulations. The Company believes that to aforementioned action is a suitable course action to address the incidence and will act as deterrent against any future instances Designated Persons or their immediate relative</li> <li>7. Details of the previous instances of NONE</li> </ul>			trade is miniscule.
<ul> <li>Regulations. The Company believes that the aforementioned action is a suitable course action to address the incidence and will act as deterrent against any future instances Designated Persons or their immediate relative</li> <li>Details of the previous instances of NONE</li> </ul>			The Company adopts a strict stance against any
<ul> <li>aforementioned action is a suitable course action to address the incidence and will act as deterrent against any future instances Designated Persons or their immediate relative</li> <li>7. Details of the previous instances of NONE</li> </ul>			breach of its Code of Conduct and SEBI PIT
<ul> <li>action to address the incidence and will act as deterrent against any future instances Designated Persons or their immediate relative</li> <li>7. Details of the previous instances of NONE</li> </ul>			Regulations. The Company believes that the
deterrent against any future instances         Designated Persons or their immediate relative         7.       Details of the previous instances of         NONE			aforementioned action is a suitable course of
Designated Persons or their immediate relative           7.         Details of the previous instances of NONE			action to address the incidence and will act as a
7. Details of the previous instances of NONE			deterrent against any future instances by
			Designated Persons or their immediate relatives.
violations, if any since last financial year	7.	Details of the previous instances of	NONE
		violations, if any, since last financial year	
8. If any amount collected for Code of	8.	If any amount collected for Code of	
Conduct violation(s)		Conduct violation(s)	
i. Mode of transfer to SEBI - IPEF NONE	ſ	i. Mode of transfer to SEBI - IPEF	NONE
(Online/Demand Draft)	ſ	(Online/Demand Draft)	
ii. Details of transfer/payment		ii. Details of transfer/payment	
9. Any other relevant information -	9.	Any other relevant information	-

> Rajat Sharma Company Secretary and Compliance Officer PAN: BB\*\*\*\*\*9L Email id: investor@nivabupa.com



Sr. No.	Particulars	Details		
1.	Name of the listed company/	Niva Bupa Health Insurance Company Limited		
	Intermediary/Fiduciary			
2.	Please tick appropriate checkbox	Listed Company		
	Reporting in capacity of:			
	✓ Listed Company			
	☐ Intermediary			
	🕀 Fiduciary			
3.	A. Details of Designated Person (DP)			
	i. Name of the DP	Mr. Ishwar Dutt Sharma		
	ii. PAN of the DP	AR*****2K		
	iii. Designation of DP	Senior Vice President & Head Sales Academy & Distribution initiative		
	iv. Functional Role of DP	Talent Academy		
	v. Whether DP is Promoter or belongs to	No		
	Promoter Group			
	B. If Reporting is for immediate relative of	DP		
	i. Name of the immediate relative of DP	Not Applicable		
	ii. PAN of the immediate relative of DP	Not Applicable		
	C. Details of transaction(s)			
	i. Name of the scrip	Niva Bupa Health Insurance Company Limited (BSE - 544286/ NSE – NIVABUPA)		
	ii. No of shares traded and value (Rs.)	Data of the Network No. of Drive		
	(Date- wise)	Date of the Nature No. of Price		
		Transaction shares per involved share in		
		December Sell 120,000 84.00		
		03, 2024		
	D. In case value of trade(s) is more than Rs.	10 lacs in a calendar quarter		
	i. Date of intimation of trade(s) by			
	concerned	-		
	DP/director/promoter/promoter			
	group to Company under regulation 7			
	of SEBI (PIT) Regulations, 2015			
	ii. Date of intimation of trade(s) by	-		
	Company to stock exchanges under			
	regulation 7 of SEBI (PIT) Regulations,			
	2015			
4.	Details of violations observed under Code	Mr. Ishwar Dutt Sharma had sold 120,000 equity		
	of Conduct	shares in the open market on December 03,		
		2024 (Consideration aggregating to ₹		
-		10,080,000/-) without seeking pre-clearance.		
5.	Action taken by Listed company/	Mr. Ishwar was in violation of the Company's		
	Intermediary/ Fiduciary	Code of Conduct; hence, it was thought		
		appropriate to impose a penalty of ₹ 10,000/-		
		and issue warning letter and instruct to ensure		
		all compliances of the Code.		



6.	Reasons recorded in writing for taking action stated above	securities of the Compossession of any Unp information and also missed applying for pre- The trade was executed violate SEBI (PIT) Regula The Company adopts a breach of its Code of Regulations. The Comp aforementioned action action to address the in deterrent against any	strict stance against any Conduct and SEBI PIT bany believes that the is a suitable course of cidence and will act as a future instances by
		-	neir immediate relatives.
7.	Details of the previous instances of	NONE	
0	violations, if any, since last financial year		
8.	If any amount collected for Code of Conduct violation(s)		
	i. Mode of transfer to SEBI - IPEF	Online	
	(Online/Demand Draft)		
	ii. Details of transfer/payment		
		Particulars	Details
		Name of the	Niva Bupa Health
		transferor	Insurance Company Limited
		Bank Name, branch	HSBC Bank,
		and Account number	Barakhamba Road,
			New Delhi-110001
			051050888004
		UTR/Transaction	HSBCN11938552674
		reference Number	Amil 20, 2025
		Transaction date	April 29, 2025
		Transaction Amount (in ₹)	10,000
9.	Any other relevant information	-	

> Rajat Sharma Company Secretary and Compliance Officer PAN: BB\*\*\*\*\*9L Email id: investor@nivabupa.com



Sr. No.	Particulars	Details		
1.	Name of the listed company Intermediary/Fiduciary	Niva Bupa Health Insurance Company Limited		
2.	Please tick appropriate checkbox	Listed Company		
	Reporting in capacity of:			
	✓ Listed Company			
	Intermediary			
3.	A. Details of Designated Person (DP)			
5.	i. Name of the DP	Mr. Rajat Sharma		
	ii. PAN of the DP	BB*****9L		
	iii. Designation of DP	Company Secretary and Compliance Officer		
	iv. Functional Role of DP	Company Secretary and Compliance Officer		
	v. Whether DP is Promoter or belongs to	No		
	Promoter Group			
	B. If Reporting is for immediate relative of	DP		
	i. Name of the immediate relative of DP	Mr. Rakshit Sharma		
	ii. PAN of the immediate relative of DP	CI****5E		
	C. Details of transaction(s)			
	i. Name of the scrip	Niva Bupa Health Insurance Company Limited		
		(BSE - 544286/ NSE – NIVABUPA)		
	ii. No of shares traded and value (Rs.)			
	(Date- wise)	Date of the Nature No. of Price		
		Transaction shares per		
		involved share in		
		₹		
		November Buy 75 74.00		
		November         Buy         75         74.00           18, 2024		
		18, 2024		
	D. In case value of trade(s) is more than Rs.	18, 2024		
	i. Date of intimation of trade(s) by	18, 2024		
	i. Date of intimation of trade(s) by concerned	18, 2024		
	<ul> <li>Date of intimation of trade(s) by concerned DP/director/promoter/promoter</li> </ul>	18, 2024		
	<ul> <li>Date of intimation of trade(s) by concerned</li> <li>DP/director/promoter/promoter group to Company under regulation 7</li> </ul>	18, 2024 10 lacs in a calendar quarter		
	<ul> <li>Date of intimation of trade(s) by concerned</li> <li>DP/director/promoter/promoter</li> <li>group to Company under regulation 7</li> <li>of SEBI (PIT) Regulations, 2015</li> </ul>	18, 2024		
	<ul> <li>i. Date of intimation of trade(s) by concerned</li> <li>DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015</li> <li>ii. Date of intimation of trade(s) by</li> </ul>	18, 2024 10 lacs in a calendar quarter		
	<ul> <li>i. Date of intimation of trade(s) by concerned</li> <li>DP/director/promoter/promoter</li> <li>group to Company under regulation 7 of SEBI (PIT) Regulations, 2015</li> <li>ii. Date of intimation of trade(s) by Company to stock exchanges under</li> </ul>	18, 2024 10 lacs in a calendar quarter		
	<ul> <li>i. Date of intimation of trade(s) by concerned</li> <li>DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015</li> <li>ii. Date of intimation of trade(s) by</li> </ul>	18, 2024 10 lacs in a calendar quarter		
4.	<ul> <li>i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015</li> <li>ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations,</li> </ul>	18, 2024 <b>10 lacs in a calendar quarter</b> Not Applicable		
4.	<ul> <li>i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015</li> <li>ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015</li> </ul>	18, 2024 10 lacs in a calendar quarter Not Applicable		
4.	<ul> <li>i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015</li> <li>ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015</li> <li>Details of violations observed under Code</li> </ul>	18, 2024 <b>10 lacs in a calendar quarter</b> Not Applicable Mr. Rakshit Sharma bought 75 equity shares of		
4.	<ul> <li>i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015</li> <li>ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015</li> <li>Details of violations observed under Code</li> </ul>	18, 2024 <b>10 lacs in a calendar quarter</b> Not Applicable         Mr. Rakshit Sharma bought 75 equity shares of the Company (consideration aggregating to ₹		
4.	<ul> <li>i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015</li> <li>ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015</li> <li>Details of violations observed under Code</li> </ul>	18, 2024         10 lacs in a calendar quarter         Not Applicable         Mr. Rakshit Sharma bought 75 equity shares of the Company (consideration aggregating to ₹ 5,550/-) on November 18, 2024 from the open		
4.	<ul> <li>i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015</li> <li>ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015</li> <li>Details of violations observed under Code</li> </ul>	18, 2024 <b>10 lacs in a calendar quarter</b> Not Applicable         Mr. Rakshit Sharma bought 75 equity shares of the Company (consideration aggregating to ₹ 5,550/-) on November 18, 2024 from the open market during the trading window closure		
	<ul> <li>i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015</li> <li>ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015</li> <li>Details of violations observed under Code of Conduct</li> </ul>	18, 2024 <b>10 lacs in a calendar quarter</b> Not Applicable         Mr. Rakshit Sharma bought 75 equity shares of the Company (consideration aggregating to ₹ 5,550/-) on November 18, 2024 from the open market during the trading window closure period.		
	<ul> <li>i. Date of intimation of trade(s) by concerned DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015</li> <li>ii. Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015</li> <li>Details of violations observed under Code of Conduct</li> <li>Action taken by Listed company/</li> </ul>	18, 2024 <b>10 lacs in a calendar quarter</b> Not Applicable         Mr. Rakshit Sharma bought 75 equity shares of the Company (consideration aggregating to ₹ 5,550/-) on November 18, 2024 from the open market during the trading window closure period.         Mr. Rakshit was in violation of the Company's		



6.	Reasons recorded in writing for taking action stated above	Mr. Rajat has confirmed that Mr. Rakshit was not in possession of any Unpublished price sensitive information, while trading in securities of the Company. The amount involved in transaction is considered to be miniscule. The Company adopts a strict stance against any breach of its Code of Conduct and SEBI PIT Regulations. The Company believes that the aforementioned action is a suitable course of action to address the incidence and will act as a deterrent against any future instances by Designated Persons or their immediate relatives.
7.	Details of the previous instances of violations, if any, since last financial year	NONE
8.	<ul> <li>If any amount collected for Code of Conduct violation(s)</li> <li>i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)</li> <li>ii. Details of transfer/payment</li> </ul>	NONE
9.	Any other relevant information	-

> Rajat Sharma Company Secretary and Compliance Officer PAN: BB\*\*\*\*\*9L Email id: investor@nivabupa.com



[Schedule B read with Regulation 9 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

Sr. No.	Particulars	Details	Details		
1.	Name of the listed company/ Intermediary/Fiduciary	Niva Bupa Health Insurance Company Limited			
2.	Please tick appropriate checkbox Reporting in capacity of:	Listed Compa	ny		
	✓ Listed Company □ Intermediary □ Fiducient				
3.	A. Details of Designated Person (DP)				
5.	i. Name of the DP	Mr. Sunil Solan the trade)	ki (Conne	cted Person	at the time of
	ii. PAN of the DP	AC*****9A			
	iii. Designation of DP	Ex-employee o	f the Com	pany	
	iv. Functional Role of DP	Training & Dev			employment
	v. Whether DP is Promoter or belongs to Promoter Group	No	•		. ,
	B. If Reporting is for immediate relative or	f DP			
	i. Name of the immediate relative of DP	Not Applicable			
	ii. PAN of the immediate relative of DP	Not Applicable			
	C. Details of transaction(s)	••			
	i. Name of the scrip	Niva Bupa Heal - 544286/ NSE		-	y Limited (BSE
	ii. No of shares traded and value (Rs.) (Date- wise)	Date of the Transaction	Nature	No. of shares involved	Price per share in ₹
		November 18, 2024	Sell	40,000	72.26
	D. In case value of trade(s) is more than R	s 10 lacs in a cal	endar qua	arter	
	<ul> <li>Date of intimation of trade(s) by concerned</li> <li>DP/director/promoter/promoter group to Company under regulation 7 of SEBI (PIT) Regulations, 2015</li> </ul>				
	<ul> <li>Date of intimation of trade(s) by Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015</li> </ul>	Not Applicable			
4.	Details of violations observed under Code of Conduct	Mr. Sunil Solanki's last working day with the Company was October 30, 2024. Mr. Solanki had sold 40,000 equity shares of the Company (consideration aggregating to ₹ 28,90,400/-) on November 18, 2024, during the Trading window closure period.			
5.	Action taken by Listed company/ Intermediary/ Fiduciary	Mr. Solanki w Code of Cor			

Niva Bupa Health Insurance Company Limited IRDAI Registration No. 145 | CIN: L66000DL2008PLC182918

Registered Office: C-98, First Floor, Lajpat Nagar, Part 1, Delhi-110024 Corporate Office: 3<sup>rd</sup> Floor, Capital Cyber scape, Golf Course Extension Road, Sector-59, Gurugram-122101 (Haryana) Website: www.nivabupa.com | Tel: +91-124-6354900



		appropriate to issue warning letter and an instruction was issued to not to deal or trade in securities of the Company uptil April 30, 2025 and instructed to ensure all compliances of the Code.
6.	Reasons recorded in writing for taking action stated above	Mr. Solanki was an ex-employee of the Company. He has confirmed while trading in securities of the Company, he was not in possession of any Unpublished price sensitive information. The Company adopts a strict stance against any breach of its Code of Conduct and SEBI PIT Regulations. The Company believes that the aforementioned action is a suitable course of action to address the incidence and will act as a deterrent against any future instances by Designated Persons or their immediate relatives.
7.	Details of the previous instances of violations, if any, since last financial year	NONE
8.	If any amount collected for Code of Conduct violation(s)i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)ii. Details of transfer/payment	NONE
9.	Any other relevant information	-

> Rajat Sharma Company Secretary and Compliance Officer PAN: BB\*\*\*\*\*9L Email id: investor@nivabupa.com



Sr. No.	Particulars	Details		
1.	Name of the listed company Intermediary/Fiduciary	Niva Bupa Health Insurance Company Limited		
2.	Please tick appropriate checkbox Reporting in capacity of: ✓Listed Company ☐ Intermediary	Listed Company		
	☐ Fiduciary			
3.	A. Details of Designated Person (DP)			
	vi. Name of the DP	Mr. Vikas Jain		
	vii. PAN of the DP	AD*****5A		
	viii. Designation of DP	Executive Vice President and Chief Investment Officer		
	ix. Functional Role of DP	Finance		
	x. Whether DP is Promoter or belongs to	No		
	Promoter Group			
	B. If Reporting is for immediate relative of	DP		
	iii. Name of the immediate relative of DP	Not Applicable		
	iv. PAN of the immediate relative of DP	Not Applicable		
	C. Details of transaction(s)			
	iii. Name of the scrip	Niva Bupa Health Insurance Company Limited (BSE - 544286/ NSE – NIVABUPA)		
	iv. No of shares traded and value (Rs.) (Date- wise)	Date of the TransactionNature NatureNo. of shares involvedPrice per share in ₹		
		January 03, Sell 7,770 83.22 2025		
	D. In case value of trade(s) is more than Rs.	.10 lacs in a calendar quarter		
	<ul> <li>iii. Date of intimation of trade(s) by concerned</li> <li>DP/director/promoter/promoter</li> <li>group to Company under regulation 7</li> <li>of SEBI (PIT) Regulations, 2015</li> <li>iv. Date of intimation of trade(s) by Company to stock exchanges under</li> </ul>	Not Applicable		
	regulation 7 of SEBI (PIT) Regulations, 2015			
4.	Details of violations observed under Code of Conduct	Mr. Vikas Jain had earmarked equity shares of the Company against adjustment to F&O trade The Bank sold 7,770 equity shares in the oper market on January 03, 2025 (Consideration aggregating to ₹ 646,619/-), as an adjustment to F&O trade. The adjustment happened during the trading window closure period and shares were sold in the open market.		



5.	Action taken by Listed company/ Intermediary/Fiduciary	Mr. Vikas was in violation of the Company's Code of Conduct; hence, it was thought appropriate to issue warning letter and instructed to ensure all compliances of the Code.
6.	Reasons recorded in writing for taking action stated above	Mr. Vikas was not pre-informed about the automated adjustment of F&O trade. The amount of adjustment was insignificant and the said adjustment was not made with an intention to violate PIT Regulations and the Code. The Company adopts a strict stance against any breach of its Code of Conduct and SEBI PIT Regulations. The Company believes that the aforementioned action is a suitable course of action to address the incidence and will act as a deterrent against any future instances by Designated Persons or their immediate relatives.
7.	Details of the previous instances of	NONE
8.	<ul> <li>violations, if any, since last financial year</li> <li>If any amount collected for Code of Conduct violation(s)</li> <li>i. Mode of transfer to SEBI - IPEF (Online/Demand Draft)</li> <li>ii. Details of transfer/payment</li> </ul>	NONE
9.	Any other relevant information	-

Rajat Sharma Company Secretary and Compliance Officer PAN: BB\*\*\*\*\*9L Email id: investor@nivabupa.com