

April 29, 2025

Ref: NIVABUPA/EQ/2025-26/12

To,

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/ Intermediary/Fiduciary	Niva Bupa Hea	lth Insurar	nce Compan	y Limited	
2.	Please tick appropriate checkbox Reporting in capacity of: ✓ Listed Company ☐ Intermediary	Listed Compan	У			
	☐-Fiduciary					
3.	A. Details of Designated Person (DP)					
J.	i. Name of the DP	Mr. Akshat Misr	:a			
	ii. PAN of the DP	BL*****6C				
	iii. Designation of DP	Vice President 8	k Head - G	rowth Mark	eting	
	iv. Functional Role of DP	Marketing			- · · · · ·	
	v. Whether DP is Promoter or belongs	No				
	to Promoter Group					
	B. If Reporting is for immediate relative of	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 (BS	δE -
	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 F	 Rs.10 lacs in a cale	endar qua	rter		
	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	on 7 Not Applicable				
	Company to stock exchanges under regulation 7 of SEBI (PIT) Regulations, 2015					
4.	Details of violations observed under Code of Conduct	Ms. Aastha Ajmani, sold 2,800 equity shares of the Company (Consideration aggregating to ₹ 230,440/-) on December 03, 2024, without seeking pre-clearance.				
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 impo rning letter a	ose



_	December recorded to continue for 1.11	NAn Alabat I C	ad that NAs Asatlas
6.	Reasons recorded in writing for taking action stated above	possession of any Uniformation, while trace company. Considering the amounthe trade was not mad PIT Regulations and the The Company adopts as of its Code of Conduct Company believes that the suitable course of action will act as a deterrent a	ed that Ms. Aastha was not in Unpublished price sensitive ading in securities of the t of trade is insignificant and e with an intention to violate Code. trict stance against any breach and SEBI PIT Regulations. The the aforementioned action is a not address the incidence and gainst any future instances by heir 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	
	(Online/Demand Draft)		
	ii. Details of transfer/payment		
		Particulars	Details
		Name of the transferor	Niva Bupa Health Insurance Company Limited
		Bank Name, branch	HSBC Bank,
		and Account number	Barakhamba Road, New Delhi-110001 051050888004
		UTR/Transaction reference Number	HSBCN11938552704
		Transaction date	April 29, 2025
		Transaction Amount (in ₹)	5,000
9.	Any other relevant information	-	-

Rajat Sharma

Company Secretary and Compliance Officer PAN: BB*****9L

Email id: investor@nivabupa.com

Date: April 29, 2025

Place: Gurugram



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/	Niva Bupa Hea	lth Insura	nce Compan	y 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)	1			
	i. Name of the DP	Mr. Gaurav Sing	gh		
	ii. PAN of the DP	BD*****8E			
	iii. Designation of DP	Senior Vice Pr	esident 8	k Head - 1	Гесhnology
		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	DP			
	i. Name of the immediate relative of DP	Mr. Hemant Ku	mar Singh		
	ii. PAN of the immediate relative of DP	AF*****7C			
	C. Details of transaction(s)				
	i. Name of the scrip	Niva Bupa Hea	lth Insura	nce Compa	ny Limited
		(BSE - 544286/	NSE – NIV	ABUPA)	
	ii. No of shares traded and value (Rs.)	D			
	(Date- wise)	Date of the	Nature	No. of	Price
		Transaction		shares	per .
				involved	share in
		Nevenden	D	1	₹ 00
		November 14, 2024	Buy	1	75.00
		December	Dine	400	78.00
		20, 2024	Buy	400	76.00
		January 10,	Buy	200	76.00
		2025	Buy	200	70.00
		2023			
	D. In case value of trade(s) is more than Rs.	10 lacs in a caler	ıdar guart	er	
	i. Date of intimation of trade(s) by		എ	- -	
	concerned				
	DP/director/promoter/promoter				
	group to Company under regulation 7				
	of SEBI (PIT) Regulations, 2015	Not Applicable			
	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. Hemant	Kumar S	Singh boug	ht shares
	of Conduct	(Consideration		-	
		Hemant bought			
		three tranches,		-	
		executed during			
	\				•



		and one was executed without seeking pre-
		clearance.
5.	Action taken by Listed company/	Mr. Hemant was in violation of the Company's
	Intermediary/ Fiduciary	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	Mr. Gaurav has confirmed that Mr. Hemant was
	action stated above	not in possession of any Unpublished price
		sensitive information, while trading in securities
		of the Company. The amount involved in the
		trade is 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	NONE
/.	violations, if any, since last financial year	NONE
8.	If any amount collected for Code of	
0.	Conduct violation(s)	
	i. Mode of transfer to SEBI - IPEF	NONE
	(Online/Demand Draft)	HONE
	ii. Details of transfer/payment	
9.	Any other relevant information	_
٠.	Any other relevant information	

> Rajat Sharma Company Secretary and Compliance Officer PAN: BB*****9L

Email id: investor@nivabupa.com Place: Gurugram

Date: April 29, 2025



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	Niva Bupa Hea	lth Insurai	nce Compan	v Limited
	Intermediary/Fiduciary				,
2.	Please tick appropriate checkbox	Listed Compan	У		
	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 Pre- Distribution init		lead Sales A	cademy &
	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 Hea		-	ny Limited
		(BSE - 544286/ I	NSE – NIVA	ABUPA)	
	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	120,000	84.00
	D. In case value of trade(s) is more than Rs.	10 lacs in a calen	dar quart	er	
	i. Date of intimation of trade(s) by		dai quait	<u>. </u>	
	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 h	ad 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/ Intermediary/ Fiduciary	Mr. Ishwar was Code of Cond appropriate to and issue warn all compliances	duct; hen impose a ing letter	nce, it was penalty of and instruct	s thought ₹ 10,000/-



6.	Reasons recorded in writing for taking action stated above	securities of the Compossession of any Unpinformation 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 Compaforementioned action action to address the incompossession of the Company adopts a breach of its Code of Regulations.	without any intention to tion, 2015. strict stance against any Conduct and SEBI PIT pany believes that the is a suitable course of cidence and will act as a future instances by
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/Demand Draft)	Online	
	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	A! 20, 2025
		Transaction date	April 29, 2025
		Transaction Amount (in ₹)	10,000
9.	Any other relevant information	-	

> Rajat Sharma Company Secretary and Compliance Officer

Date: April 29, 2025 PAN: BB*****9L Place: Gurugram Email id: investor@nivabupa.com



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/	Niva Bupa Hea	lth Insura	nce Compan	y Limited	
	Intermediary/Fiduciary					
2.	Please tick appropriate checkbox	Listed Compan	У			
	Reporting in capacity of:					
	✓ Listed Company					
	☐ Intermediary					
	☐-Fiduciary					
3.	A. Details of Designated Person (DP)					
	i. Name of the DP	Mr. Rajat Sharm	ıa			
	ii. PAN of the DP	BB*****9L				
	iii. Designation of DP	Company Secret	tary and C	ompliance C	Officer	
	iv. Functional Role of DP	Company Secret	tary and C	ompliance C	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 Sha	rma			
	ii. PAN of the immediate relative of DP	CI*****5E				
	C. Details of transaction(s)					
	i. Name of the scrip	Niva Bupa Hea		-	ny Limited	
		(BSE - 544286/ I	NSE – NIVA	ABUPA)		
	ii. No of shares traded and value (Rs.)	Date of the	Nature	No. of	Price	
	(Date- wise)	Transaction	ivature	shares		
		ITAIISACTIOII		involved	per share in	
				ilivoiveu	Share iii	
		November	Buy	75	74.00	
		18, 2024	Day	/3	74.00	
		10,2021		l .	<u> </u>	
	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		4	-		
	concerned					
	DP/director/promoter/promoter					
	group to Company under regulation 7	Not Applicable				
	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. Rakshit Sha	rma boug	ht 75 equity	y shares of	
	of Conduct	the Company (
		5,550/-) on Nov				
		market during	the trac	ding windo	w closure	
		period.				
5.	Action taken by Listed company/	Mr. Rakshit wa				
	Intermediary/ Fiduciary	Code of Cond			_	
		appropriate to issue warning letter and instructed to ensure all compliances of the Code.				



7.	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. NONE
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

Date: April 29, 2025 Place: Gurugram Email id: investor@nivabupa.com



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/ Intermediary/Fiduciary	Niva Bupa Health Insurance Company Limited			
2.	Please tick appropriate checkbox Reporting in capacity of: ✓ Listed Company ☐ Intermediary ☐ Fiduciary	Listed Company			
3.	A. Details of Designated Person (DP)				
J.	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			
	iv. Functional Role of DP	Training & Dev	elopment	 during his 	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 dua	arter	
	 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 	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			



		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	-

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Date: April 29, 2025 Place: Gurugram Email id: investor@nivabupa.com



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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)	
	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.)	Data of the Nature No. of Drice
	(Date- wise)	Date of the Nature No. of Price Shares per
		Transaction shares per involved 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
	iii. Date of intimation of trade(s) by	η
	concerned DP/director/promoter/promoter	
	group to Company under regulation 7 of SEBI (PIT) Regulations, 2015	Not Applicable
	iv. 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. Vikas Jain had earmarked equity shares of
	of Conduct	the Company against adjustment to F&O trade. The Bank sold 7,770 equity shares in the open 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 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

> > Email id: investor@nivabupa.com

PAN: BB*****9L

Date: April 29, 2025 Place: Gurugram