



POLICY ON PREVENTION OF INSIDER TRADING

1. Objective

This Policy has been framed pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("PIT Regulations"), as amended, to:

- Prevent insider trading, regulate and monitor trades by Designated Persons.
- Ensure timely and adequate disclosure of Unpublished Price Sensitive Information ("UPSI") in a fair and transparent manner

2. Definitions

- **Insider** : means any person who is:
 - i) a connected person; or
 - ii) in possession of or having access to unpublished price sensitive information.
- **Designated Persons**: Promoters, Directors, KMPs, employees, connected persons, Employees within two reporting below the Chief Executive officer, immediate Relative of such Persons and others as identified by the Board/Compliance Officer.
- **Connected person means**,-
 - (i) any person who is or has been, during the six months prior to the concerned act, associated with a company, in any capacity, directly or indirectly, including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the company or holds any position including a professional or business relationship, whether temporary or permanent, with the company, that allows such a person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.
 - ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established, -
 - (a) Relative of connected persons specified in clause (i); or
 - (b) A holding company or associate company or subsidiary company; or
 - (c) An intermediary as specified in section 12 of the Act or an employee or director thereof; or
 - (d) An investment company, trustee company, asset management company or an employee or director thereof; or
 - (e) An official of a stock exchange or of clearing house or corporation; or
 - (f) A member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
 - (g) A member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
 - (h) An official or an employee of a self-regulatory organization recognized or authorized by the Board; or
 - (i) A banker of the company; or

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Corporate Office : 806, 8th Floor, Crown Heights, Hotel Crowne Plaza, Rohini Sector-10, New Delhi-110085



(j) A concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his relative or banker of the company, has more than ten per cent. of the holding or interest; [or]

(k) A firm or its partner or its employee in which a connected person specified in sub-clause (i) of clause (d) is also a partner; or

(l) A person sharing household or residence with a connected person specified in sub-clause (i) of clause (d);

- **UPSI:** Information not generally available, relating to financial results, dividends, change in capital structure, mergers/demergers, acquisitions/disposals, expansion plans, regulatory approvals, etc., which upon becoming generally available, is likely to materially affect the price of the securities.
- **Compliance Officer:** means any senior officer, designated so and reporting to the board of directors or head of the organization in case board is not there, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board of directors of the listed company or the head of an organization, as the case may be

3. Code of Fair Disclosure of UPSI (as per Reg. 8 of PIT Regulations)

The Company shall:

- i. Make prompt public disclosure of UPSI that would impact price discovery, no sooner than credible and concrete information comes into being.
- ii. Ensure uniform and universal dissemination of UPSI to avoid selective disclosure.
- iii. The Compliance Officer/CIRO shall deal with dissemination of information and disclosure of UPSI.
- iv. Promptly disseminate UPSI that is inadvertently disclosed selectively.
- v. Provide appropriate and fair responses to queries on news reports and requests for verification of market rumors by regulatory authorities.
- vi. Ensure information shared with analysts and research personnel is not UPSI.
- vii. Develop best practices to record analyst/IR meetings and upload proceedings/transcripts on the website.
- viii. Handle UPSI on a need-to-know basis only.

4. Trading Window Mechanism

- Trading window shall be closed during periods when UPSI exists (e.g., before financial results, corporate actions).
- Designated Persons shall trade only when the window is open, subject to pre-clearance for trades above the prescribed threshold.

5. Disclosure Requirements

- **Initial & Continual Disclosures** by Promoters, Directors, KMPs, and Designated

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Persons as per Regulation 7 of PIT.

- The Company shall notify stock exchanges within 2 trading days of receipt.

6. Legitimate Purpose Sharing of UPSI

- UPSI may be shared only for legitimate purposes by persons authorized by the Board/CIRO, strictly on a need-to-know basis.
- Recipients must be informed of their obligations, confidentiality duties, and liability for misuse.

7. Digital Database of UPSI Recipients

- The Compliance officer shall maintain a structured digital database of recipients of UPSI containing:
- Name of recipient, organization, PAN/other identifier, and contact details.
- Database must have proper internal controls, audit trails, and be tamper-proof.

8. Institutional Mechanism & Compliance

- The Board and Audit Committee shall review compliance under PIT Regulations at least once a year.
- Violations will attract disciplinary action by the Company, in addition to SEBI penalties.

9. Disclosure of this Policy

- This Policy (including the Code of Fair Disclosure of UPSI) shall be placed on the Company's **website**.
- A web link shall be provided in the **Annual Report**.

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