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Policy and Procedure for Inquiry In case of Leak of Unpublished Price Sensitive Information

Revision History

Original date of approval	Amendment	Approver
3 May 2019		Board of Directors
	29 July 2026	Board of Directors



Policy and Procedure for Inquiry in case of leak of Unpublished Price Sensitive Information

The Company hereby formulates the policy and procedure for inquiry in case of leak of unpublished price sensitive information (“UPSI”) or suspected leak of UPSI in accordance with Regulation 9A(5) of SEBI (Prohibition of Insider Trading) Regulations, 2015 (as amended).

The Process

- a. Any employee of the Company or its subsidiary or holding or associate company or of the fiduciary (“the complainant”) who has reasons to believe that any UPSI has been leaked or suspects the leak of any UPSI, shall immediately make a complaint in writing or by email to the Company Secretary or the Chief Financial Officer about such leak or suspected leak. The complaint shall include the name of the person whom the complainant has reasons to believe to have leaked the UPSI or suspects to have leaked the UPSI (“the accused”).
- b. On receipt of information about the leak or suspected leak of UPSI, an inquiry committee (the Committee) consisting of the Managing Director (or a person holding equivalent position), the Chief Financial Officer (or a person holding equivalent position) and the Company Secretary shall, within 4 working days of receipt of the complaint, make investigations on the basis of the complaint. The Committee shall have the power to summon the complainant and the accused.
- c. The Committee shall give the complainant and the accused an opportunity in writing of being heard and her/his statement shall be recorded in writing.
- d. In the event the Committee of the opinion that the information leaked or suspected to be leaked has been in public domain before such leak or suspected leak or that the information leaked or suspected to be leaked is not price sensitive in nature, Committee may drop the complaint after recording the reason/s thereof.
- e. In case of a difficulty by the Committee to investigate into a particular issue, it will have the option to call upon any appropriate resource(s) within or outside the Company for its assistance.
- f. The Committee shall conduct an inquiry into the complaint after intimation to the complainant and the accused.
- g. The Committee shall record in writing the details of all the proceedings of the inquiry.



- h. The Committee shall hand over a copy of the complaint and the statement of the complainant to the accused and give an opportunity to the accused to submit a written explanation if she/he so desires within 2 working days of receipt of the same, without disclosing the name of the complainant.
- i. The complainant shall be provided with a copy of the written explanation submitted by the accused.
- j. If the complainant or the accused desire any witness(es) to be called, they shall communicate in writing to the Committee the names of witnesses whom they propose to be called.
- k. If the complainant desires to tender any documents by way of evidence before the Committee he/she shall supply true copies of such documents to the Committee.
- l. The Committee will call upon all witnesses mentioned by both the parties and record their evidence including opportunity of cross examination of the witnesses if the Committee finds it necessary.
- m. The Committee shall complete the inquiry as soon as is reasonably possible and make out a detailed report giving the findings and the reasons for the same, and recommending appropriate action, if necessary, to be taken against the accused.
- n. The Committee shall make its best endeavour to give its findings or report on the case within 15 days of the complaint being lodged.
- o. The report shall be forwarded to the Audit Committee of the Board of Directors of the Company.

Precedence

In the event of any conflict between any provision(s) of this Policy and of any statute or law or regulations, the provisions of such statute or law or regulations shall prevail over that specific provision(s) in this Policy.

Any subsequent amendment / modification in any statute or law or regulations shall mutatis mutandis apply to /prevail upon this Policy.
