



**Amir Chand Jagdish Kumar (Exports) Limited**

**Policies and Procedures for Inquiry in Case of Leak or Suspected  
Leak of UPSI  
Effective Date: April 01, 2025**





**POLICIES AND PROCEDURES FOR INQUIRY IN CASE OF LEAK  
OR SUSPECTED LEAK OF UPSI  
(Regulation 9A(5) of SEBI (Prohibition of Insider Trading Regulations), 2015)**

**1. INTRODUCTION**

This Policy and Procedure for Inquiry in case of Leak or Suspected Leak of Unpublished Price Sensitive Information (UPSI) has been formulated by Amir Chand Jagdish Kumar (Exports) Limited (“**Company**”) in pursuance of Regulation 9A(5) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended (“**Regulations**”) shall be effective from April 01, 2025.

**2. PURPOSE**

This Policy aims to provide a framework for inquiry in case of leak or suspected leak of Unpublished Price Sensitive Information (“**UPSI**”). However, any instance of leak or suspected leak of (“**UPSI**”) reported under the Whistle Blower Policy of the Company shall be dealt with as per and under the Whistle Blower Policy of the Company.

**3. DEFINITION**

In this Policy, the following words and expressions, unless inconsistent with the context, shall bear the meanings assigned hereto:

“*Audit Committee*” shall mean Committee of the Board of the Company constituted pursuant to Section 177 of the Companies Act, 2013 read with Regulation 18 of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015.

“*Competent Authority*” means:

- (i) the managing director, in case of leak or suspected leak of UPSI involving any person other than the director(s) of the Company;
- (ii) the Chairperson of the Audit Committee of the Company, in case of leak or suspected leak of UPSI involving any Director of the Company other than the Chairperson of the Audit Committee of the Company;
- (iii) Chairperson of the Board of directors of the Company, in case of leak or suspected leak of UPSI involving Chairperson of the Audit Committee of the Company;

“**Leak of UPSI**” shall refer to such act / circumstance(s)/ communication of information by virtue of which any UPSI is made available or becomes available, by any means or mode to any person, association, body, firm, agency, society, entity or to a group thereof, whether registered or otherwise, before its official publication or announcement or formal circulation in the public domain and which shall also include any purported attempt thereof.

“**Unpublished Price Sensitive Information**” or “**UPSI**” means any information, relating to the company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following:



- a. financial results;
- b. dividends;
- c. change in capital structure;
- d. mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
- e. change in key managerial personnel.

Save and except the terms defined herein above, all the other terms used but not defined shall have meaning ascribed to them under the SEBI (PIT) Regulation, Companies Act, 2013, the SEBI Act, the Securities Contract Regulation Act, SEBI (ICDR) Regulation, etc.

#### **4. DISCLOSURE OF ACTUAL OR SUSPECTED LEAK OF UPSI TO STOCK EXCHANGES**

On becoming aware of actual or suspected leak of UPSI in respect of the Company, the Chief Investor Relation Officer (“**CIRO**”) shall ensure that the same is promptly intimated to the Stock Exchanges on which the securities of the Company are listed in the format as set out in “**Annexure A**” to the Policy

#### **5. REPORT OF ACTUAL OR SUSPECTED LEAK OF UPSI TO SEBI**

On becoming aware of actual or suspected leak of UPSI of the Company, and promptly pursuant to the intimation to the Stock Exchanges as per Clause 5 hereto, the CIRO shall ensure that a report on such actual or suspect leak of UPSI, preliminary enquiry thereon and results thereof shall be promptly informed to SEBI in the format as set out in “**Annexure B**” to the Policy

#### **6. INQUIRY PROCEDURE**

- a. The information/complaint(s) regarding leak or suspected leak of UPSI will be reviewed by the Competent Authority. If an initial review by the Competent Authority indicates that the said information/complaint has no basis or it is not a matter to be investigated under this Policy, it may be dismissed at initial stage and the decision shall be documented. All such cases shall be reported to the Audit Committee in its next meeting.
- b. The managing director of the Company or the Chairperson of the Audit Committee or Chairperson of the Board of Directors may *suo-moto* initiate an inquiry under this Policy.
- c. Where initial inquiry indicates that further investigation is necessary, the Competent Authority shall make further investigation in such matter and may, where necessary, provide an update to the board of directors in this regard. The Competent Authority may appoint one or more person(s)/entity(ies) (including external consultant(s)) to investigate or assist in the investigation of any instance of leak or suspected leak of UPSI and such person(s)/entity(ies) shall submit his/her/their report to the Competent Authority. During the course of investigation, the Competent Authority or the person(s)/entity(ies) appointed by the Competent Authority, as the case may be, may collect documents, evidence and record statements of the person(s) concerned.
- d. The investigation shall be a neutral fact-finding process. The Competent Authority shall endeavour to complete the investigation within 45 days of the receipt of the information/complaint of leak or suspected leak of UPSI or such instance coming to the knowledge of Competent Authority, as the case may be. Where Competent Authority requires



additional time to complete the inquiry, it may, where necessary, provide an interim update to the board of Directors.

## **7. DOCUMENTATION AND REPORTING**

The Competent Authority will make a detailed written record of investigation of each instance of leak or suspected leak of UPSI. The record will include:

- a. Facts of the matter
- b. Findings of the investigation
- c. Disciplinary/other action(s) to be taken against any person
- d. Any corrective actions required to be taken.

The details of inquiries made in these cases and results of such inquiries shall be informed to the Audit Committee and Board of Directors of the Company.

Further, the Company shall inform Securities and Exchange Board of India, promptly of such leaks and results of such inquiries.

## **8. COMPLAINT MECHANISM**

A person can report a leak or a suspected leak of UPSI to the following:

- a. Chairman of the Audit Committee;
- b. Company Secretary of the Company at the Registered Office of the Company.
- c. Chief Financial Officer of the Company;
- d. A person can also report:
  - i. By e-mail at [•]
  - ii. By letter, marked “Private and Confidential” and to the Company Secretary or to the Chief Financial Officer

## **9. AMENDMENT**

The Policy may be reviewed and amended periodically as and when required by the Board to ensure that it meets the objectives of the Insider Trading Regulations and the needs of the Company and remains effective.

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**Version approved by:** The Board of Directors

**Effective Date:** April 01, 2025

**Last modified date:** ---



## ANNEXURE A

Format for Intimation of Actual or Suspected leak of UPSI to the Stock Exchanges pursuant to Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015.

|                                                                                                                     |                                                                                                                                                                      |
|---------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To<br>BSE Limited,<br>P. J. Towers, Dalal Street, Fort Mumbai<br>– 400 001.<br><br>Ref.: BSE Scrip Code No. “_____” | To,<br>National Stock Exchange of India Limited,<br>Exchange Plaza, Bandra Kurla Complex,<br>Bandra (East), Mumbai - 400 051.<br><br>Ref: NSE Scrip Code No. “_____” |
|---------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------|

Dear Sir/Madam,

**Sub: Intimation of actual or suspected leak of UPSI pursuant to Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015.**

Pursuant to Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015, we are reporting actual or suspected leak of Unpublished Price Sensitive Information (UPSI) of the Company, as follows;

|                                                                       |        |
|-----------------------------------------------------------------------|--------|
| Name of Offender, if known.                                           |        |
| Name of Organization.                                                 |        |
| Designation<br>(Employee, Insider, Designated<br>Person or any other) |        |
| Nature of Information                                                 |        |
| Whether any action initiated by the<br>Company.                       | Yes/No |
| If yes, narration of the same                                         |        |
| Any other information.                                                |        |

Request you to take the aforementioned on your records.

Thanking you,

Yours faithfully

**For Amir Chand Jagdish Kumar (Exports) Limited**

**Chief Investor Relations Officer**



## ANNEXURE B

Format for Reporting Actual or Suspected leak of UPSI to the SEBI pursuant to Regulation 9A(5) of SEBI (Prohibition of Insider Trading) Regulation, 2015.

|                                                                                                                                                                         |                                 |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------|
| To,<br>Securities and Exchange Board of India<br>Plot No. C 4-A, G Block,<br>Near Bank of India, Bandra Kurla Complex,<br>Bandra East, Mumbai – 400 051,<br>Maharashtra |                                 |
| Ref.: BSE Scrip Code No. “_____”                                                                                                                                        | Ref: NSE Scrip Code No. “_____” |

Dear Sir/Madam,

**Sub: Report of actual or suspected leak of UPSI pursuant to regulation 9A(5) of SEBI (Prohibition of Insider Trading) Regulation, 2015.**

Pursuant to Regulation 9A (5) of SEBI (Prohibition of Insider Trading) Regulation, 2015, we are reporting actual or suspected leak of Unpublished Price Sensitive Information (UPSI) of the Company, as follows;

|                                                                       |        |
|-----------------------------------------------------------------------|--------|
| Name of Offender, if known.                                           |        |
| Name of Organization.                                                 |        |
| Designation<br>(Employee, Insider, Designated<br>Person or any other) |        |
| Nature of Information                                                 |        |
| Whether any action initiated by the<br>Company.                       | Yes/No |
| If yes, narration of the same                                         |        |
| Any other information.                                                |        |

Request you to take the aforementioned on your records.

Thanking you,

Yours faithfully

**For Amir Chand Jagdish Kumar (Exports) Limited**

**Chief Investor Relations Officer**