



Amir Chand Jagdish Kumar (Exports) Limited

Process for How and When People are Brought 'Inside' On Sensitive Transactions

Effective Date: April 01, 2025





**PROCESS FOR HOW AND WHEN PEOPLE ARE BROUGHT ‘INSIDE’ ON
SENSITIVE TRANSACTIONS
(Schedule B of SEBI (Prohibition of Insider Trading Regulations), 2015)**

The Chief Investor Relations Officer / Compliance officer in consultation with Managing Director or Chief Financial Officer of the Company shall decide on how and when any person(s) should be brought ‘inside’ on any proposed or ongoing sensitive transaction(s).

A person(s) shall be brought inside on any proposed or ongoing sensitive transaction(s) of the Company who may be an existing or proposed partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants etc. for legitimate purpose which shall include the following;

- a. in the ordinary course of business.
- b. in furtherance of performance of duty(ies);
- c. for discharge of legal obligation(s).
- d. for any other genuine or reasonable purpose as may be determined by the Chief Investor Relations Officer of the Company.
- e. for any other purpose as may be prescribed under the Securities Regulations or Company Law or any other law for the time being in force, in this behalf, as may be amended from time to time.

INTIMATION OF DUTIES AND RESPONSIBILITIES AND THE LIABILITY TO THE PERSON(S) WHO HAS/HAVE BEEN BROUGHT INSIDE’ ON SENSITIVE TRANSACTION(S).

Any person(s) who has/have been brought inside on any proposed and/or ongoing sensitive transaction(s) and in receipt of unpublished price sensitive information shall be considered an “insider” for purposes of this Code and due notice shall be given to such persons, in the format as set out in by the Chief Investor Relations Officer in consultation with Managing Director and/or Chief Financial Officer of the Company;

- a. To make aware such person that the information shared is or would be confidential.
- b. To instruct such person to maintain confidentiality of such unpublished price sensitive information in compliance with these regulations.
- c. To make aware to such person the duties and responsibilities attached to the receipt of such information and the liability attached to misuse or unwarranted use of such information.

Version approved by: The Board of Directors

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Last modified date: