



RANA SUGARS LIMITED

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POLICY ON HOW AND WHEN PEOPLE ARE BROUGHT “INSIDE” ON SENSITIVE TRANSACTIONS

1. OBJECTIVE

The objective of this Policy is to comply with requirements stated in SEBI (Prohibition of Insider Trading) Regulations, 2015 (Regulation 9(1) read with Clause 15 of Schedule B), as amended from time to time, (“Regulations”), which reads as under:

“Listed entities shall have a process for how and when people are brought ‘inside’ on sensitive transactions. Individuals should be made aware of the duties and responsibilities attached to the receipt of Inside Information, and the liability that attaches to misuse or unwarranted use of such information.”

2. UNPUBLISHED PRICE SENSITIVE INFORMATION (UPS)

For the purpose of above, UPSI shall have the same meaning as given under SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time. The definition of UPSI, as on date, is as under:

“UPSI means any information, relating to a 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: –

- I Financial results;
- II Dividends;
- III Change in capital structure;
- IV Mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions; and
- V Changes in Key Managerial Personnel”.

3. HOW AND WHEN PEOPLE ARE BROUGHT ‘INSIDE’ ON SENSITIVE TRANSACTIONS

The Compliance Officer in consultation with MD or CFO 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;

- I In the ordinary course of business.

- II In furtherance of performance of duty(ies);
- III For discharge of legal obligation(s).
- IV For any other genuine or reasonable purpose as may be determined by the Compliance Officer of the Company.
- V 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.

3. POLICY ON COMMUNICATING THE UPSI

- I UPSI shall be shared on need to know basis by all concerned in the Company i.e. it shall be disclosed only to those persons who need the information to discharge their official duties or discharge of legal obligations.
- II No person should procure/ communicate UPSI, except for operational purposes.
- III Every person, with whom UPSI is shared, shall be informed that the information so communicated shall not be used, except for the purposes specified, and he/ she shall be made aware of the consequences attached to misuse of such information.

3. 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 Compliance Officer in consultation with MD and/or CFO of the Company;

- I To make aware such person that the information shared is or would be confidential.
- II To instruct such person to maintain confidentiality of such unpublished price sensitive information in compliance with these regulations.
- III 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.

4. REVIEW OF THE POLICY

This Policy shall not be amended unless the amendment is required pursuant to change in the applicable law.

5. DISSEMINATION OF POLICY

Either this Policy or the important provisions of this policy shall be hosted on the website of the Company.

6. COMPLIANCE RESPONSIBILITY

The Company Secretary & Compliance Officer of the Company shall be responsible for ensuring overall compliance of this Policy.