

# AMAZIN AUTOMATION SOLUTIONS INDIA LIMITED

(Formerly Known as AMAZIN AUTOMATION SOLUTIONS INDIA PRIVATE LIMITED)

CIN: U24100DL2013PLC261524

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## POLICY FOR THE PROCEDURE OF INQUIRY IN CASE OF LEAK OF UNPUBLISHED PRICE SENSITIVE INFORMATION (“UPSI”)

*(Under Regulation 9A of SEBI (Prohibition of Insider Trading) Regulations, 2015)*

### **Background**

The Committee constituted by SEBI to review the Insider Trading Regulation noted the recent cases of leaks of UPSI related to listed entities on Instant Messaging apps. Such information originates from within the company and affects the listed company in terms of its market price as well as loss of reputation and investors' / financiers' confidence in the company.

Leakage of UPSI from a company is a matter of serious concern not only for the regulator but for the company as well, and listed companies should take responsibility to find out the sources responsible for the leakage and plug loopholes in the internal control systems to prevent recurrence of such leakage of UPSI.

The SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 (“PIT Amendment Regulations”) mandates every listed company to formulate a written **policy and procedures for inquiry in case of leak of unpublished price sensitive information** and initiate appropriate inquiries on becoming aware of leak of unpublished price sensitive information and inform the Board promptly of such leaks, inquiries and results of such inquiries.

In this regard, the Board of Directors of Amazin Automation Solutions India Limited (“Amazin/Company”) has laid down this policy for the procedure of inquiry in case of leak of Unpublished Price Sensitive Information (‘the policy’), for adoption.

### **Objective**

- To strengthen the internal control system to prevent leaks of UPSI.
- To restrict and prohibit the practice of sharing of UPSI, with unauthorised persons, which originates from within the company and which affects the market price of the Company, as well as loss of reputation and investors' / financiers' confidence in the company.
- To have a uniform code to curb the unethical practices of sharing UPSI by Insiders, Employees & Designated Persons with any person, firm, Company or Body Corporate.
- To initiate an inquiry in case of a leak of UPSI or a suspected leak of UPSI and inform the same to the Securities and Exchange Board of India (“SEBI”) promptly.
- To penalise any Insider, Employee & Designated Persons who appear to have been found guilty of violating this policy.

## **Scope**

*The Company endeavours to preserve the confidentiality of unpublished price-sensitive information(UPSI) and to prevent misuse of such information. The Company will strive to restrict and prohibit the practice of sharing of UPSI which originates from within the company by any promoter, director, key managerial person, Insider, employee, designated person, support staff or any other known or un-know person(s) with any un-authorized person which affects the market price of the Company as well as causes loss of reputation and investors' /financers' confidence in the company.*

## **Definitions:**

**Chief Investor Relations Officer (“CIO”)** shall mean the Compliance Officer of the Company who is appointed by the Board of Directors under the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015.

**Leak of UPSI** shall mean communication of information which is / shall be UPSI by any Insider, Employee & Designated Persons or any other known or unknown person to any person other than a person(s) authorized by the Board or Chief Investor Relation Officer (CIO) of the Company after following the due process prescribed in this behalf in the Code of Practices Fair Disclosure of the Company and /or under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and/or SEBI (Prohibition of Insider Trading) Regulations, 2015 and any amendment, re-amendment or re-enactment thereto.

**Support Staff** shall include IT staff, accounts and finance staff and secretarial staff who have access to unpublished price-sensitive information.

**Unpublished Price Sensitive Information (“UPSI”)** shall mean 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, include but not be restricted to, information relating to the following;

- Periodical financial results of the Company;
- Intended declaration of dividends (Interim and Final);
- Change in capital structure, i.e. Issue of securities, buy-back of securities or any forfeiture of shares or change in market lot of the Company's shares;
- Mergers, De-mergers, Amalgamation, Acquisitions, De-listing of Securities, Scheme of Arrangement or Takeover, disposals, spin off or selling division of whole or substantially whole of the undertaking and expansion of business and such other transactions;
- Any major expansion plans or execution of new projects or any significant changes in policies, plans or operations of the Company;
- Changes in key managerial personnel; and
- Any other matter as may be prescribed under the Listing Regulations and/or Corporate Law to be price sensitive, from time to time.

**Note:** Words and expressions used and not defined in this Code but defined in the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and the Rules and Regulations made there under shall have the

*meanings respectively assigned to them in those legislation.*

#### **Duties of Chief Investor Relations Officer:**

The CIO shall be responsible for:

- Oversee the Compliance of this policy.
- Report the incident of actual or suspected leak of UPSI to the *Securities and Exchange Board of India*.
- Intimate the incident of actual or suspected leak of UPSI to the Stock Exchanges.
- To coordinate with and disclose the relevant facts of the incident of actual or suspected leak of UPSI to the Enquiry committee.

#### **Disclosure of actual or suspected leak of UPSI to Stock Exchanges:**

On becoming aware of actual or suspected leak of Unpublished Price Sensitive Information of the Company, the CIO shall ensure that the same shall be 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 this policy.

#### **Report of actual or suspected leak of UPSI to SEBI:**

On becoming aware of actual or suspected leak of Unpublished Price Sensitive Information of the Company, the CIO shall ensure that a report on such actual or suspected leak of UPSI, preliminary enquiry thereon and results thereof shall be promptly made to the SEBI in the format as set out in “**Annexure B**” to this policy.

#### **Enquiry Committee (The Committee):**

The Board of Directors or any Committee authorized by them in this behalf, shall constitute a committee to be called as “Enquiry Committee”, which shall consist of minimum 3 members which shall include Whole Time Director, CFO & Compliance Officer and any other officer of the Company as may be mutually decided by Whole Time Director, CFO and Compliance Officer of the Company.

#### **Duties of the Enquiry Committee:**

The Committee shall be responsible for:

- To conduct a preliminary enquiry to ascertain the truth contained in the information or complaint pertaining to actual or suspected leak of UPSI, if any; and
- To authorise any person to collect necessary support material; and
- To decide disciplinary action thereon.

#### **Procedure for enquiry in case of leak of UPSI:**

On becoming aware of sue moto or otherwise, of actual or suspected leak of Unpublished Price Sensitive Information of the Company by any promoter, director, key managerial person, Insider, employee, designated person, support staff or any other known or un-know person, the CIO after informing the same to the Managing Director or Chief Financial Officer of the Company, shall follow the below mentioned procedure in order to enquire and/or investigate the matter to ensure.

**Preliminary Enquiry:**

Preliminary enquiry is a fact-finding exercise. The object of preliminary enquiry is to ascertain the truth or otherwise of the allegations contained in the information or complaint, if any, and to collect necessary available material in support of the allegations, and thereafter to decide whether there is justification to embark on any disciplinary action.

The Enquiry Committee shall appoint and/or authorise any person(s), as it may deem fit, to initiate/conduct an enquiry to collect the relevant facts, material substances on actual or suspected leak of UPSI.

**Report of Preliminary Enquiry to the Committee:**

The Person(s) appointed/authorised to enquire into the matter of actual or suspected leak of UPSI submit his/her report to the Committee within 7 days from the date of their appointment on this behalf.

**Disciplinary Action:**

The Disciplinary action(s) shall include, wage freeze, suspension, recovery, claw back, termination,etc., as may be decided by the Members of the Committee.

**Amendment**

The Board of Directors of the Company, subject to applicable laws, rules, & Regulations, may amend/ substitute any provision(s) with a new provision(s) or replace this entire Policy with a new Policy.

In any circumstance where the terms of this Policy differ from any law, rule, regulation, etc., for the time being in force, the law, rule, regulation, etc. shall take precedence over this Policy.

This Policy and any subsequent amendment(s) thereto shall be promptly intimated to the Stock Exchanges, if required under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and/or SEBI (Prohibition of Insider Trading) Regulations, 2015 and any amendment, re-amendment or re-enactment thereto.

Sd/-  
**VIKAS SHARMA**  
**Director**

**Effective Date: 01.12.2025**

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**AMAZIN AUTOMATION SOLUTIONS INDIA LIMITED  
(FORMERLY KNOWN AS AMAZIN AUTOMATION SOLUTIONS INDIA PRIVATE LIMITED)**

## **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,  
National Stock Exchange of India Limited  
Exchange Plaza, Bandra Kurla Complex,  
Bandra (East), Mumbai-400 051.

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 Organisation.	
Designation (Employee, Insider, Designated Person or any other)	
Nature of Information	
Whether any action is initiated by the Company.	Yes/No
If yes, narration of the same	

Request you to kindly take the aforementioned on your records. Thanking you,  
Yours faithfully,

**For Amazin Automation Solutions India Limited**

**Company Secretary**

## 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,

Securities and Exchange Board of India  
Plot No. C 4-A, G Block,  
Near Bank of India, Bandra Kurla Complex, Bandra East, Mumbai – 400 051, Maharashtra

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 Organisation.	
Designation (Employee, Insider, Designated Person or any other)	
Nature of Information	
Whether any action is initiated by the Company.	Yes/No
If yes, narration of the same	

Request you to kindly take the aforementioned on your records. Thanking you,  
Yours faithfully,

**For Amazin Automation Solutions India Limited**

**Company Secretary**