

POLICY AND
PROCEDURE FOR
INQUIRY IN CASE
OF LEAKAGE OF
UNPUBLISHED
PRICE SENSITIVE
INFORMATION

NAGA DHUNSERI GROUP LIMITED
(CIN: L01132WB1918PLC003029)

POLICY AND PROCEDURE FOR INQUIRY IN CASE OF LEAKAGE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

PREFACE

Pursuant to Regulation 9A of the SEBI (Prohibition of Insider Trading) Regulations, 2015, including any amendments thereto, the Company shall formulate written policies and procedures for inquiry in case of leak of Unpublished Price Sensitive Information (“UPSI”) or suspected leak of UPSI duly approved by the Board of Directors of the Company and accordingly initiate appropriate inquiries on becoming aware of leak of UPSI or suspected leak of UPSI and inform SEBI promptly of such leaks, inquiries and results of such inquiries.

Under these circumstances, the Company has formulated “Policy and Procedure for Inquiry in case of Leakage of Unpublished Price Sensitive Information” (hereinafter known as ‘Policy’) to safeguard the interests of its Stakeholders, Directors and Employees to freely communicate and address to the Company their genuine concerns in relation to any instances of leakage of UPSI or suspected leakage of UPSI.

The Company has also formulated a Whistle-Blower Policy to enable employees to report instances of leak of UPSI.

PROCEDURE FOR INQUIRY

1. The Company on becoming aware of leak of UPSI or suspected leak of UPSI should take necessary steps, as may be necessary, or may refer the matter or any issue(s) arising to any Competent Forum, Professional Experts, and / or Legal Counsels, whether internal or external, for requisite review, analysis, investigation and consequent guidance / opinion / advise, if any, so as to take an effective, rational and unbiased redressal measure with regard to such matter and / or issue(s) arising therefrom.
2. On becoming aware of leak of UPSI or suspected leak of UPSI, the Compliance Officer shall ensure that the same shall be intimated to the Stock Exchanges in **Annexure I**.
3. The Accused shall have right to be heard and adequate time and opportunity shall be given for the subjects to communicate his / her say on the matter.
4. On completion of investigation, Whistle Blower Officer / Chairman shall have the right to take such action as it may deem just and proper. Such decision shall be final and binding on all concerned parties including the Company.
5. The Accused shall have the right to be informed of the outcome of the investigation and shall be so informed in writing by the Company after the completion of the inquiry / investigation process.
6. The Compliance Officer shall ensure that the Report of such actual or suspected leak of UPSI, preliminary enquiry thereon and results thereof shall be promptly made to SEBI and the Stock Exchanges in **Annexure II**.
7. The Report of the investigation carried out and the result thereof shall be reported to the Board of Directors of the Company at their next meeting.

Annexure I

Format for Intimation of Actual or Suspected Leak of Unpublished Price Sensitive Information to the Stock Exchanges

Date:

The National Stock Exchange of India Limited

(Symbol: NDGL)

Exchange Plaza

Plot No: C/1, G Block

Bandra – Kurla Complex, Bandra (E)

Mumbai – 400 051

Sub: Intimation of actual or suspected leak of Unpublished Price Sensitive Information pursuant to Regulation 30(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015

Dear Sir / Madam,

Pursuant to Regulation 30(1) of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015, please note the following details of actual or suspected leak of Unpublished Price Sensitive Information, as received by Company:

Name of Offender, if known	
Name of Organization	
Designation	
Nature of Information	

The same is for your information and record.

Thanking You.

Yours faithfully,

For Naga Dhunseri Group Limited

Director / Company Secretary

Annexure II

Format for Reporting Actual or Suspected Leak of Unpublished Price Sensitive Information

Date:

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

The National Stock Exchange of India Limited

(Symbol: NDGL)

Exchange Plaza
Plot No: C/1, G Block
Bandra – Kurla Complex, Bandra (E)
Mumbai – 400 051

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

Dear Sir / Madam,

Pursuant to Regulation 9A(5) of SEBI (Prohibition of Insider Trading) Regulation, 2015, the following is the Report of actual or suspected leak of Unpublished Price Sensitive Information received by the Company:

Name of Offender, if known	
Name of Organization	
Designation	
Nature of Information	
Decision taken by the Company	
Disciplinary Action taken by the Company	

The same is for your information and record.

Thanking You.

Yours faithfully,
For **Naga Dhunseri Group Limited**

Director / Company Secretary