

Anjali LabTech Limited

**POLICY FOR INQUIRY IN CASE OF LEAK OR SUSPECTED LEAK OF UNPUBLISHED PRICE
SENSITIVE INFORMATION (UPS)**

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

POLICY FOR INQUIRY IN CASE OF LEAK OR SUSPECTED LEAK OF UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI)

1. Preamble

The Board of Directors ("**Board**") of Anjali LabTech Limited (formerly known as Anjali Diamonds Private Limited) (the "**Company**") has adopted this Policy in compliance with Regulation 9A of the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("**PIT Regulations**") and other applicable provisions of law.

This Policy sets out the framework for initiating inquiry in case of a leak or suspected leak of Unpublished Price Sensitive Information ("**UPSI**") and for reporting the findings thereof to the Audit Committee and the Board, and where applicable, to regulatory authorities.

2. Objective

The objectives of this Policy are to:

- Establish a structured and transparent mechanism to investigate actual or suspected leaks of UPSI.
- Safeguard the confidentiality and integrity of UPSI.
- Uphold good governance practices and comply with regulatory requirements.

3. Scope & Applicability

This Policy applies to:

- All Directors, Officers, Employees, Designated Persons, and Connected Persons of the Company.
- Intermediaries, consultants, advisors, and third parties who may have access to UPSI by virtue of their relationship with the Company.

4. Definitions

- "**UPSI**" shall have the meaning ascribed to it under the PIT Regulations.
- "**Leak of UPSI**" means communication or dissemination of UPSI, by any means whatsoever, directly or indirectly, to any unauthorized person.
- "**Suspected Leak of UPSI**" means an unverified or alleged event of unauthorized communication or dissemination of UPSI.
- "**Compliance Officer**" means the officer appointed by the Company under Regulation 6 of the PIT Regulations.

5. Reporting of Leak or Suspected Leak

- Any person who becomes aware of a leak or suspected leak of UPSI must immediately report it to the Compliance Officer or the Managing Director/CEO.
- Reports may be made in writing (including email). The identity of the informant shall be kept confidential.

6. Inquiry Mechanism

- Upon receipt of a complaint or report, the Managing Director (MD) shall constitute an Inquiry Committee, which shall comprise:
 - Compliance Officer (Chairperson)
 - Head of HR or Legal
 - One senior functional head, as may be nominated by the MD
- The Inquiry Committee shall:
 - a. Record details of the complaint/report.
 - b. Conduct preliminary assessment to determine materiality.
 - c. Undertake a detailed investigation, including review of relevant documents, emails, system logs, and interviews.
 - d. Prepare a report of findings, clearly identifying whether a leak occurred, persons responsible (if any), and corrective/disciplinary measures.

7. Disciplinary & Corrective Actions

Based on the findings, the Company may take one or more of the following actions:

- Initiate disciplinary proceedings against employees, which may include warning, suspension, termination, or recovery of losses.
- Take legal action or terminate contracts with intermediaries/third parties found responsible.
- Strengthen internal controls, IT security, and data access protocols.
- File necessary reports with SEBI/stock exchanges as per applicable law.

8. Reporting to the Audit Committee/Board

- The Inquiry Committee shall submit its report to the Audit Committee, which will review and place the matter before the Board of Directors for noting and directions.
- In case the leak/suspected leak is material, the Company shall make appropriate regulatory filings/disclosures.

9. Confidentiality

All proceedings, documents, and information related to the inquiry shall be maintained in strict confidence and shall not be disclosed except as required under law or to regulatory authorities.

10. Authority for Approval & Review

- This Policy has been approved by the Board of Directors of the Company at its meeting held on September 20, 2025.
- The Board of Directors may review and amend this Policy from time to time to ensure continued compliance with applicable law and regulatory requirements.