



INSIDER TRADING PROHIBITION CODE

Policies and Procedures to prevent Insider Trading



Policy Title	Insider Trading Prohibition Code
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23 DECEMBER 2024

**A-One Steel India Limited (formerly known as A-One Steels India Private Limited
and A-One Steel and Alloys Private Limited)**

A One House, No. 326, CQAL Layout, Ward No. 08, Sahakar Nagar, Bangalore 560092

Purpose

This SOP outlines the policies and procedures to prevent insider trading at A One Steel India Limited (AOSIL). The aim is to ensure compliance with the Securities and Exchange Board of India (SEBI) regulations and maintain the highest corporate governance standards.

Scope

This SOP applies to all employees, directors, officers, and connected persons of AOSIL who have access to or receive unpublished price-sensitive information (UPSI) about the company.

Definitions

Insider: Any person who is connected, in possession of, or has access to UPSI.

Connected Person: Any person who is or has, during the six months before the concerned act, been associated with AOSIL, directly or indirectly.

Unpublished Price Sensitive Information (UPSI): Information related to the company that is not available and which, upon becoming available, is likely to affect the price of the securities of AOSIL materially. UPSI includes but is not limited to:

- Financial results
- Dividends
- Change in capital structure.
- Mergers, de-mergers, acquisitions, delisting, disposals, and expansion of business and such other transactions
- Changes in key managerial personnel
- Material events following the listing agreement.

Designated Persons: Employees, directors, and officers who are expected to have access to UPSI due to their roles.

Policy Statements

1. Confidentiality of UPSI:

- All UPSI must be handled on a need-to-know basis and disclosed only to those within the company who need the information to discharge their duties.
- No UPSI shall be communicated, provided, or allowed access to any person except in furtherance of legitimate purposes, performance of duties, or discharge of legal obligations.

2. Prohibited Transactions:

- Insiders are prohibited from trading in the securities of AOSIL when possessing UPSI.

- Insiders must not communicate, counsel, or procure any UPSI to any person.
3. Trading Window:
- The trading window for dealing in the company's securities shall be closed when UPSI is unpublished.
 - The trading window will open after the UPSI becomes available.
4. Pre-clearance of Trades:
- Designated persons who intend to trade in the securities of AOSIL must obtain pre-clearance of the transaction from the compliance officer.
 - Pre-clearance is not required if the cumulative value of the securities traded in a fiscal year does not exceed a threshold limit specified by the company.

Procedures

1. Identification of UPSI:
- The compliance officer shall identify and list events and information that are deemed to be UPSI.
2. Maintenance of Confidentiality:
- Ensure that all documents and files containing UPSI are kept secure.
 - Avoid discussing UPSI in public places.
3. Trading Window Mechanism:
- The compliance officer will notify the opening and closing of the trading window.
 - Employees and designated persons will be informed about the trading window status via email or internal communication channels.
4. Pre-clearance Process:
- Submit a pre-clearance request form to the compliance officer.
 - The compliance officer will review and approve/disapprove the request within two business days.
5. Disclosure Requirements:
- All insiders must disclose their trades in the securities of AOSIL as per the regulatory requirements.
 - Initial disclosure of holding by designated persons within seven days of becoming designated persons.
 - Continual disclosure within two trading days of the transaction if the value of securities traded in a calendar quarter exceeds the threshold limit.

Roles and Responsibilities

Compliance Officer:

- Oversee adherence to the Insider Trading Prohibition Code.
- Maintain records of all disclosures and pre-clearance approvals.
- Educate employees on the prohibition of insider trading.

Designated Persons:

- Adhere strictly to the provisions of this SOP.

- Report any violations or suspected violations of this SOP to the compliance officer immediately.

All Employees:

- Maintain confidentiality of UPSI.
- Follow the trading window restrictions.

Penalties for Non-Compliance

Non-compliance with this SOP may result in disciplinary action, including termination of employment. Violations of insider trading laws can also attract severe penalties under SEBI regulations.

Review and Amendment

This SOP will be reviewed annually and amended to ensure compliance with applicable laws and regulations and address changes in AOSIL's internal policies.

Contact Information

If you have any questions or need further information about this SOP, please get in touch with the Compliance Officer at legal@aonesteelgroup.com

This SOP aims to ensure transparency, fairness, and adherence to regulatory requirements, thus safeguarding the interests of A-One Steel India Limited and its stakeholders.

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