



Insider Trading Policy for Stallion India Fluorochemicals Limited

1. Introduction and Objectives:

- This Insider Trading Policy ("Policy") is established in accordance with the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("Regulations").
- The objective of this Policy is to prevent misuse of Unpublished Price Sensitive Information ("UPSI") and to ensure that insiders of Stallion India Fluorochemicals Limited ("the Company") adhere to ethical standards and legal obligations while dealing in the Company's securities.

2. Definitions:

- **Insider:** Any person who is or was connected with the Company or is deemed to have been connected with the Company and who is reasonably expected to have access to UPSI.
- **Unpublished Price Sensitive Information (UPSI):** Information that is not generally available and which, upon becoming publicly available, is likely to materially affect the price of securities.
- **Designated Persons:** Include directors, employees, and consultants who are expected to have access to UPSI.
- **Immediate Relatives:** As defined under the Regulations, includes a spouse, parent, sibling, child, or any other person financially dependent on the designated person.

3. Prohibitions:

- Insiders are prohibited from trading in the Company's securities when in possession of UPSI.
- Communicating, providing, or allowing access to UPSI, except in the ordinary course of business or as required under law, is prohibited.

4. Trading Restrictions:

- **Trading Window:** The Compliance Officer will specify the periods when the trading window is open or closed.
- Designated persons must obtain pre-clearance from the Compliance Officer before executing any trade.
- Contra trades or derivative transactions are restricted within certain periods as specified in the Policy.
- Specific restrictions, such as a cooling-off period post-trading, are imposed to prevent contra trade.
- Directors, officers, and employees are prohibited from engaging in short-term or speculative transactions in the Company's securities.



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5. Disclosure Requirements:

- Initial and continual disclosure of shareholdings by promoters, key managerial personnel, directors, and their immediate relatives is mandatory.
- Formats and timelines for disclosures are detailed in the Policy.

6. Code of Conduct and Duties of Compliance Officer:

- The Compliance Officer is responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of UPSI, pre-clearance of designated employees' and their dependents' trades, and the implementation of the code under the overall supervision of the board.
- The Code of Conduct will govern actions of the insiders.

7. Penalties for Violation:

- Violation of this Policy will result in disciplinary action, which may include termination, and may also attract penal provisions of the Regulations and other applicable laws.

8. Amendments and Waivers:

- The Board of Directors or a committee authorized by the Board may amend, modify, or waive any provision of this Policy.

9. Miscellaneous Provisions:

- The policy includes measures for reporting and managing leaks of UPSI.
- Procedures for inquiry in case of suspected leak or violation of the Policy are detailed.

This Policy shall be periodically reviewed and updated as necessary to ensure compliance with new regulations and changes in business practices.