

Title: Securities Trading Code

Doc No -4

Date of issue: 01/01/2026

Revision No. Ref:

Policy No-4

Sparkon Textiles Ventures Pvt. Ltd.

Securities Trading Code

Revision History		
Sr. No	Revision No	Date
1	Revision No. Ref:	01/01/2026

Content

- 1. Purpose**

The purpose of this Securities Trading Code ("Policy") is to regulate, monitor, and report trading in the securities of the Company by Directors, Key Managerial Personnel (KMP), Designated Persons, and other connected persons.

This Policy aims to:

- Prevent insider trading and misuse of Unpublished Price Sensitive Information (UPSI).
- Ensure compliance with applicable securities and corporate laws.
- Promote ethical standards and transparency in securities transactions.

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- Protect the reputation and integrity of the Company.
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- **2. Scope**

This Policy applies to:

- Directors
- Key Managerial Personnel (KMP)
- Designated Persons identified by the Company
- Immediate relatives of the above persons
- Any other connected person having access to UPSI

This Policy governs trading in all types of securities issued by the Company, including shares, debentures, bonds, derivatives, or any other marketable instruments.

- **3. Definitions**

Unpublished Price Sensitive Information (UPSI):

Any information relating to the Company or its securities that is not generally available and which, upon becoming generally available, is likely to materially affect the price of securities.

Examples include:

- Financial results
- Dividends
- Change in capital structure
- Mergers, acquisitions, or expansion plans
- Key managerial changes
- Material events affecting business operations

Trading:

Buying, selling, subscribing, pledging, or agreeing to buy/sell securities.

Trading Window:

A specified period during which trading in securities is permitted.

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- **4. Compliance Officer**

The Board of Directors shall appoint a Compliance Officer who shall:

- Administer this Policy
- Monitor adherence to the rules
- Maintain records of disclosures and approvals
- Approve or reject pre-clearance requests
- Report violations to the Board

- **5. Trading Restrictions**

5.1 Prohibition on Insider Trading

No person covered under this Policy shall trade in securities while in possession of UPSI.

5.2 Trading Window Closure

The Trading Window shall be closed when UPSI is available and shall reopen 48 hours after such information becomes publicly available.

- **6. Pre-Clearance of Trades**

- Designated Persons must obtain written pre-clearance from the Compliance Officer before executing trades exceeding the prescribed threshold.
- Approved trades must be executed within the specified time (e.g., 7 trading days).
- If the trade is not executed within the validity period, fresh approval must be obtained.

- **7. Disclosure Requirements**

The following disclosures shall be made:

- Initial disclosure upon becoming a designated person.
- Disclosure of change in holdings beyond prescribed limits.
- Annual declaration of compliance with this Policy.

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All disclosures shall be submitted to the Compliance Officer in the prescribed format.

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- **8. Preservation of Confidential Information**
 - UPSI must be handled strictly on a need-to-know basis.
 - Confidential information must not be shared with unauthorized persons.
 - Employees must ensure secure handling of sensitive documents and data.

- **9. Penalties for Violations**

Violation of this Policy may result in:

- Disciplinary action
- Suspension or termination of employment
- Recovery of gains made through unlawful trading
- Reporting to regulatory authorities, if required

- **10. Review and Amendment**

This Policy shall be reviewed periodically and may be amended by the Board of Directors to ensure compliance with applicable laws and best governance practices.

EFFECTIVE

The policy shall come into force with effect from - 01/01/2026



A. Charaf