



KANCHI KARPOORAM LIMITED

(Manufacturer of Camphor & Allied Products)

ISO 9001 : 2015 Certified Company - CIN:L30006 TN1992 PLC022109

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Ref: KKL/SE-Q3-06/2025-26

10/02/2026

To,
BSE Limited
Pheroze Jeejeebhoy Towers,
Dalal Street, Mumbai – 400 001

Dear Sir/Madam,

Sub: Amendment to the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

Ref: Scrip ID – KANCHI, Scrip Code – 538896

Pursuant to Regulation 8(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Company has amended the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“Code of Fair Disclosure”), inter-alia incorporating the recent amendments to the SEBI (Prohibition of Insider Trading) Regulations, 2015.

A copy of the Code of Fair Disclosure is enclosed and the same is also being uploaded on the website of the Company at <https://www.kklgroup.in>

Kindly take the above information on record.

Thank you.

For KANCHI KARPOORAM LIMITED

K Abirami
Company Secretary and Compliance Officer

Encl: As above



KANCHI KARPOORAM LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

I. INTRODUCTION

Kanchi Karpooram Limited (hereinafter ‘the Company’) has formulated this Code of practices and procedures for fair disclosure of unpublished price sensitive information (‘the Code’) pursuant to Regulation 8 of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (hereinafter ‘the Regulations’) and shall be published on the website of the Company.

The Board of Directors of the Company, has formulated this Code in order to ensure timely and adequate public disclosure of unpublished price sensitive information. All the terms used herein shall have the same meaning as assigned to it under the Regulations.

II. OBJECTIVE OF THE POLICY

The objective of this Code is to put in place a framework and policy for fair disclosure of events and occurrences, i.e. Unpublished Price Sensitive Information (‘UPSI’) that could impact price discovery in the market for the Company’s securities, on generally becoming public and to maintain uniformity and transparency in our disclosures.

III. DEFINITIONS

A connected person is any person who is or has been associated with the Company, directly or indirectly, in any capacity—such as through frequent communication, business, professional, or contractual relationship—during the preceding six months, and who is reasonably expected to have access to UPSI;

Designated Person means to be such persons who are covered by the Code of Conduct, decided in consultation between the Board of Directors and Compliance Officer, on the basis of their role and function in the organisation, and the access to the UPSI because of such role and function, in addition to seniority and professional designation;

Generally available information means information that is accessible to the public on a non-discriminatory basis and shall not include unverified event or information reported in print or electronic media;

Fiduciary or Fiduciaries means professional firms such as auditors, accountancy firms, law firms, analysts, insolvency professional entities, consultants, banks, etc. assisting or advising the Company.

Immediate relative means a spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or



consults such person in taking decisions relating to trading in securities;

Insider means any person who is a connected person or in possession of or having access to UPSI;

Legitimate purpose includes sharing of UPSI in the ordinary course of business by an Insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibition of the Regulations;

Trading means and includes subscribing, redeeming, switching, buying, selling, dealing, or agreeing to subscribe, redeem, switch, buy, sell, deal in any securities, and "trade" shall be construed accordingly;

Trading day means a day on which the recognized stock exchanges are open for trading;

Trading Window means a trading period in which no designated persons including their immediate relatives shall deal in the securities when the trading window is closed;

Unpublished price sensitive information (UPSI) means any information, relating to the Company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities;

Words and expressions used and not defined in the Code or in the Regulations but defined in the Securities and Exchange Board of India Act, 1992 (15 of 1992), the Securities Contracts (Regulation) Act, 1956 (42 of 1956), the Depositories Act, 1996 (22 of 1996) or the Companies Act, 2013 (18 of 2013) and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislations.

IV. COMPLIANCE OFFICER

The Board of Directors of the Company have appointed and/or designated the Company Secretary as Compliance officer under the Regulations.

V. FAIR DISCLOSURE PRACTICES AND PROCEDURES

- The Company shall make a prompt public disclosure of UPSI that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
- The Company shall disclose the UPSI in uniform and universal manner to avoid selective disclosure.
- The Company shall promptly disseminate UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.



- Compliance Officer shall ensure that any information shared with analysts and research personnel shall not be UPSI.
- Compliance Officer in consultation with Managing Director or Chairman, shall verify market rumours or news report and shall provide appropriate and fair responses to the stock exchange.

VI. CHINESE WALL PROCEDURES

Chinese Wall procedure is to prevent the misuse or unauthorized dissemination of UPSI and to ensure compliance with the Regulations.

The Company shall maintain effective information barriers to segregate:

- Insider Areas, being departments or functions which routinely have access to UPSI; and
- Public Areas, being departments or functions which do not ordinarily have access to UPSI.

Access to UPSI shall be provided strictly on a need-to-know basis and only in furtherance of legitimate purposes, performance of duties, or discharge of legal obligations.

Structured Digital Database as Chinese Wall

The Company shall maintain a Structured Digital Database (“SDD”) as a core Chinese Wall mechanism to monitor, control, and record the flow of UPSI. The SDD shall capture the name of the person or entity with whom UPSI is shared, Permanent Account Number, nature and purpose of sharing UPSI and date and time of sharing of UPSI.

As per the Chinese Wall procedures:

- Designated Persons shall ensure reporting to the Compliance Officer prior to sharing any UPSI whether within or outside the Organization (including to employees who are not categorized as Designated Persons).
- The Designated Person and/or UPSI Recipient shall take reasonable steps to prevent inadvertent leakage, spread or misuse of UPSI. They shall share the UPSI, strictly on need-to-know basis, in furtherance of legitimate purposes, performance of duties or discharge of legal obligations
- Employees who are not marked as recipients in the UPSI event/ entered into SDD, can be given access to UPSI strictly on a need-to-know basis and in furtherance of legitimate purposes. Such Employees post sharing of information will be considered as UPSI Recipients.
- Every Designated Person and/or UPSI Recipient, who further disseminates such UPSI information are responsible to inform the recipient that such information is UPSI and needs to be maintained under strict confidentiality and the liability that would arise on



misuse or unwarranted use of such information.

VII. TRADING PLAN

An insider who is perpetually in possession of UPSI, is entitled to formulate a trading plan and submit it to the Compliance Officer for approval. The Compliance Officer shall review the trading plan to assess its compliance with the applicable provisions of the Regulations, this Code, and any other internal policies of the Company. The Compliance Officer may seek such clarifications, modifications, or additional information as may be necessary to ensure compliance.

The trading plan approved by the Compliance Officer shall be irrevocable and shall be implemented strictly in accordance with its terms and the applicable provisions of the Regulations. Any deviation from the approved trading plan shall require prior approval of the Compliance Officer and shall be permitted only to the extent allowed under the Regulations.

VIII. OBLIGATIONS ON FIDUCIARY

When a connected person is a fiduciary, then the fiduciary shall:

- Maintain confidentiality of UPSI till the expiry of 48 hours of such UPSI becoming public;
- Share UPSI only for legitimate purpose;
- Not trade/ solicit trading in the Company's securities based on the knowledge/ possession of UPSI till the expiry of 48 hours of such UPSI becoming public;
- Not trade/ solicit trading in the Company's securities during trading window Closed Period.
- Share his details and details of persons with whom UPSI is shared. Details viz. Name, Address, PAN Card or any other identifier where the PAN Card is not available, shall be shared with the Company.

IX. AMENDMENT

Unless required under an enactment to be approved by the Board of Directors, all statutory amendments in the Companies Act 2013 or in the Regulations, shall be effective and binding even if such amendments are not incorporated in the Code. For administrative convenience, any change in the Code herein shall be made by the Compliance Officer in consultation with the Managing Director and Chief Financial Officer.

All amendments/modifications to the Regulations or any other applicable circular(s)/notification(s) on the subject matter of the policy, shall mutatis mutandis be deemed to have been incorporated in this Policy.

This Code and any subsequent amendment(s) thereto, shall be promptly intimated to the Stock Exchange where the securities of the Company are listed and published on website.