

BAJAJ HOLDINGS & INVESTMENT LIMITED
POLICY FOR INQUIRY IN CASE OF LEAK OR SUSPECTED LEAK OF
UNPUBLISHED PRICE SENSITIVE INFORMATION

Version control			
Versio n	Date of approval/ amendment	Remarks	Author
1.0	17 May 2019	Adoption of the Policy	Secretarial Team
1.1	15 March 2023	Annual Review	Secretarial Team
1.2	21 March 2024	Annual Review	Secretarial Team
1.3	21 March 2025	Annual Review	Secretarial Team
1.4	16 September 2026	Amended the policy	Secretarial Team
1.5	20 March 2026	Annual Review	Secretarial Team

BAJAJ HOLDINGS & INVESTMENT LIMITED

POLICY FOR INQUIRY IN CASE OF LEAK OF UNPUBLISHED PRICE SENSITIVE INFORMATION

Introduction

Pursuant to Regulation 9A of the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018, every listed company shall formulate written policies and procedures for inquiry in case of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information and accordingly initiate appropriate inquiries on becoming aware of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information and inform the Board promptly of such leaks, inquiries and results of such inquiries.

In compliance with the Regulations, the Policy for inquiry in case of leak of unpublished price sensitive information or suspected leak of unpublished price sensitive information has been formulated, approved and adopted by the board of directors of the Company.

Constitution of Committee, procedure and process for inquiry:

The whistle-blower policy/Vigil Mechanism of the Company allows employees/ any person to avail the said mechanism to report instances of leak of Unpublished Price Sensitive Information (UPSI) as per the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended.

Under the whistle-blower policy/Vigil Mechanism the Disciplinary Action Committee has been vested with the powers to investigate, inquire, to report and recommend actions on the matters brought before it.

Hence,

- the Enforcement Committee constituted from time to time under the WhistleBlower Policy will be act as Inquiry Committee for the purpose of this Policy. The Chief Financial Officer and Compliance Officer shall be invited for Committee Meetings, for the matters concerning under this policy.
- Further powers of the Committee and the procedure and processes mentioned in the Whistle Blower Policy/Vigil mechanism shall apply, mutatis -mutandis for dealing with matters herein.
- In addition, the Committee may obtain outside legal or other professional advice and secure attendance of outsiders with relevant expertise, if it is considered necessary.
- The Committee shall inform such leaks, inquiries and results of such inquiries promptly to the Audit Committee and SEBI.

This code is subject to review annually.

CHAIRMAN

Pune
20 March 2026