



**Code of Practices and Procedures for Fair Disclosure of Unpublished
Price Sensitive Information of**

Alliance Integrated Metaliks Limited

*[In terms of Regulation 8(1) of Securities and Exchange Board of India
(Prohibition of Insider Trading) Regulations, 2015]*

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

1. APPLICABILITY

This Code of Practices and Procedures for fair disclosure of Unpublished Price Sensitive Information (“Code”) is made pursuant to Regulation 8(1) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 as amended by *SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018*, (together referred to as “**Regulations**”), read with Schedule A of the Regulations. The objective of this Code is to formulate a framework and policy for fair disclosure of events and occurrences that could impact price discovery in the market for its securities.

2. DEFINITIONS

- a) “**Chief Investor Relations Officer (CIO)**” shall mean the Compliance Officer of the Company appointed by the Board of Directors under Securities and Exchange Board India (Listing Obligations and Disclosure Requirements) Regulations, 2015.
- b) **Connected Person** means,-
 - (i) any person who is or has during the six months prior to the concerned act been associated with the company, directly or indirectly, in any capacity including by reason of frequent communication with its officers or by being in any contractual, fiduciary or employment relationship or by being a director, officer or an employee of the company or holds any position including a professional or business relationship between himself and the company whether temporary or permanent, that allows such person, directly or indirectly, access to unpublished price sensitive information or is reasonably expected to allow such access.
 - (ii) Without prejudice to the generality of the foregoing, the persons falling within the following categories shall be deemed to be connected persons unless the contrary is established, -
 - a) an immediate relative of connected persons specified in clause (i); or
 - b) a holding company or associate company or subsidiary company; or
 - c) an intermediary as specified in section 12 of the Act or an employee or director thereof; or
 - d) an investment company, trustee company, asset management company or an employee or director thereof; or
 - e) an official of a stock exchange or of clearing house or corporation; or
 - f) a member of board of trustees of a mutual fund or a member of the board of directors of the asset management company of a mutual fund or is an employee thereof; or
 - g) a member of the board of directors or an employee, of a public financial institution as defined in section 2 (72) of the Companies Act, 2013; or
 - h) an official or an employee of a self-regulatory organization recognised or authorized by SEBI; or
 - i) a banker of the company; or
 - j) a concern, firm, trust, Hindu undivided family, company or association of persons wherein a director of a company or his immediate relative or banker of the company, has more than ten percent of the holding or interest;

- c) **"Insider"** shall mean any person who is:
- a. connected person; or
 - b. in possession of or having access to unpublished price sensitive information;

Any person in receipt of UPSI pursuant to a "legitimate purpose" shall be considered as an "insider" for purposes of these regulations and due notice shall be given to such persons (Insiders) to maintain confidentiality of such UPSI in compliance with the regulations.

- d) **"Leak of UPSI"** shall mean communication of UPSI by any Insider, Employee or Designated Person, and/or their relatives, or any other known or unknown person to any person other than a person(s) authorized by the Board after following the due process prescribed in this behalf in this **Code Of Practices And Procedures For Fair Disclosure Of Unpublished Price Sensitive Information** and/or under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and/or SEBI (Prohibition of Insider Trading) Regulations, 2015 and any amendment, re-amendment or re-enactment thereto.
- e) **"Legitimate Purposes"** shall mean sharing of UPSI in the ordinary course of business by an Insider with the following, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the regulations:
- i. Promoters of the Company
 - ii. Auditors (Statutory, Internal, Branch, Cost, Secretarial, Tax and/or any other Auditor as applicable)
 - iii. Staff Members of the Audit firm/team conducting the Audit
 - iv. Business Partners/Franchisees
 - v. Collaborators
 - vi. Lenders
 - vii. Customers
 - viii. Suppliers
 - ix. Bankers
 - x. Legal Advisors
 - xi. Insolvency Professionals
 - xii. Consultants
 - xiii. Any other person with whom UPSI is shared
- f) **"Support Staff"** shall include such staff members from the Finance & Accounts, the Internal Audit and/or the Secretarial Department of the Company who have access to UPSI.
- g) **"Un-published Price Sensitive Information (UPSI)"** shall mean any information, relating to a company or its securities, directly or indirectly, that is not generally available and which, upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily include but not restricted to, information relating to the following:
- Periodical financial results of the Company;
 - Intended declaration of dividends (Interim and Final);
 - Change in capital structure i.e. Issue of securities, buy - back of securities or any forfeiture of shares or change in market lot of the Company's shares;
 - Mergers, De-mergers, Amalgamation, Acquisitions, De-listing of Securities, Scheme of Arrangement or Takeover, disposals, spin off or selling division of whole or substantially whole of the undertaking and expansion of business and such other transactions;

- Any major expansion plans or execution of new projects or any significant changes in policies, plans or operations of the Company;
- Changes in Key Managerial Personnel;
- Any other matter as may be prescribed under the Listing Regulations and/or Corporate Law to be price sensitive, from time to time.

3. PROHIBITION ON COMMUNICATION OR PROCUREMENT OF UNPUBLISHED PRICE SENSITIVE INFORMATION

An Insider shall not communicate, provide, or allow access to any UPSI, relating to the Company or its securities, to any person including other insiders except to the extent allowed by these Rules. Further, no person shall procure from or cause the communication by an Insider of UPSI relating to the Company or its securities;

Provided that nothing contained above shall be applicable when an UPSI is communicated, provided, allowed access to or procured:

- (i) in furtherance of legitimate purposes, performance of duties or discharge of legal obligations; or
- (ii) that would entail an obligation to make an open offer under the takeover regulations where the board of directors of the company is of informed opinion that the proposed transaction is in the best interests of the company.
- (iii) that would not attract the obligation to make an open offer under the takeover regulations but where the board of directors of the company is of informed opinion that the proposed transaction is in the best interests of the company and the information that constitute unpublished price sensitive information is disseminated to be made generally available at least two trading days prior to the proposed transaction being effected.
- (iv) within a group of persons if such persons have been identified and secluded within a “Chinese wall” or information barrier by the Compliance Officer from the rest of the Company for a particular purpose or for a specified period of time in furtherance of legitimate purposes, performance of duties or discharge of legal obligations, and are subjected to, among other conditions, additional confidentiality obligations, information barriers designed to prevent exchanges of UPSI outside the “Chinese Wall”, and the execution of an undertaking by such persons to abstain and/or forego trading during such seclusion or till the UPSI no longer constitutes UPSI.

4. PROHIBITION ON INSIDER TRADING WHEN IN POSSESSION OF UNPUBLISHED PRICE SENSITIVE INFORMATION

An Insider shall not, directly or indirectly, –

- (i) Trade in securities of the Company when in possession of UPSI;
- (ii) Trade in securities of the Company except when the Trading Window is open and the Insider is not in possession of UPSI.

Provided that the insider may prove his innocence by demonstrating the circumstances including the following: –

- a) the transaction is an off-market *inter-se* transfer between Insider who were in possession of the same unpublished price sensitive information without being in breach of regulation 3 of SEBI

(Prohibition of Insider Trading) Regulations,2015 and both parties had made a conscious and informed trade decision;

- b) the transaction in question was carried out pursuant to a statutory or regulatory obligation to carry out a bona fide transaction.
- c) in the case of non-individual insiders: –
 - (i) the individuals who were in possession of such unpublished price sensitive Information were different from the individuals taking trading decisions and such Decision-making individuals were not in possession of such unpublished price sensitive information when they took the decision to trade; and
 - (ii) appropriate and adequate arrangements were in place to ensure that these regulations are not violated and no unpublished price sensitive information was communicated by the individuals possessing the information to the individuals taking trading decisions and there is no evidence of such arrangements having been breached;
- d) the trades were pursuant to a trading plan set up in accordance with regulation 5 of SEBI (Prohibition of Insider Trading) Regulations,2015

Insiders shall maintain the confidentiality of all Unpublished Price Sensitive Information. They shall, while in possession of any Unpublished Price Sensitive Information, neither Trade in the Securities of the Company on the basis of Unpublished Price Sensitive Information nor pass on such information to any person directly or indirectly by way of making a recommendation for Trading in Securities of the Company.

In the case of Connected Persons the onus of establishing, that they were not in possession of Unpublished Price Sensitive Information, shall be on such Connected Persons.

5. PRACTICES AND PROCEDURES

The following Principles of Fair Disclosure for the purposes of “Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information” shall be strictly followed by Alliance Integrated Metaliks Limited (the “Company”) with immediate effect:-

- a) The Company shall promptly disclose to the public "unpublished price sensitive information” (UPSI) that would impact price discovery, no sooner than credible & concrete information comes into being in order to make such information generally available.
- b) The Company shall ensure that information shared with analysts and research personnel is not UPSI.
- c) The Company shall uniformly & universally disseminate information (UPSI) and avoid selective disclosure.
- d) The Company shall promptly disseminate UPSI that gets disclosed selectively, inadvertently or otherwise, to make such information generally available to all/public.
- e) The Company shall render appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities, if any.

- f) The Company shall develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on its official website, in order to ensure official confirmation and documentation of disclosures made.
- g) The Company shall handle all UPSI on a need-to-know basis.

6. TRADING PLAN

An Insider shall be entitled to formulate a trading plan and present it to the Compliance Officer for approval and public disclosure pursuant to which Trades may be carried out on his behalf in accordance with such plan. The intimation on formulation of the trading plan may be given to the Compliance Officer in the format specified in **Annexure A** hereto. Upon approval of the trading plan, the Compliance Officer shall notify the plan to the stock exchanges on which the Securities are listed.

Such trading plan shall:

- not entail commencement of Trading on behalf of the Insider earlier than six months from the public disclosure of the trading plan;
- not entail Trading for the period between the twentieth trading day prior to the last day of any financial period for which results are required to be announced by the Company and the second Trading Day after the disclosure of such financial results;
- not entail Trading for a period of less than 12 months;
- not entail overlap of any period for which another trading plan is already in existence;
- either set out the value of trades to be effected or the number of Securities to be traded along with the nature of the trade and the intervals at, or dates on which such Trades shall be effected;
- not entail Trading in securities for market abuse; and

Mandatorily implement the plan without being entitled to either deviate from it or execute any Trade outside the scope of the trading plan. Thus, the trading plan, once published, shall be irrevocable. Provided that the Insider shall not commence Trading under trading plan, if any UPSI in his possession at the time of formulation of the plan has not become Generally Available Information at the time of commencement of the implementation of trading plan. In such cases, the Compliance Officer will confirm that the commencement ought to be deferred until such Unpublished Price Sensitive Information becomes Generally Available Information.

The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of the SEBI Regulation and/or this Code and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.

Provided that pre-clearance of Trades shall not be required for a Trade executed as per an approved trading plan.

The Insider shall also not be allowed to Trade in securities of the Company, if the date of Trading in securities of the Company, as per the approved Trading Plan, coincides with the date of closure of Trading Window announced by the Compliance Officer.

7. LEGITIMATE PURPOSE

As an exception, the UPSI can be shared by an Insider in furtherance of 'legitimate purposes' provided it is not shared to evade or circumvent the prohibitions under the Regulations.

The Company's "Policy for determination of Legitimate Purposes" is given as **Annexure B**.

8. PROCESS FOR HOW AND WHEN PEOPLE ARE BROUGHT 'INSIDE' ON SENSITIVE TRANSACTIONS

The Compliance Officer, in consultation with Wholetime Director or Chief Financial Officer of the Company, shall decide on how and when any person(s) should be brought 'inside' on any proposed or ongoing sensitive transaction(s).

A person(s) shall be brought inside on any proposed or ongoing sensitive transaction(s) of the Company who may be existing or proposed partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants etc. for legitimate purpose, which shall include the following;

- (i) in the ordinary course of business.
- (ii) in furtherance of performance of duty(ies);
- (iii) for discharge of legal obligation(s);
- (iv) for any other genuine or reasonable purpose as may be determined by the Compliance Officer of the Company;
- (v) for any other purpose as may be prescribed under the Securities Regulations or Company Law or any other law for the time being in force, in this behalf, as may be amended from time to time.

9. INTIMATION OF DUTIES, RESPONSIBILITIES AND LIABILITIES TO THE PERSON(S) WHO HAS/HAVE BEEN BROUGHT 'INSIDE' ON SENSITIVE TRANSACTION(S)

Any person(s) who has/have been brought inside on any proposed and/or ongoing sensitive transaction(s) and who is in receipt of any unpublished price sensitive information shall be considered an "insider" for purposes of this Code, and due notice shall be given to such persons, in the format as set out by the Compliance Officer in consultation with WTD and/or CFO of the Company;

- (i) To make such person aware that the information shared is or would be confidential;
- (ii) To instruct such person to maintain confidentiality of such unpublished price sensitive information in compliance with these regulations.
- (iii) To make such person aware of the duties and responsibilities attached to the receipt of such information and the liability attached to the misuse or unwarranted use of such information.

10. LEAK/SUSPECTED LEAK OF UPSI

The Board has formulated a written policy for initiating appropriate inquiries on becoming aware of leak/suspected leak of unpublished price sensitive information, and informing SEBI promptly of such leaks, inquiries and results of such inquiries. **Annexure C**.

The Company has formulated a whistle-blower policy, that, inter-alia, enables employees to report instances of leak of UPSI.

11. CODE OF CONDUCT

The Company shall in addition to this adhere to the prescribed standards for code of conduct to regulate, monitor and report trading by designated persons.

12. CHIEF INVESTOR RELATIONS OFFICER

The Compliance Officer of the Company has been designated as the "Chief Investor Relations Officer" to deal with dissemination of information and disclosure of UPSI.

13. AMENDMENTS AND MODIFICATION

This Code shall be reviewed from time to time and any amendments or modifications thereto shall be subject to the review and approval of the Board of Directors of the Company.

APPLICATION FOR ANNUAL TRADING PLAN

Date:

To,
The Compliance Officer,
Alliance Integrated Metaliks Limited
5th Floor, Unit No. 506, Building No. 57, Manjusha Building,
Nehru Place, New Delhi -110019

1. Name of the Applicant: _____
PAN _____
2. No. of securities held in the Company as on date: _____
3. Approval sought for: Self [] Immediate Relative (IR) []
4. Trading plan belongs for a period of _____ months i.e. for a period commencing from _____ and ending on _____
5. Details of the proposed trade:

| S. No. | Nature of transaction (Sale/Purchase) | Date of Transaction / period / interval for transaction | Value of trade/ No. of securities transacted | Conditions /Remarks |
|--------|--|---|--|------------------------|
| | | | | |

Undertaking:

- (a) I will not commence trading earlier than six months from the public disclosure of the plan.
- (b) I do not have overlapping trading plan for the same period.
- (c) In the event that I am in possession/knowledge of any information that is construed as “Unpublished Price Sensitive Information” as defined in the Policy, at the time of formulation and approval of this plan but which is not made public at the time of trading as per the approved time schedule in the said plan, I shall inform the Compliance Officer of the same and shall completely refrain from dealing in the securities of the Company until such information becomes public;
- (d) I have not contravened the provisions of the Insider Trading Policy as notified by the Company from time to time;
- (e) I have made full and true disclosure in the matter.
- (f) I undertake to abide by this trading plan once approved and shall furnish such declarations disclosures as may be deemed necessary by compliance officer for the monitoring of this plan.
- (g) I shall not use this trading plan as a tool for market abuse.

Date:**Signature of Designated**

For use of Compliance Officer:

| Application Recd. Date | Approval Date | Approval No. | Approval No. Compliance Officer'ssignature |
|-----------------------------------|----------------------|---------------------|---|
| | | | |

Approval granted for Trading Plan for a period of _____ months commencing from _____
to _____

Notification to Stock Exchange _____

Signature:

Compliance Officer

*Please provide all the information. Incomplete forms will not be accepted.

POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES

[Pursuant to Regulation 3(2A) of the Regulations]

1. PREFACE

This Policy as part of Code of Fair Disclosure and Conduct formulated under the Regulations is known as "Policy for Determination of Legitimate Purposes" (hereinafter referred to as the "Policy").

2. OBJECTIVE

The objective of this policy is to identify 'Legitimate Purposes', which will be considered as an exception for the purpose of sharing/procuring unpublished price sensitive information (UPSI) relating to the Company or its listed securities or proposed to be listed securities, if any.

3. DIGITAL DATABASE

The Board of Directors shall ensure that a structured digital database is maintained containing the names of such persons or entities, as the case may be, with whom UPSI is shared under Regulation 3 of the Regulations, along with the Permanent Account Number (PAN) or any other identifier authorized by law, where PAN is not available. Such database shall be maintained with adequate internal controls and checks, such as time stamping, audit trails, etc. to ensure non-tampering of the database.

4. RESTRICTIONS ON COMMUNICATION AND TRADING BY INSIDERS

The Board of Directors shall require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, and shall not otherwise trade in securities of the company when in possession of unpublished price sensitive information.

5. AMENDMENT

The Board of Directors of the Company, subject to applicable laws, rules & Regulations, may amend / substitute any provision(s) with a new provision(s) or replace this entire Policy with a new Policy.

In any circumstance where the terms of this Policy differ from any law, rule, regulation etc. for the time being in force, then such law, rule, regulation etc. shall take precedence over this Policy.

This Policy and any subsequent amendment(s) thereto, shall be promptly intimated to the Stock Exchanges, if required under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and/or SEBI (Prohibition of Insider Trading) Regulations, 2015 and any amendment, re-amendment or re-enactment thereto.

POLICY AND PROCEDURE FOR INQUIRY IN CASE OF LEAK OR SUSPECTED LEAK OF UNPUBLISHED PRICE SENSITIVE INFORMATION (“UPSI”)

[Under Regulation 9A(5) of the Regulations]

1. BACKGROUND

The Regulations has mandated every listed Company to formulate a written policy and procedures for inquiry in case of leak/suspected leak of unpublished price sensitive information (UPSI), to be approved by the Board of Directors of the company and to initiate appropriate inquiries on becoming aware of leak of UPSI or suspected leak of UPSI and inform the Board promptly of such leaks, inquiries and results of such inquiries.

In this regard, Board of Directors of Alliance Integrated Metaliks Limited has laid down this Procedure of inquiry in case of leak of Unpublished Price Sensitive Information (the ‘policy’), for adoption.

2. OBJECTIVES

- i. To strengthen the internal control system to prevent leak of UPSI.
- ii. To restrict and prohibit the practice of sharing of UPSI, with un-authorized persons, which originates from within the company and which affects the market price of the Company as well as loss of reputation and investors’/financers’ confidence in the company.
- iii. To have a uniform code to curb the un-ethical practice of sharing UPSI by Insiders, Employee(s) & Designated Persons with any person, firm, Company or Body Corporate.
- iv. To initiate inquiry in case of leak of UPSI or suspected leak of UPSI and inform the same to the Securities and Exchange Board of India (“SEBI”) promptly.
- v. To penalize any Insider, Employee & Designated Persons who is/are found guilty of violating this policy.

3. SCOPE

The Company endeavors to preserve the confidentiality of UPSI and to prevent misuse of such information. The Company shall strive to restrict and prohibit the practice of sharing of UPSI which originates from within the company by any Promoter, Director, Key Managerial Person, Insider, employee, designated person, support staff or any other known or un-know person(s) with any un-authorized person which affects the market price of the Company as well as causes loss of reputation and investors’ / financers’ confidence in the Company.

4. DUTIES OF CHIEF INVESTOR RELATIONS OFFICER (‘CIO’)

The CIO shall be responsible to;

- i. Oversee the Compliance of this policy.
- ii. Report the incident of actual or suspected leak of UPSI to the Securities and Exchange Board of India (SEBI) as per the direction of the Board.
- iii. Intimate the incident of actual or suspected leak of UPSI to the Stock Exchanges as per the direction of the Board.
- iv. To co-ordinate with and disclose the relevant facts of the incident of actual or suspected leak of UPSI to the Inquiry committee.

5. DISCLOSURE OF ACTUAL OR SUSPECTED LEAK OF UPSI TO STOCK EXCHANGES:

On becoming aware of actual or suspected leak of UPSI of the Company, the CIO shall ensure proper and necessary steps are taken as per the procedure laid down and approved by the Board of Directors

of the Company and accordingly be promptly intimated to the Stock Exchanges on which the securities of the Company are listed in the format as set out in “**Annexure D**” to this policy.

6. REPORT OF ACTUAL OR SUSPECTED LEAK OF UPSI TO SEBI

The CIO shall also ensure that a report on such actual or suspect leak of UPSI, preliminary inquiry thereon and results thereof shall be promptly made to the SEBI in the format as set out in “**Annexure E**” to this policy.

7. CONSTITUTION OF INQUIRY COMMITTEE

The Inquiry Committee shall consist of minimum 4 (four) Members which shall include Wholetime Director, Chairman of the Audit Committee, Chief Financial Officer and Chief Investor Relation Officer and any other officer of the Company as may be mutually decided by the members of the Committee, on a case to case basis.

8. DUTIES OF INQUIRY COMMITTEE:

The Inquiry Committee shall be responsible:-

- a. To conduct a preliminary inquiry to ascertain the truth contained in the information or complaint pertaining to actual or suspected leak of UPSI, if any; and
- b. To authorize any person to collect necessary support material; and
- c. To decide disciplinary action thereon.

9. PROCEDURE FOR INQUIRY IN CASE OF LEAK OF UPSI:

On becoming aware suo-moto or otherwise, of actual or suspected leak of UPSI of the Company by any Insider or any other known or un-know person, the CIO after informing the same to the Wholetime Director and/or Chief Financial Officer of the Company, shall follow the below mentioned procedure in order to inquire and/or investigate the matter:-

(a) Preliminary Inquiry:

Preliminary inquiry is a fact-finding exercise. The object of preliminary inquiry is to ascertain the truth or otherwise of the allegations contained in the information or complaint, if any, and to collect necessary available material in support of the allegations, and thereafter to decide whether there is justification to embark on any disciplinary action.

The Inquiry Committee may appoint and/or authorize any person(s)/expert, as it may deem fit, to initiate/conduct an inquiry, to collect relevant facts or material substances on actual or suspected leak of UPSI.

Any member of the Committee or other officer who has any conflict of interest with the matter, shall disclose his/her concern/interest forthwith and shall not deal with the matter.

(b) Report of Preliminary Inquiry to the Inquiry Committee:

The Person(s) appointed/authorized to inquire into the matter of actual or suspected leak of UPSI shall submit his/her report to the Inquiry Committee within 7 days from the date of his appointment on this behalf, or within such reasonable time, as may be allowed by the Inquiry Committee, keeping into view the facts and circumstances of the case.

(c) Disciplinary Action:

The Disciplinary action(s) shall include, wage freeze, suspension, recovery, clawback, termination of employment contract/agreement etc., as may be decided by the Members of the Committee.

10. AMENDMENT

The Board of Directors of the Company, subject to applicable laws, rules & Regulations, may amend/substitute any provision(s) with a new provision(s) or replace this entire Policy with a new Policy.

In any circumstance where the terms of this Policy differ from any law, rule, regulation etc. for the time being in force, the law, rule, regulation etc. shall take precedence over this Policy.

This Policy and any subsequent amendment(s) thereto, shall be promptly intimated to the Stock Exchanges, if required under SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 and/or SEBI (Prohibition of Insider Trading) Regulations, 2015 and any amendment, re-amendment or re-enactment thereto.

FORMAT FOR INTIMATION OF ACTUAL OR SUSPECTED LEAK OF UPSI TO THE STOCK EXCHANGES

To
Department of Corporate Services,
BSE Limited
Phiroze Jeejeebhoy Towers, Dalal Street,
Mumbai – 400 001

**Scrip Code: 534064, Scrip Symbol: AIML
ISIN:- INE123D01016**

Dear Sir/ Ma'am,

Sub: Intimation of actual or suspected leak of UPSI pursuant to Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015.

Pursuant to Regulation 30 of SEBI (Listing Obligations and Disclosure Requirements) Regulation, 2015, we are reporting actual or suspected leak of Unpublished Price Sensitive Information (UPSI) of the Company, as follows;

| | |
|---|---------------|
| Name of Offender, if known | |
| Name of Organization | |
| Designation: (Employee, Insider, Designated Person or any other) | |
| Nature of Information | |
| Whether any action initiated by the Company? If yes, narration of the same | Yes/No |

Request you to kindly take the aforementioned on your records.

Thanking you,

**Yours faithfully
For Alliance Integrated Metaliks Limited**

Compliance Secretary/ Wholetime Director/ Authorised Officer

FORMAT FOR REPORTING ACTUAL OR SUSPECTED LEAK OF UPSI TO THE SEBI

To,
Securities and Exchange Board of India
Plot No. C 4-A, G Block,
Near Bank of India, Bandra Kurla Complex,
Bandra East, Mumbai – 400 051

Ref.: Scrip Code: 534064, Scrip Symbol: AIML
ISIN:- INE123D01016

Dear Sir/ Ma'am,

Sub: Report of actual or suspected leak of UPSI pursuant to regulation 9A (5) of SEBI (Prohibition of Insider Trading) Regulation, 2015

Pursuant to Regulation 9A(5) of SEBI (Prohibition of Insider Trading) Regulations, 2015, we are reporting actual or suspected leak of Unpublished Price Sensitive Information (UPSI) of the Company, as follows:

| | |
|---|---------------|
| Name of Offender, if known | |
| Name of Organization | |
| Designation: (Employee, Insider, Designated Person or any other) | |
| Nature of Information | |
| Whether any action initiated by the Company? If yes, narration of the same | Yes/No |

Request you to kindly take the aforementioned on your records.

Thanking you,

Yours faithfully
For Alliance Integrated Metaliks Limited

Compliance Secretary/ Wholetime Director/ Authorised Officer