

POLICY FOR INQUIRY IN CASE OF LEAK OF UNPUBLISHED PRICE SENSITIVE INFORMATION

EFFECTIVE DATE The Policy for Inquiry in Case of Leak of Unpublished Price Sensitive Information shall come into effect on: **January 7, 2026**

INTRODUCTION:

Regulation 9A of the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended ("SEBI PIT Regulations") mandates every listed company to formulate a written policy and procedures for inquiry in case of leak of unpublished price sensitive information and initiate appropriate inquiries on becoming aware of leak of unpublished price sensitive information and inform SEBI promptly of such leaks, inquiries and results of such inquiries.

DEFINITIONS:

- a) "Act"** means the Companies Act, 2013 and the rules framed thereunder, as amended from time to time.
- b) "Audit Committee"** means the committee constituted by the board of directors in accordance with the Section 177 Act and Regulation 18 of LODR Regulations, as constituted from time to time.
- c) "Board of Directors"** shall mean the Board of Directors of the Company.
- d) "Company"** means Laxyo Limited (Formerly Laxyo Energy Limited).
- e) "Connected Person"** means as defined under Rule 2(1)(d) of the SEBI PIT Regulations.
- f) "Employee"** means employee of the company.
- g) "Insider"** means a person who is:
 - i. a connected person; or
 - ii. in possession of or having access to unpublished price sensitive information

h) "Investigators" means that person authorised, appointed, consulted or approached by the Chairman of the Audit Committee and includes the Compliance Officer and auditors of the company.

i) "Policy" means Policy for inquiry in case of leak of unpublished price sensitive information.

j) "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.

k) "SEBI" means the Securities and Exchange Board of India.

l) "SEBI PIT Regulations" means SEBI (Prohibition of Insider Trading) Regulations, 2015.

m) "Unpublished Price Sensitive Information" means as defined in Rule 2(1)(n) of the SEBI PIT Regulations.

All other words and expressions used but not defined in this Policy, shall have the same meaning as defined in the Companies Act, 2013, SEBI PIT Regulations or any other applicable law or regulation to the extent applicable to the Company.

MECHANISM:

The existing Audit Committee of the Board of Directors of the Company shall inquire, investigate and report to the Board the case of leak of unpublished price sensitive information by the insider.

Procedure of Inquiry:

a) Disclosures should be reported in writing by the complainant to the Committee as soon as he becomes aware of the leak of UPSI and the complaint should be either typed or written in a legible handwriting in English or in the regional language. Alternatively, the same can also be sent through email to the mail id cs@laxyo.com with the subject **"Intimation with respect to leak of UPSI"**.

b) The disclosures shall be addressed to the Audit Committee of the Company. The contact details of the committee are as under:

Chairperson of the Audit Committee - Mrs. Jeena Agarwal sent through email to the mail id cs@laxyo.com

- c)** If a disclosure is received by any executive of the Company other than Chairman of Audit Committee, the same should be forwarded to the Chairperson of the Audit Committee for further appropriate action.
- d)** On receipt of the disclosure the committee shall make a record of the Disclosure and also ascertain from the complainant whether he/she was the person who made the disclosure or not. The committee shall also carry out an initial enquiry by itself or by involving any other officer of the Company. The committee, if deems fit, may call for further information, details or particulars from the complainant.
- e)** The committee shall issue a show cause notice to the suspected person to submit his/her justification/reasons for leak of UPSI.
- f)** The investigation shall be completed normally within 60 days of the receipt of the disclosure by the committee. If it is not completed within 60 days, the committee shall record the reason in writing for the delay.

Decision: If an investigation leads the Chairman of the Audit Committee to conclude that there was a leakage of UPSI, the Chairman of the Audit Committee shall recommend to the management of the Company to take such disciplinary or corrective action as the Chairman of the Audit Committee may deem fit.

It is clarified that any disciplinary or corrective action initiated against the person who has leaked the UPSI, as a result of the findings of an investigation pursuant to this Policy shall adhere to the applicable personnel or staff conduct and disciplinary procedures.

INTERNAL CONTROL:

Company has put forward adequate and effective system of internal controls to ensure compliance with requirements of amended SEBI Regulations.

The Audit Committee of the Company shall review compliance with the Code least once in a financial year and shall verify that the systems for internal control are adequate and are operating effectively.

RETENTION OF DOCUMENTS:

All Protected Disclosures in writing or documented along with the results of investigation relating thereto shall be retained by the Company for a minimum period of five (5) years.

REVIEW OF THIS POLICY:

This policy is framed based on the provisions of the requirements of the SEBI PIT Regulations. In the event of any conflict between the provisions of this Policy and of the SEBI PIT Regulations or any other statutory enactments, rules, the provisions of such SEBI PIT Regulations or statutory enactments, rules shall prevail over this Policy.

Any subsequent amendment / modification in the SEBI PIT Regulations, Act and/or applicable laws in this regard shall automatically apply to this Policy. Any changes or modification on the Policy would be approved by the Board of Directors.