Policy for dealing with Leak or Suspected Leak of Unpublished Price Sensitive Information

This Policy is framed by the Board of Directors of the Company pursuant to Regulation 9A(5) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 .

This Policy is being framed for dealing with leak or suspected leak of unpublished price sensitive information.

An 'insider', as defined under the Code of Conduct for Prevention of Insider Trading (the Code), shall not communicate or share any unpublished price sensitive information (UPSI) relating to the Company or securities listed or proposed to be listed, to any person and shall handle all information on need-to-know basis. No UPSI shall be communicated to any person except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

In the case of any leak or suspected leak of UPSI, the Company shall adopt the following procedures:

1. Determine whether the person who is suspected of having leaked the information is an 'insider' according to the Code adopted by the Company and whether such person was authorised to possess such information.
2. Ascertain whether the information is price sensitive and unpublished.
3. Ascertain the impact of the leak on the market and various stakeholders.
4. Initiate an enquiry to ascertain the reasons for such leak or suspected leak Seek appropriate statements and declarations from the insider(s) who are found guilty of such leak of UPSI.
5. Initiate appropriate disciplinary action on such insider(s) in accordance with the Code, including legal action, if considered necessary.
6. Inform the Securities and Exchange Board of India directly or through National Stock Exchange of India Limited about such leaks, enquiries and the outcome of such enquiries

INDIA MOTOR PARTS & ACCESSORIES LIMITED
No. 46,
Whites Road,
Chennai
600 014.