JAYTEE ALLOYS & COMPONENTS LIMITED

Registered Office: A33/11, Site-4, Sahibabad, Ghaziabad, Uttar Pradesh, India, 201010

E-MAIL: CS@JAYTEEALLOYS.COM

POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES

Document Summary

Version Number	Version 1.0
Approved by	Board of Directors
Revision	Any revisions or modifications to this policy to be approved by the Chief Compliance Officer/Company Secretary and submitted to the Board for approval.

POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES

(As envisaged under Regulation 3 (2A) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time)

Preface:

The Company is committed to transparency and fairness in dealing with all shareholders and in ensuring adherence to SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time ("Regulations"). The Company has adopted the Code of Internal Procedures and Conduct for Regulating, Monitoring and Reporting of trading by Insiders (hereinafter referred to as the "Code of Conduct") duly approved by the Board of Directors and as amended from time to time.

As per the said Regulations, the Company has also formulated and disseminated on the website, a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (Code of Fair Disclosure) that it would follow.

Pursuant to amendment in the Regulations, the Company notifies that this Policy for Determination of Legitimate Purposes (hereinafter referred to as the "Policy") as a part of the Code of Fair Disclosure.

Capitalized terms used in this Policy but not defined herein, have the respective meanings assigned to them in the Code of Conduct and Code of Fair Disclosure.

Determination of Legitimate Purposes for Sharing the Unpublished Price Sensitive Information:

The term "Legitimate Purpose" shall include sharing of Unpublished Price Sensitive Information in the ordinary course of business by an Insider with partners, collaborators, lenders, customers, suppliers, merchant bankers,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 prohibitions of the Regulations. The Legitimate Purpose shall inter alia include sharing of the Unpublished Price Sensitive Information in relation to the following:

1. Sharing the information upon an action, subpoena or order of a court of competent jurisdiction;
2. Sharing the information for any requirement of legal process, regulation or governmental order, decree or as per applicable laws, rules and regulations;
3. Sharing of information with auditors viz. internal auditors, statutory auditors, cost auditors, tax auditors or secretarial auditors in relation to audit or for obtaining any certifications or any other services etc.
4. Sharing the information with partners, customers, collaborators and suppliers for entering into contracts or other business prospects which necessitates the same;

5. Sharing of information for the purposes of obtaining regulatory licenses and approvals etc.;

6. Sharing of information in relation to obtaining various credit facilities or loans, giving guarantees or providing security from/to banks, financial institutions or other lenders;

7. Sharing of information with merchant bankers including their counsels and advisors etc. in relation to further issue of any Securities, debentures, ADR/GDR, convertible instruments, QIPs etc.;

8. Sharing information with legal advisors or counsels in relation to any litigations, representations or registering of any intellectual property rights or in relation to obtaining any opinion or advisory services etc.;

9. Sharing information with consultants in relation to any to obtaining any opinion or advisory services etc.;

10. Sharing of information with auditors, counsels, advisors or consultant's taxation related issues;

11. Sharing of information with insolvency professionals or other advisors or consultants in any other important matters of the Company; and

12. Sharing of such information as may be determined by the Managing Director from time to time.

Powers of Board of Directors:

The Board of Directors may modify and also establish further rules and procedures, from time to time, to give effect to the intent of this Policy and to further the objective of good corporate governance

Dissemination of Code:

This Code shall be hosted on the website of the Company. Further, this code and every amendment made thereto, may be intimated to the stock exchanges where the Securities of the Company are listed.

****

Footnote

1. The Board of Directors at its meeting held on 01-09-2026 has adopted this Policy first time.

NAMAN JAIN Digitally signed by NAMAN JAIN Date: 2026.09.01 17:40:15 +05'30'

JAYTEE ALLOYS & COMPONENTS LTD.