

# CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY DESIGNATED PERSONS

## 1. PURPOSE

This Code is adopted by **Kanohar Electricals Limited** (“Company”) pursuant to Regulation 9 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“PIT Regulations”) to regulate, monitor and report trading in securities of the Company.

Accordingly, the Board has adopted the Code vide Board Resolution dated January 10, 2026 which can be further amended from time to time.

## 2. DEFINITIONS

For the purposes of this Code:

a. **“Designated Persons”** shall include:

- (i) all Directors of the Company;
- (ii) Key Managerial Personnel;
- (iii) senior management personnel; and
- (iv) such other employees or persons as may be identified by the Board of Directors or the Compliance Officer, based on their access to Unpublished Price Sensitive Information, including for example, persons occupying roles or functions such as finance, accounts, secretarial, legal, strategy or such other functions which ordinarily provide access to Unpublished Price Sensitive Information; and
- (v) All promoters of the company.

b. **“Immediate Relative”** means a spouse, parent, sibling or child of a Designated Person, whether dependent or not, or any other person as defined under the PIT Regulations.

c. **“Unpublished Price Sensitive Information” or “UPSI”** means any information relating to the Company or its securities which is not generally available and which, upon becoming generally available, is likely to materially affect the price of the securities.

d. **“Trading Window”** means the period during which trading in the Company’s securities is permitted.

## 3. APPLICABILITY

This Code shall apply to all Designated Persons and their Immediate Relatives.

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## **4. COMPLIANCE OFFICER**

The Board of Directors shall appoint a Compliance Officer in accordance with the PIT Regulations to administer and monitor compliance with this Code.

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## **5. TRADING WINDOW**

- Designated Persons shall trade in the Company's securities only when the Trading Window is open; and
- The Trading Window shall be closed when Designated Persons are in possession of UPSI.

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## **6. PRE-CLEARANCE OF TRADES**

Designated Persons shall obtain pre-clearance for trades in the Company's securities above such monetary threshold as may be prescribed by the Compliance Officer, in accordance with the PIT Regulations.

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## **7. DISCLOSURES**

Designated Persons shall make disclosures of holdings and trading in securities of the Company as required under the PIT Regulations.

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## **8. CONTRA TRADES**

Designated Persons shall not enter into contra trades except as permitted under the PIT Regulations.

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## **9. VIOLATION**

Any violation of this Code shall be dealt with in accordance with the PIT Regulations and applicable law.

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## **10. AMENDMENT**

The Board of Directors may amend this Code from time to time in accordance with applicable law.

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## **11. PUBLICATION**

This Code shall be disclosed on the website of the Company.