



NEPHRO CARE INDIA LIMITED
(FORMERLY KNOWN AS NEPHRO CARE INDIA PRIVATE LIMITED)
CIN:U85100WB2014PLC202429
Regd. Office- Flat No-1JC-18, 5th Floor Sec-III, Saltlake, Bidhan Nagar,
Sai Complex, North 24 Parganas, Kolkata - 700098 West Bengal, India.
Web: <https://www.nephrocareindia.com/>
Email id: investor@nephrocareindia.com

➤ **INSIDER TRADING POLICY:**

Insiders include:

A. Designated Persons comprising: -

- Promoter,
- Directors
- Key Managerial Personnel (KMPs) of the Company; CEO, CFO, COO, CS
- Employees of NCIL who are deemed to have access and possession of Unpublished Material Price Sensitive Information, viz.

B. Connected Person as defined connected persons as defined in SEBI (Prohibition of Insider Trading) Regulations, 2015;

C. Any person who is in possession of or having access to Unpublished Price Sensitive Information

D. Any other person who may be included in the ambit of definition of Insider as per applicable SEBI Regulations and US Securities Laws or which in the opinion of the Compliance Officer of the Company's needs to be included in the category of Insider.

INSIDER TRADING MONITORING COMMITTEE

The Insider Trading Monitoring Committee comprises of the following officials:

- Chief Financial Officer (CFO)
- Company Secretary (CS)
- Human Resource Head



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The Chief Financial Officer shall be the Chairman of the Committee and the Company Secretary shall act as Secretary of the Committee.

The Insider Trading Monitoring Committee shall be responsible for the following:

- Overall administration of the Policy;
- Review list of Designated Persons on a half yearly basis and inform the Board regarding the changes, if any;
- Conduct inquiries/investigations regarding alleged violations of the Code or the SEBI Regulations;
- Decide upon the penal consequences to be imposed on Designated Persons for any contravention of the Code;
- Waive the penal consequences for contraventions of the Code which does not amount to contravention of the SEBI Regulations;
- Seek any such information / documents from the Designated Persons and employee(s) of the Company and their Immediate Relatives, as the case may be, for the purpose of enforcing the provisions of this Code and the SEBI Regulations, and it shall be the duty of such persons to provide the same forthwith. Failure or refusal to cooperate in such enquiries shall be deemed to be a serious violation of the obligations owed to the Company under this Code;
 - The Committee, considering the nature and severity of the breach, may decide to report any such breach and action taken to the Securities and Exchange Board of India. The above actions of Company will be without prejudice to any civil or criminal action that the regulatory authorities may initiate against such an employee; The Committee can delegate all or any of the above, to the Compliance Officer of the Company.