OCCL LIMITED

14th Floor, Tower-B, World Trade Tower, Plot No. C-1, Sector-16, Noida - 201301, UP
Phone : 91-120-4744800 Email : occlnoida@occlindia.com
Website : www.occlindia.com

February 04, 2026

The Manager
BSE Limited
Department of Corporate Services
Floor 25, P.J. Towers, Dalal Street
Mumbai – 400001
Scrip Code : 544278

The Manager
National Stock Exchange of India Limited
Exchange Plaza, Bandra Kurla Complex, Bandra (E),
Mumbai - 400051
Scrip Code : OCCLLTD

Dear Sirs,

Sub: Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information of the Company

Pursuant to Regulation 8(2) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, we enclose herewith a copy of amended "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" of OCCL Limited, as approved by the Board of Directors of the Company at its meeting held on February 04, 2026. The amended Code is also available on the Company's website at www.occlindia.com.

This is for your information and records.

Yours faithfully,
For **OCCL Limited**

PRANAB KUMAR MAITY
Digitally signed by PRANAB KUMAR MAITY
Date: 2026.02.04 16:18:32 +05'30'

Pranab Kumar Maity
Company Secretary & GM- Legal

Encl. as above

INTRODUCTION	Regulation 8(1) read with Schedule A of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as "Regulation") requires the Board of Directors of every listed company to formulate and publish on its official website, a Code of Practices and Procedure for Fair Disclosure of Unpublished Price Sensitive Information (hereinafter referred to as the 'Code'). The Regulation intends to require companies to disseminate 'Unpublished Price Sensitive Information' (hereinafter referred to as 'UPSI') universally and not selectively. The Company intends to follow the best practices, compliant with Applicable Laws, in the matter of disclosure of UPSI. Accordingly, this Code has been adopted by the Board of Directors of the Company at its meeting held on June 10, 2024. Further, owing to the amendements brought in by the SEBI (Prohibition of Insider Trading) Regulations 2015, the code was revised by the Board of Directors on 04th February 2026. This Code can be modified/amended/altered by Board of Directors of the Company except in case of any statutory modification or amendment or alteration of the provisions of the Regulations, which shall be deemed to be implemented in the said Code immediately on such notification for modification/amendment/alteration etc. coming into effect.
DEFINITIONS	"Applicable Law" shall mean the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, or any statute, law, regulations including any modification and amendments there to, ordinance, rule, judgment, order, decree, bye-law, clearance, directives, guidelines, policy, requirement, notifications and clarifications, circulars or other governmental instruction and/or mandatory standards and/or guidance notes as may be applicable in the matter of trading by an Insider. "Connected Person" shall mean such persons as defined under the Regulations. "Chief Investor Relations Officer" means such senior officer of the Company appointed by the Board of Directors to deal with dissemination of information and disclosure of UPSI in a fair and unbiased manner. The name and designation of such officer shall be published on the website of the Company. "Generally available information" means information that is accessible to the public on a non-discriminatory basis. "Insider" means any person who is connected person or in possession of having access of UPSI. "Selected Group of Persons" means securities analysts or selected institutional investors, brokers and dealers or their associated persons, investment advisers and institutional advisers and institutional managers, investment companies, hedge funds or any other person. "Trading" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities and "trade" shall be construed accordingly.

	"Unpublished Price Sensitive Information" shall have the same meaning as defined in Regulation 2(n) of Securities and Exchange Board of India (Prohition of Insider Trading) Regulations, 2015.

Sharing of UPSI for legitimate purpose	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 these regulations.
	
	• Till the UPSI becomes a generally available information, UPSI can be shared only on a need-to-know basis and for legitimate purpose as provided hereunder and not to evade or circumvent the prohibitions of the Regulations:
	  ○ Sharing of relevant UPSI with consultants, advisors engaged by the Company in relation to the subject matter of the proposed deal/ assignment in relation to UPSI;
	  ○ Sharing of relevant UPSI with intermediaries/ fiduciaries viz. merchant bankers, legal advisors, auditors in order to avail professional services from them in relation to the subject matter of the UPSI;
	  ○ Sharing of relevant UPSI with persons for legitimate business purposes (e.g., attorneys, investment bankers or accountants);
	  ○ Sharing of relevant UPSI with persons who have expressly agreed in writing to keep the information confidential, such as potential customers, other developers, joint venture partners and vendors, and not to transact in the company's securities on the basis of such information;
	  ○ Sharing of relevant UPSI in case mandatory for performance of duties or discharge of legal obligations.
	• Whether this information is required to be shared? Why the information is required by the recipient? Response to the two queries shall be well recorded by the concerned Designated Person sharing the UPSI and shall be forwarded to the Compliance Officer.
	• Before sharing of the UPSI, the concerned Designated Person sharing such UPSI shall comply with the requirements in relation to circumstances and procedure for bringing people 'inside' as provided in Insider Trading Code.

FUNCTIONS OF THE CHIEF INVESTOR RELATIONS OFFICER	▪ To deal with universal dissemination and disclosure of UPSI. ▪ To determine as to whether any particular information amounts to UPSI. ▪ To provide advice to any Insider as to whether any particular information may be treated as UPSI. ▪ To determine the response, if any, of the Company to any market rumour in accordance with this Code. ▪ To deal with any query received by any insider about any UPSI.

	If an Insider receives a query about any UPSI related to the Company, he shall not comment on the same and shall forward such query to the Chief Investor Relations Officer. The Chief Investor Relation Officer shall deal with such query in accordance with Applicable Law and this Code in consultation with the Managing Director/ Chief Executive Officer of the Company.
DISCLOSURE POLICY	❖ The Company shall ensure: ▪ Prompt public disclosure of UPSI that would impact price discovery, no sooner than credible and concrete information comes in to being in order to make such information generally available. ▪ Uniform and universal dissemination of UPSI and to avoid selective disclosure. ▪ If an Insider 'selectively, inadvertently or otherwise' discloses any UPSI to any person including the Selected Group of Persons then prompt dissemination of the same shall be made in order to make the information generally available. The Chief Investor Relations Officer shall be promptly informed, of any such inadvertent or unintentional selective disclosure who in consultation with the Compliance Officer and the Managing Director and/or Chief Executive Officer shall take appropriate steps in this regard. ❖ Subject to applicable law, methods of Public disclosure of information of UPSI to ensure uniform distribution shall include either of the following :- ▪ Distribution through Press Releases in newspapers or media including electronic media. ▪ Filing with Stock Exchanges. ▪ Any other method that ensures wide distribution of the news such as webcasts and webinars. ▪ Uploading of the information on the website of the Company.
THIRD PARTY DEALINGS	The Chief Investor Relations Officer shall ensure that best practices of making transcripts or records of proceeding of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made are developed by the Company.
VERIFICATION OF MARKET RUMOURS	The Chief Investor Relations Officer shall endeavor to provide appropriate and fair responses to the queries in relation to UPSI including any news report. The Company and the Chief Investor Relations officer will maintain 'No Comment' policy on market rumours except when requested by regulatory authorities to verify such rumours.
HANDLING OF UPSI ON NEED TO KNOW BASIS	The Company shall handle UPSI only on a need to know basis. UPSI shall be provided only when needed for performance of duties, legitimate purpose or discharge of legal obligations. All insiders shall adhere to conditions of strict confidentiality and shall not share any UPSI except for the abovementioned purpose.
DISCLOSURE OF THIS CODE ON PUBLIC DOMAIN	• This Code shall be published on the Official Website of the Company. • This Code and every amendment made thereto, shall be promptly intimated to the Stock Exchanges where the securities of the Company are listed.