

23.10.2026

BSE Limited

Phiroze Jeejeebhoy Towers
Dalal Street, Fort
Mumbai – 400001
Scrip Code – 544996

National Stock Exchange of India Ltd

Exchange Plaza, C-1, Block G
Bandra Kurla Complex, Bandra (E)
Mumbai – 400051
Symbol – BONFIG

Dear Sir/Madam,

Sub: Intimation under Regulation 8(2) of the Securities Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

Pursuant to Regulation 8(2) of the Securities Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ('SEBI PIT Regulations'), the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information framed under Regulation 8 (1) of SEBI PIT Regulations is enclosed as Annexure -A and also available on the website of the company under the below link:

https://www.bonfiglioli.in/Investor_Relations

This is for your information and record.

Thanking you,

Sincerely yours,

For **BONFIGLIOLI TRANSMISSIONS LIMITED**

SUNIL KUMAR
Digitally signed by
SUNIL KUMAR
Date: 2026.10.23
13:47:54 +05'30'

Sunil Kumar

Company Secretary and Compliance officer
Membership No. A58368.

Enclosure: as above

Annexure-A

Code of Practices and Procedures for fair disclosure of unpublished price sensitive information and policy for determination of “Legitimate Purpose”

This Code intends to formulate the policy for fair disclosure of Unpublished Price Sensitive Information and the Board of Directors shall adhere to it in letter and spirit.

Principles of fair disclosure and conduct

1. Prompt public disclosure of UPSI that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. Unless resolved by the Board, the Company Secretary shall act as the Chief Investor Relations Officer to deal with dissemination of information and disclosure of UPSI.
3. Uniform and universal dissemination of UPSI to avoid selective disclosure.
If unpublished price sensitive information is disclosed selectively, inadvertently or otherwise, the Compliance Officer shall promptly make that information generally available by intimating it to the stock exchanges.
4. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
5. Ensuring that information shared with analysts and research personnel is not UPSI.
6. Developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
7. Handling of all UPSI on a need-to-know basis.

Policy for determination of “Legitimate Purpose”

1. In terms of the SEBI PIT Regulations, the term “legitimate purpose” is clarified to include sharing of UPSI in the ordinary course of business by an insider with Company’s partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing of UPSI has not been carried out to evade or circumvent the prohibitions of the SEBI PIT Regulations.
2. The SEBI Regulations require the Board to formulate a policy for determination of ‘legitimate purpose’, in line with the guidance provided in the SEBI Regulations. The assessment of whether sharing of UPSI for a particular instance would tantamount to ‘legitimate purpose’ would entirely depend on the specific facts and circumstances of each case. Accordingly, this Policy only sets out the principles that should be considered while assessing if the purpose for which UPSI is proposed to be shared is “legitimate”.
3. Primarily, the following factors should be considered:
 - a. whether sharing of such information is in the ordinary course of business of the Company.
 - b. whether information is sought to be shared to evade or circumvent the prohibitions of the Regulations.

- c. whether sharing the information is in the best interests of the Company or in furtherance of a genuine commercial purpose.
 - d. whether the information is required to be shared for enabling the Company to discharge its legal obligations.
 - e. whether the nature of information being shared is commensurate to the purpose for which access is sought to be provided to the recipient.
4. It is clarified that in the event there exist multiple purposes for sharing UPSI, each purpose will be evaluated on its own merits, in line with the aforementioned principles.
5. Before, or at the time of, sharing unpublished price sensitive information for a legitimate purpose, the recipient of UPSI shall be informed of the following, by way of written intimation and/or contractual agreement, such as, confidentiality agreement or non-disclosure agreement, that:
 - a. The information being shared is UPSI and that the Company is the exclusive owner of such UPSI.
 - b. Upon receipt of UPSI, the recipient would be deemed to be an Insider and subject to the provisions of the SEBI PIT Regulations.
 - c. The recipient must maintain confidentiality of the UPSI at all times.
 - d. The recipient may use the UPSI only for the approved purposes for which it was disclosed.
 - e. the recipient should provide a written undertaking that he/she/it shall not undertake trades in the securities of the Company while in possession of the UPSI.
 - f. the recipient must extend all cooperation to the Company, as may be required in this regard.
 - g. The recipient must also adopt a code of conduct in terms of Regulation 9 of the SEBI Regulations, to inter alia ensure that it safeguards the UPSI in line with the SEBI Regulations.
6. The information should be shared by the Company, from time to time, in the ordinary course of its business activities with its advisers and service providers, viz., auditors, merchant bankers and legal advisers/consultants of the Company, in line with the aforementioned principles.
7. Additionally, Compliance Officer, shall be responsible for maintaining structured digital database, in compliance with the SEBI PIT Regulations, comprising necessary details of all recipients of UPSI, who receive UPSI in compliance with the SEBI PIT Regulations, including, name, address, email, Permanent Account Number (PAN), or any other identifier authorised by law (where PAN is not available) and such other documents as may be necessary, in the manner that may be prescribed by the Board of Directors or SEBI.
8. The compliance officer, who is required to handle unpublished price sensitive information shall ensure that the structured digital database is preserved for a period of not less than eight years after completion of the relevant transactions and in the event of receipt of any information from the Board regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.