

## CODE OF INTERNAL PROCEDURES AND CONDUCT FOR PREVENTION OF INSIDER TRADING IN DEALING WITH SECURITIES OF BHARAT COKING COAL LIMITED.

(PURSUANT TO REGULATION 9(1) OF SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS 2015) AND AMENDMENT REGULATIONS 2018

### Trading in BCCL's shares by the Designated Employees – Closure of Trading Window:-

**In view of declaration of Standalone Unaudited financial results for the 3rd Quarter and nine months ended 31st Dec.'2025 (both days inclusive) for F.Y 2025-26 of Bharat Coking Coal Limited.**

As per the Code of internal procedures and conduct for prevention of Insider Trading (Code) in dealing with Securities of BCCL, the Company shall specify a trading period to be called "Trading Window" for trading in the Securities. The trading window shall be closed during the time the information referred to in Clause No. 7 of the aforesaid Code is unpublished. Trading window shall be opened 48 hours after the Price sensitive information referred to in Clause No. 7 of the Code, for which trading window is closed, is made public.

As mandated, the **trading window shall remain closed from 21st Jan.'26 till 48 hours after the declaration of Standalone Unaudited Financial Results for the 3<sup>rd</sup> Quarter and nine months ended 31<sup>st</sup> Dec.'2025 (both days inclusive) for F.Y 2025-26**. During the restricted period, the Designated Employees (as defined in Clause No. 2 of the said code) and their dependents shall not deal in the shares of BCCL.

All Designated Employees as per the Code are requested to take note of the above. Heads of the concerned Departments of Bharat Coking Coal Limited are also requested to bring the above circular to the notice of Designated Employees of the respective Departments under their control.

This circular is also being displayed on the Notice Boards of the concerned offices of Bharat Coking Coal Limited and hosted on BCCL website for strict compliances. **It may also be noted that failure to comply with the aforementioned circular shall invite action(s) as prescribed under Prohibition of Insider Trading Regulations, 2015 including action by regulatory authorities.**

*21/01/2026*  
B.K Parui  
(Company Secretary & Compliance Officer)

### Distribution:

भारत कोकिंग कोल लिमिटेड  
(एक मिनीरत्न कंपनी)  
(कोल इण्डिया लिमिटेड की एक अनुषंगी कंपनी)  
(भारत सरकार का उपक्रम)



Bharat Coking Coal Limited  
(A Miniratna Company)  
(A Subsidiary of Coal India Limited)  
(A Government of India Undertaking)

- 1. All Directors, BCCL**
- 2. All Directors, CIL**
- 3. ED(CS),CIL**
- 4. CFO, BCCL**
- 5. All GMs,BCCL**
- 6. All HoDs, BCCL HQ**
- 7. All designated employees of BCCL**
- 8. GM System, BCCL –with a request to upload the circular on BCCL website**
- 9. TS to CMD/ D(F)/D(T)Op./D(T)P&P/D(HR)**
- 10. Executives of Company Secretary Department, BCCL- through CS, BCCL**
- 11. Executives of Central Accounts Department, BCCL- through CFO, BCCL**
- 12. M/s Nag & Associates, Statutory Auditors, BCCL-through GM(Fin)I/c , BCCL.**
- 13. M/s Mahata Agarwal & Associates, Secretarial Auditor, BCCL- through CS, BCCL**
- 14. M/s Karma & Company LLP, Internal Auditor, BCCL-through HoD –IAD, BCCL**
- 15. M/s Paliwal & Associates, Cost Auditor, BCCL – through GM(Fin)I/c.**
- 16. M/s KFin Technologies Limited, RTA**

भारत कोकिंग कोल लिमिटेड  
Bharat Coking Coal Limited