

Ref no. BCCL:CS:F-Insider Trading:101

Dated:28.03.2026

**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**

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The trading window shall be closed during the time the information referred to in Clause No. 7 of the aforesaid Code is unpublished.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 1<sup>st</sup> April, 2026 till 48 hours after the declaration of Standalone Audited financial results for the 4th Quarter and year ended 31st March, 2026 (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.

The aforesaid code is available at BCCL website under the link [https://bcclweb.in/newpdfs/Investor relation/Corporate Governance Policies/Code%20of %20Conduct%20to%20Regulate,%20Monitor%20and%20Report%20Trading%20by%20De signed%20Persons.pdf](https://bcclweb.in/newpdfs/Investor%20relation/Corporate%20Governance%20Policies/Code%20of%20Conduct%20to%20Regulate,%20Monitor%20and%20Report%20Trading%20by%20Designated%20Persons.pdf)

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.**

**Debanuj Debnath**  
**(Company Secretary & Compliance Officer)**

**Distribution:**

- 1. All Directors, BCCL**
- 2. All Directors, CIL**

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

