



## ELGI EQUIPMENTS LIMITED

### STANDARD OPERATING PROCEDURE – ONE-ON-ONE MEETINGS WITH INVESTORS & ANALYSTS

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#### STANDARD OPERATING PROCEDURE (SOP)

Title: One-on-One Investor Meetings (physical and/or virtual)

Effective Date: 27-6-2025

#### 1. PURPOSE

**The SOP applies to ELGi Equipment’s Limited (together with its subsidiaries, the “Company “or “ELGi”)**

The purpose of this SOP on Investor Relations is to state the principles followed for engagement with investors and analysts and to provide clear guidelines and procedures for disclosing material price sensitive information outside the Company in order to provide accurate and timely communications on a broadly disseminated basis to our shareholders and the financial markets. The SOP at all times aims to ensure compliance with SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended (“SEBI POIT Regulations”).

#### 2. EXPLANATIONS

- i. **Unpublished Price Sensitive Information (UPSI):** As defined under The SEBI (Prohibition of Insider Trading) Regulations 2015 (“SEBI PIT Regulations (“SEBI POIT Regulations”).
- ii. **Year:** Means financial year (April to March)
- iii. **SOP** shall operate in compliance with SEBI POIT Regulations, ELGi’s Code for Fair Disclosure of UPSI and Conduct and the policies named below.

#### 3. RESPONSIBILITIES

- i. **Investor Relations Officer:** Oversee and coordinate meeting requests and ensure that the procedure prescribed in this SOP is being followed.
- ii. **Investors and Analysts:** Submit questions in advance to ensure transparency and avoid discussing price-sensitive or non-public information.
- iii. **Compliance Officer:** Ensure that the meeting complies with SEBI POIT Regulations, the policies named below and review any sensitive questions ahead of the meet.
- iv. **Company Management:** Person participating in the investors and analysts meet is required to ensure no disclosure of UPSI and adhere to SEBI POIT Regulations during such meetings.

#### 4. PROCEDURE

- i. **Criteria for One-on-One Meeting – Investors & Analysts:**
  - a. Following investors or analysts shall meet one or more criteria as provided below:
    - i. Investment firms, institutions or companies shall have or manage a minimum of \$1 Billion Assets Under Management (AUM).
    - ii. Existing investors holding 2% or more of the paid-up share capital of the Company.
  - b. Analysts who propose to engage with the Company for the first time are expected to :
    - i. Have published at least two reports in a year on a large, listed company in India (large defined as market cap greater than Rs 10,000 crores); OR



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- ii. should have acted as investment advisors to funds that have a minimum of \$ 1 Billion in AUM or to Company's existing investors holding 2% or more of the paid-up share capital in the Company.
- c. Analysts/Investors with existing relationship with the company for more than three years.
- d. The abovesaid thresholds should be reviewed periodically by the Investor Relations Officer.

#### ii. Maximum Number of Meetings, Meeting Request and Coordination

- a. The Company will meet with an Investor/Analyst once every Year, in addition to year end investor meet.
- b. If an investor or analyst requests to visit the company's facilities (e.g., factory), during our meeting, The Investor Relations Officer shall organise the same subject to availability of management.
- c. The Investor Relations Officer will review the request and, if it meets the criteria, will approve the meeting.

#### iii. Meeting Format and Location

- a. Virtual Meetings are preferred via video conference to reduce logistical complexities, especially with remote participants.
- b. Physical meetings, if requested for by the concerned Investor/Analyst shall be held only at Coimbatore or Bangalore, at mutual convenience.
- c. If an investor or analyst requests to visit the company's facilities (e.g., factory), this will be evaluated on a case-by-case basis, and if agreed, an appointment shall be provided for physical meeting and visit to the Company facilities.
- d. The Investor Relations Officer must review the physical meeting request, and a formal internal approval process should be followed for factory visits.
- e. For any inquiries or to schedule meetings, investor/analyst community can reach out via email at investor@elgi.com.

#### iv. Adherence to Regulatory Compliances prior to the Meeting

- a. The Investor Relations Officer shall inform the Compliance Officer about the meeting schedule at least one week prior to the meeting date.
- b. The Compliance Officer shall make a prior intimation about the schedule of the one-on-one meeting with investor/analyst to the Stock Exchanges (i.e., BSE and NSE) at least 2 working days excluding the date of intimation and date of meeting, in advance, with the name of the investor/analyst, date, time and mode of meeting.
- c. The below policies as adopted by the Company shall be followed in letter and spirit:
  - i. Code of Fair Disclosure of Unpublished Price Sensitive Information and Conduct which can be accessed in this link:  
<https://www.elgi.com/in/wp-content/uploads/2019/10/Code-of-Fair-disclosure-of-UPSI-and-Conduct.pdf>
  - ii. Code of Conduct and Business Ethics which can be accessed in this link:  
<https://www.elgi.com/in/wp-content/uploads/2019/10/Code-of-Fair-disclosure-of-UPSI-and-Conduct.pdf>



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- iii. Code of Conduct to Regulate, Monitor and Report Insider Trading by Designated Persons which can be accessed in this link:  
<https://www.elgi.com/in/wp-content/uploads/2019/10/Code-of-Conduct-to-Regulate-Monitor-and-Report-Trading-by-Designated-Persons.pdf>
- iv. Policy on Disclosure of Material Events or Information which can be accessed in this link:  
<https://www.elgi.com/in/wp-content/uploads/2019/05/Policy-for-determining-Materiality-of-Events.pdf>
- v. Policy and Procedures for Inquiry in Case of Leak or Suspected Leak of UPSI under the SEBI POIT Regulations which can be accessed in this link:  
<https://www.elgi.com/in/wp-content/uploads/2019/10/Policy-and-procedure-for-inquiry-into-leak-or-suspected-leak-of-UPSI.pdf>

**v. Presence of Company Officials & Conducting the Meeting**

Managing Director, Executive Director, CFO will be regular participants at the meeting. Other internal participants will be included at Management's Discretion. Investors/Analysts will have an opportunity to meet other leaders at the Annual Investors Meet held every year.

**vi. Authorities Under the Policy**

The Company's Managing Director, Executive Director or Chief Financial Officer shall have the authority to determine matters to be covered and information to be disclosed about the Company and also are the persons authorized to speak on behalf of the Company to investor community ('Authorized Spokesperson/s').

**vii. Adherence To Regulatory Compliances Post Meeting**

- a. After conclusion of the meeting, the Compliance Officer shall disclose outcome (containing confirmation of the meeting held) to the Stock Exchanges on the same day of the meeting and upload the same on the website of the Company.
- b. The said documents shall be maintained for a period of 8 years on the website of the Company.
- c. If there are any unresolved questions or commitments made during the meeting, the Investor Relations Officer should handle the follow-up and ensure timely and accurate communication.

**viii. Headquarters and/or factory visits:**

The Company while conducting visits to its headquarters and / or tours of its factories, if any for investor/analyst community shall ensure that no access to UPSI shall be gained by the visitors during the said visits. The Authorized Spokespersons in consultation with the Investor Relations Officer shall plan for such visits. The Authorized Spokespersons or designated officer/s shall be present and accompanied at all times.

**ix. Press Release:**

The Company may issue press releases to disclose information that the management believes is important or useful to the public, whether or not the information is material. The Authorized Spokesperson will designate the appropriate officer to prepare press releases to be issued by



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the Company. All press releases will be reviewed, approved and signed by an Authorized Spokesperson/s.

**x. Silent Period**

- a. The Company has adopted a “silent” period from the Last working day of the last month of any financial quarter for which results are required to be announced by the Company till the publication of said results. During such period, the Authorized Spokesperson/s or any other Company official/s will not meet any member of investors/analysts’ community.
  
- b. During the silent period, the Company will continue to issue press releases and communicate with the media regarding its business, products or operations.

**xi. Communication with Investor community:**

Direct contact with investor/analyst community shall be limited to the Authorized Spokesperson/s and the Investor Relations Officer.

**5. VIOLATION OF THIS SoP**

Any violation of this policy by an employee, director or independent contractor of the Company or any of its subsidiaries shall be brought to the attention of the Board of Directors and may constitute grounds for disciplinary action.

**6. LIMITATION, REVIEW AND AMENDMENT**

- a. In the event of any conflict between the provisions of this Policy and the relevant SEBI Regulations and / or other applicable laws, the provisions of the relevant SEBI Regulations and / or other applicable laws shall prevail.
  
- b. Any subsequent amendments / modifications in the relevant SEBI Regulations and / or other applicable laws shall automatically apply to this SoP without any further act by the Board of Directors of the Company. The Authorized Spokesperson/s shall be authorized to give effect to such changes in the SoP.
  
- c. The Authorized Spokesperson/s shall review this SoP, as deemed necessary.

**Note:** This SOP ensures that the company adheres to clear guidelines for one-on-one meeting with investors and analysts, is in compliant with SEBI POIT Regulations, and to foster transparency, while also protecting unpublic price sensitive information of the Company. This SOP is subject to modifications from time to time as needed.

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