RIGA SUGAR CO. LIMITED

A Subsidiary of Nirani Sugars Limited · CIN: L15421WB1980PLC032970

Registered Office: 14 Netaji Subhas Road, 2nd Floor, P.S. Hare Street, Kolkata – 700 001, West Bengal · www.rigasugar.com

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

Framed under Regulation 8 read with Schedule A of the SEBI (Prohibition of Insider Trading) Regulations, 2015

Version	Approved by	Effective date
1.0	The Board of Directors at its meeting held on 13 August 2026	13 August 2026

1. Introduction and Objective

This Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (the "Fair Disclosure Code") is framed by Riga Sugar Co. Limited (the "Company") pursuant to Regulation 8 read with Schedule A of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (the "Regulations"), as amended. Its objective is to ensure timely, adequate, uniform and universal dissemination of unpublished price sensitive information relating to the Company, so as to avoid selective disclosure and to preserve the confidentiality of such information until it is made generally available.

"Unpublished Price Sensitive Information" or "UPSI" means information relating to the Company or its securities, directly or indirectly, that is not generally available and which upon becoming generally available is likely to materially affect the price of the securities, and shall ordinarily include information relating to financial results; dividends; change in capital structure; mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions; and changes in key managerial personnel, and shall otherwise bear the meaning assigned to it under Regulation 2(1)(n) of the Regulations. Words and expressions used but not defined in this Fair Disclosure Code shall bear the meanings assigned to them under the Regulations, the Companies Act, 2013, the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("LODR"), and the Company's Code of Conduct to regulate, monitor and report trading by Designated Persons.

2. Principles of Fair Disclosure

The Company shall observe the following principles, as set out in Schedule A to the Regulations:

(a) prompt public disclosure of unpublished price sensitive information that would impact price discovery, no sooner than credible and concrete information comes into being, in order to make such information generally available;

(b) uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure;

(c) designation of a senior officer as a Chief Investor Relations Officer to deal with the dissemination of information and disclosure of unpublished price sensitive information — the Company Secretary and Compliance Officer of the Company is hereby designated as the Chief Investor Relations Officer;

(d) prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise, to make such information generally available;

(e) appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities;

(f) ensuring that information shared with analysts and research personnel is not unpublished price sensitive information;

(g) developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences available on the official website to ensure official confirmation and documentation of disclosures made; and

(h) handling of all unpublished price sensitive information on a need-to-know basis, such that no unpublished price sensitive information shall be communicated to any person except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

3. Policy for Determination of "Legitimate Purposes"

In terms of Regulation 3(2A) of the Regulations, the following policy for determination of "legitimate purposes" forms an integral part of this Fair Disclosure Code.

3.1 "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, credit rating agencies, registrars and transfer agents, debenture trustees, or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the Regulations.

3.2 Unpublished price sensitive information shall not be shared with any person except where such sharing is for a legitimate purpose, in the performance of duties, or for the discharge of legal obligations, and in every case only on a need-to-know basis.

3.3 Any person in receipt of unpublished price sensitive information pursuant to a legitimate purpose shall be considered an "insider" for the purposes of the Regulations, and due notice shall be given to such person to maintain confidentiality of such unpublished price sensitive information in compliance with the Regulations. Such person shall be required to keep the information confidential, and shall not trade in the securities of the Company when in possession of unpublished price sensitive information.

3.4 The Company shall maintain a structured digital database in terms of Regulation 3(5) of the Regulations containing the names of, and the Permanent Account Numbers or such other identifiers as may be authorised by law of, such persons or entities with whom unpublished price sensitive information is shared, along with the nature of the unpublished price sensitive information shared. The database shall have adequate internal controls and checks, including time-stamping and audit trails, shall not be outsourced, and shall be preserved for a period of not less than eight years after completion of the relevant transactions (and, in the event of any investigation or litigation, until the same is disposed of).

4. Dealing with Analysts, Investors and the Media

The Chief Investor Relations Officer, or such other officer as may be authorised by the Board, shall be the sole spokesperson of the Company for the purpose of dealing with analysts, institutional investors, research personnel and the media in relation to price sensitive matters. Only public information shall be shared at such meetings and conferences. Unanticipated questions which may call for a response involving unpublished price sensitive information shall be taken on notice and responded to only after the information has been made generally available. Transcripts, audio or video recordings or records of proceedings of such meetings and calls shall be made available on the Company's website within the timelines prescribed under LODR.

5. Response to Market Rumours and Inadvertent Disclosure

The Company shall respond appropriately and fairly to queries on news reports and requests for verification of market rumours by the stock exchange(s) and regulatory authorities, in accordance with Regulation 30(11) of LODR. Where any unpublished price sensitive information is disclosed selectively, inadvertently or otherwise, the Chief Investor Relations Officer shall promptly disseminate such information so as to make it generally available, and shall make the requisite intimation to the stock exchange(s).

6. Reporting of Leak of Unpublished Price Sensitive Information

Any actual or suspected leak of unpublished price sensitive information may be reported under the Company's Vigil Mechanism and Whistle Blower Policy, which is framed, inter alia, pursuant to Regulation 9A(6) of the Regulations. The inquiry into any such leak or suspected leak shall be conducted in accordance with the written policies and procedures adopted by the Board under Regulation 9A(5) of the Regulations, and the Securities and Exchange Board of India shall be promptly informed of such leaks, inquiries and the results of such inquiries.

7. Dissemination, Disclosure and Amendment

The Chief Investor Relations Officer shall be responsible for ensuring adherence to this Fair Disclosure Code. In terms of Regulation 8(1) and 8(2) of the Regulations, this Fair Disclosure Code, and every amendment to it, shall be published on the Company's website and shall be promptly intimated to the stock exchange(s) on which the securities of the Company are listed. The Board of Directors may amend this Fair Disclosure Code from time to time. Any subsequent amendment or modification in the Regulations shall automatically apply to this Fair Disclosure Code, and to the extent of any inconsistency, the provisions of the Regulations shall prevail.

Document control

Approved by the Board of Directors of Riga Sugar Co. Limited at its meeting held on 13 August 2026 and effective from 13 August 2026. Version 1.0. Owner / custodian: Company Secretary & Compliance Officer. Review: Reviewed by the Board of Directors as and when required, and in any event whenever the Regulations are amended. This document is placed on the Company's website at www.rigasugar.com. In the event of any conflict between this document and the provisions of any applicable statute, rules, regulations or guidelines, the statutory provisions shall prevail.

For Riga Sugar Co. Limited

Company Secretary & Compliance Officer