Insider Trading Policy

The Insider Trading Policy of Century is established to prevent the misuse of material non-public information for personal gain and to uphold the highest standards of ethical conduct and transparency in our business operations. For the sake of this policy, the term "Insider" applies to any person who is or was connected with Century and has access to material non-public information. This includes all employees, officers, directors, auditors, contractors, and significant shareholders (holding 10% or more of the shares).

1. **Prohibition of Insider Trading:** All individuals covered by this policy are strictly prohibited from trading in Century's securities while in possession of material non-public information. This prohibition extends to both buying and selling whether directly or indirectly, and includes any securities linked to Century's performance or activities.

2. **Material Non-Public Information:** Material non-public information refers to any information that could reasonably be expected to affect the market price of Century's securities if it were disclosed. This includes financial results, mergers, acquisitions, business partnerships, significant contracts, and any other information that is not publicly available.

3. **Trading Windows and Blackout Periods:** Trading windows will be designated during which covered individuals may trade in Century's securities. These trading windows will typically open after the public release of financial results or other significant announcements. Outside of trading windows, blackout (closed) periods will be imposed, during which trading is strictly prohibited to prevent insider trading.

4. **Pre-Clearance of Trades:** All covered individuals planning to trade in Century's securities must obtain pre-clearance from the Legal and Compliance Department. Pre-clearance ensures that there is no potential conflict with material non-public information.

5. **Reporting Obligations:** Any covered individual who buys or sells Century's securities must report such transactions to the Legal and Compliance Department promptly, regardless of whether the transaction occurred during a trading window or blackout period.

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6. **Restricted Persons:** Certain individuals may be considered "Restricted Persons" and may have additional trading restrictions due to their roles or access to sensitive information. These individuals will be informed of their restricted status by the Legal and Compliance Department.

7. **Consequences of Violation:** Violation of this policy will result in disciplinary action, including termination of employment, legal actions, and potential liability for civil and criminal penalties under applicable laws.

8. **Educational Efforts:** Regular training and awareness programs will be conducted to educate covered individuals about the insider trading policy, the consequences of violations, and the importance of ethical behavior.

9. **Confidentiality and Enforcement:** All individuals covered by this policy are required to maintain the confidentiality of material non-public information. The Legal and Compliance Department will monitor and enforce compliance with this policy, investigate potential violations, and take appropriate actions as necessary.

10. **Continuous Improvement:** We are committed to continuous enhancement of our Insider Trading Policy to adapt to changing legal, regulatory, and market conditions, ensuring its effectiveness.

By adhering to the Insider Trading Policy, Century underscores its commitment to integrity, transparency, and ethical conduct, ensuring a level playing field for all stakeholders and upholding the trust placed in us by investors and the market.

Prepared By : ____________ **Version No :** 01

Approved By : ____________ **Effective From :** 15-06-2024