

**DISCLOSURE UNDER REGULATION 25 AND 46 OF SEBI
(LISTING OBLIGATIONS AND DISCLOSURE REQUIREMENTS)
REGULATIONS, 2015**

**DETAILS OF FAMILIARIZATION PROGRAMMES IMPARTED TO
INDEPENDENT DIRECTORS OF
SAMBHV STEEL TUBES LIMITED (“THE COMPANY”)**

The Familiarization Program (“**The Programme**”) for Independent Directors of Sambhv Steel Tubes Limited. (“**The Company**”) has been adopted by the Board of Directors pursuant to Regulation 25(7) of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 as amended.

OVERVIEW

The Company has adopted a structured familiarization and orientation programme for its Independent Directors at the time of their appointment and on a continuous basis. The objective of these programmes is to enable them to understand the nature of the industry in which the Company operates, its business model, operational structure, and the roles, rights, and responsibilities of Independent Directors.

Further, the programmes are designed to update the Directors regularly on significant developments to ensure that they are equipped to take well-informed and timely decisions.

These familiarization initiatives provide insights into:

- Business model and operational structure
- Manufacturing processes and plant operations
- Regulatory developments, including SEBI regulations
- Roles, responsibilities, and liabilities of Directors
- Risk management, compliance, and governance framework

DETAILS OF PROGRAMMES CONDUCTED

DURING THE FINANCIAL YEAR 2024-2025

The Company has an orientation process/familiarization programme for one of its independent director with emphasis on:

- Operations and working of manufacturing facility as on January 8, 2025.

Details of Familiarization Programmes imparted to Independent Directors.	Directors are given opportunities to visit the company's plants so they can gain a comprehensive, first-hand understanding of operations, including safety, quality, sustainability etc.
Attended by	Ms. Nidhi Thakkar
Number of hours spent by Independent Director in such programmes	5 hrs
Purpose of Program	<ul style="list-style-type: none"> ○ Tilda Site Visit ○ To update the Director regarding scale and details of its operations

DURING THE FINANCIAL YEAR 2025-2026

Programme 1

The Company had a familiarization programme 1 for its independent directors with emphasis on:

- SEBI PIT Regulations & SDD as on April 10, 2025.

Details of Familiarization Programmes imparted to Independent Directors.	Overview of SEBI PIT Regulations and Structured Digital Database (SDD), including UPSI definitions, insider trading restrictions, disclosure requirements, liabilities, and the role of Directors in ensuring compliance and ethical governance.
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Attended by	Ms. Nidhi Thakkar Mr. Manoj Khetan Mr. Kishore Kumar Singh
Number of hours spent by Independent Directors in such programmes	1 hr 20 mins
Purpose of Program	<ul style="list-style-type: none"> ○ Building in-depth understanding of SEBI PIT Regulations, including UPSI definitions, prohibitions, trading restrictions, pre-clearance, disclosures, and directors' liabilities as insiders. ○ Deepen their understanding of SEBI PIT Regulations, including definitions of Unpublished Price Sensitive Information (UPSI), prohibitions on insider trading, trading window restrictions, pre-clearance procedures, disclosure obligations, and personal liabilities as designated persons/insiders ○ Foster awareness of directors' roles in preventing misuse of UPSI, overseeing compliance mechanisms, and contributing to ethical decision-making and fair market practices

Programme - 2

The Company had a familiarization programme 2 for its independent directors with emphasis on:

- Business & Operational Insights as on January 31, 2026.

Details of Familiarization Programmes imparted to Independent Directors.	Comprehensive understanding of the business model and operations through interactions with plant personnel, evaluation of operational, safety, environmental and compliance risks, and strategic discussions with Directors, KMPs, and SMPs.
Attended by	Ms. Nidhi Thakkar Mr. Manoj Khetan Mr. Kishore Kumar Singh Mr. Sarbesh Kumar Das

Number of hours spent by Independent Directors in such programmes	8 hrs
Purpose of Program	<p>Tilda Site Visit & Interaction with the Management at Registered Office.</p> <ul style="list-style-type: none"> ○ Enable directors to understand the company's core business model, production processes, and operational realities. ○ Facilitate direct interaction with plant teams, workers, and middle management for authentic insights. ○ Help directors assess risks (operational, safety, environmental, compliance) more effectively for informed decision-making. ○ Interaction with other Directors, KMPs, SMPs discussing Company's future goals.

The details of orientation given to the Independent Directors during the Financial Year 2024-25 and 2025-26 are as follows:

No. of hours spent by Independent Directors						
S. N.	Name of the Directors	Plant Visit as on January 8, 2025 (2024-25)	Total Cumulative till March 31, 2025	SEBI PIT Regulations & SDD on April 10, 2025 (2025-26)	Operational & Strategic Insights January 31, 2026 (2025-26)	Total Cumulative till March 31, 2026
1	Mrs. Nidhi Thakkar	5.00	5.00	1.20	8.00	14.20
2	Mr. Manoj Khetan	-	-	1.20	8.00	9.20
3	Mr. Kishore Kumar Singh	-	-	1.20	8.00	9.20
4	Mr. Sarbesh Kumar Das (Appointed as on 30.08.2025)	-	-	-	8.00	8.00



SAMBHV STEEL TUBES LIMITED
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