

## ANNEXURE- A

### **CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

[Under Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015]

The Board of Directors of **Alankit Limited** (hereinafter referred to as “Company”) has adopted the ‘Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information’ (Herein after called “THE FAIR DISCLOSURE CODE”). It shall come into force with effect from 15 May 2015.

1. The Purpose of the Fair Disclosure Code is to clearly outline procedures and practical guidelines that would be followed by Alankit Ltd for consistent, transparent, regular and timely public disclosures and dissemination of Unpublished Price Sensitive Information (UPSI).
2. All terms and words not defined in this Fair Disclosure Code (for example – Unpublished Price Sensitive Information ) shall, unless repugnant or contrary to the context or meaning thereof, have the same meaning as described under the SEBI (Prohibition of Insider Trading) Regulations, 2015 or any statutory modification or re-enactment thereof from time to time.
3. This Fair Disclosure Code shall be applicable and binding on all the employees, officers and directors of the Company.
4. The Company Secretary or any Senior Officer authorized by the Board of Director shall act as the Chief Investor Relations Officer / Compliance Officer of the Company under SEBI (Prohibition of Insider Trading) Regulations, 2015 to deal with dissemination of information and disclosure of unpublished price sensitive information.
5. The Company shall ensure prompt public disclosure of unpublished price sensitive information relating to the Company or securities thorough the Stock Exchanges or by any other means in order to make such information generally available.
6. The Company shall ensure uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
7. Disclosures must be complete in all material respects and should not be misleading.
8. The Company will ensure that information shared with analysts and research personnel, if any, is not UPSI.
9. Under certain circumstances, the Company may determine that such disclosure would be unduly detrimental to the Company (for example it may compromise

certain strategic business negotiations/ transactions or may not be disclosable due to third party confidentiality restrictions or uncertainty of events), in which case, the information shall be kept confidential until the Company determines it may be publicly disclosed. Information should be disclosed only after there is creditability to the information and the information has concretized.

10. The Directors/ employees of the Company shall not discuss the matters of developments regarding the Company which in any way relate to UPSI with any other persons, except that are required to be disclosed in performance of his or her duties or under applicable laws or regulations or discharge of legal obligations.
  11. In the event of the Company makes an unintentional disclosure of Material information, it shall forthwith take steps to ensure that the same is disclosed to the Stock Exchanges immediately.
  12. The Company shall not comment, affirmatively or negatively, on market rumors. Should a Stock Exchange request that the Company make a definitive statement in response to a market rumors that is causing significant volatility in the securities of the Company, the Compliance Officer in consultation with the Managing Director shall consider the matter and communicate the Company's response such as "no corporate development at this time".
  13. The Company shall maintain and store records in respect of disclosures made by it through any means under the relevant provisions of the Companies Act, 2013, Rules made there under, SEBI Act, 1992 , Rules, regulations and guidelines issued there under.
  14. This Fair Disclosure Code shall be reviewed from time to time and any amendment or modifications thereto shall subject to the review and approval to the Board of Directors (which terms shall deem to include any Committee of the Board constituted to exercise its powers)of the Company.
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