

ACHAL INVESTMENTS LIMITED

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CIN: L65993DL1980PLC010636

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

(Pursuant to Regulation 8 of the SEBI (Prevention of Insider Trading) Regulations, 2015)

This following is the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code") adopted by www.achalinvest.com. This Code is consistent with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the terms used therein shall have the same meaning as given in the said Regulations:

The following are the principles of Fair Disclosure adopted by Company:

1. The Company shall ensure prompt Disclosure of Unpublished price sensitive information (UPSI) that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. The Company shall ensure uniform and universal dissemination of UPSI to avoid selective disclosure.
3. The Whole-time Director of the Company has been designated as the Chief Investor Relations Officer (CIRO) for the purpose of timely dissemination and disclosure of UPSI.
4. The Company shall make prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company shall ensure that information shared with analysts and research personnel is not UPSI.
7. The Company shall develop and follow best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
8. The Company shall handle all UPSI on need-to-know basis.

The above Code has been duly approved by the Board of Directors.