

ANIL LIMITED – CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

IN compliance with SEBI (Prohibition of Insider Trading) Regulations, 2015 (“the Regulations”) notified by the Securities and Exchange Board of India on 15th January, 2015, the Board of Directors of Anil Limited (herein after known as “ANIL” or “The Company”) has approved the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information.

Object:

This code is formulated to ensure timely and adequate disclosure of unpublished price sensitive information, which would impact the price of the Company’s security and to maintain the transparency and fairness in dealing with all the stakeholders.

Principles of Fair Disclosure for purposes of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information:

1. The Company shall promptly make public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
2. The Company shall make uniform and universal dissemination of unpublished price sensitive to avoid selective disclosure.
3. The Company shall designate a senior officer as a “chief investor relations officer” to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall make appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.

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6. The Company shall ensure that the information shared with analysts and research personnel is not unpublished price sensitive information.
7. The Company shall develop 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 The Company shall Handle all unpublished price sensitive information on a need-to-know basis

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