

ANANDRATHI
Wealth Management. uncomplicated

Anand Rathi Wealth Services Limited

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Fair Disclosure of Unpublished Price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

Preamble

In light of the introduction of SEBI (Prohibition of Insider Trading) Regulations, 2015 vide notification no. No. LAD-NRO/GN/2014-15/21/85, dated January 15, 2015 (taking effect from May 14, 2015), the Company is required to formulate a code of practices and procedures for fair disclosure of unpublished price sensitive information as prescribed under the aforementioned regulations.

The following code is formulated by the Company, in compliance of the said regulations, to preserve the confidentiality of unpublished price sensitive information and has been approved by the Board.

Effective Date

The policy shall take effect from immediate effect.

Definitions

For the purposes of this policy

“**Board**” means Board of Directors of ARWSL.

“**Chief Investor Relations Officer**” shall be a senior officer of the Company who has been designated as such by it.

“**Code**” shall mean the code of practices and procedures for fair disclosure of unpublished price sensitive information

“**Company or ARWSL**” shall mean Anand Rathi Wealth Services Limited, wherever it is referred to in the Code.

“**Directors**” shall mean the directors of ARWSL.

“**Regulations**” shall mean the SEBI (Prohibition of Insider Trading) Regulations, 2015 wherever referred to in the Code.

“**SEBI**” shall mean the Securities and Exchange Board of India wherever referred to in the Code.

“**Senior Officer**” for the purpose of this code shall be any employee of the Company occupying the position of Functional Head (Departmental Head) and above.

“Unpublished price sensitive information” shall mean any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall ordinarily include, but shall not be restricted to, information relating to the following:

- i. Financial results;
- ii. dividends;
- iii. change in capital structure;
- iv. mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
- v. changes in key managerial personnel; and
- vi. material events in accordance with the listing agreement.

The Code

The principles of Fair Disclosure adopted by ARWSL are as follows:

1. To 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. To disseminate unpublished price sensitive information uniformly and universally through channels like widely circulated media (including print media) and / or through stock exchanges where its equity shares are listed in order to avoid selective disclosure.
3. Mr. Amit Rathi, Managing Director, is designated as Chief Investor relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information of the Company.
4. To promptly disseminate any unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise, in order to make such information generally available.
5. To provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. To ensure that information shared with analysts and research personnel is not unpublished price sensitive information.


7. To make and publish 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. To handle all unpublished price sensitive information on a need-to-know basis, i.e., Unpublished Price Sensitive Information should be disclosed only to those within the company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.

Amendments to the Code:

Any amendment to this Code, in whole or in part, shall be made only by the approval of the Board.

The Board may also establish further rules and procedures from time to time to give effect to the intent of this Code and to further the objective of good corporate governance.

This Code shall be published on the website of the Company.


.....
Chairman