



CIN No.: L45400MH2012PLC234941

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DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE  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

**[Under Regulation 2A and Regulation 8 of the Securities and  
Exchange Board of India (Prohibition of Insider Trading)  
Regulations, 2015]**

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## **INTRODUCTION**

The Securities and Exchange Board of India (“SEBI”) notified the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“Regulations”). This document embodies the policy in respect of a Code of Practices and Procedures for Fair Disclosures of Unpublished Price Sensitive Information (“Fair Disclosure Code”) for prohibition of Insider Trading and dealing in securities of the Atal Realtech Limited (“ARL/Company”), to be observed by all Employees, Directors, Designated Persons, Immediate Relatives of Designated Persons and Connected Persons, as and where applicable.

## **OBJECTIVE**

The Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“the Code”) is made pursuant to Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015. The Code has been framed in order to ensure that the Unpublished Price Sensitive Information (“UPSI”) is not disseminated to anyone other than for legitimate purposes, thereby maintaining confidentiality of the UPSI and fairness in dealing with all the stakeholders.

## **PRACTICES AND PROCEDURES**

The following principles of fair disclosure for the purposes of “Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information” shall be strictly followed by the Company with immediate effect:

1. The Company shall promptly disclose to the public "Unpublished Price Sensitive Information" (UPSI) that would impact price discovery, no sooner than such credible & concrete information comes into being.
2. The Company shall uniformly & universally disseminate information (UPSI) and avoid selective disclosure.
3. The Company has designated the Compliance Officer to deal with the dissemination of information and disclosure of UPSI.
4. The Company shall promptly disseminate UPSI that gets disclosed selectively, inadvertently or otherwise, to make such information generally available to all/public.
5. The Company shall render appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities, if any.
6. The Company shall ensure that the information shared with analysts and research personnel is not UPSI.
7. The Company shall develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on its official website, in order to ensure official confirmation and documentation of disclosures made.

The Company shall handle all UPSI on a need-to-know basis by creating suitable safeguards to avoid UPSI becoming available to any person who is not required to have access to such information. UPSI, may however be disclosed to persons who need such information for furtherance of legitimate purposes, performance of duties or discharge of legal obligations in relation to the Company. The policy for determination of “legitimate purposes” is as below:

For determining legitimate purposes, the below mentioned policy shall be adhered to:



## **LEGITIMATE PURPOSE**

The UPSI can be shared as an exception for Legitimate Purposes (as per its "Policy for determination of Legitimate Purposes" (**Annexure A**), provided it is not shared to evade or circumvent the prohibition under the Regulation), performance of duties, or discharge of legal obligations

## **REVIEW**

This code of conduct is subject to modification. The Board of Directors has requisite powers and authority to update and amend the code of Conduct from time to time.

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## ANNEXURE A

### POLICY FOR DETERMINATION OF LEGITIMATE PURPOSE [Under Regulation 3(2A) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015]

#### INTRODUCTION

This Policy, as a part of “Code of practices and procedures for fair disclosure of unpublished price sensitive information”, formulated under Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations 2015, will be known as "Policy for Determination of Legitimate Purposes" hereinafter referred to as the "Policy", and is prepared in accordance with Regulation 3(2A) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

#### OBJECTIVE

The objective of this Policy is to identify ‘Legitimate Purposes’ which will be considered as exception for the purpose of sharing / procuring Unpublished Price Sensitive Information (UPSI) relating to the Company or its listed securities or proposed to be listed securities, if any.

#### LEGITIMATE PURPOSE

"Legitimate Purposes" shall mean sharing of UPSI in the ordinary course of business by an Insider with the following, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations:

1. Promoters of the Company
2. Auditors (Statutory, Internal, Branch, Cost, Secretarial, GST and any other Auditor as applicable)
3. Staff Members of the Audit firm/team conducting the Audit
4. Collaborators
5. Lenders
6. Customers
7. Suppliers
8. Bankers
9. Legal Advisors
10. Insolvency Professionals
11. Consultants
12. Any other advisors/consultants/partners.

It is hereby clarified that any person in receipt of UPSI pursuant to a "legitimate purpose" shall also be considered as an "insider" for the purpose of this Code, the Insider Trading Policy and the Regulations and thus such persons shall maintain confidentiality of such UPSI in compliance with this Code, the Insider Trading Policy and the Regulations.

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