



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UNPUBLISHED PRICE SENSITIVE INFORMATION**

I. **Preface:**

1. This code of practices and procedures for fair disclosure of Unpublished Price Sensitive Information (UPSI) is formed under Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, which provides for formulation of Code of Practices and Procedures for Fair Disclosures of Unpublished Price Sensitive Information by the Board of Directors of the Company.
2. This Code shall be applicable with effect from 15th May, 2015

II. **Principle of Fair Disclosures for the purpose of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information**

This code intends to formulate a framework and policy for Fair Disclosure of events and occurrences that could impact price discovery in the market for Company's Securities. So as to ensure Fair Disclosures of events and occurrences that could impact price discovery in the market, the Board of Directors of the Company shall adhere the following code of practices and procedures for Fair Disclosure of Unpublished Price Sensitive Information and envisaged in Schedule-A of SEBI (Prohibition of Insider Trading) Regulations, 2015.

1. It shall be ensured that uniform and universal dissemination of UPSI is promptly made to avoid selective disclosures
2. The Whole Time Director of the Company is designated as Chief Investor Relation Officer to deal with dissemination and disclosures of UPSI.
3. It shall be ensured that prompt public disclosure of UPSI is made to make it generally available, once it is discovered that credible and concrete information having the potential of effective the price of securities of the Rachana Capital and Securities Limited exists or comes into being.
4. It shall be ensured that any UPSI which gets disclosed selectively or inadvertently is promptly disseminated through stock exchanges and made generally available.
5. The Company shall ensure that appropriate and fair responses and replies are promptly provided/given to the news reports and requests for verification of market rumours received from the regulatory authorities.





RACHANA

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6. It shall be ensured that no UPSI is shared with analysts and Research Personnel.
7. Best Practices shall be followed to ensure the recordings, transcripts of the proceedings of the Meetings with analysts and other investor relations conferences are disseminated by publishing the same on Website of the Company.
8. UPSI is to be handed on need -to-know basis.

For Rachana Capital and Securities Limited

R.K. Nizare

Rakesh Nizare
(Whole Time Director)

