



## **ASHIMA LIMITED**

### **CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION FOR ADHERING TO THE PRINCIPLES OF FAIR DISCLOSURE.**

*(As envisaged under Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and effective from 15<sup>th</sup> May, 2015.)*

The Board of Directors of Ashima Limited (“the Company”) has always strived to conduct the business in a fair and transparent manner with a view to protect the interest of all the stakeholders of the Company.

This code has been adopted by the adopted by the Board of Directors (Board) vide a Resolution by Circulation dated 13<sup>th</sup> May, 2015, passed on 23<sup>rd</sup> May, 2015 and noted by the Board at its meeting held on 27<sup>th</sup> June, 2015.

The Company shall adhere to the following principles of fair disclosure of unpublished price sensitive information with respect to it or its securities which is likely to affect price of the securities:

1. The Company shall endeavor to make prompt public disclosure of all unpublished price sensitive information(s) that may impact price discovery, as soon as credible and concrete information comes into being, in order to make such information generally available.
2. The Company shall endeavor to make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Company Secretary / Compliance Officer of the Company shall act as the Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall endeavor to make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.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 rumors by regulatory authorities.

6. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information. No communication shall be made by the Company to any analyst or investor of any Unpublished Price Sensitive Information or a part thereof at any such meetings with analysts or investor conferences. All information communicated at such meetings will be only such information that is available in public domain or otherwise disclosed on the website of the company.
7. The Company shall endeavor to 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 endeavor to put in place a system to ensure handling of all unpublished price sensitive information on a need-to-know basis.