

VIKALP SECURITIES LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

**(As per regulation 8(1) of SECURITIES AND EXCHANGE BOARD OF INDIA
(PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015**

OBJECTIVE

In order to undertake the business and to achieve the objectives for which it is being formed, a company is required to make various decisions, some on regular basis and some on event basis. Amongst them some informations concerning the working of the company are price sensitive which may have effect on the securities of the company. In order to maintain the confidentiality of such price sensitive informations which are not published and not in public domain and also for fair disclosure of such unpublished price sensitive information, **SECURITIES AND EXCHANGE BOARD OF INDIA** has formulated "**Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015**". In order to adhere to the above said regulation, the company (Vikalp Securities Limited) has formulated a code of practices and procedures for fair disclosure of unpublished price sensitive information.

EFFECTIVE DATE

15th of May, 2015

AMENDMENT

The code shall be subject to modification as may be deemed necessary in the interest of the Company and as and when required as per amendment in SECURITIES AND EXCHANGE BOARD OF INDIA (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015 and the Amendment, if made, shall be approved by the Board of Directors of the Company and shall form part of this code.

VIKALP SECURITIES LIMITED

DEFINITIONS

1 .COMPANY

Company here means Vikalp Securities Limited

2. UNPUBLISHED PRICE SENSITIVE INFORMATION

Any information, relating to the company or securities of the company, 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 including but not 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;
- (vi) Material events in accordance with the listing agreement

3. CHIEF INVESTOR RELATIONS OFFICER

An officer designated with the responsibility to deal with dissemination of information and disclosure of unpublished price sensitive information.

CODE

In order to maintain transparency while dealing with the price sensitive information and to prevent the misuse of unpublished price sensitive information by the insiders, the company has adopted the following code of practices and procedures for fair disclosure of unpublished price sensitive information :

- 1) The company shall ensure prompt 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.

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- 2) The company shall ensure uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- 3) Compliance Officer of the company has been designated as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
- 4) Company shall make appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- 5) Company shall ensure that the information shared with analysts and research personnel is not unpublished price sensitive information.
- 6) Company shall ensure that it will promptly disseminate the unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- 7) Company shall handle all unpublished price sensitive information on a need-to-know basis.
- 8) 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.

In order to comply with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, Company shall make all its efforts to timely disseminate the price sensitive information of the company through various channels like informing the stock exchanges where company is listed, posting the information on the website of the company, publishing the information in newspapers as and when required by it to make price sensitive informations generally available.