

## **CODE OF PRACTICES & PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

[Under Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

### **PREAMBLE**

Securities and Exchange Board of India ("SEBI"), has formulated the SEBI (Prohibition of Insider Trading) Regulations, 2015, notified to come into force with effect from May 15, 2015, to be applicable to all listed entities.

In terms of the said Regulations, Apple Finance Limited ("the Company") is required to formulate and publish on its official website, a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information. Accordingly, the Company's Board of Directors has formulated a specific a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code of Fair Disclosure").

This document embodies the said Code of Fair Disclosure and shall be deemed to have come in to force from May 15, 2015.

### **CODE OF FAIR DISCLOSURE**

The Code of Fair Disclosure is consistent with the said SEBI Regulations.

The Principles of Fair Disclosure adopted by the Company are as follows:-

1. To make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being, in order to make such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.
2. To make disclosures of uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.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Company shall act as the Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.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. To make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.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 To ensure that information shared with analysts and research personnel, if any, is not unpublished price sensitive information.

7. To develop and follow 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. To handle of all unpublished price sensitive information on a need-to-know basis.

The Company's Board of Directors may stipulate further guidelines, procedures and rules, from time to time, to ensure fair disclosure of unpublished price sensitive information and may delegate to any Director(s)/Company Secretary, the authority to amend or modify this Code, in whole or in part, subject to approval of the Board.

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

Any subsequent modification(s)/amendment(s) to the SEBI (Prevention of Insider Trading) Regulations, 2015 shall automatically apply to this Code.