



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FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE  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

*[Under Regulation 8(1) of the Security Exchange Board of India  
(Prohibition of Insider Trading) Regulations, 2015]*



# APIS INDIA LIMITED

(CIN: L51900DL1983PLC164048)

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## **Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information**

**[Pursuant to Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]**

### **A. Preface:**

In an endeavor to prevent the misuse of unpublished price sensitive information in the day-to-day business affairs and to promote the culture of fair disclosure of information in due compliance with the Principles of Fair Disclosures as set out in the SEBI (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred as “Regulations”), the Board of Directors of the Company, M/s APIS India Limited have formulated a Code of Conduct to be known as “**APIS India Limited: Code of Practices and Procedures for fair disclosure of unpublished price sensitive information**” (hereinafter referred as “Code for fair disclosure of UPSI” or “Code”).

### **B. Objects of the Code:**

The Code aims at:

- Preventing the misuse of unpublished price sensitive information within the Organization and practice of selective disclosures to the public;
- Acknowledging the necessity of communicating, providing or allowing access to information and promoting the principle of equality of access to information.

**C. Chief Investor Relations Officer:**

The Company Secretary or any other senior officer duly authorized by the Board of Directors of the Company, shall act as the Chief Investor Relations Officer, who would be responsible for satisfactory discharge of the duties and responsibilities laid down under this Code.

**D. Procedural aspect involved in complying with the principle of fair disclosure of information**

| S. No | Principle  | Procedure   |
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| 1.    | Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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. | In this regard, to ensure fair and timely disclosure of information that would have direct impact on the market price of the securities, the company generally follows the below-mentioned procedure:<br><br>a) Intimate the Stock Exchange well in advance about the Board Meeting in which any such proposal is to be considered.<br><br>b) Intimates the outcome of the Board Meeting within stipulated time periods.<br><br>c) Update the Stock Exchange about the current happenings in respect of the events that have direct bearing on the market sentiments for onwards dissemination to be public at large. |

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| 2. | Uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.   | <p>To ensure that the unpublished price sensitive information is evenly and properly disseminated, the Company generally, in compliance with the provisions of applicable status, follows the following procedure and practice:</p> <ul style="list-style-type: none"> <li>I. Intimates the said information to the Stock Exchange where the securities are listed, within the stipulated time period.</li> <li>II. Publicize the said information in the Newspaper.</li> <li>III. Uploading the said information on the official website under the Investors section as earliest as possible or as is stipulated under the various status.</li> </ul> |
| 3. | Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available. | <p>To ensure the authentication of the information to be disclosed to the stakeholders, the said information is generally cross verified by the Chief Investor Relationship Officer.</p> <p>However, if any information get disclosed selectively, inadvertently or otherwise the Company:</p> <ul style="list-style-type: none"> <li>i. Intimates the facts and rectified information to the Stock Exchange, where the securities of the Company are listed, for onwards dissemination to the shareholders.</li> <li>ii. Publicize the facts and rectified information, if required, in the Newspaper.</li> </ul>                                     |
| 4. | Appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.  | The Chief Investor Relations Officer shall be responsible for giving appropriate and fair response to quarries on news reports and requests for verification of market rumors by regulatory authorities.   |

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| <p><b>5.</b></p> | <p>Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.</p>   | <p>The Chief Investor Relations Officer/respective Department Heads shall take all the necessary measure to ensure that no unpublished price sensitive information is being disclose to analysts and research personnel.</p> <p>In this regard, whenever any such analysis and/or research personnel will approach the Company for seeking financial or any price sensitive information, the Compliance Officer or any other authorized representative of the Company shall obtain a Declaration from the said Association/Agency to the effect of such Association/Agency is seeking information for sole the purpose of educating investor and neither the said Association/Agency nor its Employees shall use the information for their personnel gain.</p> <p>The said Association/Agency will also be required to sign such other undertakings/Confirmation, as the Compliance Officer may deem fit, and give to the Compliance Officer, to make sure that no Insider Trading take place in the Company’s scrip from their end.</p> |
| <p><b>6.</b></p> | <p>Developing 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.</p> | <p>The Company, may time to time, authorize any concerned persons, depending upon the domain of conferences and meetings to make transcripts or records of proceedings of meetings with analysts.</p> <p>Further, the said proceedings shall be disclosed on the Official Website of the Company.</p>  |

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| 7. | Handling of all unpublished price sensitive information on a need-to-know basis. | Due procedure as prescribed in “APIS: CODE OF CONDUCT FOR PREVENTION OF INSIDER TRADING” would be followed to ensure that the unpublished price sensitive information be communicated only on a “need to know” basis i.e. Price Sensitive Information should be disclosed only to those who need such information to discharge their duties. |
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**Declaration**

The Company hereby declare that all the requisite measures shall be taken to ensure adherence with the principle of fair disclosure of unpublished price sensitive information.

**For APIS India Limited**



**Amit Anand**