

KHANDWALA SECURITIES LIMITED

CODE OF CORPORATE DISCLOSURE PRACTICES FOR PREVENTION OF INSIDER TRADING

Corporate Disclosure Policy

To ensure timely and adequate disclosure of price sensitive Information, the following norms shall be followed by Khandwala Securities Limited (“the Company”).

1. Prompt disclosure of price sensitive information

- Price sensitive information shall be given by the Company to stock exchanges as and when required ;
- For improving Investor access to Company’s public announcements, the Company shall endeavor to consider ways of supplementing information released to stock exchanges.

2. Responding to Market Rumours

The official designated for corporate disclosure shall be responsible for deciding whether a public announcement is necessary for verifying or denying rumours and then making the disclosure.

3. Timely Reporting of shareholdings/ownership and changes in ownership

The Company shall make timely and adequate disclosure of shareholdings/ownership by major shareholders and disclosure of changes in ownership as provided under any Regulations made under the Act and the listing agreement.

4. Disclosure/dissemination of price sensitive information with special reference to Analysts, Institutional investors

The Company should follow the guidelines given here under while dealing with analysts and institutional investors:-

i. Only Public information to be provided

The Company shall provide only public information to the analyst/research persons/large investors like institutions. Alternatively, the information given to the analyst can be uploaded on the Company’s website.

ii. Handling of unanticipated questions

The Company should be careful when dealing with analyst's questions that raise issues outside the intended scope of discussion. Unanticipated questions may be taken notice of and a considered response given later. If the answer includes price sensitive information, a public announcement should be made before responding.

iii. Simultaneous release of Information

When a company organizes meetings with analysts, the Company shall make a press release or post relevant information on its website after every such meet. The Company may also consider live web casting of analyst meets.

5. Medium of disclosure/dissemination

- i. Disclosure/dissemination of information may be done through various media for quick dissemination.
- ii. The Company shall ensure that disclosure to stock exchanges is made promptly.
- iii. The Company may also facilitate disclosure through websites;
- iv. The Company websites may provide a means of giving investors a direct access to analyst briefing material, significant background information and questions and answers.