

CIN : L74900MH1948PLC006791

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Policy Review on: 18th May 2024

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

Securities Exchange Board of India (SEBI) vide its circular No. LAD-NRO/GN/2014-2015/21/85 dated 15th January, 2015 has notified SEBI (Prohibition of Insider Trading) Regulations, 2015 to be effective from 15th May, 2015.

Pursuant to Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015, the Company shall formulate and publish on its website, a "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" (hereafter mentioned as the "Code"). Further, pursuant to Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015, the Company shall promptly intimate the stock exchange where the securities are listed such code and every amendment thereof.

The Company thus endeavors to preserve the confidentiality of Un-published Price sensitive Information and to prevent the misuse of the Information. To achieve these objectives and in compliance with the aforesaid SEBI regulations, the Board of Directors of the Company has adopted following Code in compliance with the Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015.

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 The Company shall ensure prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
2. The Company shall uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
3. Unless otherwise resolved by the Board of Directors, the Compliance Officer of the Company shall act as the Chief Investor Relations Officer (CIRO) to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall make efforts for prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

EMERALD LEISURES LTD.
(Formerly known as Apte Amalgamations Ltd.)

CLUB e EMERALD
"Where Dreams Come Alive"

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5. The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. The 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.
8. The Company shall handle of all unpublished price sensitive information on a need-to-know basis.

For **Emerald Leisures Limited**
(Formerly Known as **Apte Amalgamation Ltd**)

Director
Mr. Rajesh Loya
DIN No.: 00252470

