



CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

Prithvi Exchange (India) Limited

Effective from: 06.08.2022

Amended on : 14.02.2025

INTRODUCTION

Regulation (8) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (the "Regulations") requires a listed company to formulate and publish on its official website a "Code of Practices and Procedure for fair disclosure of Unpublished Price Sensitive Information" in adherence to the principles set out in Schedule A to the said Regulations.

POLICY

Accordingly, a new Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (the "Code") for Prithvi Exchange (India) Limited (the "Company") is hereby framed as under:-

1. The Company shall ensure prompt public disclosure of Unpublished Price Sensitive Information that would impact price discovery, as soon as it has credible and concrete information, in order to make such information „generally available“, i.e. to make the information accessible to the public on a non-discriminatory basis.
2. The Company shall ensure a uniform and universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure. Senior Management of the Company shall comply the requirement in Compliance of the Regulations and where required by Consultation with Board of Directors of the Company.
3. The Company shall ensure prompt dissemination of Unpublished Price Sensitive Information that gets disclosed selectively, inadvertently or otherwise to make such information „generally available“ as required under the Regulations and includes compliance of requirement under Clause 36 of Equity Listing Agreement with Stock Exchanges.

The Unpublished Price Sensitive Information shall be disseminated uniformly and universally to all stakeholders through Stock Exchanges and by posting the same on official website of the Company i.e. www.popularmaruti.com. The Company shall use its best endeavors to avoid selective disclosure of price sensitive information. However, if any information gets disclosed selectively or inadvertently or otherwise, endeavor shall be made to make generally available the above information through dissemination of the same to Stock Exchanges and/or by posting the same on the official website of the Company as soon as practicable.

4. The Company shall ensure an appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
5. The Company shall ensure that information shared with analysts and research personnel is not Unpublished Price Sensitive Information.
6. 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.
7. The Company shall ensure the handling of all Unpublished Price Sensitive Information on a need-to-know basis.
8. The Compliance Officer of the Company as appointed for the Purpose of code of conduct to regulate, monitor and report trading by insiders of Prithvi Exchange (India) Limited shall act as the Chief Investor Relations Officer (CIRO) for the purpose of dealing with dissemination of information and disclosure of Unpublished Price Sensitive Information as contained herein.

9. This code shall be read together with code of conduct to regulate, monitor and report trading by insiders of Prithvi Exchange (India) Limited.

10. The Company shall comply with Principles of Fair Disclosure for purposes of Code of Practices and procedures for Fair Disclosure of Unpublished Price Sensitive Information as required under the Regulations.