

***DOLAT* INVESTMENTS LIMITED**

Corporate Office: 301-308, Bhagwati House, Plot A/19, Veera Desai Road, Andheri (West), Mumbai- 400058

Tel.: 91-22-2673 2602/03/04/5570 4167/68/69/71 Fax: 91-22-26732642,

Corporate Identity Number: L67100DD1983PLC004760

Website: www.dolatinvest.com, E-mail: post@dolatinvest.com or grievances@dolatinvest.com

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

As required under Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, which stand further amended by the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 (hereinafter referred to as “**the Regulations**”), Dolat investments Limited, hereby notifies the “**Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information for adhering to the Principles of Fair Disclosure**” (hereinafter referred to as “**the Code**”).

The Code intends to formulate a framework and policy for fair disclosure of events and occurrences that would impact price discovery in the market for the securities of the Company. To achieve this objective, the Board of Directors shall adhere to the principles of fair disclosure mentioned hereunder in letter and in spirit, to ensure fair disclosure of events and occurrence that could impact price of its securities in the market.

PART A- Definitions

“**Company**” means DOLAT INVESTMENTS LIMITED

“**Board of Directors**” means Board of Directors of DOLAT INVESTMENTS LIMITED

“**Compliance Officer**” means the officer appointed by the Board of Directors as per the Regulations from time to time.

“**Insider**” means any person who is:

- i) a connected person; or
- ii) in possession of or having access to unpublished price sensitive information;

“**Immediate Relative**” means a spouse of a person, and includes parent, sibling, and child of such person or of the spouse, any of whom is either dependent financially on such person, or consults such person in taking decisions relating to trading in securities;

“**Generally Available Information**” means information that is accessible to the public on a non-discriminatory basis;

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"**Securities**" shall have the meaning assigned to it under the Securities Contracts (Regulation) Act, 1956 (42 of 1956) or any modification thereof except units of a mutual fund;

"**Trading**" means and includes subscribing, buying, selling, dealing, or agreeing to subscribe, buy, sell, deal in any securities, and "trade" shall be construed accordingly.

"**Unpublished Price Sensitive Information or UPSI**" means any information, relating to a Company or its securities, directly or indirectly, that is not Generally Available Information which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: –

- (i) financial results;
- (ii) dividends;
- (iii) change in capital structure;
- (iv) mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
- (v) changes in key managerial personnel;

Words and Expressions not defined in this code shall have the same meaning as contained in SEBI (Prohibition of Insider Trading) Regulations, 2015 or the Securities and Exchange Board of India Act, 1992.

PART B -Principles for Purposes of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

- a. The Company will make prompt public disclosure of Unpublished Price Sensitive Information (UPSI) that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
- b. The Company shall ensure uniform and universal dissemination of UPSI to avoid selective disclosure.
- c. For the purpose of this Code, Managing Director and in his absence Chief Financial Officer and in his absence, Company Secretary of the Company is designated as the Chief Investor Relations Officer to deal with the dissemination of information and disclosure of UPSI.
- d. The Company shall ensure prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

Registered Office: Office No. 141, Center Point, Somnath, Daman, Daman & Diu-396210

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- e. The Company shall endeavor to appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
- f. The Company shall ensure that information shared with analysts and research personnel is not UPSI.
- g. The Company will develop the 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.
- h. UPSI shall be handled on a need-to-know basis.

PART C- Policy for determination of "Legitimate Purposes"

(Pursuant to sub-regulation 2A of Regulation 3)

- a. Sharing of UPSI in the ordinary course of business by an Insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals, other advisors or consultants shall be considered as "legitimate purposes" provided that such sharing has not been carried out to evade or circumvent the prohibitions of the Regulations.
- b. Any person in receipt of UPSI pursuant to a legitimate purpose shall be considered an "Insider" for purposes of the Regulations and due notice shall be given to such person to maintain confidentiality of such UPSI in compliance with the said Regulations. Such person is also required to ensure the confidentiality of UPSI shared with him/her, in compliance with the Regulations.
- c. UPSI as defined should be disclosed only to those who need such information to discharge their duties or legal obligations by virtue of their respective role and function, whose possession of such information will not give rise to a conflict of interest or appearance of misuse of such information.
- d. Adequate and effective internal controls will be laid out including entering into Non Disclosure Agreements with connected persons to ensure the confidentiality of UPSI in compliance with the Regulations.

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PART D- Powers of Board of Directors

The Board of Directors may establish further rules and procedures, from time to time, to give effect to the intent of this Code.

The decision of the Board of Directors with regard to all matters relating to the Code will be final and binding.

PART E – Disclosure of the Code in Public Domain

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

Further, this Code and every subsequent amendment made thereto, shall be promptly intimated to the stock exchange where the securities are listed.

Note: Above amended code approved through resolution by circulation on 28.03.2019 and is effective from April 1, 2019