



**ANNA
INFRASTRUCTURES
LTD.**

CIN: L65910UP1993PLC070612

BACKGROUND

Securities and Exchange Board of India (SEBI) has come up with a new set of regulation 'SEBI (Prohibition of Insider Trading) Regulation, 2015' which has been notified on 15th January 2015 and will be effective from 15th May, 2015. The 2015 regulation will repeal SEBI (Prohibition Insider Trading) Regulation 1992 which has remained the principle guideline over a decade, curbing the incidence of Insider Trading in listed securities.

In deference to the abovementioned Regulations M/s Anna Infrastructures Limited (hereinafter referred to as the Company), through its Board of Directors has formulated the following codes.

The 'Code of Fair Disclosure of Unpublished Price Sensitive Information of the Company' has been made pursuant to Regulation 8 of the SEBI (Prohibition of Insider Trading) Regulations, 2015, hereinafter referred to as the "Regulations".

The 'Code of Conduct for Insiders of the Company' has been made pursuant to Regulation 9 of the Regulations.

These Codes shall be applicable to Directors/Officers/Connected Person/Designated Employees of the Company and their immediate relatives as defined herein and contravention of these Codes shall attract such sanctions and disciplinary actions as may be decided by the Board of Directors on case to case basis apart from the penalties under the Regulation/Act' which the Securities and Exchange Board of India could impose upon the defaulter.



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UNPUBLISHED PRICE SENSITIVE INFORMATION**

[Under Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

(Effective from 15th May, 2015)

The Board of Directors of Anna Infrastructures Limited ('the Company') has always thrived to conduct its business in a fair and transparent manner with a view to protect the interest of all the stakeholders of the Company.

The Company shall adhere to the following principles of fair disclosure of unpublished price sensitive information with respect to it or its securities which is likely to affect price of the securities:

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 The Company shall ensure prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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 ensure uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Company Secretary/Compliance Officer of the Company shall act as the Chief Investor Relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumors 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 and follow 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.



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The Chairman & Managing Director of the Company, subject to approval of the Board, is authorized to amend or modify this Code in whole or in part.

The Board of Directors may stipulate further guidelines, procedures and rules, from time to time, to ensure fair disclosure of unpublished price sensitive information. This Code shall be published on the official web site of the Company.

This Code and every subsequent modification, alteration or amendment made thereto, shall also be intimated to the Stock Exchange where the securities of the Company are listed.

The Code has been adopted by the Board of Directors of Anna Infrastructures Limited in its meeting held on 30th May, 2015 and shall be deemed to have come into force with effect from 15th May, 2015. Subsequent modification(s) / amendment(s) to SEBI (Prevention of Insider Trading) Regulations, 2015 shall automatically apply to this Code.
