



**CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF MATERIAL
INFORMATION OF PRECISION CAMSHAFTS LTD**

**As required by clause 8(1) of Chapter IV of Securities and Exchange Board of India
(Prohibition of Insider Trading) Regulations, 2015**

This Policy of disclosure of Price Sensitive information related to Securities of Precision Camshafts Ltd is known as Code of Conduct for Fair Disclosure of information related to issues which may be Price Sensitive, as required by clause 8 of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

1. Equity shares of Precision Camshafts Limited are listed on BSE and NSE.
2. Company Secretary of the Company acts as Compliance Officer of this purpose. In absence of Company Secretary due to separation/pre-occupation with other work, Board of Directors may place the responsibility for compliance with some other senior official of the Company, until such time new Company Secretary is appointed and assumes office/ or is available for this work.
3. Price sensitive information is disseminated on continuous basis to the Stock exchanges as required by SEBI (Listing obligations and disclosure requirements Regulations) 2015. This is further supplemented by Public announcements by way of Press release and release of information on website of the Company.
4. Disclosure of information to press and website is also overseen by the Director, Finance of the Company.
5. Compliance Officer is responsible for continuous disclosure of price sensitive information to stock exchanges, analysts, shareholders, media and for educating concerned staff on disclosure policy and procedures
6. Information disclosure and dissemination is normally approved by the Managing / Whole-time Directors/ Senior Management of the Company
7. In case any information is accidentally disclosed without prior approval by any official, the person responsible is expected to draw attention of Compliance Officer. Compliance Officer shall thereafter take steps for its immediate and proper disclosure.
8. Company does not provide response to mere market rumors. Compliance Officer, in consultation with the Whole-time Directors / Senior Management of the Company, examines the news item and after investigation provides response to media and / or Stock Exchanges if necessary, else states Company's policy of not providing reaction to mere market rumors



9. Only public information is provided to Analysts, Research personnel, Institutional and large shareholders. Alternatively information provided to Analysts is simultaneously put in public domain which may include hosting the same on the website of the Company.
10. At least two representatives of the Company remain present at a meeting with Analysts, stock brokers, institutional investors. Efforts are made to record the proceedings of such meetings, where situation permits. For unanticipated questions from Analysts, brokers, investors, note of the questions is made and response is given later. If the response/information to be provided is considered as price sensitive, the same is put in public domain, before providing the response/information is provided to the questions/ queries.
11. Press release is issued along with website update in respect of the information released at Analyst meet / brokers' conference. Company may also webcast such meetings.
12. All unpublished price sensitive information is shared strictly on need to know basis.