

APRAAVA RENEWABLE ENERGY PRIVATE LIMITED

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UNPUBLISHED PRICE SENSITIVE INFORMATION**

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UNPUBLISHED PRICE SENSITIVE INFORMATION**

[Under Regulation 8(1) of Securities and Exchange Board of India
(Prohibition of Insider Trading Regulations), 2015]

This 'Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information' ("Code of Fair Disclosure") of Apraava Renewable Energy Private Limited shall come into force from the date of receipt of the final listing and trading approval from BSE Limited.

The Company shall ensure:

1. Prompt public disclosure of Unpublished Price Sensitive Information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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. Uniform and universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure. As an exception to the general rule, the Unpublished Price Sensitive Information can be shared by an Insider for "legitimate purposes", as determined in Sr. No. 10 below.
3. Prompt dissemination of Unpublished Price Sensitive Information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
4. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
5. Ensuring that information shared with analysts and research personnel is not Unpublished Price Sensitive Information.
6. Developing 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. Handling of all Unpublished Price Sensitive Information on a need-to-know basis.
8. Dissemination of information.
9. Mr. Naveen Munjal, Director of the Company shall be designated as the Chief Investor Relations Officer who, in consultation with the Compliance Officer, shall deal with the dissemination of information and disclosure of Unpublished Price Sensitive Information.
10. Determination of Legitimate Purpose:
 - i. The Company shall be guided by the definition of 'Legitimate Purpose' as provided in its 'Code of Conduct for Prohibition of Insider Trading' (the "Insider Trading Code")

and the Securities and Exchange Board of India (Prohibition of Insider Trading), Regulations, 2015.

- ii. The Manager or the Whole-Time Director, shall be the final deciding authority on whether an item constitutes a Legitimate Purpose or not on a case-to-case basis. In the event of lack of clarity on whether an item constitutes a Legitimate Purpose or not, the person sharing the information shall forward the matter for determination by the Compliance Officer, who shall decide on the matter.

Disclaimer:

This Code is subordinate to the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015, or other applicable laws, regulations, rules, etc. including the Companies Act, 2013 (collectively referred to as the “Regulations”), as amended, and in the event of disparity between this Code and the Regulations (including due to subsequent amendments to the Regulations), the provisions of the Regulations will prevail and there would not be any necessity to amend this Code to that extent.

Version	Date of Approval	Approving Authority	Effective Date
1	04 September 2025	Board of Directors	29 September 2025