A. K. CAPITAL FINANCE LIMITED

BUILDING BONDS

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

Adopted/Review of the Investment Policy	**Board Meeting Date**
Adoption of the Policy	March 31, 2017
Amendment of the Policy (*Formatting done to keep uniformity*)	November 03, 2025

Last reviewed on November 03, 2025

This document specifies the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ('UPSI') ("**Code**") duly adopted by A.K. Capital Finance Limited ("**Company**"). This Code intends to formulate a framework and policy for fair disclosure of events and occurrences that could impact price discovery in the market for the Company's listed securities. This Code is consistent with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

Principles of fair disclosures adopted by the Board of the Company are as follow:

1. To promptly make public disclosure of UPSI that would impact price discovery. Such disclosures would be made promptly when credible and concrete information comes into being in order to make such information generally available.

2. The Company shall endeavor to make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosures.

3. The Chief Investor Relation Officer of the Company shall deal with dissemination and disclosure of UPSI.

4. In the event of any UPSI getting disclosed selectively or inadvertently, the Company shall promptly disseminate the same to make it generally available through Stock Exchanges.

5. The Company shall provide appropriate and fair response to the queries on the news report and requests for verification of market rumors received from regulatory authorities.

6. The Company shall not provide any UPSI to the analysts and research personnel while sharing information with them.

7. To handle all UPSI on a need-to-know basis.