



Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

KAIZEN AGRO INFRABUILD LIMITED (Formerly: Anubhav Infrastructure Limited)

The Board of Directors of Kaizen agro Infrabuild Limited (the Company) are expected to manage the affairs of the Company in a fair, transparent and ethical manner keeping in view the needs and interest of all the stakeholders.

As envisaged under Chapter — IV of SEBI (Prohibition of Insider Trading) Regulation, 2015. Regulation 8, provides for the formulation of a "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information' (hereinafter referred to as the "Code").

A. The Company will adopt the following so as to ensure fair disclosure of events and occurrence that could have impact on price of the securities in the market of the Company.

1. The Company shall make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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 The Company shall ensure uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.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. Unless otherwise resolved by the Board of Directors, the Company Secretary of the Company shall act as the Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. There shall be prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise. It shall be ensured that such information is made generally available.
5. Appropriate and fair response shall be provided against queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Board of Directors shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.

7. Best practices will be followed 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. Unpublished price sensitive information shall be followed on a need-to-know basis.

This code shall be applicable upon the Members of the Board of Directors of the Company with effect from 15th May, 2015 which is further amended on March 09, 2024.

The Board of Directors, reserves the right to amend or modify this Code in whole or in part, at any time without assigning any reason whatsoever

Any subsequent modification and / or amendments brought about by SEBI in the SEBI (Prohibition of Insider Trading) Regulation, 2015 shall automatically apply to this Code.

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