

23<sup>rd</sup> January, 2026

To,  
BSE Limited,  
Phiroze Jeejeebhoy Towers,  
Dalal Street,  
Mumbai - 400001

**Scrip Codes:** 977162, 977225, 977394 and 977441  
**ISIN No.:** INE1QWF07014, INE1QWF07030, INE1QWF07048 and INE1QWF07022

Dear Sir/ Madam,

**Sub.: Intimation under Regulation 8(2) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ('PIT Regulations')**

Pursuant to Regulation 8(2) of the PIT Regulations, please find enclosed the "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" ('Fair Disclosure Code'), as reviewed and approved by the Board of Directors at its meeting held today, 23<sup>rd</sup> January, 2026.

This is for your information and records.

Thanking you,

**Yours faithfully,**  
**For Greaves Finance Limited**

**Fredrick Pinto**  
**Company Secretary & Compliance Officer**  
**ICSI Membership No - A22085**

**GREAVES FINANCE LIMITED**

(formerly known as Greaves Leasing Finance Limited)

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OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

*Under Regulation 8 of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015*

## 1. Background

The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“PIT Regulations”), requires the Board of Directors of a company, whose securities are listed on a stock exchange, to formulate and publish on its official website, a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“Code”). The Code had been formulated on the principles set out in Schedule A of the PIT Regulations.

## 2. Principles of Fair Disclosure of “Unpublished Price Sensitive Information” (“UPSI”)

The Company shall follow below principles to ensure timely, fair and adequate disclosure of UPSI with respect to it or its securities which is likely to affect price of its securities:

- a. The Company shall make prompt public disclosure of UPSI that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
- b. The Company shall ensure uniform and universal dissemination of UPSI to avoid selective disclosure.
- c. The Company Secretary of the Company shall act as the “Chief Investor Relations Officer” (“CIRO”) to deal with dissemination of information and disclosure of UPSI.
- d. The Company shall ensure prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- e. The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- f. The Company will ensure that information shared with analysts and research personnel is not UPSI.
- g. The Company will 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.
- h. The Company will ensure handling of all UPSI on a need-to-know basis.

## 3. Policy for determination of Legitimate Purposes

In line with Regulation 3 (2A) of PIT Regulations, the Company shall have a policy to determine the legitimate purpose for which the UPSI is being shared and the same shall form part of this Code. Following are the principles to determine the legitimate purpose:

**"Legitimate Purpose"** shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of SEBI (Prohibition of Insider Trading) Regulations, 2015.

This shall also include any other genuine or reasonable purpose as may be determined by the CIRO of the Company.

**To determine whether the information sharing is for legitimate purpose or not, the person seeking the information or sharing the information shall satisfy the following conditions to the extent applicable:**

- i. Sharing of information where such information is in furtherance of performance of duties;
- ii. Sharing of information for the discharge of legal obligation (i.e. contracts, agreements etc.) or pursuant to earlier agreed agreement/ MoU;
- iii. Sharing of information pursuant to the business objects of the Company under its MOA;
- iv. Sharing of information pursuant to any statutory obligation;
- v. Sharing of information following compliance of regulatory or judicial order;
- vi. Sharing information during due diligence for merger & amalgamation, an IPO or any other corporate restructuring;
- vii. Sharing of UPSI for any other purpose as may be prescribed under the PIT Regulations, 2015, as amended from time to time.

Provided that such sharing should not be carried out to evade or circumvent the PIT Regulations, 2015.

**Legitimate Purpose shall ordinarily include but not restricted to the information relating to the following:**

- i. Sharing of information with auditors for audit purpose;
- ii. Sharing of information with fiduciaries (bankers, partners, collaborators, consultants, etc) and intermediaries for the completion of business transactions;
- iii. Sharing of information with lawyers/ statutory authorities to fulfill any legal obligation related to the Company;
- iv. Giving insight about the merger, amalgamation or restructuring of the Company pursuant to legal requirement, for time being in force;
- v. Responding to statutory bodies etc.

Note: Any information shared in pursuant to the above provisions, the recipient of the information shall be considered as Insider for the purpose of this Code and is expected to maintain confidentiality of such information till such information has been released by authorised representative of the Company in public domain, violation of which shall attract severe punishment/penalty.

#### **4. Amendment**

This Code shall be reviewed from time to time and any amendments or modifications in this Code shall be subject to the review and approval by the Board of Directors of the Company. However, the amendment in the regulatory requirements shall be binding on the Company and shall prevail over this Code, even if not incorporated in the Code.

#### **5. Communication and Dissemination of the Code**

A copy of this Code and every amendment thereto shall be promptly intimated to the Stock Exchange(s) where the securities of the Company are listed. This Code shall also be posted on the website of the Company i.e. <https://www.evfin.co/>