

Ref No. PIL/SECR/2015-2016/

Dated: 29.05.2015

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

**Ref: Compliance under Regulation 8 & 9 of the Securities Exchange Board of India
(Prohibition on Insider Trading) Regulations, 2015**

Dear Sir,

Pursuant to Regulation 8 of the Securities Exchange Board of India (Prohibition on Insider Trading) Regulations, 2015 ("Insider Regulations"), a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (The Code) has been formulated and adopted by the Board of the Directors of the Company w.e.f. 29.05.2015. Find attached herewith a copy of Code for your records. The same is also being Uploaded On the website of the Company at <http://www.palsoft.in//>

Thanking You.

Yours truly,
PALSOFT INFOSYSTEMS LIMITED


SHILPA AGARWAL
COMPANY SECRETARY

Encl.: as above

Palsoft Infosystems Limited

(Formerly : Autolite Capital and Finance Ltd.)

D-469, Road No. 9A V.K.I. Area, Jaipur -302013 (INDIA), Tel : +91-141-2333994, Fax : +91-141-2330426
Email : palsoftinfo@gmail.com, Web : www.palsoft.in

**Palsoft's Code of Practices and Procedures for Fair Disclosure of
Unpublished Price Sensitive Information**

**(As envisaged under SEBI (Prohibition of Insider Trading) Regulations, 2015)
Principle of Fair Disclosure for purposes of Code of Practices and Procedures for
Fair Disclosure of Unpublished Price Sensitive Information**

The Company will adhere to the following so as to ensure timely and adequate disclosure of Price Sensitive Information with respect to it or its securities, which is likely to affect price of the securities.

1. The Company will make prompt public disclosure of Unpublished Price Sensitive Information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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 The Company will make, uniform and universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure.
3. The Compliance Officer of the Company will be Chief Investor Relations Officer to deal with dissemination of information and disclosure of Unpublished Price Sensitive Information.
4. The Company will make prompt dissemination of Unpublished Price Sensitive Information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company will provide, appropriate and fair response to queries on news reports and request for verification of market rumours by regulatory authorities.
6. The Company will ensure that information if any shared with analysts and research personnel are not Unpublished Price Sensitive Information.
7. The Company will develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the website of the Company to ensure official confirmation and documentation of disclosures made.
8. The Company will handle all Unpublished Price Sensitive Information on a need-to know basis. This Code was duly approved by the Board in its Meeting held on May 29, 2015 and the Code shall be deemed to have come into force from May 29, 2015.



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