

The Code

Code of Practice and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“the Code”) under the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation, 2015 and any amendments thereof.

Objective:

The Company endeavours to preserve the confidentiality of Unpublished Price Sensitive Information and to prevent the misuse of such information. This code is framed as per the requirement of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015. This code shall be applicable upon approval / ratification by the Board of the Company with effect from date of approval by the Board of Directors.

Any subsequent modification(s) and / or amendment(s) brought about by SEBI in Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation, 2015 as applicable shall automatically apply to this code.

The company has policy to preserve the confidentiality of Unpublished Price Sensitive Information and to prevent misuse of such information.

PRINCIPLES OF FAIR DISCLOSURE FOR THE PURPOSES OF CODE OF PRACTICES AND PROCEDURE FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION:

This code intends to formulate a stated framework and policy for fair disclosure of events and occurrences that could impact price discovery in the market for the securities of the Company. To achieve this objective, the members of the Board of Directors shall adhere to the following principles in letter as well as in spirit:

- i. The Company will promptly make public disclosure of Unpublished Price Sensitive Information as soon as the information or the decisions are validated by the Board and simultaneously upload such information on Company’s official website in order to make such information generally available to Investors & Members of the Company.
- ii. The Company will disclose Unpublished Price Sensitive Information to the stock exchanges and on its official website to avoid selective disclosure.
- iii. Unless otherwise resolved by the Board of Directors, the Chairman and / or Director and / or Company Secretary is designated as the Chief Investor Relation Officer to take all required action for dissemination of information and disclosure of Unpublished Price Sensitive Information indiscriminately.
- iv. In the event of inadvertent selective disclosure of Unpublished Price Sensitive Information, the Company will take prompt action to ensure such information is generally available.
- v. The Company shall provide appropriate assistance and fair response to regulatory authorities for verification of news reports or market rumours.

- vi. The Board shall further ensure that the information shared with analysts and research personnel is not unpublished price sensitive information.
- vii. The Company shall take reasonable steps, to make generally available, any discussion on Unpublished Price Sensitive Information at the meeting of Analyst or Investor Relations through the official website to ensure official confirmation and indiscriminate disclosure.
- viii. Unpublished Price Sensitive Information shall be handled on a “Need to Know” basis.