

## **CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION (CODE OF FAIR DISCLOSURE)**

### **1. INTRODUCTION**

The Code of practices and procedures for Fair Disclosure of Unpublished Price Sensitive Information (Code of Fair Disclosure) is made pursuant to Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015 read with Schedule A to these Regulations.

### **2. PRINCIPLES OF FAIR DISCLOSURE**

- The Company shall make a prompt public disclosure of Unpublished Price Sensitive Information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
- The Company shall ensure a uniform and universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure by communicating the same to the Stock Exchange(s) and disclosing the same on our website.
- The Compliance Officer shall be the Chief Investor Relations Officer who shall respond to the enquiries from the Stock Exchange(s), the media or others with dissemination of information and disclosure of Unpublished Price Sensitive Information.
- The Company shall promptly disseminate Unpublished Price Sensitive Information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- The Company shall provide an appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- The Company shall develop best practices 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.
- The Company can share all Unpublished Price Sensitive Information only on a need-to-know basis and for legitimate Purposes and not to evade or circumvent the prohibition of the Regulations.
- The Company shall ensure that information shared with analysts and research personnel is not Unpublished Price Sensitive Information. Company may share Unpublished Price Sensitive Information in the ordinary course of business for the legitimate purpose.

*“Legitimate purpose” shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers,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 these regulations.*

### **3. DISCLOSURE OF THE CODE**

This Code shall be uploaded on the Company's website for public information and the Code and every amendment thereto shall be promptly intimated to stock exchange(s) where the Securities of the Company are listed.

### **4. AMENDMENT**

The Board of Directors of the Company, in compliance with applicable laws, rules & regulations, may amend / substitute any provision(s) with a new provision(s) or replace this entire Code with a new Code. In case, the Code differ from any law, rules, regulations etc. for the time being in force, the law, rule, regulation etc. shall supersede the Code.