



Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information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

- A. The Code of practices and procedures for Fair Disclosure of Unpublished Price Sensitive Information (Code of Fair Disclosure) is made pursuant to Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015 read with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. The Board of Directors of the Company are authorised to amend these Codes, as and when deemed necessary. The amendment in the Disclosure Code shall be promptly intimated to the stock exchanges where the securities are listed.

In view of this code;

- The Company shall make a prompt public disclosure of Unpublished Price Sensitive Information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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- The Company shall ensure a uniform and universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure.
- The Compliance Officer shall be the Chief Investor Relations Officer who shall deal with dissemination of information and disclosure of Unpublished Price Sensitive Information.
- The Company shall promptly disseminate Unpublished Price Sensitive Information that gets disclosed selectively, inadvertently or otherwise to make such information Generally Available.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- The Company shall handle all Unpublished Price Sensitive Information on a need-to-know basis.
- The Company shall ensure that information shared with analysts and research personnel is not Unpublished Price Sensitive Information. Company may share Unpublished Price Sensitive Information in the ordinary course of business for the legitimate purpose.

B. Policy for determination of Legitimate Purposes

“Legitimate purpose” shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers,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

C. 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.