

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

With the promulgation of SEBI (Prohibition of Insider Trading) Regulations, 2015, this 'Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information', has been framed pursuant to Clause 8 of *Chapter IV* of the said Regulations.

The code aims to set out the procedures involved in inter-alia public disclosure of unpublished price sensitive information, dissemination of unpublished price sensitive information, addressing queries on news reports, sharing of information with analysts etc.

The broad principles in relation to the aforesaid are as follows:

1. The Company shall promptly make public disclosure of unpublished price sensitive information that would impact price of its shares. The same shall be made publicly available as soon as credible and concrete information thereof becomes available to the Company.
2. The Company shall take all reasonable steps for uniform and universal dissemination of all unpublished price sensitive information. The Company shall avoid any selective disclosure in this regard.
3. Person authorized/nominated by the Board of Directors for this purpose shall be deemed to be the Chief Investor Relations Officer (CIRO) in relation to dealing in/dissemination of information and disclosure of price sensitive information.
4. If any unpublished price sensitive information gets disclosed selectively/inadvertently or otherwise, then the Company shall promptly disseminate such information to any public domain wherefrom the concerned information will be generally available.
5. CIRO shall provide appropriate and fair response to the queries on news reports and requests for verification of the market rumors by the regulatory authorities.
6. The Company, while dealing with the analysts and researchers, shall ensure that the information shared are not in the nature of unpublished price sensitive information.
7. The Company shall record the proceedings of meetings with the analysts and also record the proceedings of investor relations conferences. Record of such proceedings shall be placed on the website of the Company.
8. The Company shall handle all price sensitive information on a need to know basis.

Terms used in this Code shall carry the same meaning as stated under the SEBI (Prohibition of Insider Trading) Regulations, 2015 or any other regulation, act, statute or otherwise framed and promulgated from time to time.