

## **CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

The Securities and Exchange Board of India (“SEBI”) vide its Notification Dated 15<sup>th</sup> January, 2015, has introduced SEBI (Prohibition of Insider Trading) Regulation, 2015 (“said Regulation”) to be effective from 15<sup>th</sup> May, 2015.

Regulation 8 of the said Regulations requires a listed company to formulate and publish on its official website a “Code of Practices and Procedures for Fair disclosure of Unpublished Price Sensitive Information” (hereinafter referred to as “Code”), in adherence to principles set out in Schedule A to the said Regulations.

Accordingly in compliance with the said Regulations, the Board of Directors of the Company has adopted the Code as enumerated below in order to ensure timely and adequate disclosure of Unpublished Price Sensitive Information (“UPSI”) and to prevent misuse of such information.

### **1. Prompt Disclosure:**

There shall be prompt public disclosure of UPSI that would impact price discovery as soon as it has credible and concrete information, in order to make such information, generally available to the public.

### **2. Uniform and Universal Dissemination:**

The uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure shall be ensured.

### **3. Chief Investor Relation Officer:**

Unless otherwise decided, the Compliance Officer of the company shall act as a Chief Investor Relation Officer for the purpose of dealing with dissemination of information and disclosure of UPSI to the Stock Exchange (s), where securities of the company are listed and also upload the same on the official website of the Company, from time to time.

### **4. Prompt Dissemination:**

There shall be prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available to the public.

### **5. Response to Queries:**

The company shall ensure appropriate and fair response to all queries received from Stock Exchange (s) including queries on news reports and request for verification of market rumors by regulatory authorities.

**6. Sharing of Information with Analysts and Research Personnel:**

The Company shall ensure that information shared with analysts and research personnel, if any, is not unpublished price sensitive information.

**7. Documentation of Disclosures made:**

The Company shall develop best practices to make transcripts or records of proceedings of meetings with Analysts and other investor relations conferences. As a good practice thereof may be uploaded on the official website of the Company which will ensure official confirmation and documentation of disclosures made.

**8. Handling of UPSI:**

All UPSI shall be handled by the employees on a need-to-know basis i.e the UPSI shall be disclosed only to those within the company who need information for legitimate purposes under legal obligation, to discharge the performance or duties and use only for the purpose for which it is meant for.

**9. Disclosures:**

This Code shall be uploaded on the official website of the Company.

This Code shall be intimated to the Stock Exchanges where the securities of the Company are listed.

**10. Amendment:**

This Code may be amended with the approval of Board of Directors of the Company from time to time to comply with the said Regulations as may be applicable for the time being in force.

Any amendment to the Code shall be promptly intimated to the Stock Exchanges, where the securities of the Company are listed and shall be uploaded on the official website of the Company