

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

Regulation (8) of SEBI (Prohibition of Insider Trading) Regulations, 2015 requires a listed company to formulate and publish on its website a “Code of Practices and Procedure for Fair Disclosure of Unpublished Price Sensitive Information”, in adherence to the principles set out in **Schedule A** to the said regulations. Accordingly, a code is hereby framed as under:

1. The Company shall ensure prompt public disclosure of unpublished price sensitive information (UPSI) that would impact price discovery, as soon as it has credible and concrete information, in order to make such information ‘generally available’, i.e., to make the information accessible to the public on a non- discriminatory basis.
2. The Company shall ensure a uniform and universal dissemination of UPSI to avoid selective disclosure.
3. The Company shall ensure prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise, to make such information ‘generally available’.
4. The Company shall ensure an appropriate and fair response to queries on news reports, and requests for verification of market rumours by regulatory authorities.
5. The Company shall ensure that information shared with analysts and research personnel is not UPSI.
6. The Company shall ensure handling of all UPSI on a need-to-know basis.
7. The Compliance Officer will act as Chief Investor Relations Officer for the purpose of dealing with dissemination of information and disclosure of UPSI as contained herein.

This Code is subject to review from time to time.

This policy was adopted by the Board of Directors, in their meeting held on 27 July 2020.
