

**Code of Practices and Procedure for Fair Disclosure of
Unpublished Price Sensitive Information**

[As envisaged under Regulation 8(1) of SEBI (Prohibition of Insider Trading), Regulations, 2015]

Principles for Fair Disclosure for purposes of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)

1. The Company will make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
2. The Company will make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Compliance Officer of the Company shall act as Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company will make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company will provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company will ensure that information, if shared, with analysts and research personnel are not unpublished price sensitive information.
7. The Company will make or record of proceedings of meetings with analysts and other investor relations conferences on the official website of the Company to ensure official confirmation and documentation of disclosures made.
8. The Company will handle all unpublished price sensitive information on a need-to-know basis.
9. * Policy for determination of Legitimate Purpose: No Person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to the company except in furtherance of legitimate purposes, performances of duties or discharge of legal obligations.

The term “legitimate purposes” shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers,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 SEBI (Prohibition of Insider Trading) Regulations as amended from time to time.

Any person in receipt of unpublished price sensitive information pursuant to a “legitimate purpose” will be considered an ‘insider’ for the purposes of the Regulations and due notice shall be given to such person to maintain the confidentiality of UPSI.

* As per SEBI Prohibition of Insider Trading (Amendment) Regulations, 2018

