## CODE OF PRACTICE AND PROCEDURE FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION:

Pursuant to **SEBI (Prohibition of Insider Trading) Regulation**, **2015** the company has following code of practice and procedures for fair disclosure of unpublished price sensitive information:

The Company:

- **1)** Shall make prompt public disclosure of UPSI that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
- **2)** Shall ensure uniform, continuous and universal dissemination of UPSI information to avoid selective disclosure.
- **3)** Shall authorize one or more key managerial personnel for Dissemination of information and Disclosure of UPSI.
- **4)** Shall make prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- **5)** Shall give appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- 6) Shall ensure that information shared with analysts, research personnel and investor groups is not UPSI.
- **7)** Shall develop best practices to record meetings with analysts and research persons and other investor relations conferences.
- 8) Shall ensure that all unpublished price sensitive information are Handled on a need-to-know basis.