



CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI)

(Approved by the Board of Directors on 19th May, 2015 and further amended on 26th March, 2019)

As per Regulation (8) of SEBI (Prohibition of Insider Trading) Regulations, 2015 and its amendment from time to time, a listed company to formulate and publish on its official website a “Code of Practices and Procedure for fair disclosure of Unpublished Price Sensitive Information” (“Code of fair Disclosure”) in adherence to the principles set out in Schedule A to the said Regulations. Accordingly, the Code of Fair Disclosure, which is a part of the Code of Conduct under Regulations 9 is as under:

1. The Company shall ensure prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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 The Company shall ensure a uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Compliance Officer of the Company shall act as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall ensure prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall ensure an appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. The Company shall develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
8. The Company shall ensure the handling of all unpublished price sensitive information on a need-to-know basis.
9. The Company has formulated a policy for determination of “legitimate purpose” as a part of “Codes of Fair Disclosure and Conduct” as set out as Annexure 8 of code of Internal Procedure and conduct for regulating, monitoring and reporting of trading by Designated Persons.