

### Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

This code is formulated on the principles, as set out in Schedule A to the SEBI (Prohibition of Insider Trading) Regulations, 2015.

SEBI has vide notification dated 31<sup>st</sup> December 2018, amended SEBI (Prohibition of Insider Trading) Regulations, 2015 effective from 1<sup>st</sup> April 2019; as required under the said Regulations, a revised code of Practices and Procedures for Fair Disclosure of unpublished Price sensitive Information [UPSI], [hereinafter referred to as the "code"] has been framed for adoption by the Board of Directors of the company.

1. Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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. Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
3. The compliance officer will act as Chief Investor Relations Officer and shall deal with dissemination of information and disclosure of unpublished price sensitive information.
4. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.
7. Developing 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. Handling of all unpublished price sensitive information on a need-to-know basis.
9. In terms of the SEBI Regulations, the term "legitimate purpose" is clarified to include sharing of UPSI in the ordinary course of business by an insider with Company's partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing of UPSI has not been carried out to evade or circumvent the prohibitions of the SEBI Regulations.
10. Any person in receipt of UPSI pursuant to a "legitimate purpose" shall be considered an "insider" for purposes of these regulations and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with these regulations.

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