

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

A code of practices and procedures for fair disclosure of unpublished price sensitive information for adhering each of the principles is set out below:

- i. 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.
- ii. Uniform and universal dissemination of UPSI to avoid selective disclosure.
- iii. The Company's Chief Financial Officer and Compliance Officer serve as its Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
- iv. Prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- v. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- vi. Ensuring that information shared with analysts and research personnel is not UPSI.
- vii. 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.
- viii. Handling of all UPSI on a need-to-know basis. i.e UPSI should be disclosed only to those within the company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.
- ix. For "legitimate purposes" the Company may share information including unpublished price sensitive information in the ordinary course of business by an insider, with partners, collaborators, lenders, customers, suppliers, merchant bankers,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, other

advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the regulation.

- x. Any person in receipt of unpublished price sensitive information pursuant to a "legitimate purpose" shall be considered an "insider" for the purpose of the regulation and such persons are also required to ensure the confidentiality of unpublished price sensitive information shared with them, in compliance with the regulation and Insider Trading policy of the Company, which is available in the website of the Company.
- xi. A structured database containing the names of such persons or entities as the case may be with whom information is shared for legitimate purposes along with Permanent Account Number (PAN) or any other identifier authorized by law where PAN is not available. Such databases shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.

(Note: Pursuant to SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 the Board of Directors at their meeting held on 22nd March, 2019 approved the incorporation of Clauses ix to xi above, which shall come into force with effect from 1st April 2019.)