

**CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED  
PRICE SENSITIVE INFORMATION**

The Securities and Exchange Board of India ("SEBI") vide its Notification dated. 15th January, 2015, has introduced SEBI (Prohibition of Insider Trading) Regulation, 2015 ("said Regulation"). These regulations came into effect from 15th May, 2015.

Chapter IV of said Regulations deals with Code of fair disclosures and conduct. Clause 8 of said regulation interalia requires the Board of Directors of every Listed Company to formulate and publish on its official website a "Code of Practices and Procedures for Fair disclosure of Unpublished Price Sensitive Information" (hereinafter referred to as "Code"), in adherence to principles set out in Schedule A to the said Regulations. Further, the same Code and every amendment thereto shall be promptly intimated to the Stock Exchange where the securities of the Company are listed.

Accordingly in compliance with the said Regulations, the Board of Directors of the Company at their meeting held on 22<sup>nd</sup> May, 2015 has formed and adopted the Code in line with principles set out in Schedule A to the Regulation. The Code is enumerated here in below:

**1. Prompt Disclosure:**

The Company shall make timely and prompt public disclosure of Unpublished Price Sensitive Information which can impact price discovery of the Securities of the Company. The same shall be made by the Company as soon as credible and concrete information comes into being in order to make such information generally available.

**2. Uniform and Universal Dissemination:**

The Company shall ensure uniform and universal dissemination of unpublished price sensitive information to avoid any selective disclosure.

**3. Chief Investor Relation Officer:**

Unless otherwise decided, the Compliance Officer of the company shall act as a Chief Investor Relation Officer for the purpose of dealing with dissemination of information and disclosure of Unpublished Price Sensitive Information.

**4. Prompt Dissemination:**

The Company shall make all efforts to promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.



**5. Response to Queries:**

The company shall ensure proper mechanism for appropriate and fair response to queries on news reports and request for verification of market rumours by regulatory authorities.

**6. Sharing of Information with Analysts and Research Personnel:**

The Company shall ensure that information shared with analysts and research personnel, if any, is not unpublished price sensitive information.

**7. Documentation of Disclosures made:**

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 of the Company which will ensure official confirmation and documentation of disclosures made.

**8. Handling of Unpublished Price Sensitive Information:**

The Company shall ensure and form a mechanism such as to handle all Unpublished Price Sensitive Information on a need-to-know basis only.

**9. Disclosures:**

This Code shall be uploaded on the official website of the Company. As per the requirements the Code and every amendment thereto shall be promptly intimated to the Stock Exchanges where the securities of the Company are listed.

