

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION
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(As envisaged under Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015)

Preface:

Securities and Exchange Board of India (SEBI) has notified the SEBI (Prohibition of Insider Trading) Regulations, 2015 w.e.f. from 15th May, 2015.

As per the said regulations, the Company shall formulate and publish on its website, a code of practices and procedures for fair disclosure of unpublished price sensitive information that it would follow.

Principles for the purpose of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information:

The Company will adhere to the following principles so as to ensure fair disclosures of events and occurrence that could impact price of its securities in the market:

1. There shall be prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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. There shall be uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. Unless other resolved by the Board of Directors, the Company Secretary shall act as the Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. There shall be prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise. It shall be ensured that such information generally available.
5. Appropriate and fair response shall be provided against the queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Board of Directors shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.

7. Best practices shall be developed 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. Unpublished price sensitive information shall be followed on a need-to-know basis.

Powers of Board of Directors:

The Board of Directors may also establish further rules and procedures, from time to time, to give effect to the intent of this Code and to further the objective of good corporate governance.

Dissemination of Code:

This Code shall be shall be hosted on the website of the Company. Further this code and every amendment made thereto, shall be promptly intimated to the Stock Exchange where the Securities of the Company are listed.
