

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UNPUBLISHED PRICE SENSITIVE INFORMATION**

[Pursuant to Regulation 8 of SEBI (Prohibition of Insider Trading) Regulation, 2015]

1. Preambles

The Securities and Exchange Board of India (SEBI), in its endeavor to protect the interests of investors in general, had formulated then SEBI (Prohibition of Insider Trading) Regulation, 2015 under the power conferred on it under the SEBI Act, 1992. These regulations came into force with effect from 15th May, 2015 and the same have been made applicable to all Companies whose shares were listed on Indian Stock Exchange. Accordingly our Company is required to formulate Code of Practices and procedures for Fair Disclosures.

2. Objective

The Code is required for the Company to ensure timely and adequate disclosure of Unpublished Price Sensitive Information (UPSI) which would impact the Price of the Company's Securities and to maintain the uniformity, transparency and fairness in dealing with all stakeholder and ensuring adherence to applicable laws and regulations. Further, the Company endeavor to preserve the confidentiality of UPSI and to prevent misuse of the same.

3. Chief Investor Relation Officer

The Board of Directors of the Company may designate any senior officer of the Company as Chief Investor Relation Officer, to deal with dissemination of information and disclosure of UPSI.

The Company Secretary shall act as Chief Investor Relation Officer, unless the Board of Directors of the Company decided otherwise.

4. Disclosure of Price Sensitive Information

- a) Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
- b) The Company shall make uniform and universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure.
- c) If there would any UPSI disclosed to meet the statutory or business requirement selectively, inadvertently or otherwise, such information shall be disseminated promptly to make such information generally available.
- d) The company shall disclose and disseminate the UPSI to Stock Exchanges continuous and immediate basis, as may be appropriate and required.
- e) If it seems necessary to make disclosure to Stock Exchanges about events materially bearing on performance/ operation of the Company as well as Price Sensitive Information, as per Listing Agreements with Stock Exchange, the CFO and Managing Director will take a view on materiality of events that qualify for disclosure, appropriate time and details for disclosures.

5. Responding to Market Rumours

The Chief Investor Relation Officer shall promptly, appropriately and fairly make response to queries on news reports and requests for verification of market rumours by regulatory authorities or Stock Exchanges.

6. Dealing with Analysts and Research Professionals

Company shall ensure that information shared with analysts and research personnel is not UPSI.

The Company shall adhere to follow 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.

7. Handling of Information on Need to Know Basis

All information shall be handled with in the Company on a need to know basis. No UPSI shall be communicates within or outside the Company except for legitimate purposes, performance of duties or discharge of any legal obligations.

8. Notification

This code of conduct shall be circulated to every Promoters/ Directors/ Designated Employees/ Officers of the Company to let them be informed about the desired conduct under the provisions of SEBI (Prohibition of Insider Trading) Regulation, 2015 by the HR department.

9. Amendment

The Company reserves its right to amend or modify this Policy in whole or in part as circumstances so warrants, at any time without assigning any reason whatsoever.