



**Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)**

Regulation (8) of the newly introduced SEBI (Prohibition of Insider Trading) Regulation, 2015 requires a listed company to formulate and publish on its official website a "Code of Practices and Procedures for Fair Disclosure of "Unpublished Price Sensitive Information (UPSI)" in adherence to the principle set out in Schedule A to the said Regulations. Accordingly, a code is hereby framed as under;

1. The Company shall ensure prompt public disclosure of UPSI that would impact price discovery, as soon as it has credible and concrete information, in order to make such information 'generally available', i.e. to make the information accessible to the public on a non-discriminatory basis.
2. The Company shall make, uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Company shall ensure prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information 'generally available'.
4. The Compliance Office of the Company will be chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
5. The Company shall ensure an appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company shall ensure that, information if any shared with analysts and research personnel is not UPSI.
7. 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 to ensure official confirmation and documentation of disclosure made.
8. The Company shall ensure the handling of all UPSI on a need-to-know basis.

The Code was duly approved by the Board of Directors of the Company and Code shall come into force from 15<sup>th</sup> May, 2015.

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