

CODE OF FAIR DISCLOSURE

As required under Regulation 8 of the SEBI (Prohibition of Insider Trading) Regulations, 2015, the code of practices and procedures for fair disclosure of Unpublished Price Sensitive Information (UPSI) forms part of this Code and the same is appended below:

- a. 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.
- b. Uniform and universal dissemination of UPSI to avoid selective disclosure.
- c. Designation of a senior officer as a Chief Investor Relations Officer to deal with dissemination of information and disclosure of UPSI. The Chief Investor Relations Officer may, along with the Compliance Officer, coordinate the dissemination of UPSI.
- d. Prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- e. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- f. Ensuring that information shared with analysts and research personnel is not UPSI.
- g. 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.
- h. Handling of all UPSI on a need-to-know basis.
- i. In order to identify whether sharing of UPSI is for legitimate purpose, the Designated Person shall take into consideration the following: -
 - Sharing of UPSI is for statutory purpose.
 - Sharing of UPSI is mandated by a Regulator.
 - Sharing of UPSI for business purpose internally for performance of day-to-day activities.
 - Sharing of UPSI for any purpose as approved by Compliance Officer in consultation with the Managing Director.

(Approved by the Board on July 17, 2024 and made effective from July 17, 2024)