

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information
[Framed under regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

In consonance with the principles of fair disclosure specified in SEBI (Prohibition of Insider Trading Regulations), 2015, (herein after referred to as “Insider Trading Regulations”) the Company would adhere to following practice and procedure for fair disclosures in respect of unpublished price sensitive information (UPSI) relating to the Company and/ or its securities

1. The Company shall promptly make public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being and as soon as the information or the decisions are validated by the Board of Director of the Company to National Stock Exchange of India Limited (NSE), BSE Limited (BSE) and Ahmedabad Stock Exchange Limited (ASE) and upload such information on the Company’s official website in order to make such information generally available to investors and members of the Company.
2. The Company shall make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure by making simultaneous disclosure to NSE, BSE and ASE and also at the website of the Company.
3. Mr.Ramesh Shenoy.K., Compliance Officer is designated as Chief Investor Relations Officer to take all required action for dissemination of information and disclosure of unpublished price sensitive information indiscriminately.
4. In case of selective disclosure of unpublished price sensitive information inadvertently or otherwise, the Company shall make prompt dissemination of such unpublished price sensitive information to ensure that such information is generally available.
5. The Chief Investor Relations Officer shall provide appropriate assistance and fair response to queries raised by regulatory authorities on news reports and requests for verification of market rumours.
6. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.

7. The Company shall take reasonable steps to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences are generally available by uploading such transcripts and records available to the Company on the official website to ensure official confirmation and documentation of disclosures made.
8. Unpublished price sensitive information shall be handled on a “need-to-know basis”, i.e., unpublished price sensitive information shall be disclosed only to those who need the information by virtue of statutory requirement, contractual obligation to discharge their duties / obligations etc. in the interest of the Company.