



CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

The Board of Directors adopted the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("CODE") framed on the basis of the principles of fair disclosure outlined in the SEBI (Prohibition of Insider Trading) Regulations, 2015. These Regulations were further amended by the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018. Accordingly, the Board of Directors of the Company would follow the following practice and procedure for the fair disclosure of unpublished price sensitive information.

1. The Company will make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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. The Company will make, uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Compliance Officer of the Company will be the chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company will make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company will provide, appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. The Company will ensure that, information if any shared with analysts and research personnel is not unpublished price sensitive information.
7. The Company will make transcript or records of proceedings of meetings with analysts and other investor relation conferences on the website of the Company to ensure official confirmation and documentation of disclosures made.
8. The Company will handle all unpublished price sensitive information on need to know basis.

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9. An Insider can share unpublished price sensitive information, subject to the prior approval of the Board of Directors or the Audit Committee of the Company, in the ordinary course of business and for legitimate purposes with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals, other advisors or consultants of the Company, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the SEBI(Prohibition of Insider Trading), Regulations as amended.

A handwritten signature in black ink, appearing to read 'Blair', with a long horizontal stroke extending to the right.