

## **POLICY FOR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE OR MATERIAL INFORMATION**

The Company shall adhere to the following principles for fair disclosure of Unpublished Price Sensitive or Material Information:

- a) Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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) Timely disclosure of every Material event or information. Uniform and universal dissemination of unpublished price sensitive or Material event or information to avoid selective disclosure.
- c) Prompt dissemination of unpublished price sensitive or Material event or information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- d) Proper disclosure of Material events or information with respect to the subsidiaries, as per applicable rules & regulations
- e) Appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
- f) Ensuring information shared with analysts and research personnel is not unpublished price sensitive information.
- 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- h) Handling of all unpublished price sensitive or Material information on a need-to-know basis
- i) Ensuring compliance with the listing provisions and other applicable rules and regulations
- j) Alignment with Company's codes & policies including Code of Business Ethics and Communication Policy.

The CEO, CFO & Compliance Officer of the Company shall jointly deal with the determination, dissemination and disclosure of unpublished price sensitive or material event or information.

#### **Material event or information**

An event or information shall be considered Material if:

- it is deemed to be material under applicable laws and regulations or
- omission of the event or information, is likely to result in discontinuity or alteration of event or information already available publicly; or
- omission of the event or information is likely to result in significant market reaction if the said omission came to light at a later date;
- if in the opinion of the Board of Directors of the Company the event or information is considered material.

#### **Archival of Information**

Every material event or information, which has been disclosed to the stock exchange, shall be uploaded on the website of the Company and shall be retained for a period of 5 years, after which it shall be scrapped or archived or retained, as may be decided by the Compliance officer of the Company. Archived information will be maintained in safe and secure place to ensure timely and proper retrieval as and when necessary.