

## **INSIDER TRADING CODE & CODE OF FAIR DISCLOSURE**

The Company has adopted the **Insider Trading Code and Code of Fair Disclosure** in accordance with the applicable provisions of the **SEBI (Prohibition of Insider Trading) Regulations, 2015**, as amended from time to time.

The Company is committed to maintaining the highest standards of integrity, transparency and fairness in dealing with its securities and information relating to the Company. The Code establishes a framework for regulating trading in the securities of the Company and preventing the misuse or communication of **Unpublished Price Sensitive Information (UPSI)**.

### **Key Commitments**

The Company is committed to:

- Establishing appropriate standards and procedures for regulating and monitoring trading in the securities of the Company.
- Preventing the communication, disclosure or misuse of UPSI, except as permitted under applicable law.
- Ensuring fair, timely and adequate disclosure of material information to investors and other stakeholders.
- Maintaining the confidentiality of UPSI and restricting access to such information on a legitimate need-to-know basis.
- Implementing appropriate procedures relating to pre-clearance, trading restrictions and monitoring of trades by designated persons, wherever applicable.
- Ensuring compliance with the applicable provisions of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

### **Code of Fair Disclosure**

The Company is committed to ensuring fair and equitable disclosure of UPSI and material information.

The Company endeavours to make prompt, fair and adequate disclosure of UPSI wherever such disclosure is required under applicable laws and regulations. The Company does not ordinarily make selective disclosure of UPSI to any particular investor or stakeholder.

The Company takes reasonable measures to ensure that UPSI is disseminated in a fair and non-discriminatory manner and that appropriate records of disclosures are maintained.

### **Unpublished Price Sensitive Information**

For the purposes of the Code, UPSI means information relating to the Company which is not generally available and which, upon becoming generally available, is likely to materially affect the price of the securities of the Company.

The Company requires persons who are in possession of UPSI to maintain its confidentiality and not to communicate, provide or allow access to such information except where permitted for legitimate purposes, performance of duties or discharge of legal obligations.

### **Trading Restrictions**

The Company requires all designated persons and other persons covered by the Code to comply with the applicable trading restrictions and procedures prescribed by the Company.

Where applicable, trading in the securities of the Company is subject to pre-clearance requirements, trading window restrictions and other controls prescribed under the Code and applicable SEBI regulations.

No person is permitted to trade in the securities of the Company while in possession of UPSI, except as permitted under applicable law.

### **Compliance and Review**

The Company maintains appropriate systems and procedures for monitoring compliance with the Code and applicable insider trading regulations.

The Company expects all its Directors, designated persons, employees and other persons covered by the Code to comply with the requirements relating to confidentiality, disclosure and trading in the securities of the Company.

The Company reviews and amends the Code from time to time to ensure continued compliance with amendments to the **SEBI (Prohibition of Insider Trading) Regulations, 2015** and other applicable laws and regulatory requirements.