

## **MARGO FINANCE LIMITED**

### **CODE OF FAIR DISCLOSURE**

**APPROVED IN THE BOARD MEETING DATED: 13.05.2015**

In pursuance of chapter 4 of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation, 2015 the Board of Directors of the Company has formulate a code of fair disclosure of Un-published price sensitive information. Accordingly the Company would adhere to the following principles of fair disclosure practices and procedures in respect to the Un-published price sensitive information.

1. Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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. Uniform and universal dissemination of unpublished price sensitive information shall ensure to avoid selective disclosure.
3. Company Secretary will also be the Chief Investor Relations Officer (CIRO) to deal with dissemination of information and disclosure of unpublished price sensitive information.
  - CIRO/any other authorised person shall ensure that the information shared with the analysts and research personnel is not UPSI and that principle such as, equality of access to information, call and meeting with analysts etc. are being followed.
  - CIRO shall ensure development of the best practice to make transcripts or record of proceeding of meeting with analysts/other investor relations conference available on the official website to ensure official confirmation and documentation of disclosure made.
4. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. Company Secretary shall ensure that disclosures of shareholding pattern, Quarterly/Annual Financial Results, Dividend and Record Date/ Book Closure etc., as required under the Listing Agreement with Stock Exchange are made in a timely and adequate manner.

The Board may, if deem fit, advice any additional disclosure with respect to decision on any agenda item place before the Board. The Company Secretary shall ensure prompt disclosure of the same in accordance with the Board's direction.

6. In line with the Company practice, the Compliance officer shall ensure release of all the official Press Release simultaneously to the Stock Exchange. This press release shall also be posted on the website of the Company.

He shall ensure appropriate and fair response to the queries on news reports and requests for verification of market rumours by regulatory authorities/stock exchange in consultation with Head of the concerned department to which the news report/ market rumours pertain and the CIRO.

7. The Company Secretary shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
8. 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.
9. It shall ensure that all UPSI shall be handled within the Company on need-to-know basis and shall not be communicated, provided or allow access to, except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligation.