

CODE OF CORPORATE DISCLOSURE PRACTICES

Overseeing and coordinating disclosure:

1. The Board of Directors of the Company shall identify an employee who would be responsible to ensure timely and adequate disclosure of Price Sensitive Information (Public Spokesperson) pursuant to this Code as required under the Regulations. In case there is no Public Spokesperson appointed by the Board, the Compliance Officer shall discharge the relevant functions.
2. In case the Public Spokesperson is not the Compliance Officer, he/she shall report to the Directors.
3. The Public Spokesperson shall be responsible for ensuring that the Company complies with continuous disclosure requirements, overseeing and coordinating disclosure of Price Sensitive Information to stock exchanges, analysts, shareholders and media, and educating staff on disclosure policies and procedures.
4. All disclosure/dissemination whatsoever of any information (save and except disclosure required to be made under any law or under this Code) on behalf of the Company shall be first marked to the Public Spokesperson, for approval. Any such information shall be made public or published on behalf of the Company only if the same is approved by the Public Spokesperson. In case of doubt, the Public Spokesperson, shall consult and seek approval of the Managing Director before dissemination of such information.
5. Should any dissemination of information on behalf of the Company takes place without prior approval referred above, out of accidental omission, by any Employee or Director of the Company, such Employee/Director shall forthwith inform the Public Spokesperson, about such disclosure irrespective of the fact whether such information is Price Sensitive Information or not.

Responding to market rumours:

6. The Employees/Directors of the Company shall promptly direct any queries or requests for verification of market rumours received from stock exchanges or from the press or media or from any other source to the Public Spokesperson.
7. The Public Spokesperson shall on receipt of requests as aforesaid, consult the Managing Director as the case may be and respond to the same without any delay.
8. The Public Spokesperson shall be also responsible for deciding in consultation with the Managing Director of the Company as to the necessity of a public announcement for verifying or denying rumours and thereafter making appropriate disclosures.
9. All the requests/queries received shall be documented and as far as practicable, the Public Spokesperson shall request for such queries/requests in writing. No disclosure in response

to the queries/request shall be made by the Public Spokesperson unless the Managing Director approves the same.

Timely reporting of shareholdings and changes in ownership:

10. The Compliance Officer shall be responsible for ensuring that disclosures of shareholdings/ownership of major shareholders and disclosure of changes in ownership as required under the Stock Exchange Listing Agreements and/or any rules/regulations made under the Securities & Exchange Board of India Act, 1992 are made in a timely and adequate manner. Any such shareholding reporting by the Compliance Officer shall also be reported to the Managing Director from time-to-time.

Disclosure/dissemination of price sensitive information with special reference to analysts, institutional investors:

11. No person, except those authorized by the Directors shall disclose any information relating to the Company's Securities to analysts and institutional investors. The Public Spokesperson shall be invited to meetings/ conferences organized by the Company with the analysts/institutional investors.

12. All Directors, Officers and Employees of the Company should follow the guidelines given hereunder while dealing with analysts and institutional investors: -

Sharing of non public information:

13. The Directors, Officers and Employees shall provide only public information to the analysts/ research persons/ large investors like institutions. In case nonpublic information is proposed to be provided, the person proposing to so provide information shall consult the Directors, in advance. The Public Spokesperson in such cases shall ensure that that the information provided to the analyst/research person/investor as above is made public simultaneously with such disclosure.

14. The Company shall take extreme care and caution when dealing with analysts' questions that raise issues outside the intended scope of discussion.

15. The Public Spokesperson should tackle the unanticipated questions carefully. The unanticipated questions may be noted and a considered response be given later in consultation with the Directors. If the answer to any question requires dissemination of Price Sensitive Information, the Public Spokesperson shall report the same to the Directors and obtain necessary approval for its dissemination to the Stock Exchanges/public announcement through press. The Public Spokesperson shall, after dissemination of such Price Sensitive Information aforesaid, respond to such unanticipated questions.

Recording of discussion:

16. All the analyst, broker or Institutional Investor meetings shall be attended by the Public Spokesperson and another senior Employee(s) of the Company. The Public Spokesperson in

order to avoid misquoting or misrepresentation, shall arrange for recording the discussions at the meeting.

Simultaneous release of information:

17. Whenever the Company proposes to organise meetings with investment analysts/institutional investors, the Company shall make a press release or post relevant information on its website after every such meeting. The Company may also consider live webcasting of analyst meets.

18. The Public Spokesperson shall be responsible for drafting of the press release or the text of the information to be posted on the Company's website, in consultation with the Managing Director.

Medium of disclosure/ dissemination:

19. The Company shall disseminate all Price Sensitive Information on a continuous and in a timely manner to stock exchanges where its Securities are listed and thereafter to the press. As a good corporate practice, the Price Sensitive Information disclosed to the Stock Exchanges and to the Press may also be supplemented by prompt updates on the Company's website. The Company may also consider other modes of public disclosure of Price Sensitive Information so as to improve investor access to the same.

20. The information filed by the Company with the Stock Exchanges under the Stock Exchange Listing Agreement shall also be posted on the Company's website.