

Annexure A

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI)

- (A) The Company Secretary of the Company shall act as a Chief Investor Relations Officer to deal with dissemination of information and disclosure of UPSI

- (B) To ensure timely and adequate disclosures, the following norms shall be followed by the Company as a good corporate disclosure practice :
 - (1) The Company shall promptly disclose to the public all USPI 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 shall follow uniform and universal dissemination of UPSI to avoid selective disclosure
 - (3) Chief Investor Relations Officer shall be responsible for deciding whether a public announcement is necessary for verifying or denying rumors and then making the disclosure
 - (4) Chief Investor Relations Officer shall also make an appropriate and fair response to the queries on news reports and requests for verification of market rumors by regulatory authorities
 - (5) While dealing with analysts or research persons or large investors like institutions, the Company shall provide only public information. Alternatively, the information given to analysts or research persons shall be simultaneously made public at the earliest
 - (6) Information disclosure/ dissemination may normally be approved in advance by the Compliance Officer. If information is accidentally disclosed without prior approval, the person responsible may inform the designated officer immediately, even if the information is not considered price sensitive
 - (7) The Company shall handle all UPSI on a need to know basis