

Framework to avoid insider trading

Currently the following things are ensured to avoid insider trading in the shares of the Company

- The price sensitive information is handled on need to know basis only i.e. it is disclosed only to those persons within the company who need the information to discharge their duties.
- The financial results/ statements are not shared over the e-mails but the same are uploaded on a secure internal system and the access is granted on need to know basis.
- The financial results/ statements are not sent to the directors in advance and the same are kept on the table on the day of the meeting itself.
- The financial results are sent to the advertising agencies only after its approval and submission to the Stock Exchanges.
- As soon as the stock exchanges are informed about the date of Board meeting to consider the approval of financial results, the designated employees under the code are advised not to deal in the shares of the company.
- Requirement to obtain pre-clearance from the Company Secretary for buying /selling 25,000 shares or more.

Proposed action plan for avoiding insider trading

- Obtain the demat account Nos. and PAN Nos. of designated employees and their dependents (as defined in the code).
- Provide the above data to the Registrars.
- Tracking the dealings in the shares of the company by the designated employees and their dependents.
- To verify that the dealings are not carried out during the trading window closure, pre-clearance, if applicable, has been taken, and no opposite transactions were entered within six months from the earlier transaction.