



CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

(Under Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015)

The Company shall

- (a) make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
- (b) Ensure uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- (c) Compliance Officer or any other officer designated in this regard shall act as the Chief Investor Relations Officer of the Company to deal with dissemination of information and disclosure of unpublished price sensitive information.
- (d) ensure prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- (e) endeavor appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- (f) Ensure that the information shared with analysts and research personnel is not unpublished price sensitive information.
- (g) 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.
- (h) ensure that all unpublished price sensitive information are handled on a need-to-know basis.

Compliance Officer shall ensure that the principles of fair disclosures of Unpublished Price Sensitive information are adopted and adhered to before the same being published on the website of the Company www.kushaltradelink.com .