

SUNKIND INDIA LIMITED

POLICY ON FAIR DISCLOSURE OF UPSI

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION ("FAIR DISCLOSURE POLICY")

For the purpose of fair disclosure of Unpublished Price Sensitive Information, the Company adopts the following principles:

- 1) The Compliance Officer or any other person as may be authorised by the Board shall act as the Chief Investor Relations Officer for the purpose of dissemination of information and disclosure of Unpublished Price Sensitive Information.
- 2) The Company shall promptly disclose Unpublished Price Sensitive Information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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, subject to the provisions of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 ('SEBI Listing Regulations').
- 3) The Company shall follow uniform and universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure.
- 4) The Company shall promptly disseminate Unpublished Price Sensitive Information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- 5) The Company shall make appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- 6) The Company through its representative(s) would participate in meetings with analysts, media persons and institutional investors and release the presentation or transcripts, wherever required, in accordance with the provisions of the SEBI Listing Regulations.
- 7) The Company's representative(s) shall ensure that information shared with analysts, institutional investors and research personnel is only such information which is generally available to the public on non-discriminatory basis, and that such information is shared in accordance with the provisions of the SEBI Listing Regulations.
- 8) The Company shall handle all Unpublished Price Sensitive information on a need-to-know basis in the following manner:
 - (i) Any Unpublished Price Sensitive Information selectively disclosed to any person must be pursuant to consultation and approval from the concerned departmental head of the Company. The recipient of such information should be appropriately informed of this Code.
 - (ii) The concerned departmental head shall make sure while dealing with third parties that confidentiality agreements or non-disclosure agreements shall be entered into wherever necessary to keep the information confidential.



- 9) Legitimate Purpose shall include sharing of Unpublished Price Sensitive Information in the ordinary course of business by an insider with partner(s), collaborator(s), lender(s), customer(s), supplier(s), merchant banker(s), lawyer(s), legal advisor(s), auditor(s), audit firm(s), diligence professional(s), insolvency professional(s) or other advisor(s) or consultant(s) or operator(s) or management service provider(s) or business service provider(s), bank(s), analyst(s), insolvency professional entity(ies), consultant(s), bank(s) and other employee(s) etc., assisting, advising or engaging with the Company from time to time in order to perform duties or discharge of legal obligations i.e. on need to know basis, provided that such sharing has not been carried out to evade or circumvent the provisions of the Insider Trading Regulations.

