

CAPRIHANS INDIA LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

1. INTRODUCTION:

The Securities and Exchange Board of India (“SEBI”) notified the SEBI (Prohibition of Insider Trading) Regulations, 2015 (“Regulations”) on January 15, 2015, which is effective May 15, 2015. Pursuant to regulation 8 of the Regulations, Caprihans India Limited (CIL) is required to formulate a code of Practices and procedures for Fair Disclosure of Unpublished Price Sensitive Information (“Fair Disclosure Code”).

2. OBJECTIVES:

In compliance with the above requirements and Regulations, the Board of Directors of CIL has formulated the Fair Disclosure Code based on Schedule A of the said Regulations. CIL endeavors to ensure timely and adequate disclosure of price sensitive information.

3. CODE:

The Code of practices and procedures for fair disclosure of unpublished price sensitive information for adhering each of the principles is set out below:

- 3.1 The Company shall promptly make public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
- 3.2 The Company shall disseminate unpublished price sensitive information on uniform and universal basis to avoid selective disclosure.
- 3.3 The Compliance Officer will act as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.

- 3.4 The Company shall promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
 - 3.5 The Company shall give appropriate and fair response to queries on news reports and request for verification of market rumors by regulatory authorities.
 - 3.6 The Company shall ensure that information shared with analyst and research personnel is not unpublished price sensitive information.
 - 3.7 The Company shall place transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website.
 - 3.8 All unpublished price sensitive information shall be handled on a need-to-know basis.
4. The Fair Disclosure Code is subject to review by the Board of Directors as and when deemed necessary.
