

# CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION



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**CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

**1. INTRODUCTION**

On January 15, 2015 the Securities Exchange Board of India (“SEBI”) notified the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time (“Regulations”) which replace the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992 with effect from May 15, 2015.

The Regulations for the time being force inter alia prohibits (i) communication of Unpublished Price Sensitive Information (“**UPS**I”) (ii) procurement of price sensitive information and (iii) trading in securities when in possession of UPSI. The Regulations require the Company to enact and adopt a code which lays down the internal procedures for regulating, monitoring and reporting of trading by Designated person(s) and their Immediate Relatives. (“Code”). Accordingly, the Code adopted by the Board of Directors is enclosed herewith.

**2. OBJECT AND COMMENCEMENT**

This Code of internal procedures and conduct for regulating, monitoring and reporting of trading is enacted pursuant to the PIT Regulations, as amended from time to time, under the overall supervision of the Board of Directors.

The object of this Code is to formulate (i) a Code of Conduct for fair disclosure and (ii) an internal Code of conduct to regulate, monitor and report trading by the Designated Person(s) and their Immediate Relatives in terms of regulation 8 and 9 of the PIT Regulations read with Schedule A and B appended thereto, and as amended from time to time. The Code shall also cover Policy on Determining Legitimate Purpose.

The provision(s) of this Code may be made applicable, fully or partially, to any person whether an employee of the Company or otherwise who may be in possession of unpublished price sensitive information

**3. DEFINITIONS**

“**Act**” means the Securities and Exchange Board of India Act, 1992.

“**Audit Committee**” means the audit committee of the Company

“**Board**” means the Board of Directors of the Company.

“**Code**” or “**Code of Conduct**” shall mean this Code of Fair Disclosure, Internal Procedures and Conduct for Regulating, Monitoring and Reporting of Trading by Designated Person(s) of the Company and policy on Legitimate purpose, as amended from time to time and formulated in terms of the PIT Regulations as amended from time to time.

“**Company**” means Krsnaa Diagnostics Limited

“**Compliance Officer**” means any Senior Officer, designated so and reporting to the board of directors or head of the organization in case board is not there, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for Compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board of directors of the listed Company or the head of an organization, as the case may be;

[Explanation – For the purpose of this regulation, “financially literate” shall mean a person who has the ability to read and understand basic financial statements i.e. balance sheet, profit and loss account, and statement of cash flows.

“**Connected Person**” shall have the meaning as provided under Regulation 2(1)(d) of the PIT Regulations;

“**Dealing in Securities**” means an act of subscribing to, buying, selling or agreeing to subscribe to, buy, sell or deal in the securities of the Company either as principal or agent;

“**Generally available information**” shall have the meaning as provided under Regulation 2(1)(e) of the PIT Regulations;

“**Insider**” shall have the meaning as provided under Regulation 2(1)(g) of the PIT Regulations;

“**Relative**” shall have the meaning as provided under Regulation 2(1)(hc) of the PIT Regulations;

“**Unpublished Price Information**” or (“**UPI**”) shall have the meaning as provided under Regulation 2(1)(n) of the PIT Regulations;

Words and expressions used and not defined in this Policy shall have the meaning as described in the SEBI Listing Regulations, the Securities and Exchange Board of India Act, 1992, as amended, the Securities Contracts (Regulation) Act, 1956, as amended, the Depositories Act, 1996, as amended, or the Companies Act, 2013 and rules and regulations made thereunder.

#### 4. COMPLIANCE OFFICER

The Compliance Officer shall be responsible for setting forth policies, procedures, monitoring adherence to the rules for the preservation of UPSI, pre-clearing of trades of Designated Person(s), monitoring of trades and the implementation of this Code in consultation with Executive Director & Chief Executive Officer or Chief Financial Officer and under the overall supervision of the Board of Directors of the Company.

The Compliance Officer shall maintain a record of the Designated Person(s) and any changes made in the list of Designated Person(s), in consultation with the Executive Director or Chief Executive Officer or Chief Financial Officer.

The Compliance Officer shall assist Designated Person(s) and/or all Employees in addressing any clarifications regarding the Regulations and the Code.

The Compliance Officer shall report on the Compliance and implementation of the Regulations and the Code to the Board and in particular, shall provide reports to the Chairman of the Audit Committee or to the Chairman of the Board as and when directed by the Board or Audit Committee, at least once in a year.

The Audit Committee shall review compliance with the provisions of these regulations at least once in a financial year and shall verify that the systems for internal control are adequate and are operating effectively.

#### 5. PRESERVATION OF UNPUBLISHED PRICE SENSITIVE INFORMATION

Designated Person(s) and Insiders shall maintain the confidentiality of all UPSI. Designated Person(s) and Insiders shall not communicate, provide or allow access to any UPSI except where such communication is in furtherance of Legitimate Purposes, performance of duties or discharge of legal obligations.

UPSI is to be handled on a “need to know” basis. i.e. UPSI should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information and shall be communicated, allowed access to or provided in a secure location.

The Company shall ensure that all files including soft copies containing UPSI are kept secure, such that such information can only be accessed by persons who “need to know” such information or for Legitimate Purpose. All Designated Person(s) and Insiders that get access to UPSI shall also ensure that all the files including soft copies containing Unpublished Price Sensitive Information are kept secure.

## 6. TRADING WHEN IN POSSESSION OF UNPUBLISHED PRICE SENSITIVE INFORMATION

### I. Designated Person(s) and Insiders shall trade in Securities subject to Compliance with the Regulations and this Code.

- a) No insider shall trade in securities when in possession of UPSI and where a person has traded in securities has been in possession of Unpublished Price Sensitive Information, his trades would be presumed to have been motivated by the knowledge and awareness of such UPSI in his possession.
- b) Trades may be permitted in certain cases as under, subject to compliance with the Regulations:

### II. Trading window

- a) The Company, through the Compliance Officer, shall specify a trading period, to be called "Trading Window", for trading in Securities. The "Trading Window" can be closed when the Compliance Officer, determines that Designated Person(s) or class of Designated person(s) can reasonably be expected to have possession of UPSI.
- b) Without prejudice to the generality of paragraph mentioned in this Code, the "Trading Window" with respect to the Company's Securities shall be closed at the time of:-
  - i. Declaration of Financial results (quarterly, half-yearly and annual);
  - ii. Declaration of dividends (interim and final);
  - iii. Issue of Securities by way of public/ rights/bonus etc. or any change in capital structure;
  - iv. Amalgamation, demergers, mergers, takeovers, acquisitions, delisting, expansion of business, buy-back and other such transactions;
  - v. Changes in Key Managerial Personnel;
  - vi. Disposal of whole or substantially whole of the undertaking;
  - vii. Material events as may be determined by the Chairperson, Chief Executive Officer and Chief Financial Officer.
- c) Without prejudice to clause a and b, the trading window shall be closed from the end of each quarter until 48 hours after the declaration of financial result of such quarter by the Board. The gap between clearance of accounts by the audit committee and the board meeting shall be as narrow as possible and preferably on the same day to avoid leakage of material information.
  - a. The timing for re-opening of the Trading Window shall be determined by the Compliance Officer while taking into account various factors including the UPSI in question becoming generally available and being capable of assimilation by the market, which in any event shall not be earlier than forty-eight hours after the information becomes generally available Information.
  - b. Designated Person(s) and their Immediate Relatives shall conduct all their trades/dealings in the Securities of the Company only when the trading

window is open and shall not trade in the Company's Securities during the period when the trading window is closed.

- c. Irrespective of the fact that the Trading Window is open, Designated Persons shall not execute a contra trade during six months following the prior transaction the Compliance Officer may be empowered to grant relaxation from the strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate the Regulations.
- d. In case of any contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund administered by SEBI under the Act. However, this shall not be applicable for trades pursuant to the exercise of stock options.
- e. The Board under the Act and this code is authorized to put in place an adequate and effective system of internal controls, to ensure Compliance with the requirements given in these regulations to prevent insider trading and to delegate all such powers as deemed necessary for effective monitoring of the Compliances of these regulations and the Code
- f. Pre-clearance of trades

## 7. PRE-CLEARANCE OF TRADES

- i. If Designated Person(s) and/or their Immediate Relatives intend to trade in Company's Securities when the Trading Window is open and if the value of the proposed trades in a calendar quarter (singly or cumulatively, and along with any trades already executed during the calendar quarter) is above Rs. 10,00,000/- (Rupees Ten Lakhs only), Designated Person(s) should obtain pre-clearance for the transaction.
- ii. Prior to approving any trades, the Compliance Officer shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any UPSI

## 8. THE PRE-CLEARANCE PROCEDURE SHALL BE AS UNDER: -

1. An application shall be made in the form prescribed in Code, to the Compliance Officer indicating the details as required under the Form together with Undertaking.
2. The pre-clearance approval by the Compliance Officer, if any shall in the form prescribed in Code.
3. All Designated Person(s) and their Immediate Relatives shall execute their trade in respect of the Company's Securities within one week after the approval of pre-clearance is given. The



Designated Person shall file within 2 (two) trading days of the execution of the trade, the details of such trade with the Compliance Officer in the form prescribed in the Code.

4. If the trade is not executed/partly executed within one week after the approval is given, the Designated Person must get the transaction pre-cleared again in accordance with the Code for the trade to be executed.
5. All Designated Person(s) and their Immediate Relatives shall not execute contra trade including taking contra positions in derivative transactions in the Securities, during the next 6 (six) months following prior trade.
6. Designated Persons shall not enter into any trading including but not limited to intra-day transactions, in violation of the Regulations.
7. The Compliance Officer may grant relaxation from the strict application of contra trade restriction, for reasons to be recorded in writing provided that such relaxation does not violate the Regulations. Ordinarily, the restrictions imposed by Clause 5 shall not be applicable in any of the following instances: -
  - I. the Securities are purchased by exercise of stock options under the Employee Stock Option Scheme(s) of the Company in force and thereafter sold within 6 (six) months; or
  - II. the Securities are sold and thereafter Securities are purchased by exercise of stock options under the Employee Stock Option Scheme(s) of the Company in force within 6 (six) months.
  - III. In case any contra trade is executed, inadvertently or otherwise, in violation of contra trade restriction, the profits from such trade shall be liable to be disgorged for remittance to the Securities and Exchange Board of India (SEBI) for credit to the Investor Protection and Education Fund administered by SEBI under the Act.

## 9. TRADING PLAN

- i. A Designated Person or any Insider is entitled to formulate a trading plan for dealing with the Securities of the Company and present it to the Compliance Officer for approval and public disclosure pursuant to which trade may be carried out on his/her behalf in accordance with such a plan.
- ii. The Trading Plan shall not entail commencement of trading on behalf of the Designated Person or Insider earlier than one hundred and twenty calendar days) from the public disclosure of the plan also does not entail an overlap of any period for which another trading plan is already in existence and set out following parameters for each trade to be executed:
  - a) either the value of trade to be effected or the number of securities to be traded;
  - b) nature of the trade;

- c) either specific date or time period not exceeding five consecutive trading days;
- d) price limit, that is an upper price limit for a buy trade and a lower price limit for a sell trade, subject to the range as specified below:
  - I. for a buy trade: the upper price limit shall be between the closing price on the day before submission of the trading plan and up to twenty per cent higher than such closing price;
  - II. for a sell trade: the lower price limit shall be between the closing price on the day before submission of the trading plan and up to twenty per cent lower than such closing price.
  - III. not entail trading in Securities for market abuse.
- iii. The Compliance Officer shall review the trading plan to assess whether the plan would have any potential for violation of these regulations and shall be entitled to seek such express undertakings as may be necessary to enable such assessment and to approve and monitor the implementation of the plan.

Provided that pre-clearance of trades shall not be required for a trade executed as per an approved trading plan.

Provided further that trading window norms shall not be applicable for trades carried out in accordance with an approved trading plan.

- iv. The trading plan once approved shall be irrevocable and the insider shall mandatorily have to implement the plan, without being entitled to either execute any trade in the securities outside the scope of the trading plan or to deviate from it except due to permanent incapacity or bankruptcy or operation of law.

Provided that the implementation of the trading plan shall not be commenced if any unpublished price sensitive information in possession of the insider at the time of formulation of the plan has not become generally available at the time of the commencement of implementation.

Provided further that if the insider has set a price limit for a trade under sub-clause (iv) of clause (v) of sub-regulation 2, the insider shall execute the trade only if the execution price of the security is within such limit. If price of the security is outside the price limit set by the Insider, the trade shall not be executed.

- a. The insider shall intimate non-implementation (full/partial) of the trading plan to the Compliance Officer within two trading days of end of tenure of the trading plan with reasons thereof and supporting documents, if any.
- b. Upon receipt of information from the Insider, the Compliance Officer shall place such information along with his recommendation to accept or reject the submissions of the Insider, before the Audit Committee in the immediate next meeting. The Audit



- Committee shall decide whether such non-implementation (full/partial) was bona fide or not.
- c. The decision of the Audit Committee shall be notified by the Compliance Officer on the same day to the stock exchanges on which the securities are listed.
  - d. In case the Audit Committee does not accept the submissions made by the Insider, then the Compliance Officer shall take action as per the Code of Conduct.
  - e. The Compliance Officer shall approve or reject the trading plan within two trading days of receipt of the trading plan and notify the approved plan to the stock exchanges on which the securities are listed, on the day of approval

## 10. REPORTING REQUIREMENTS FOR TRANSACTIONS IN COMPANY'S SECURITIES

- a. Every public disclosure under this code shall be made in such form as may be specified by the Board from time to time. The disclosures of trading in securities shall also include trading in derivatives of securities.
- b. Initial Disclosure: Every person on appointment as a Key Managerial Personnel or a Director of the Company or upon becoming a Promoter or member of Promoter Group shall disclose his/her holding of Securities of the Company as on the date of appointment or becoming a Promoter/Promoter Group, to the Compliance Officer within 7 (seven) days of such appointment or becoming a Promoter in the form set out in code.
- c. Continual Disclosure: Every Promoter, member of the Promoter Group, Director and Designated Person person(s) and Director of the Company shall disclose to the Compliance Officer the number of Securities of the Company, traded by him/ her by Immediate Relatives, within 2 (two) trading days of such transaction if the value of the Securities traded, whether in one transaction or a series of transactions over any calendar quarter, aggregates to a traded value in excess of Rs. 10,00,000/- (Rupees Ten Lakh Only).
- d. The disclosure of such trading to the stock exchange on which the securities are listed shall be made within 2 (two) trading days of transaction, in the form specified in the code.
- e. Disclosures by other connected persons: Any company whose securities are listed on a stock exchange may, at its discretion require any other connected person or class of connected persons to make disclosures of holdings and trading in securities of the company in such form and at such frequency as may be determined by the company in order to monitor Compliance with these regulations.
- f. Disclosure of off-market trades by Insiders: Details of off-market inter-se transfer, as specified under Regulation 4 of the Regulations, between Insiders who were in possession of the same Unpublished Price Sensitive Information and who had made a

conscious and informed trade decision, shall be reported to the Compliance Officer within 2 (two) working days of such transaction.

- g. Disclosure by the Company to the Stock Exchange(s): Within 2 (two) trading days of receipt of intimation. The Compliance Officer shall disclose to all Stock Exchanges on which the Company's Securities are listed, the information received.
- h. The Compliance Officer shall maintain records of all the disclosures received for a minimum period of five years.
- i. Other Disclosure: All Designated Person(s) of the Company are required to forward details of their holding in securities/ transactions the statement or of Immediate Relatives, to the Compliance Officer in the Form(s) set out in Code.
  - I. At the time of joining the Company or any of its Material Subsidiary(ies); or upon being categorized as Designated Person(s)
  - II. On an annual basis within 30 days from the end of 31st March each year, till the time they are associated with the Company or any of its Material Subsidiaries

The Company shall maintain a structured digital database containing the names of such persons with whom Unpublished Price Sensitive Information is shared under the Regulations.

## 11. STRUCTURED DIGITAL DATABASE

- a. The Company shall maintain a structured digital database containing the nature of UPSI and the names of such persons with whom UPSI is shared under the Regulations and the names of such persons who have shared the information along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such database shall not be outsourced and shall be maintained internally with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.
- b. The Company shall ensure that the structured digital database is preserved for a period of not less than eighty 8 years after completion of the relevant transactions and in the event of receipt of any information from the Company regarding any investigation or enforcement proceedings, the relevant information in the structured database shall be preserved till the completion of such years.

## 12. CODE OF FAIR DISCLOSURE

- a. The Code of Practices and Procedures for Fair Disclosures is required for the Company to ensure timely and fair disclosure of UPSI which would impact the price of the Company's Shares, to maintain the uniformity, transparency, and fairness in dealing with all stakeholders, to determine legitimate purpose for which UPSI may be shared and in ensuring adherence to applicable laws and regulations

- b. The Company shall adhere to the Code of practices and procedures for fair disclosure of Unpublished Price Sensitive Information and 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.
- c. Uniform and universal dissemination of UPSI to avoid selective disclosure.
- d. Designation of Compliance Officer to deal with dissemination of information and disclosure of UPSI.
- e. Prompt dissemination of Unpublished Price Sensitive Information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- f. An appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- g. Ensuring that information shared with analysts and research personnel is not UPSI.
- h. Developing best practices to 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.
- i. Handling of all UPSI on a “need-to-know” basis.

### 13. OVERSEEING AND COORDINATING DISCLOSURE

- i. The Compliance Officer shall be responsible for ensuring that the Company complies with continuous disclosure requirements, overseeing and coordinating the disclosure of price sensitive information to Stock Exchanges, analysts, shareholders, and media, and educating staff on disclosure policies and procedures. Timelines stipulated in the Listing Regulations with respect to prior intimations/ notices/ notification and disclosures shall be strictly observed to ensure prompt public disclosure of UPSI.
- ii. If information is accidentally disclosed without any prior approval out of accidental omission, selectively, inadvertently or otherwise, then the person responsible shall inform the compliance officer immediately, even if the information is not considered price sensitive. The Compliance Officer shall promptly take appropriate corrective actions, including informing to Stock Exchanges, to make the information generally available
- iii. The Officer shall handle all the UPSI on a need-to-know basis only. In case of any doubt, the Compliance Officer shall consult and seek approval of the Executive Director and Chief Executive Officer before dissemination of such information.

### 14. RESPONDING TO MARKET RUMORS

- I. Any queries on news reports or requests for verification of market rumors by Stock Exchanges or any other regulatory authority should be forwarded immediately to the Compliance Officer who shall decide on the response/clarification. All such queries and requests received shall be documented, and as far as possible the Compliance Officer shall request such queries and requests to be made in writing.

- II. The Company shall subject to non-disclosure obligations, aim to provide appropriate and fair response to the queries on news reports and requests for verification of market rumors by regulatory authorities.

#### **15. DISCLOSURE/ DISSEMINATION OF PRICE SENSITIVE INFORMATION WITH SPECIAL REFERENCE TO ANALYSTS, RESEARCH PERSONNEL, INSTITUTIONAL INVESTORS**

- I. Only generally available public information shall be provided to the analyst/research persons, institutional investors, and fund managers. In case there is any unintentional disclosure of UPSI to analysts, research personnel or institutional investors during any meeting or conference, the Compliance Officer shall ensure that the same should also be made 'generally available information' at the earliest. Further, any disclosures made are to be complete and specific. Selective disclosures are strictly prohibited.
- II. To avoid misquoting or misrepresentation, the Compliance Officer, along with at least two representatives of the Company, may be present at meetings with analysts, research personnel, brokers or Institutional Investors and discussion shall be recorded (either an audio recording or video recording). For the sake of clarity, no person except those authorized shall disclose any information at such meetings.
- III. The Company shall make written transcripts and audio/ video recordings of the meetings or other interactions with analysts, research personnel, brokers or Institutional Investors, available on the website of the Company and intimate to the Stock Exchanges within 5 working days of such meeting.

#### **16. POLICY ON DETERMINATION OF LEGITIMATE PURPOSE**

- I. "Legitimate Purpose" shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.
- II. Any person in receipt of unpublished price sensitive information pursuant to a "Legitimate Purpose" shall be considered an "insider" for purposes of these regulations and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in Compliance with these regulations
- III. A structured digital database shall be maintained containing the nature of unpublished price sensitive information and the names of such persons who have shared the information and also the names of such persons or entities as the case may be with whom information is shared for legitimate purpose along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such database shall not be outsourced and shall be maintained internally with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.

- IV. The Company shall ensure that the structured digital database is preserved for a period of not less than eight years after completion of the relevant transactions and in the event of receipt of any information from SEBI regarding any investigation or enforcement proceedings, the relevant information in the structured digital database shall be preserved till the completion of such proceedings.
- V. The following factors must be satisfied while determining what constitutes a legitimate purpose
  - a. Must be shared in the ordinary of course of business or for Corporate Purpose;
  - b. Required to be done in furtherance of fiduciary duties or in fulfillment of any statutory or contractual obligation;
  - c. The action is executed in a manner which is considered fair and transparent; and
  - d. Information shared is in the interest of the Company and should not result into a personal benefit to the Insider

#### 17. PENALTY FOR CONTRAVENTION OF THE CODE AND REGULATIONS

- I. Designated Person(s) shall bring to the attention of the Compliance Officer and the Board any violation of the Regulations or this Code whether committed by such Designated Person or any other person.
- II. Any Designated Person or Insider who trades in Securities or communicates any information for trading in Securities, in contravention of the Code of Conduct, may be penalized and appropriate action may be taken by the Company.
- III. Designated Person of the Company who violates the Code of Conduct shall also be subject to disciplinary action by the Company, which may include wage freeze, suspension, recovery, etc., ineligibility for future participation in employee stock option plans, etc. Any amount collected under this clause shall be remitted to the SEBI for credit to the Investor Protection and Education Fund administered by the SEBI under the Act.
- IV. The action by the Company shall not preclude SEBI from taking any action in case of violation of the Regulations.
- V. In case it is observed by the Compliance Officer that there has been a violation of Regulations or the Code by Designated person(s) and/or their Immediate Relative(s), then on behalf of the Company, the Compliance Officer in consultation with Executive Director & CEO or Chief Financial Officer or Audit Committee, shall inform the stock exchange(s), in such form and such manner as may be specified by the SEBI, from time to time.

## 18. AMENDMENTS

The Company is dedicated to regularly assess and update the Code and procedures. Consequently, this Code may be amended from time to time subject to Board approval and in Compliance with applicable laws and regulations. This Code and any further modifications/ amendments to the same shall be promptly disclosed on the Company's website and filed in accordance with the applicable laws and regulations.

*In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Code, then such amendment(s), clarification(s), circular(s) etc., shall prevail upon the provisions hereunder and this Code shall stand amended accordingly from the Effective Date as laid down under such amendment(s), clarification(s), circular(s) etc.*

