



KALPA-TARU®

POWER TRANSMISSION LIMITED

Kalpataru Power Transmission Limited

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF
UNPUBLISHED PRICE SENSITIVE INFORMATION (“CODE”)

(Effective from 15th May, 2015)

➤ **INTRODUCTION**

With a view to govern the conduct of insiders relating to insider trading, the Securities and Exchange Board of India (SEBI) had formulated SEBI (Prohibition of Insider Trading) Regulations, 2015 (“**Regulations**”) as amended time to time under power conferred to on it under the SEBI Act, 1992.

➤ **OBJECTIVES**

In compliance with the above requirements and Regulation, the company has adopted this code based on Schedule A of the said Regulations. Kalpataru Power Transmission Limited (“**the Company**”) endeavours to ensure timely and adequate disclosure of price sensitive information.

➤ **CODE**

The code of practices and procedures for fair disclosure of unpublished price sensitive information (“Code”) for adhering each of the principles is set out below:

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 The Company shall promptly make public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
2. The Company shall disseminate unpublished price sensitive information on uniform and universal basis to avoid selective disclosure.
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Officer will act as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall prompt disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall give appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. The Company shall place transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website.

8. All unpublished price sensitive information shall be handled on a need-to-know basis.

➤ **CLARIFICATIONS, AMENDMENTS ETC.**

This Code has been framed in accordance with the SEBI (Prohibition of Insider Trading) Regulations, 2015. In case of any amendment in the Regulations, direction or clarification by SEBI, provision of this Code shall be read and implemented in context of such amended or clarified positions.

This Code may be modified, amended or substituted by the Board of Directors as may be necessary.