

## GILADA FINANCE AND INVESTMENTS LIMITED

### **CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

Pursuant to the Regulation 8 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 a listed company is required to formulate and publish on its official website a Code of Practices and Procedures for fair Disclosure of "Unpublished Price Sensitive Information" in adherence to the principles set out in Schedule A in the said regulations . Accordingly, the principles of fair disclosure of Unpublished Price Sensitive Information adopted by Gilada Finance and Investments Limited (GFIL) are as follows:

1. GFIL shall ensure to make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.

**"Unpublished Price Sensitive Information"** means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the financial results; dividends; change in capital structure; mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions; changes in key managerial personnel; and material events in accordance with the listing agreement.

2. Uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure;
3. Designation of a senior officer as a Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information;
4. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available;
5. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.
7. 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.
8. Handling of all unpublished price sensitive information on a need-to-know basis.

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