

HIGH GROUND ENTERPRISE LIMITED

Code of practices and procedures for fair disclosure of unpublished price sensitive information

Introduction

The Securities and Exchange Board of India (SEBI), in its endeavor to protect the interest of investors in general has introduced SEBI (Prohibition of Insider Trading) Regulation, 2015 to be effective from May 15, 2015. Chapter IV Regulation 8(1) read with Schedule A of the SEBI (Prohibition of Insider Trading) Regulation, 2015 provides for formulation of a Code of Practices and Procedures for fair Disclosure of Unpublished Price Sensitive Information by the Board of Directors of Every Listed Company.

Accordingly, this code of Practices and Procedures for fair disclosure of unpublished price sensitive information (hereinafter referred to as 'Code') has been formulated in accordance with the SEBI (Prohibition of Insider Trading) Regulation 2015 and amendments thereon from time to time, with a view to preserve the confidentiality of unpublished price sensitive information and prevent misuse of such information.

Code of fair disclosure

A code of practices and procedures for fair disclosure of unpublished price sensitive Information for adhering each of the principles is set out below:

1. Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
2. Uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The company secretary and compliance officer shall be chief investor relation officer to deal with dissemination of information and disclosure of unpublished price sensitive information.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 Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.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 request for verification of market rumours by regulatory authorities.
6. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.

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7. *Developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relation conferences on the official website to ensure official confirmation and documentation of disclosure made.*
8. *Handling of all unpublished price sensitive information on a need-to-know basis.*