

## POLO QUEEN INDUSTRIAL AND FINTECH LIMITED

### CODE OF FAIR DISCLOSURE AND CONDUCT

The Securities Exchange Board of India (SEBI) has promulgated the SEBI (Prohibition of Insider Trading) Regulations, 2015, on 15<sup>th</sup> January, 2015 (hereinafter referred to as the “Regulations”), to formulate a stated framework and policy for fair disclosure of events and occurrences that could impact price discovery in the market for its securities.

In order to comply with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, the Company has adopted this code of Fair Disclosure and Conduct

#### **Principles of Fair Disclosure for purposes of Code of Practices and Procedures for Fair Disclosures of Unpublished Price Sensitive Information**

The Chief Investor Relations Officer will deal with dissemination of information and disclosure of unpublished price sensitive information.

In addition to the above, the duties of the Chief Investor Relations Officer will be inclusive of, but not limited to, the following :-

1. Appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
2. 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.
3. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.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 Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.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. Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
6. Uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
7. Handling of all unpublished price sensitive information on a need-to-know basis.

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