

# **CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

## **1) PREFACE**

The SEBI (Prohibition of Insider Trading) Regulations, 2015, makes it mandatory for every listed company to formulate a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information. Accordingly, this Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“Code”) has been formulated to ensure fair and adequate disclosure of unpublished price sensitive information. The Board of Directors of Midas Infra Trade Limited (“Company”) in its meeting held on 13th August, 2018 amended the this Code.

## **2) PRINCIPLES OF FAIR DISCLOSURE**

- a. To promptly make public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
- b. To make disclosures of unpublished price sensitive information in a universal and uniform manner to avoid selective disclosure of unpublished price sensitive information.
- c. The Chief Financial Officer of the Company has been designated as the Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information. He shall be responsible to ensure timely and adequate disclosure of unpublished price sensitive information pursuant to this Code. In the absence of the Chief Financial Officer for any reason whatsoever, the Compliance Officer/Company Secretary or any other Officer of the Company duly authorised by the Managing Director of the Company will be responsible for dissemination of information and disclosure of unpublished price sensitive information.
- d. To promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise if at all, to make such information generally available.
- e. To provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- f. To ensure that information shared with analysts and research personnel is not unpublished price sensitive information.

- g. To make transcripts or records of proceedings of meetings with analysts and of other investor relations conferences on Company's official website to ensure official confirmation and documentation of disclosures made.
- h. To handle all unpublished price sensitive information on a need-to-know basis only.

### **3) APPLICABILITY**

This Code shall be effective with effect from May 15, 2015.

### **4) AMENDMENT**

The Board of Directors of the Company may amend / modify / update this Code in whole or in part, at any time, subject to any subsequent modification(s) / amendment(s) to SEBI (Prohibition of Insider Trading) Regulations, 2015 or any other law.