



INNOVATION | QUALITY | CARE

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

In compliance with Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Board of Directors formally adopts this Code of Conduct.

Under this Code, the Company will ensure the following Principles, in disclosing UPSI:

- a. Prompt public disclosure of Unpublished Price Sensitive Information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
- b. Uniform and universal dissemination of UPSI to avoid selective disclosure.
- c. Prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- d. Appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
- e. Ensuring that Information shared with analysts and research personnel is not UPSI.
- f. Developing best practice 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.
- g. Handling of all UPSI on need-to-know basis and shall not be communicated by any insider to any person except for 'legitimate purposes.

Unless otherwise appointed by the Board of Directors, the Chief Financial Officer shall act as the Chief Investor Relations Officer to deal with dissemination of information and disclosure of UPSI.

Sharing of UPSI pursuant to Legitimate Purpose

“Legitimate purpose” shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of SEBI (Prohibition of Insider Trading) Regulations, 2015

Explanation: For the purposes of this Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information, the term 'intermediary' refers to the persons specified under Section 12 of the Securities and Exchange Board of India Act, 1992 and the term 'fiduciary' refers to the professional firms such as, auditors, accountancy firm, law firms, analysts, insolvency professional entities, consultants, banks, etc. assisting or advising the company.

Rubicon Research Limited (formerly known as **Rubicon Research Private Limited**) | CIN: L73100MH1999PLC119744

Registered Office: Plot No. B-75, MedOne House, Road No. 33, Wagle Estate, Thane West, PIN – 400 604, Maharashtra, India

+91-22-61414000 / 50414000 | reachus@rubicon.co.in | www.rubicon.co.in