

P H CAPITAL LIMITED

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

1. Preface:-

- a.** This Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information is formed under Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulation, 2015, which provides for formulation of a “Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information” for the Board of Directors of the Company.
- b.** This Code shall become applicable with effect from May 15, 2015.

2. Principles of Fair Disclosure for purposes of Code of Practices and Procedures for Fair

The Company shall-

- i. Arrange for prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
- ii. Adopt uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
- iii. Designate, Company Secretary as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
- iv. Arrange for prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- v. Appropriately and fairly respond to queries on news reports and requests for verification of market rumors by regulatory authorities.

- vi. Ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
- vii. Develop 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.
- viii. handle of all unpublished price sensitive information on a need-to-know basis

3 Amendment

Any or all provisions of this Code would be subject to revision / amendment in accordance with the guidelines on the subject as may be issued from SEBI from time to time.

The Board of Directors reserves the right to modify, add, or amend any of provisions of this Code subject to approval of the Board.
