

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of Unpublished Price Sensitive Information*

Golden Goenka Fincorp Limited (GGFL)

Date: 13-05-2015

GOLDEN GOENKA FINCORP LIMITED (GGFL)

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

(formulated in line with Sub-Regulation (1) of Regulation 8 of SEBI Prohibition of Insider Trading Regulations, 2015 read with Schedule A thereof)

- A. This Code may be called **GGFL Code for Fair Disclosure of Unpublished Price Sensitive Information**
- B. This Code shall come into force from 15th May, 2015.
- C. Following norms shall be followed by the Company to ensure fair, timely and adequate disclosure of unpublished price sensitive information:-

- (a) The Company shall ensure to make prompt public disclosure of the **Unpublished Price Sensitive Information** that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.

["UNPUBLISHED PRICE SENSITIVE INFORMATION" means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: –

- Financial Results;
- Dividends;
- Change in Capital Structure;
- Mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
- Changes in key managerial personnel; and
- Material events in accordance with the listing agreement.

"GENERALLY AVAILABLE INFORMATION" means information that is accessible to the public on a non-discriminatory basis.]

- (b) The Company shall make Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
- (c) The Company has designated Mr. Dinesh Burman, Executive Director as the chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
- (d) The Company shall ensure prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- (e) The Company shall ensure to make Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- (f) The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.

GOLDEN GOENKA FINCORP LIMITED (GGFL)

- (g) *Following guidelines will be adopted by the Company while dealing with Analysts/Institutional investors:-*
- (1) *The Company will provide only public information to analysts/ Research persons/ large investors/ Institutions.*
 - (2) *At least two officers of the Company will be present at the meetings with Analysts, Brokers, Institutional Investors and the discussions with them will be recorded to avoid misquoting or misrepresenting.*
 - (3) *Questions outside the intended scope of discussions by the Analysts will not be answered normally but the same may be taken on notice and a considered response given later.*
 - (4) *Whenever the Company will organise meetings with analysts it will normally be followed by a press release and the same information will also be posted on the website of the Company. This will be simultaneously sent to the Stock Exchanges.*
- (h) *The Company shall handle of all unpublished price sensitive information on a need-to-know basis. Persons of Company, who are in possession or access to unpublished price sensitive information, shall handle such information with care and to deal with the information with them when transacting their business strictly on a need-to-know basis.*