

INTRASOFT TECHNOLOGIES LTD

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION (With Effect from April 01, 2019)

As required under the SEBI (Prohibition of Insider Trading) Regulations, 2015, a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information was adopted by the Company. The principles of fair disclosure of the Code are as follows;

- 1) The Company shall ensure prompt disclosure of Unpublished Price Sensitive Information (hereinafter referred as “UPSI”) with the Stock Exchanges where the securities of the Company are listed that would impact the share price of the Company.
- 2) The Company shall make uniform and universal dissemination of UPSI to avoid selective disclosure. Upon the information being submitted with the stock exchanges, the information shall be deemed to be generally available and shall no longer be treated as Unpublished Price Sensitive Information.
- 3) The Company Secretary is designated as Compliance Officer and Chief Investor Relations Officer for the purpose of aforesaid SEBI Regulations and to deal with the dissemination of information and disclosure of UPSI. In the absence of Company Secretary, such other officer as may be authorized by the Board of Directors.
- 4) The Company shall promptly disseminate UPSI that gets disclosed selectively, inadvertently or otherwise, if at all, to make such information generally available.
- 5) The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- 6) The Company shall ensure that information shared with analysts and research personnel is not UPSI.
- 7) The Company shall adopt 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.
- 8) The Company shall ensure handling of all UPSI on a “need to know” basis only.