

P H CAPITAL LIMITED

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CIN: L74140MH1973PLC016436

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

(As envisaged under Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulation, 2015)

The Company will adhere to the following so as to ensure fair disclosure of events and occurrence that could impact price of its securities in the market:

- a) The Company will make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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- b) The Company will make, uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- c) The Company Secretary shall act as Chief Investor Relations officer to deal with dissemination of information and disclosure of unpublished price Sensitive Information.
- d) The Company will make promote dissemination of unpublished price sensitive Information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- e) The Company will provide appropriate and fair response to queries on news report and request for verification of market rumours by regulatory authorities.
- f) The Company will ensure that, information if any, shared with analyst and research personnel is not unpublished price sensitive information.
- g) The Company will develop best practices to make available transcripts or records of proceedings of meetings with analyst and other investor relations conference on the website of the Company to ensure official confirmation and documentation of disclosures made.
- h) The Company will handle all unpublished price sensitive information on a need –to –know basis.

The Code has been adopted by the Board of Directors in their Meeting held on 11th February, 2019.