



VKJ INFRADEVELOPERS LIMITED

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CIN: L45400DL2010PLC200014

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

(Pursuant to Regulation 8 of the SEBI (Prevention of Insider Trading) Regulations, 2015)

The following are the principles of Fair Disclosure adopted by Company :

1. Unpublished price sensitive information (UPSI) will be intimated immediately to the Stock Exchanges where the Securities of the Company are listed that would impact price discovery on any such credible and concrete information coming into the knowledge of the Company.
2. Company will ensure that there is no selective disclosure of any UPSI
3. The Whole-time Director of the Company has been designated as the Chief Investor Relations Officer (CIRO) for the purpose of timely dissemination and disclosure of UPSI.
4. In case any UPSI gets disclosed inadvertently to any selected persons or group of persons, the CIRO will immediately take steps for disclosing such information to the Stock Exchanges and also the website of the Company.
5. Company will provide prompt and appropriate response to queries on news reports and ask for verification of market rumours by regulatory authorities.
6. Company will ensure that any UPSI is not shared with personnel.
7. The Company will ensure applicability of best practices for recording the proceedings of the meeting on official website for ensuring official confirmation and documentation of disclosures.
8. All the functional heads and other senior executives of the Company will ensure that:
 - a. The information shared with analysts and research personnel are not UPSI. They will seek guidance from the CIRO and the Company Secretary, wherever necessary.
 - b. Share all the UPSI with the concerned personnel strictly on a need to know basis.
 - c. Appropriate non-disclosure agreements are signed by the advisors, consultants, etc. who are engaged for advising on major business plans and similar proposals, which have not otherwise been made public