

WHITEHALL COMMERCIAL COMPANY IMITED

CODE OF PRACTISES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

- I. This Code has been formulated in terms of Sub-Regulation (1) of Regulation 8 of the Securities Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015. It contains the Practices and Procedures for fair disclosure of Unpublished Price Sensitive Information, which are as under:
 1. There shall be prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
 2. The uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure shall be ensured.
 3. The Company Secretary of the Company shall act as a Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
 4. The Company shall ensure prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
 5. The Company shall ensure that appropriate and fair response shall be provided to queries on news reports and requests for verification of market rumors by regulatory authorities.
 6. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
 7. The Company shall 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.
 8. The Company shall ensure the handling of all unpublished price sensitive information on a need-to-know basis.
 9. The Company will periodically inform / counsel the top tier management to sensitize them on the Code and provide clarification on its application, whenever necessary.
- II. SEBI vide its notification dated 31 December 2018 has brought various amendments to the SEBI (Prohibition of Insider Trading) Regulations, 2015. One of the amendments required that the Board of Directors of a listed Company to formulate a policy for determination of legitimate purpose as a part of codes of fair disclosure and conduct w.e.f. 1 April 2019.
- III. Accordingly, a policy for determination of legitimate purpose has been formulated and the same has been uploaded on the website of the Company i.e www.whitehall.co.in.

This code is subject to review from time to time.