

BOMBAY CYCLE & MOTOR AGENCY LIMITED

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

Few people take advantage of Unpublished Price Sensitive Information (“UPSI”) before it is disclosed to the others, is a grave compromise on fairness and equity.

Since, absolute prohibition of share trading by the insiders is not tenable; insider trading is restricted and monitored through a series of measures in different jurisdictions. So as to ensure fair disclosure of UPSI that could impact price discovery in the market, the Board of Directors of the Company shall adhere to the following Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information envisaged in Schedule ‘A’ of SEBI (Prohibition of Insider Trading) Regulation, 2015 :

1. It shall be ensured that prompt public disclosure of unpublished price sensitive information is made to make it generally available, once it is discovered that credible and concrete information having the potential of effecting the price of securities of the Company exist or comes into being.
2. It shall be ensured that uniform and universal dissemination of unpublished price sensitive information is promptly made to avoid selective disclosures.
3. The Company Secretary is designated as a Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. It shall be ensured that any unpublished price sensitive information, which gets disclosed selectively, inadvertently or otherwise, is promptly disseminated to make such information generally available.
5. The Company shall ensure that appropriate and fair response and replies are promptly provided to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. It shall be ensured that no unpublished price sensitive information is shared with analysts and research personnel.
7. The Company shall develop and follow best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences, if any, on the official website to ensure official confirmation and documentation of disclosures made.
8. It shall be ensured that all the unpublished price sensitive information is handled on a need-to-know basis.