

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF  
UNPUBLISHED PRICE SENSITIVE INFORMATION  
[Under Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

The Board of Directors of Hemisphere Properties India Limited (hereinafter referred to as “Company”) has adopted the following Principles of Fair Disclosure for purposes of ‘Code of Practices and Procedures for Fair

Disclosure of Unpublished Price Sensitive Information’.

1. To make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
2. To make uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
3. Senior officer\* as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. To make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. To provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. To Ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. To 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. To Handle of all unpublished price sensitive information on a need-to-know basis.

\*As decided by Competent Authority