

## Transcorp International Limited

### **Transcorp International Limited: Principles of Fair Disclosure for purposes of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information**

**1. Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.**

The Company believes in timely, uniform and adequate disclosure of unpublished price sensitive information as per the statutory framework and the Company's communication policies.

**2. Uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.**

The Chief Investor Relations Officer i.e. Company Secretary shall furnish unpublished Price Sensitive Information to the Stock Exchanges. The Unpublished Price Sensitive Information shall be hosted in the website of the Company after the information is furnished to the Stock Exchanges.

**3. Designation of a senior officer as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.**

The Company has designated Company Secretary as a Chief Investor Relations Officer.

**4. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.**

If information is accidentally disclosed without prior approval, the person making such disclosure shall immediately inform the Chief Investor Relations Officer who shall take all necessary steps to make the information generally available and accessible.

**5. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.**

The Company shall make all efforts to clarify rumours and queries, while ensuring comments are restricted to clear facts.

**6. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.**

All Directors, Officers and Employees of the Company shall comply with the following guidelines while dealing with analysts, institutional investors and media.

- i. Only the Company Secretary and Chief Executive Officer will deal with the analysts, institutional investors and media.
- ii. All other directors, officer and employees of the Company shall not deal with analyst and media except with the prior approval of the Managing Director.
- iii. Only public information shall be provided to the analyst/research persons/large investors, institutional institutions and media.
- iv. In order to avoid misquoting or misrepresentation, the Chief Investor Relations Officer and/or one other representative of the Company shall be present at meetings with Analysts, brokers, Institutional Investors and media. The discussions shall be recorded.

- v. Unanticipated questions shall be taken on notice and a considered response given later. If the answer includes unpublished price sensitive information, a public announcement shall be made before responding.
- vi. When any meeting is organized with analysts, the presentation and a press release shall be hosted on the website after every such meet.

**7. Developing 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.**

- i. Disclosure/dissemination of information shall be made through various media so as to achieve good reach and quick dissemination.
- ii. Disclosures shall also be made through the Company's official website at [www.transcorpint.com](http://www.transcorpint.com)
- iii. The Investor Relations section of the Company's website shall be used to give investors a direct access to analyst briefing material, significant background information, questions and answers, etc.

**8. Handling of all unpublished price sensitive information on a need-to-know basis.**

All unpublished price sensitive information shall be handled only on a need to know basis.