

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

The Board of Directors of Gautam Exim Limited is committed to manage the affairs of the Company in a fair, transparent and ethical manner keeping in view the needs and interest of all stakeholders. The Company upholds the basic doctrine of Corporate Governance and to put in place a framework for prohibition of insider trading in securities and to strengthen the legal framework of the Company by prohibiting and regulating such activities within the applicable law.

Regulation 8 of The SEBI (Prohibition of Insider Trading) Regulations, 2015 ("Insider Regulations") prescribe all listed Companies to formulate and publish on its official websites a 'Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive information' ("Code of Fair Disclosure") as per Schedule A of the Insider Trading Regulations.

1. PREFACE

- 1.1 SEBI vide its Circular No. LAD-NRO/GN/2014-15/21/85 dated 15.01.2015 has introduced the insider trading Regulations effective from 15.05.2015
- 1.2 Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015 provides for the Code of Fair Disclosure.
- 1.3 The Code of Fair Disclosure shall be applicable to the Promoters, key Managerial Personnel, Board Members and Employees of the Company.

2. DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

- 2.1 The Company will make Prompt public disclosure of unpublished price sensitive information in relation to the Company that would impact price discovery of the securities of the Company no sooner than credible and concrete information comes into being in order to make such information generally available.
- 2.2 The Company will ensure uniform and universal dissemination of unpublished price sensitive information in relation to the Company in order to avoid selective disclosure.
- 2.3 The Compliance Officer of the Company shall act as the Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information in relation to the Company.
- 2.4 The Company will make efforts to promptly disseminate any unpublished price sensitive information in relation to the Company that gets disclosed sensitivity, inadvertently or otherwise to make such information generally available.
- 2.5 The Company will endeavor to provide appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.

- 2.6 The Company will ensure that information shared with analysts and research personnel is not unpublished price sensitive information in relation to the Company.
- 2.7 The Company will develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the Company's website www.gautamexim.com to ensure official confirmation and documentation of disclosures made.
- 2.8 The Company executive will handle all unpublished price sensitive information on a need-to-know basis.

REVIEW/AMENDMENT

The Board of Directors of the Company may amend, abrogate, modify or revise any of or all clauses of this code in accordance with the applicable provisions of the regulations, listing agreement and guidance note issued by stock exchanges.
