

Balurghat Technologies Limited

Policy for Determination of Legitimate Business Purpose

Principle of Fair Disclosure for purpose of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

Objective:

In terms of Regulation 3(2A) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended (“PIT Regulations”) it is necessary for the Board of Directors of a Listed Company to make a policy for determination of “Legitimate Purposes”. The objective of the policy is to regulate and monitor communication of Unpublished Price Sensitive Information (“UPSI”) for legitimate business purposes in the best interest of the Company and to ensure that such information is shared on ‘need to know’ basis and not misused by the recipient thereof and it should be treated as part of Code of Fair Disclosures and Conduct formulated under the PIT Regulations.

Policy:

1. The Company will make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes in to being in order to make such information generally available.
 2. The Company will make uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
 3. The Compliance Officer of the Company will be the chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
 4. The Company will make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
 5. The Company will provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
 6. The Company will ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
 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 official website to ensure official confirmation and documentation of disclosures made.
 8. The Company will handle all unpublished price sensitive information on a need-to-know basis
 9. The Company shall maintain a structured digital data base of all such persons containing the name, address, Permanent Account Number (PAN) or any other Identifier if PAN not available, nature of UPSI, LBP for which the information or communication was shared and date and time when such UPSI was shared.
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