

PRIME
PROPERTY DEVELOPMENT CORPORATION LTD.

**CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF
UNPUBLISHED PRICE SENSITIVE INFORMATION**

[See sub-regulation (1) of regulation 8]

Prime Property Development Corporation Limited ("The Company") shall adhere to the following practices and procedure to ensure fair disclosure of price sensitive information such as the events and occurrence that would impact price of the securities of the Company.

A code of practices and procedure for fair disclosure of Unpublished Price Sensitive Information for adhering each of the principles is set out below:

To ensure timely and adequate disclosure/ dissemination of Unpublished Price Sensitive Information, the Company shall follow the following norms:

1. To promptly make public disclosure of unpublished price sensitive information that would impact price discovery, and such information shall be made no sooner than credible and concrete information comes into being in order to make such information generally available.
2. To make disclosures of unpublished price sensitive information, in a uniform and universal manner in media or through Stock Exchanges where the Equity Shares of the Company are listed. Selective disclosure of unpublished price sensitive information shall be avoided
3. The Compliance Officer of the Company will act as the Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. To promptly disseminate the unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.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 rumors by regulatory authorities.
6. To ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. To make transcripts or records of proceedings on the official website in case of meetings with analysts and other investor relations conferences to ensure official confirmation and documentation of disclosures made.



CIN : L67120MH1992PLC070121

BUILDERS & DEVELOPERS

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8. To handle all unpublished price sensitive information on a need-to-know basis.

9. *Sharing of UPSI for legitimate purpose:*

The UPSI shall be shared by any person(s) authorized by the Board of Directors or CIO of the Company in this behalf, only in furtherance of legitimate purpose(s) which shall include the following;

(i) Sharing of UPSI in the ordinary course of business by any Insider, Designated Person, or by any Authorized person with existing or proposed partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants. Legitimate purposes would mean actions including but not limited to sharing of UPSI in any mode, as a part of business operations and in the normal course of business.

Any person who is in receipt of the UPSI for legitimate purposes shall be considered as an "insider" and due notice shall be given to such person to maintain confidentiality of the UPSI].

(ii) Sharing of UPSI where such communication is in furtherance of performance of duty (ies);

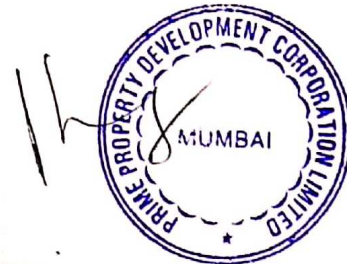
(iii) Sharing of UPSI for discharge of legal obligation(s).

(iv) Sharing of UPSI for any other genuine or reasonable purpose as may be determined by the CIO of the Company.

(v) Sharing of UPSI for any other purpose as may be prescribed under the Securities Regulations or Company Law or any other law for the time being in force, in this behalf, as may be amended from time to time.

Provided that such sharing should not be carried out to evade or circumvent the prohibitions of PIT Regulations.

However, other provisions / restrictions as prescribed under the SEBI (Prohibition of Insider Trading) Regulations, 2015 or any other law for the time being in force in this behalf, as may be amended from time to time, shall be observed.



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