



Radhe
Developers
(India) Ltd.

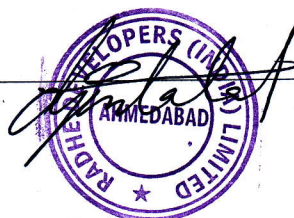
RADHE DEVELOPERS (INDIA) LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

(Approved by the Board of Directors on 13th June, 2015, further revised on 29th March, 2019 by passing circular Resolution)

pursuant to regulation 8 (1) of The Securities and Exchange Board of India (Prohibition Of Insider Trading) Regulations, 2015, which stand further amended by the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018, ("the regulation") the Board of Directors of the Company, would follow the following practice and procedure for fair disclosure of unpublished price sensitive information:

1. Radhe Developers (India) Limited ("the Company") shall promptly make public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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. The Company, as and when made price sensitive information, shall disclose, in a universal and uniform manner through stock exchanges where its equity shares are listed, further wherever required, shall be disclosed in the website of the company www.radhedevelopers.com to avoid selective disclosure of unpublished price sensitive information.
3. The Company's Managing Director, Chief Financial Officer and Compliance Officer serve as its Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. There shall be prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise. It shall be ensured that such information is made generally available.
5. The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. The Company shall take reasonable steps, to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website www.radhedevelopers.com to ensure official confirmation and documentation of disclosures made.



8. The Company shall handle the unpublished Price Sensitive Information only on a "need to know" basis, i.e., Unpublished Price Sensitive Information shall be disclosed only to those within the Company who need the information to discharge their duty.
9. For "legitimate purposes" the Company may share information including unpublished price sensitive information in the ordinary course of business by an insider, with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals, other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the regulation.
10. Any person in receipt of unpublished price sensitive information pursuant to a "legitimate purpose" shall be considered an "insider" for purposes of the regulation and such persons are also required to ensure the confidentiality of unpublished price sensitive information shared with them, in compliance with the regulation and Insider Trading policy of the Company, which is available in the website of the Company www.radhedevelopers.com.
11. A structured digital database shall be maintained containing the names of such persons or entities as the case may be with whom information is shared for legitimate purposes along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Such databases shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.

(Note: Pursuant to SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 the Board of Directors by Circular Resolution on March 29, 2019 approved the incorporation of Clauses 9 to 11 above, which shall come into force with effect from April 01, 2019.)

