

## **Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information**

[Under Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

This document forms the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“Code”) adopted by Venus Remedies Limited. This Code is consistent with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

### **I) The Principles of Fair Disclosure adopted by Venus Remedies Limited are as follows:**

1. To promptly make public disclosure of unpublished price sensitive information that would impact price discovery. Such disclosures are made no sooner than credible and concrete information comes into being in order to make such information generally available.
2. Uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Company Secretary / 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Company shall act as the Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. To promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise if at all, to make such information generally available
5. To provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.

6. To ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. To publish proceedings of meetings with analysts and of other investor relations conferences on its official website [www.venusremedies.com](http://www.venusremedies.com) to ensure official confirmation and documentation of disclosures made therein.
8. To handle all unpublished price sensitive information on a need-to-know basis only.

## **II) Designated Employees will be:**

1. All the directors
2. Key Managerial Person.
3. All employees of Secretarial Department.
4. Any employee who is having price sensitive information

## **III) Trading window:**

Trading window will be closed during following events:

1. Declaration of Financial Results;
2. Declaration of Dividend;
3. Change in capital structure;
4. Mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
5. Changes in key managerial personnel; and
6. Material events in accordance with the listing agreement.

- The trading window shall be opened 48 hours after information mentioned mentioned in point (III) above becomes generally available.
- All Designated Employees shall conduct all their trading in the securities of the company only in a valid trading window and shall not trade in company's securities during the periods when trading window is closed, as mentioned in point (III) above under trading window

heading or during any other period as may be specified by the Company from time to time.

**IV)** This Code shall be published on the official web site of the Company.

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