

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

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

PREAMBLE

In terms of the Regulations, it is mandatory for every listed Company to formulate a specific Code of Fair Disclosure of Unpublished Price Sensitive Information.

In order to comply with the requirement of the Regulations, Control Print Limited (hereinafter referred to as 'the Company') has formulated a specific Code of Fair Disclosure of Unpublished Price Sensitive Information. The Code seeks to ensure timely, fair and adequate disclosure of price sensitive information to the investor community by the Company to enable them to take informed investment decisions with regard to the Company's Securities.

LEGAL FRAMEWORK

In terms of Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulation, 2015, every listed company to formulate a specific Code of Fair Disclosure of Unpublished Price Sensitive Information.

DEFINITIONS

"Compliance Officer" means the Company Secretary of the Company who shall be responsible for ensuring compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of UPSI, monitoring of trades and the implementation of the Code under the overall supervision of the Board. In the absence of the Company Secretary, the Chief Financial Officer shall, in the interim period, act as the Compliance Officer.

"Chief Investor Relation Officer" ("CIRO") means Compliance Officer of the Company.

"Unpublished Price Sensitive Information" or "UPSI", means any information, relating to the Company or its Securities, directly or indirectly, that is not Generally Available which upon becoming Generally Available, is likely to materially affect the price of the Securities and shall, ordinarily include but not be restricted to, information relating to the following:

- (i) financial results;
- (ii) dividends;
- (iii) change in capital structure;
- (iv) mergers, de-mergers, acquisitions, de-listings, disposals and expansion of business and such other transactions;
- (v) changes in Key Managerial Personnel; and
- (vi) Material Events in accordance with the Listing Regulation.

All other words and phrases used and not defined in this Code but defined in the Act, the SEBI Regulations, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996, the Companies Act, 2013 and rules and regulations made thereunder shall have the meanings respectively assigned to them in those legislations.

CODE OF FAIR DISCLOSURE

To achieve the objective of this Code, the Company will adhere to the following principles to ensure timely and adequate disclosure of price sensitive information with respect to it and its Securities which is likely to affect price of the securities:

- The Company shall ensure prompt 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.
- The Company shall ensure uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- 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.
- The Company shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- The Company shall ensure that information shared with analysts and research personnel, if any, is not unpublished price sensitive information.
- The Company shall develop and follow 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.
- The Company shall handle all unpublished price sensitive information on a need-to-know basis.

AMENDMENT

The Board reserves its right to amend or modify the Code in whole or in part, at any time without assigning any reason whatsoever. However, no such amendment or modification will be binding unless the same is notified in writing.

DISCLOSURES

The Code shall be published on the official website of the Company, i.e. www.controlprint.com.

The Code and every amendment thereto shall be immediately confirmed and intimated to the Stock Exchanges.