



**Code of practices and procedures for fair disclosure of Unpublished Price Sensitive Information**

Version: 1.0

## ONMOBILE- CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

Regulation 8 of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, requires every listed Company to formulate a stated framework and policy for fair disclosure of events and occurrences that would impact the price of the Company's securities in the market.

The principles of Fair Disclosure adopted by OnMobile ('the Company') in pursuance of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 are as follows:

- 1) To make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
- 2) To make disclosures of unpublished price sensitive information in a universal and uniform manner to avoid selective disclosure.
- 3) Designation of a senior officer as a Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information. (*Chief Financial Officer will be the Chief Investor Relations Officer of the Company*)
- 4) To promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.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 regulatory authorities.
- 6) To ensure that the information shared with analysts and research personnel is not unpublished price sensitive information.
- 7) Developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the website of the Company to ensure official confirmation and documentation of disclosures made.
- 8) Handling of all unpublished price sensitive information on a need-to-know basis
- 9) This Code and any amendment thereof will be published on the Company's website [www.onmobile.com](http://www.onmobile.com) and the same shall be promptly intimated to the Stock Exchange where the securities of the Company are listed.

**Note:** Words not defined herein shall have the same meaning as given in OnMobile- Code of Conduct of the Company to Regulate, Monitor and Report Trading by Insiders and Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.