CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

1. Corporate Disclosure Policy:

The following is the Corporate Disclosure Policy/norm to be followed by Kartik Investments Trust Limited ("**Company**") to ensure timely and adequate disclosure of price sensitive information. Unpublished Price Sensitive Information, as defined under the Securities and Exchange Board of India (Prevention of Insider Trading) Regulations, 2015 ("SEBI Insider Trading Regulations") **("UPSI")**. The Company intends to adopt and follow best and fair practices in making public disclosures and this policy lays down the Company's principles for making a fair disclosure/dissemination of its USPI.

Any other term not defined herein shall have the same meaning as defined under the SEBI Insider Trading Regulations, the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 or any other applicable law or regulation to the extent applicable to the Company.

2. Prompt disclosure of price sensitive information:

2.1. Disclosure of USPI would be done promptly when credible and concrete information is available for making the same generally available;

2.2. The Company will endeavour to make uniform and universal dissemination of UPSI and will avoid making selective disclosure once the information is ready to be made generally available. Material events will be disseminated as mandated by the stock exchanges in Regulation 30 of the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulations, 2015 ("**SEBI LODR Regulations**"), as amended from time to time.

2.3. In case there has been any instance of inadvertently making a selective disclosure of UPSI , then the information will be promptly disseminated either in the form of notification to stock exchanges or upload of information on the website of the Company save and except disclosures made pursuant to 2.4 below

2.4. UPSI handling will be on a need to know basis only for legitimate purposes as determined by its policy in this regard (Enclosure I) or performance of duties or discharge of legal obligations.

2.5. The information released to stock exchanges will also be published in the website of the Company for investor access to the public announcements.

3. Overseeing and coordinating disclosure:

3.1. The Chairman of the Board of the Company who is also designated as the Corporate Disclosure Officer (CDO) to oversee corporate disclosure will be the Chief Investor Relations Officer ("**CIO**") to deal with dissemination of information and disclosure of UPSI.

3.2. The CIO shall be responsible for ensuring that the Company complies with continuous disclosure requirements, overseeing and co-coordinating disclosure of unpublished price sensitive information to stock exchanges, analysts, shareholders and media, and educating staff on disclosure policies and procedure.

3.3. Information disclosure/ dissemination may normally be approved in advance by the CIO.

3.4. If information is accidentally disclosed without prior approval, the person responsible may inform the CIO immediately, even if the information is not considered price sensitive.

4. Responding to market rumours:

4.1. Any queries or requests for verification of market rumours by stock exchanges should be forwarded immediately to the CIO who shall decide on the response/clarification.

4.2. Pursuant to Regulation 30(11) of SEBI LODR Regulations, the Company shall, based on the decision of the CIO, confirm, deny or clarify, upon the material price movement (as specified by the Stock Exchanges from to time), any reported event or information in the mainstream media which is not general in nature and which indicates that rumours of an impending specific event or information is circulating amongst the investing public, as soon as reasonably possible and not later than 24 hours from the trigger of material price movement, as pe the requirements stipulated therein.

4.3. Employees of the Company should not respond to enquiries from the stock exchanges, the media or others unless authorised to do so by the CIO of the Company.

4.4. The CIO shall decide whether a public announcement is necessary for verifying or denying rumours and then make the disclosure.

4.5. The Company will, subject to non-disclosure obligations, aim to provide appropriate and fair response to the queries on news reports and requests for verification of market rumours by regulatory authorities.

4.6. As a general practice, if the rumour appears in a responsible media channel which has reasonably wide audience and rumour can have material impact on pricing of securities, then the Company shall consider immediately make a proper announcement to present the correct position.

5. Timely Reporting of shareholdings/ ownership and changes in ownership:

Disclosure of shareholdings/ ownership by major shareholders and disclosure of changes in ownership as provided under any regulations made under the Securities and Exchange Board of India Act, 1992 and the SEBI LODR Regulations shall be made in a timely and adequate manner.

6. Disclosure / dissemination of Price Sensitive Information with special reference to Analysts, Institutional Investors:

The guidelines given hereunder shall be followed while dealing with analysts and institutional investors:-

(i) Only Public information to be provided:

Only generally available public information should be provided to the analyst/ research persons.

(ii) Recording of discussion:

In order to avoid misquoting or misrepresentation, it is desirable that at least two representatives of the Company be present at meetings with analysts, brokers or Institutional Investors and discussion should preferably be recorded.

(iii) Handling of unanticipated questions:

Sufficient care should be exercised while dealing with analysts' questions that raise issues outside the intended scope of discussion. Unanticipated questions may be taken on notice and a considered response given later. Unpublished Price sensitive information should not be disclosed to analysts in response to such questions before such information becomes generally available.

(iv) Prompt release of Information:

The dissemination of transcripts/audio/video recordings on the Company's website and/or submission with the Stock Exchanges shall be made as per the requirements stipulated in Clause 15 of Para A of Part A of Schedule III of SEBI LODR Regulations.

(v) Interaction during Trading Window Closure period

During the trading window closure period, the Directors, Officers and other employees of the Company should refrain from interaction with the media/analysts/ investors

7. Medium of disclosure / dissemination:

i. Disclosure/ dissemination of information may be done through various media so as to achieve maximum reach and quick dissemination which will include press release, filings with stock exchanges, dissemination on website etc.
ii. CIO shall ensure that disclosure to stock exchanges is made promptly.
iii. Company may also facilitate disclosure through the use of their dedicated Internet website.
iv. Company websites may provide a means of giving investors a direct access to analyst briefing material, significant background information and questions and answers.
v. The information filed by the Company with exchanges under continuous disclosure requirements may be made available on the Company website.

8. Maintenance of a Structured database:

The Compliance Officer shall be responsible to maintain a structured digital database of such persons or entities as the case may be with whom UPSI is shared for legitimate purposes along with Permanent Account Number or any other Identifier authorized by law where PAN is not available and such other information as may be prescribed from time to time, containing the details as required under the SEBI Insider Trading Regulations and further ensure that such database is maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the same.

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