



# **Aster DM Healthcare Limited**

## **Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information**

<b>Adoption/Amendment by the Board of Directors</b>	<b>Effective Date</b>
Adoption	November 10, 2020

The Designated Persons of Aster DM shall abide by the following principles of fair disclosure of unpublished price sensitive information for fair disclosure of events and occurrences that could impact price discovery for its securities in the market:

1. The Company shall ensure prompt disclosure of UPSI 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 shall make uniform and universal dissemination of UPSI to avoid selective disclosure. Upon the information being submitted with the Stock Exchanges, the information shall be deemed to be generally available and shall no longer be treated as UPSI.
3. The Company shall promptly disseminate the UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
4. The Company shall ensure that appropriate and fair response is provided to queries on news reports and requests for verification of market rumours by regulatory authorities.
5. The Company shall ensure that the information shared with analysts and research personnel is not UPSI.
6. The Company shall adopt 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.
7. The Company shall handle all UPSI on a need-to-know basis i.e. no UPSI shall be communicated to any person except in furtherance of the legitimate purposes, performance of duties or discharge of his legal obligations.
8. Company Secretary of Aster DM is designated as the "Compliance Officer" to deal with all matters relating to dissemination of information and disclosure of UPSI.

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