

BRIGHT BROTHERS LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

1 Preface:

- a. This Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information is formed under Chapter IV Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 which provides for formulation of a “Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information”
- b. The Code shall become applicable with effect from 15th May, 2015.

2 The Principles and Obligation:

The Company endeavors to preserve the confidentiality of un-published price sensitive information and to prevent misuse of such information. The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations.

Every promoter, director and employee who deals with unpublished price sensitive information has a duty to safeguard the confidentiality of all such information obtained in the course of his or her work at the Company. There shall be no selective disclosure of the information and the Company and every employee of the Company shall endeavor to ensure equal accessibility of information to all the stakeholders associated with the Company.

3 Compliance Officer:

- a. The Company Secretary shall be the Compliance Officer for the purpose of the Code.
- b. For the period when there is no Company Secretary or he is on leave or absent from the corporate office of the Company, the Deputy Company Secretary or the Chief Financial Officer shall function as compliance officer.
- c. For the period when there is no company secretary /deputy company secretary or chief financial officer due to vacancy in the respective post or they are on leave or out of the city for an extended period, Compliance Officer shall be such person who fulfills the norms mentioned in Regulation 2(1)(c) of the Regulations.
- d. The Compliance Officer shall also function as Chief Investor Relation Officer.

4 Code of Practices and Procedures for fair disclosure of unpublished price sensitive information:

- a. The Company shall promptly disclose publicly any unpublished price sensitive information that will impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
- b. The Company will uniformly and universally disseminate in timely manner unpublished price sensitive information to avoid selective disclosure by communicating the same to the stock exchange(s) and disclosing the same on its official website.
- c. The Company designates the Compliance Officer as the Chief Investor Relations Officer (CIRO) to deal with dissemination of information and disclosure of unpublished price sensitive information.
- d. The Company will promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise make such information generally available.
- e. The CIRO will give appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- f. The Company will ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
- g. The Company will make transcripts or records of proceedings of meetings with analysts and other investor relation conferences available in a timely manner on the official website to ensure official confirmation and documentation of disclosures made.
- h. The Company will handle all unpublished price sensitive information on a need to know basis by creating suitable safeguards to avoid unpublished price sensitive information becoming available to any person who is not required to have access to such information.

5 Amendment:

All provisions of this Code would be subject to revision /amendment in accordance with the guidelines on the subject as may be issued by SEBI from time to time.