GODREJ
HOUSING FINANCE

GODREJ HOUSING FINANCE LIMITED

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("UPSI")

1. Preface

This Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code") is framed under Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended, based on the principles of fair disclosure outlined in **Schedule 'A'** therein.

2. Legitimate Purpose

The unpublished price sensitive information can be shared as an exception by an Insider for legitimate purpose as per policy for determination of Legitimate Purpose for disclosure of UPSI of the Company.

3. Principles of Fair Disclosure of UPSI

The Company will adhere to the below identified principles to ensure timely and adequate disclosure of UPSI with respect to it or its securities which is likely to affect price of the securities:

- Compliance Officer of the Company is designated as the Chief Investor Relations Officer and is responsible for dissemination of information and disclosure of unpublished price sensitive information.
- The Company will make, prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
- The Company will make, uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- The Company will make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available, as it deems fit.
- The Company will provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- The Company will ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
- The Company will handle all unpublished price sensitive information on a need-to know basis.

4. Communication of this Code

A copy of this Code and every amendment thereto shall be promptly intimated to the Stock Exchanges. This Code shall also be posted on the website of the Company at https://housingfinance.godrejcapital.com/ghf/information-and-policies.

5. Review, Modification & Changes

- There shall be an annual review of the Code by the Board of Directors.
- Board of Directors can at any time modify or amend, either the whole or any

part of Code, within the regulatory framework.

6. Disclosure to Stock Exchange:

This Code of Fair Disclosure and subsequent amendment(s) thereto shall be promptly intimated to Stock Exchanges where the Securities of the Company are listed.

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