



CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

(Pursuant to the Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015)

PREFACE

The Securities and Exchange Board of India (SEBI), in its endeavor to protect the interests of investors in general, had formulated the SEBI (**Prohibition of Insider Trading**) Regulations, 2015 (“**Regulations**”). In terms of the Regulations, it is mandatory for every listed company to formulate a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information. In order to comply with the mandatory requirement of the Regulations, **Manav Infra Projects Limited** “the **Company**” has formulated following Code of Practices and procedure for fair Disclosure.

APPLICABILITY

The Code of Practices and Procedures for Fair Disclosures is required for the Company to ensure timely and adequate disclosure of Unpublished Price Sensitive Information which would impact the price of the company’s securities and to maintain uniformity, transparency and fairness in dealing with all stakeholders and in ensuring adherence to applicable laws and regulations. Further, the Company endeavors to preserve the confidentiality of un-published price sensitive information and to prevent misuse of such information.

NORMS FOR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

Under this Code, the Company will ensure the following principles, in disclosing Unpublished Price Sensitive Information:

- Prompt public disclosure of all Unpublished Price Sensitive Information (intended to be made public or are required to be made public as per law) that may impact price discovery, as soon as credible and concrete information comes into being, so that such information is generally available.
- Uniform and universal dissemination of Unpublished Price Sensitive Information, to avoid selective disclosure.
- Prompt dissemination of Unpublished Price Sensitive Information that gets disclosed selectively, whether inadvertently or otherwise, in the manner stated above. Rumors and media speculation (including quotes by unnamed persons) will not be considered as selective disclosure.
- Appropriate and fair response to queries on news reports and requests for verification of market rumors, by regulatory authorities.
- No Unpublished Price Sensitive Information will be shared with Analysts, Institutional Investors, and Research Personnel.



- Prompt dissemination of transcriptions or recordings of proceedings of earnings calls, or similar events hosted by the Company, on its website.
- Handling of all Unpublished Price Sensitive Information on need-to-know basis i.e. Unpublished Price Sensitive Information shall be disclosed only to those where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

Chief Investor Relations Officer

The Company Secretary and Chief Financial Officer of the Company will act as the 'Chief Investor Relations Officers', as per the code. The Chief Investor Relations Officer will be responsible for dissemination of information and disclosure of Unpublished Price Sensitive Information, in compliance with applicable corporate and securities laws.

Disclosure

This Code and any amendment thereof will be published on the Company's website www.manavinfra.com.

Amendment of the Code

This Code and any subsequent amendment(s) thereto, shall be promptly intimated to the Stock Exchange where the securities of the Company are listed.