Centrum Housing Finance Limited

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

Document Title	**Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information**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This Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code") is framed under Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 based on the principles of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

2. Objective

This Code lays down the practices and procedures Centrum Housing Finance Limited (the 'Company') would follow in relation to dissemination of UPSI in accordance with the principles as laid down under the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ('SEBI PIT Regulations') and the Securities and Exchange Board of India (Listing Obligations and Disclosure Requirements) Regulation, 2015, as amended from time to time.

3. Company's policy on determination of legitimate purpose

"Legitimate purpose" means sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.

4. Principles of Fair Disclosure of UPSI

The Company will adhere to the followings so as to ensure timely and adequate disclosure of unpublished price sensitive information with respect to it or its securities which is likelyto affect price of the securities:

3.1. The Company will make, prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.

3.2. The Company will make, uniform and universal dissemination of unpublished pricesensitive information to avoid selective disclosure.

3.3. The Compliance Officer of the Company has been designated as "Chief Investor Relations Officer" to deal with dissemination of information and disclosure of unpublished price sensitiveinformation.

3.4. The Company will make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make suchinformation generally available, as it deems fit.

3.5. The Company will provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.

3.6. The Company will ensure that information shared with analysts and research personnel is not unpublished price sensitive information.

3.7. The Company will make transcripts or records of proceedings of meetings with analysts and other investor relations conferences related to quarterly and annual financial results, on the website of the company to ensure official confirmation and documentation of disclosures made.

3.8. The Company will handle all unpublished price sensitive information on a need-to- know basis.

5. Digital Database

The structured digital database is maintained as per the regulatory requirements.

6. Review / Revision of Policy

This Policy would be subject to revision/amendment in accordance with the guidelines asmay be issued by SEBI or such other regulatory authority as may be authorized, from timeto time, on the subject matter.

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.