

JM FINANCIAL CAPITAL LIMITED

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)

This document forms the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“Code”) adopted by JM Financial Capital Limited (the Company). This Code intends to formulate a framework and policy for fair disclosure of events and occurrences that could impact price discovery in the market for the Company’s listed securities. This Code is consistent with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

Principles of fair disclosures adopted by the Board of the Company

1. To promptly make public disclosure of UPSI that would impact price discovery. Such disclosures would be made promptly when credible and concrete information comes into being in order to make such information generally available.
2. The Company shall endeavor to make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosures.
3. The Company’s Chief Financial Officer who is designated as the Investor Relations Officer shall deal with dissemination and disclosure of UPSI.
4. In the event of any UPSI getting disclosed selectively or inadvertently, the Company shall promptly disseminate the same to make it generally available through Stock Exchanges.
5. The Company shall provide appropriate and fair response to the queries on the news report and requests for verification of market rumors received from regulatory authorities.
6. The Company shall not provide any UPSI to the analysts and research personnel while sharing information with them.
7. The Company shall publish the proceedings of meetings with analysts and other investor relations conferences on its website to ensure official confirmation and documentation of disclosures made therein.
8. To handle all UPSI on a need-to-know basis.