

**INTERNAL CONTROL MECHANISM FOR PREVENTION OF INSIDER TRADING**  
(Under Regulation 9A of SEBI (Prohibition of Insider Trading) (Amendment)  
Regulations, 2018)

This is an “**Internal Control Mechanism for Prevention of Insider Trading** and is consistent with the Securities and Exchange Board of India (Prohibition of Insider Trading) (Amendment) Regulations, 2018 (‘Insider Trading Regulations’).

The internal controls shall include the following:

- (a) All employees having access to UPSI are identified as designated employee;
- (b) All the UPSI shall be identified and its confidentiality shall be maintained as per the requirements of the Insider Trading Regulations;
- (c) Adequate restrictions shall be placed on communication or procurement of UPSI as required by the Insider Trading Regulations;
- (d) Lists of all employees and other persons with whom UPSI is shared shall be maintained and confidentiality agreements shall be signed or notice shall be served to all such employees and persons;
- (e) All other relevant requirement specified under the Insider Trading Regulations shall be complied with and administered by the Compliance Officer;
- (f) Periodic process review to evaluate effectiveness of such internal controls shall be done by the Audit Committee.

The Managing Director, Chief Financial Officer and Compliance Officer shall ensure compliance with Regulation 9 and sub-regulations (1) and (2) of the Insider Trading Regulations.

The Audit Committee shall review compliance with the provisions of the Insider Trading Regulations at least once in a financial year and shall verify that the systems for internal control are adequate and are operating effectively.

The Company shall formulate written policies and procedures, which shall be approved by the Board of Directors of the Company for inquiry in case of leak of UPSI or suspected leak of UPSI.

The board of directors of the Company shall initiate appropriate inquiries on becoming aware of leak of UPSI or suspected leak of UPSI and inform SEBI promptly of such leaks, inquiries and results of such inquiries.

The Company shall make employees aware of such policy to enable employees to report instances of leak of UPSI.

The Board of Directors reserves the right to amend or modify this Internal Control Mechanism in whole or in part, at any time without assigning any reason whatsoever and to establish further rules and procedures, from time to time, to give effect to the intent of this mechanism.

This Internal Control Mechanism has been adopted by the Board of Directors of the Company in its meeting held on March 11, 2019.