



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Disclosure of Unpublished Price Sensitive  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

**Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information**  
(Pursuant to Reg. 8(1), Chapter – IV of the SEBI (Prohibition of Insider Trading) Regulations, 2015)

In adherence of the principles of fair disclosure enumerated under Schedule A to the SEBI (Prohibition of Insider Trading) Regulations, 2015, which stand further amended by the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 (hereinafter referred to as “SEBI PIT Regulations”), the Board of Directors of the Company viz. Data Patterns (India) Limited, would follow the following practice and procedure for fair disclosure of unpublished price sensitive information:

1. Any material event/information that could have a bearing on the price discovery of the shares/securities of the Company shall be promptly disclosed.
2. The Company shall always endeavour to follow utmost standards of disclosures ensuring uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Company shall designate a senior officer to act as the as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. In the unlikely event of any unpublished price sensitive information getting disclosed selectively, inadvertently or otherwise, the same shall be made generally available.
5. The Company shall always endeavour to provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. Best practices shall be followed to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
8. All unpublished price sensitive information shall be handled on a need-to-know basis.
9. For determining legitimate purpose as required under Regulation 3(2A) of SEBI PIT Regulations, the below mentioned policy shall be adhered to:
  - i. Sharing of information with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals, other advisors or consultants, shall be considered as “legitimate purposes” for the purpose of sharing unpublished price sensitive information in the ordinary course of business by an insider, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the SEBI PIT regulations.
  - ii. A structured digital database shall be maintained containing the nature of unpublished price sensitive information and the names of such persons or entities as the case may be with whom information is shared for legitimate purposes along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Adequate and effective system of internal controls shall be in place to ensure the compliance of maintenance of a digital database for sharing the information for said legitimate purposes.

- iii. Any person in receipt of unpublished price sensitive information pursuant to a “legitimate purpose” shall be considered an “insider” for purposes of SEBI PIT Regulations and such persons are also required to ensure the confidentiality of unpublished price sensitive information shared with them, in compliance with the SEBI PIT Regulations.
10. The Fair Disclosure Code is subject to review by the Board of Directors as and when deemed necessary.