

COSMO FIRST LIMITED
(Formerly Cosmo Films Limited)

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FOR FAIR DISCLOSURE OF UNPUBLISHED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UNPUBLISHED PRICE SENSITIVE INFORMATION**

Under Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015

This Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information, in relation to the securities of the Company, is framed in terms of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as the 'Regulations'), as amended from time to time.

In terms of the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (hereinafter referred to as the 'Code'), the Company will ensure:

1. Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
2. Uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available unless disclosed under point No. 8 below.
4. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
5. Information shared with analysts and research personnel, if any, is not unpublished price sensitive information.
6. Best practices to be developed and 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.
7. Handling all unpublished price sensitive information on a need-to-know basis.
8. Disclosure of unpublished price sensitive information to persons who need such information for furtherance of legitimate purposes, performance of duties or discharge of legal obligations in relation to the Company.

Unpublished price sensitive information shall be considered to be communicated for legitimate purpose when any employee or any other insider (who is in possession of such information):

- communicates such information, in the ordinary course of business, to the auditors, lenders, customers, suppliers, legal advisers, merchant bankers, partners, collaborators, insolvency professionals or any other advisers or consultants as may be considered necessary;
- submits or provides such information to a court of law or any governmental or regulatory authority;
- communicates or shares such information for any other genuine or reasonable purpose as may be determined jointly by the Compliance Officer and the Chief Investor Relations Officer appointed by the Board of Directors of the Company.

Any person or entity in receipt of unpublished price sensitive information pursuant to 'legitimate purpose', as stated above, shall be considered an 'Insider' for the purpose of the Regulations.

9. Due notice be given to persons or entities with whom unpublished price sensitive information is being shared pursuant to 'legitimate purpose' to maintain the confidentiality of the same.

The Chief Financial Officer of the Company has been designated as the Chief Investor Relations officer of the Company to deal with dissemination of information and disclosure of unpublished price sensitive information relating to the Company to the investors, analysts, press and electronic/social media.

The Code is subject to review by the Board as and when deemed necessary.

The Code will be posted on the Company's corporate website www.cosmofirst.com.
