

Balaxi Pharmaceuticals Limited

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICESENSITIVE INFORMATION

[Sub-regulation (1) of Regulation 8, of Securities Exchange Board of India(Prohibition of Insider Trading) Regulations, 2015]

PURPOSE:

The Board of Directors of every company, whose securities are listed on a stock exchange, shall formulate and publish on its official website, a Code of practices and procedures for fair disclosure (“the Code”) of unpublished price sensitive information that it would follow in order to adhere to each of the principles as stated in Schedule A of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“theRegulations”).

The Board of Directors of the Company is expected to manage the affairs of the Company in a fair, transparent and ethical manner keeping in view the needs and interests of all the stakeholders and to further the objective of good corporate governance.

The Board of Directors of the Company resolves to adopt the Code in furtherance of the longtime commitment of the Company to transparency and fairness in dealing with all stakeholders and in consonance with the mandate of the Regulations.

PREAMBLE:

The Board of Directors of the Company has formulated and adopted the Code for the Company in compliance with Chapter IV read with Schedule A of the Regulations. The Code is also published on the official website of the Company www.balaxipharma.in.

CODE OF FAIR DISCLOSURE OF THE COMPANY

1. The Company shall promptly disclose to the public all the Unpublished Price Sensitive Information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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. The Company shall follow uniform and universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure.
3. The Board of Directors of the Company designated Company Secretary of the company as the Chief Compliance Officer and Chief Investor Relations Officer of the Company to deal with dissemination of information and disclosure of Unpublished Price Sensitive Information.

Balaxi Pharmaceuticals Limited

4. In the event of any Unpublished Price Sensitive Information getting disclosed selectively either inadvertently or otherwise, the Company shall ensure prompt dissemination of Unpublished Price Sensitive Information as generally available, by publishing the same on Company's website.
5. The Company shall ensure appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. The Company shall ensure that information shared with analysts and research personnel is not Unpublished Price Sensitive Information.
7. The Company shall develop best practices to make transcripts or record of proceedings of meetings with analysts and conference calls with investors/analysts on the official website of the Company to ensure official confirmation and documentation of disclosures made.
8. The Company shall handle all Unpublished Price Sensitive Information on a need-to-know basis.

"Need-to-know" basis means that Unpublished Price Sensitive Information should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information.

9. Powers of the Board of Directors

The Board of Directors reserves the right to amend or modify the Code 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 the Code.

The decision of the Board of Directors of the Company with regard to any or all matters relating to the Code shall be final and binding on all concerned.

10) Disclosure of the Code on Public Domain

The Code shall be published on the official website of the Company.

Any amendment(s) to the Code, duly approved by the Board of Directors of the Company, shall be promptly intimated to the Stock Exchanges and shall also be updated on the official website of the Company.

Subsequent modification (s) / amendment (s) to the Regulations shall automatically apply to the Code.