

ZEN TECHNOLOGIES LIMITED

(ISO: 9001: 2008 & ISO 27001: 2005 Certified)
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Corporate Identity Number: L72200TG1993PLC015939

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

Pursuant to Regulation 8(1) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015

Principles of Fair Disclosure for purposes of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

Zen Technologies Limited (the Company) shall adhere to the following principles of fair disclosure in order to ensure timely and adequate disclosure of unpublished price sensitive information relating to the events and occurrences that would impact price discovery in the market for Equity Shares (securities) of the Company.

- 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 Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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 Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
- 3. The Company Secretary & the Compliance Officer is designated as the Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
- 4. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- 5. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- 6. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.
- 7. Developing best practices 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. Handling of all unpublished price sensitive information on a need-to-know basis.



