

Tamboli Capital Limited

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI)

The Securities and Exchange Board of India (SEBI) in its endeavor to protect the investors in general, vide its circular no. LAD-NRO/GN/2014-15/21/85 dated 15.1.2015 has formulated SEBI (Prohibition of Insider Trading) Regulations, 2015 to be effective from 15th May, 2015.

As per Regulation (8) of Chapter IV of SEBI (Prohibition of Insider Trading) Regulation, 2015 every listed company has to formulate and publish on its website "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" (herein after referred to as the "UPSI")

To ensure timely and adequate disclosure of Unpublished Price Sensitive Information and to maintain the uniformity, transparency and fairness in dealing with Stakeholders, the following norms shall be followed by the Company:

1. The Company shall ensure that the UPSI shall be handled on a "need to know" basis, i.e. UPSI shall be disclosed only to those within the Company who need the information to discharge their duty or to discharge legal obligations.
2. The Company shall make prompt public disclosure of UPSI that would impact price discovery as soon as it has credible, concrete information in order to make such information generally available. The said information shall also be uploaded on a continuous and immediate basis on the official website of the Company www.tambolicapital.in
3. The uniform and universal dissemination of UPSI to avoid selective disclosure shall be ensured by the Company.
4. There shall be prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise. It shall be ensured that such information is made generally available.
5. The Compliance Officer of the Company will be The Chief Investor Relations Officer to deal with dissemination of information and disclosure of UPSI.
6. The Company shall respond to queries on news reports and any queries or requests for verification of market rumours by regulatory authorities in appropriate and fair manner.
7. The Company shall provide only public information to analyst/research persons/large investors like institutions but not UPSI.
8. The Company shall develop best practices to make transcripts or records of proceedings of the meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosure made.

This code and any subsequent amendment(s) thereto, shall be promptly intimated to regulatory authority

This Code is approved by the Board of Directors of the Company on 20.05.2015 and shall be effective from 01.06.2015.
