

STABLE TRADING COMPANY LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

SCOPE

This Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code") is adopted by **STABLE TRADING COMPANY LIMITED** (the "Company"). This Code is in compliance with Regulation 8(1) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("Regulations") read with Schedule A of the Regulations.

CODE FOR FAIR DISCLOSURES

1. The Company will make prompt public disclosure of Unpublished Price Sensitive Information (UPSI) in relation to the Company that would impact price discovery of the securities of the Company no sooner than credible and concrete information comes into being in order to make such information generally available.
2. The Company will ensure uniform and universal dissemination of unpublished price sensitive information (UPSI) in relation to the Company via Stock Exchanges where the securities of the Company are listed and in order avoid selective disclosure.
3. The Company Secretary of the Company shall act as the Chief Investor Relations Officer of the Company shall deal with dissemination of information and disclosure of unpublished price sensitive in relation to the Company.
4. The Company will make prompt dissemination of unpublished price sensitive information in relation to the Company that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company will provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company will ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. The Company will develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the Company's website www.stabletrading.in to ensure official confirmation and documentation of disclosures made.
8. The Company will handle all unpublished price sensitive information in relation to the Company on a need-to-know basis.

Dissemination / Sharing of Unpublished Price Sensitive Information (UPSI) for Legitimate Purposes

UPSI can be shared for legitimate purposes which shall include sharing of unpublished price sensitive information in ordinary course of business by an insider with collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants. Legitimate purposes would mean actions including but not limited to sharing of UPSI in any mode, as a part of business operations and in the normal course of business.

Provided that sharing of information for the above-said purposes shall not be carried out with a motive to evade or circumvent the prohibitions of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Legitimate purposes shall be determined by the Company Secretary of the Company in consultation with the Managing Director, which shall be in the best interest of the Company.

Any person who is in receipt of the UPSI for legitimate purposes shall be considered as an "insider" and due notice shall be given to such person to maintain confidentiality of the UPSI.

Amendments to the Policy

The Board of Directors shall amend this policy, as may be required to be in line with the changes, amendments and modifications if any in the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Further, in case of any amendment, clarification, circular, notification etc. issued by a competent authority, which is not consistent with the provisions laid down under this Policy, the provisions of such amendment, clarification, circular, notification, etc. shall prevail and this policy shall stand amended accordingly, without any further action, on and from the date on which such amendment, clarification, circular, notification comes in to effect.
