



**CODE OF PRACTICES AND PROCEDURE FOR FAIR
DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE
INFORMATION**

1. PREAMBLE

In accordance with Regulation 8 of Chapter IV of SEBI (Prohibition of Insider Trading) Regulation, 2015, the Board of Directors (“The Board”) of The Byke Hospitality Limited (the “Company”) has adopted the following Code of Practices and Procedure for Fair Disclosure of “Unpublished Price Sensitive Information”.

The Company is committed to preserve the confidentiality of un-published price sensitive information and to prevent the misuse of such information.

2. DEFINITIONS

- a) **"unpublished price sensitive information"** means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following:–
- i) financial results;
 - ii) dividends;
 - iii) change in capital structure;
 - iv) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
 - v) changes in key managerial personnel
- b) **"generally available information"** means information that is accessible to the public on a non-discriminatory basis.
- c) **"compliance officer"** means any senior officer, designated so and reporting to the board of directors or head of the organization in case board is not there, who is financially literate and is capable of appreciating requirements for legal and regulatory compliance under these regulations and who shall be responsible for compliance of policies, procedures, maintenance of records, monitoring adherence to the rules for the preservation of unpublished price sensitive information, monitoring of trades and the implementation of the codes specified in these regulations under the overall supervision of the board of directors of the listed company or the head of an organization, as the case may be.

3. PRINCIPLES OF FAIR DISCLOSURE FOR PURPOSES OF CODE OF PRACTICES AND PROCEDURE FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

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 Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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 Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.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. Designation of a senior officer as a 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.

4. DISSEMINATION OF THIS POLICY

This policy shall be disclosed on the Company's website www.thebyke.com

5. AMENDMENT

The Board of Directors of the Company is authorized to make necessary changes to the above policy as and when required. If any change is necessary to be made due to statutory amendments, the same shall be made with the approval of the Managing Director of the Company and the same shall be placed at the next Meeting of the Board of Directors for information and ratification.

6. EFFECTIVE DATE

This policy shall come into effect from the date of its adoption.

7. REVIEW

This policy will be reviewed by the Company at regular intervals.