

# Avon Mercantile Limited

## Code of Practices and Procedure for Fair Disclosure of Unpublished Price Sensitive Information

[As envisaged under Regulation 8(1) SEBI (Prohibition of Insider Trading) Regulation, 2015]

### Principals of Fair Disclosures for purpose of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

1. The company will make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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. The company will make, uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The compliance officer of the company shall act as chief investor relation officer to deal with dissemination of information and disclosures of unpublished price sensitive information.
4. The company will make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.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 The company will ensure that information, if shared, with analysts and research personnel are not unpublished price sensitive information.
7. The company will develop best practice 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. The company will handle all unpublished price sensitive information on a need-to-know basis.

The code has been adopted by the Board of Directors and subject to review from time to time.

For Avon Mercantile Limited

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## Code of Conduct

This code of conduct is prescribed for all employees, including managerial and superintending staff of the company. Every employee of the company must adhere to guidelines prescribed below in his conduct and behavior:

1. Act in the best interests of, and fulfill fiduciary obligations to the company;
2. Act honestly, fairly, ethically and with integrity;
3. Conduct themselves in a professional, courteous and respectful manner and not take improper advantage of the position;
4. Act in a socially responsible manner, within the applicable law, rules and regulations, customs and traditions of the countries in which the company operates;
5. Act for the upliftment of poor, downtrodden and needy;
6. Comply with communication and other policies of the company;
7. Act in good faith, responsibility, with due care, competence and diligence, without allowing their independent judgement to be subordinated;
8. Not to use the company's property or position for personal gain;
9. Not to use any information or opportunity received by them for personal interest or in a manner that would be detrimental to the company's interest;
10. Act in a manner to enhance and maintain the reputation of the company;
11. Help create and maintain a culture of high ethical standards and commitment to compliance;
12. Keep the company informed in a appropriate and timely manner any information in the knowledge of the member which is related to the decision making or is otherwise critical for the company;
13. Show and practice no discrimination based on race, gender, religion, caste, age, disability, national origins or other such factors;
14. Pursue excellence in all sphere of activities and strive to achieve the highest quality, effectiveness and dignity in their professional work and give utmost attention to business responsibilities and do their duty conscientiously and without fear or favour;
15. Encourage and support professional development of fellow employees by providing necessary assistance and cooperation, thus enhancing the quality of working.
16. Not put himself in a position where there is potential conflict of interest between personal interest and duty to company;
17. Not indulge in any internal trading of the company's shares and stocks;
18. Not indulge in consumption of tobacco, cigarette, drugs, alcohol or any other banned substance within the premises of the company within and after office hours;
19. Not carry any weapon or other unsafe article within the premises of the company;
20. All personnel shall ensure protection of company's properties and interests at all times.