

COMMITMENT FINANCE CODE OF PRACTICES
and
PROCEDURES FOR FAIR DISCLOSURE
Of
UNPUBLISHED PRICE SENSITIVE INFORMATION

[Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015]



Commitment Finance Limited
C/O Business Communication Centre 21,
Parsee Church Street, Opp. 18, Ezra Street Kolkata
West Bengal -700001

COMMITMENT FINANCE LTD

CIN: L65923WB1990PLC050406

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CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

Commitment Finance Limited (the Company) follows the highest standards of transparency and fair disclosure, and ensures that all material updates / information are shared with the stakeholders – including investors, market analysts, media and other third parties – in a timely, orderly, consistent and credible manner.

As per practice, all material updates, including Unpublished Price Sensitive Information (UPSI), which are intended to be made public or require public disclosure under any law, are submitted to the stock exchanges, uploaded on the company's web-site, and if deemed necessary, informed to media by way of press release / media statement. Such material updates / UPSI are also intimated through email to those who register their email id, on the Company's website, the Investor Relations Section.

In compliance with Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Board of Directors formally adopts this Code of Conduct.

Under this Code, the Company will ensure the following Principles, in disclosing UPSI.

1. Prompt public disclosure of all UPSI (intended to be made public, or are required to be made public as per law) that may impact price discovery, as soon as credible and concrete information comes into being so that such information is generally available.
2. Uniform and universal dissemination of UPSI, to avoid selective disclosure.
3. Prompt dissemination of UPSI that gets disclosed selectively, whether inadvertently or otherwise, in the manner stated above. Rumors and media speculation (including quotes by unnamed persons) will not be considered as selective disclosure.
4. Appropriate and fair response to queries on news reports and requests for verification of market rumors, by regulatory authorities.
5. No UPSI will be shared with Analysts, Institutional Investors, and Research Personnel

6. Prompt dissemination of transcriptions or recordings of proceedings of earnings calls, or similar events hosted by the Company, on its website.

7. Handling of all UPSI on need-to-know basis.

The Company will maintain a functional and updated website containing complete details, including information about its various businesses, products and services, financial information, quarterly and annual results, annual reports, management and ownership structure, investor presentations, press releases, stock exchanges submissions, shareholders communications, contact details, etc., for universal disclosure of UPSI.

The Head – Investor Relations of the Company, will act as the ‘Chief Investor Relations Officer’, as per the Code. The Chief Investor Relations Officer will be responsible for dissemination of information and disclosure of UPSI, through the Company Secretary, in compliance with applicable corporate and securities laws.

The Code will be published on the website of the Company.

The Code can be modified at any time by the Board of Directors of the Company, or by the Company Secretary to reflect any changes / amendments / clarifications notified by SEBI, subject to ratification of such amendment by the Board, in its next meeting.

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