

REGANTO ENTERPRISES LIMITED

Preliminary

This Code of practices and procedures of fair disclosure of unpublished price sensitive information (“Code”) is framed pursuant to Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015 (“Regulations”), as amended from time to time. This Code has been framed with an aim to ensure fair disclosure of unpublished price sensitive information, that Reganto Enterprises Ltd would follow in order to adhere to each of the principles set out in Schedule A to the Regulations without diluting the provisions of the Regulations in any manner, by the Company to the Stock Exchanges and disseminate on a continuous and prompt basis.

Principles of Fair Disclosure:

Code of practices and procedures for fair disclosure of unpublished price sensitive information (“UPSI”) is set out below:

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 Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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 Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.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. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
4. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
5. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.
6. 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.
7. Handling of all unpublished price sensitive information on a need-to-know basis.

Investor Relations Officer

The Company Secretary shall be the Chief Investor Relations Officer of the Company. In absence of the Company Secretary, the Board of Directors may authorize such other senior officer to discharge the duties of the Chief Investor Relations Officer.

Responding to Market Rumours

All queries or requests for verification of market rumours by exchanges shall be directed to the Company Secretary and Compliance Officer and be sent at the following address:



Reganto Enterprises Ltd.

1117, 11th Floor, Hemkunt Chamber, 89, Nehru Place, New Delhi, Delhi-110019

The Company Secretary and Compliance Officer on receipt of such requests shall respond appropriately and fairly to the queries on news reports and requests for verification of market rumours by regulatory authorities within a reasonable time.

Legitimate Purpose

It shall include sharing of UPSI Information of the Company in the ordinary course of business only if the same is necessary to be shared in order to complete any task/ activity/ deal including any other assignment for furtherance of the business interest by an Insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Any person in receipt of UPSI pursuant to a legitimate purpose shall be considered an “insider” for purposes of the Regulations.

Disclosure / publication of the Code and any amendments

This Code and any amendment(s) thereto, shall be promptly intimated to the stock exchange here the securities of the Company are listed and shall be published on the Company’s website at [www. regantoenterprises.com](http://www.regantoenterprises.com).
