

# Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

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*(As per Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015)*

A Code of practices and procedures for fair disclosure of unpublished price sensitive information has been set out as below for adhering to each of the principles:

- i. The Company shall ensure prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
- ii. The Company shall ensure uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
- iii. For the purpose of this Code, the Compliance Officer of the Company shall act as the Chief Investor Relations Officer for dealing with dissemination of information and disclosure of UPSI.
- iv. The Company shall promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- v. The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- vi. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
- vii. The Company shall develop 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.
- viii. The Company shall handle of all unpublished price sensitive information on a need-to-know basis.

This Code shall be published on the web site of the Company [www.nucleussoftware.com](http://www.nucleussoftware.com). This Code and every subsequent modification, alteration or amendment made thereto, shall also be intimated to the Stock Exchange where the securities of the Company are listed.