

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION (CODE OF FAIR DISCLOSURE)

Version Control

Version No.	Approved By	Approval Date	Effective From	Last Modified on
1.0	Board	23-5-2021		

1. Preamble:

2. The board of directors of every company whose securities are listed on a stock exchange is required to formulate and publish on its official website, a code of practices and procedures for fair disclosure of unpublished price sensitive information. The board would follow each of the principles set out in Schedule A to SEBI (Prohibition of Insider Trading) Regulations, 2015 without diluting the provisions of the Regulations in any manner. Accordingly, the Board of Directors of Star Health and Allied Insurance Co. Ltd (“**Company**”) has formulated this Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information. The policy shall be promptly intimated to the stock exchanges on which the securities of the Company are listed.. **Chief Investor Relation Officer**

The Chief Investor Relation Officer (CIRO) shall be responsible for dissemination of information and disclosure of Unpublished Price Sensitive Information (“**UPSI**”) to the investors, analysts, press and electronic / social media. In the temporary absence of the CIRO, the Managing Directors may nominate any other official of the Company to be responsible for dissemination of information and disclosure of UPSI.

3. Principles of Fair Disclosure

The Company shall ensure:

- a. Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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- b. Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
- c. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.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- e. Ensuring that information shared with analysts and research personnel is not unpublished price sensitive information.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- g. Handling of all unpublished price sensitive information on a need-to-know basis.

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The Company shall also ensure that no UPSI is disclosed selectively to any one or group of research analysts or investors to the disadvantage of other stakeholders. In the unlikely event of any UPSI being disclosed selectively, inadvertently or otherwise, at a meeting with analysts or at any investor relations conference, such UPSI would be promptly communicated to the Stock Exchanges where the Company's securities are listed.

UPSI shall be considered to be communicated for legitimate purpose when any employee or any other insider (who is in possession of such information):

- a) communicates such information, in the ordinary course of business, to the auditors, lenders, customers, suppliers, legal advisers, merchant bankers, partners, collaborators, insolvency professionals or any other advisers or consultants as may be considered necessary;
- b) submits or provides such information to a court of law or any governmental or regulatory authority
- c) communicates or shares such information for any other genuine or reasonable purpose as may be jointly determined by the Chief Investor Relations officer and Compliance Officer appointed by the Board of the Company under the Regulations

4. Disclosure:

This policy shall be published on the Company's website for public information.

5. Review:

The Board reserves the right to modify or amend the policy from time to time on the basis of the developments in the extant law and regulations and tax related matters. Accordingly, the policy will be reviewed on need basis and implemented with the approval of the Board
