

STELLAR CAPITAL SERVICES LIMITED

(CIN: L74899DL1994PLC062247)

Regd Office : Plot No. A1 and A2, Road No.43, Mangolpuri Industrial Area,
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CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

[Pursuant to Regulation 8(1) of the Securities and Exchange Board of India (Prohibition of
Insider Trading) Regulations, 2015]

Preamble:-

This Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information is formed under Regulation 8(1) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, which provides for formulation of a “Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information” for the Board of Directors of the Company.

Principle of Fair Disclosure for the purpose of Code of Practices & Procedures for Fair Disclosure of Unpublished Price Sensitive Information

The Company will adhere to the following code for fair disclosure to ensure fair and uniform disclosure of all events and occurrences that would impact the price of the securities of the Company:

- a) The Company shall ensure prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
- b) The Company shall ensure Uniform and Universal dissemination of unpublished price Sensitive Information to avoid selective disclosure.
- c) The Managing Director of the Company shall act as the Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished Price Sensitive Information.
- d) The Company shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- e) The Company shall provide appropriate and fair responses to queries on news reports and requests for verification of market rumours by regulatory authorities.
- f) The Company will ensure that information share with analysts and research personnel, if any, is not unpublished price sensitive information.
- g) The Company shall develop and follow 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 & documentation of disclosures made.
- h) The Company shall handle all unpublished Price Sensitive information on a need to know basis.