

WILLIAMSON FINANCIAL SERVICES LIMITED

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Policy on Fair Disclosure for purposes of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

(This revised Policy will be effective on and from 1st April, 2019)

[Vide sub-Regulation (1) of Regulation 8 and sub-Regulation (2A) of Regulation 3 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 read with the Securities and Exchange Board of India (Prohibition of Insider Trading) (Amendment) Regulations, 2018]

The Policy of Fair Disclosure of unpublished price sensitive information as enumerated hereunder shall be effective solely for the 'legitimate purpose' of the Company, which means sharing of the information in the ordinary course of business - with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants - with the clear instruction to the particular recipient of the information that it is strictly for the purpose of performance of the act agreed upon or for which the recipient has been engaged and shall not be disclosable to any other person not directly connected with such 'act' or 'engagement' for any reason whatsoever until allowed by the Company to do so .

1. Timing of Disclosure: The Company shall disclose any incident generating or leading to an unpublished price sensitive information ('such incident')[as defined under the SEBI (Prohibition of Insider Trading) Regulations, 2015] whenever the same will materialise finally.

- 2 .Means of Disclosure: Such disclosures shall be through the Stock Exchanges where its Shares are listed and if so merited or statutorily required, through the Company's website and such newspaper/s as the Board of Directors may decide.

3. Investor Relations: The Company Secretary shall act as the chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. Inadvertence: During the progress of such incident and until its finality, the Company shall take all possible safeguards to protect its confidentiality. In case of any inadvertent or selective disclosure about such incident, the Company shall promptly clear its position by appropriate means.
5. Unverified information: If any rumour or unverified information regarding the Company comes into its notice, it shall clear its standing suitably inclusive of replying any query from regulatory authorities and shareholders.
6. Analysis and Research: The Company shall not share with any analysts and research personnel, any unpublished price sensitive information. Important outcomes of Meetings with analyst and investors will be suitably documented and posted in brief on the Company's website for general information of the public.
7. Need to know : All unpublished price sensitive information shall be handled on need to know basis and for the legitimate purpose.