

EAST WEST HOLDINGS LIMITED

(Formerly Bullish Bonds & Holdings Ltd)

CODE OF PRACTICE AND PROCEDURE FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

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1. INTRODUCTION

To protect the interests of stakeholders and to avoid the misuse of the Unpublished Price Sensitive Information in the day to day business affairs and In line with the Regulation 8(1) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended ("Insider Trading Regulations"), the Board of Directors ("Board") of EAST WEST HOLDINGS LTD (The Company) has pursuant to the aforementioned Regulations adopted the following Code of Practices and Procedures for Fair Disclosures of Unpublished Price Sensitive Information ("Code").

2. OBJECTIVE OF THE POLICY:

The objective of this Policy is to:

- prevent the misuse and ensure timely and adequate disclosure of Unpublished Price Sensitive Information ('UPSI'),
- to maintain the uniformity, transparency and fairness in dealing with the stakeholders and
- to govern the conduct of the insiders connected persons and the persons who are deemed to be connected person on matters relating to insider trading.

3. PRINCIPLE OF FAIR DISCLOSURE:

1. The Company shall ensure prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
2. The Company shall ensure a uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. Designation of officer as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information
4. Disclose press releases issued by it from time to time which are considered to be important for the general public besides putting the same on Company's website.
5. The Company shall ensure prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
6. The Company shall ensure appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
7. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
8. The Company shall ensure for handling of all unpublished price sensitive information on a need-to-know basis.

Note: Words not defined herein shall have the meaning as per the Securities and Exchange Board of India (SEBI) (Prohibition of Insider Trading) Regulations, 2015, as amended ("Insider Trading Regulations").

4. LEGITIMATE PURPOSE

The UPSI can be shared by an Insider for Legitimate purposes as per its "Policy for determination of Legitimate Purposes" (Annexure A), provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.

Annexure A

POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES

1. INTRODUCTION:

This "Policy for Determination of Legitimate Purposes" hereinafter referred to as the "Policy" is prepared in accordance with Regulation 3(2A) of SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018.

2. OBJECTIVE OF THIS POLICY:

The objective of this policy is to identify 'Legitimate Purposes' for performance of duties or discharge of legal obligations, which will be considered as exception for procuring UPSI relating to the Company.

The assessment of whether sharing of UPSI for a particular instance would tantamount to 'legitimate purpose' would depend on the specific facts and circumstances of each case.

3. DEFINATION:

I. "Legitimate Purposes" means sharing of UPSI in the ordinary course of business by an Insider with the following, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations:

- Company's Partners
- Auditors, Accountancy firms, Legal advisors, Merchant Bankers, Consultants
- Collaborators
- Lenders
- Customers
- Suppliers
- Any other advisors/consultants/partners
- Any other person with whom UPSI is shared

II. "Insider" means any person in receipt of UPSI pursuant to a "legitimate purpose" shall be considered as an "insider" for purpose of these regulations and due notice shall be given to such persons (Insiders) to maintain confidentiality of such unpublished price sensitive information in compliance with these regulations

4. AMENDMENT/REVIEW OF THE POLICY

The Board of Directors reserves the power to review and amend this policy from time to time as may be deemed necessary as per any regulatory amendments. In the event of any conflict between the provisions of this Policy and of the Act or Regulations or any other statutory enactments, rules, the provisions of such Act or Regulations or statutory enactments, rules shall prevail over this Policy.
