

COMBAT DRUGS LIMITED

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

The Board of Directors of the Company has formulated and adopted a Code of Practices and Procedures for Fair Disclosures of “**Unpublished Price Sensitive Information**” (“**UPSI**”) as defined in and arising from SEBI Prohibition of Insider Trading Regulations 2015 to be followed. Under this Code, the Company will:

1. Make prompt public disclosure of **such** UPSI that would impact price discovery so that this information becomes **generally available** no sooner than credible and concrete information comes into being of such UPSI being in the public domain.
2. Make uniform and universal dissemination of UPSI so as to avoid selective disclosure.
3. Make prompt dissemination of **such** UPSI **that** gets disclosed selectively, inadvertently or otherwise so that such information becomes generally available.
4. Provide for the Compliance Officer to act as Chief Investor Relations Officer to deal with dissemination of information and disclosure of UPSI.
5. Handle all UPSI on a need-to-know basis.
6. Provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
7. Ensure that information, if shared, with analysts and research personnel, is not UPSI.
8. 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.

This code has been adopted by the Board of Directors of the Company and it shall come into force from May 30, 2015.

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