



GTL Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

➤ Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information:

The Company adopts the following Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information with effect from 01st May, 2026. This Code is consistent with the SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended.

The Principles of Fair Disclosure adopted by GTL are as follows:

1. To promptly make disclosure of Unpublished Price Sensitive Information that would impact price discovery. Such disclosures are made no sooner than credible and concrete information comes into being in order to make such information generally available.
2. To make disclosures of Unpublished Price Sensitive Information in a uniform and universal manner through forums like widely circulated media and/or through stock exchanges where its equity shares are listed. Selective disclosure of Unpublished Price Sensitive Information is to be avoided.
3. The Designated Person(s) of the Company shall promptly disclose any Unpublished Price Sensitive Information to the Chief Investor Relations Officer of the Company to ensure compliance with The Fair Disclosure Code of the Company.
4. GTL's Chief Financial Officer serves as the Chief Investor Relations Officer (CIRO) to deal with dissemination of information and disclosure of Unpublished Price Sensitive Information.
5. To promptly disseminate Unpublished Price Sensitive Information that gets disclosed selectively, inadvertently or otherwise if at all, to make such information generally available.
6. To provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
7. To ensure that information shared with analysts and research personnel is not Unpublished Price Sensitive Information.
8. To publish proceedings of meetings with analysts and investor relations conferences on its official website www.gspltrans.com to ensure official confirmation and documentation of disclosures made therein.
9. To handle all Unpublished Price Sensitive Information on a Need-to-Know basis only.

10. Sharing of information with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals, other advisors or consultants, shall be considered as "Legitimate Purposes" for the purpose of sharing Unpublished Price Sensitive Information in the ordinary course of business by an Insider, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the SEBI (Prohibition of Insider Trading) Regulations, 2015.
11. A Structured Digital Database shall be maintained containing the names of such persons or entities as the case may be with whom information is shared for Legitimate Purposes along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the data base will also be laid out to ensure the compliance of maintenance of a digital database for sharing the information for said Legitimate Purposes.
12. Any person in receipt of Unpublished Price Sensitive Information pursuant to a "Legitimate Purpose" shall be considered an "Insider" for purposes of SEBI (Prohibition of Insider Trading) Regulations, 2015 and such persons are also required to ensure the confidentiality of Unpublished Price Sensitive Information shared with them, in compliance with SEBI (Prohibition of Insider Trading) Regulations, 2015.

Apart from the above, the Board of Directors of the Company may stipulate further guidelines, procedures and rules, from time to time, to ensure Fair Disclosure of Unpublished Price Sensitive Information.