

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“the Code”)

1.1 Policy for fair disclosure of UPSI

Pursuant to Regulation 8(1) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, Oracle Financial Services Software Limited (“Oracle” / “the Company”) shall adhere to the following principles for fair disclosure Unpublished Price Sensitive Information (“UPSI”) with respect to its securities which is likely to affect price of the securities:

1. The Company shall promptly make public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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 The Company shall have a uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. Chief investor relations officer shall deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
5. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
6. The Company shall develop best practices to make transcripts or records if any of proceedings of company organised analyst calls and other investor relations conferences on the Company’s website to ensure official confirmation and documentation of disclosures made.
7. The Company shall handle all unpublished price sensitive information on a need-to-know basis in furtherance to legitimate purpose. The policy for determination of Legitimate Purpose forms part of this Code.

1.2 Policy for determination of Legitimate Purpose

Pursuant to Regulation 3(2A) of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015:

1. Definition of Legitimate Purpose

“Legitimate purpose” shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider on a need to know basis with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.

2. Procuring of Information in furtherance of Legitimate Purpose

No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to the Company or its securities except in furtherance of legitimate purpose, performance of duties, or discharge of legal obligations.

Any person in receipt of unpublished price sensitive information pursuant to a “legitimate purpose” shall be considered as an insider for the purposes of this Code and such person shall maintain confidentiality of such unpublished price sensitive information in compliance of this Code.

3. Confidentiality and Non-Disclosure obligations

The Company may require the parties to execute agreements to contract confidentiality and non-disclosure obligations on the part of such parties and such parties shall keep information so received confidential, except for legitimate purpose, performance of duties, or discharge of legal obligations and shall not otherwise trade in securities of the Company when in possession of unpublished price sensitive information.

1.3 Disclosures

The Code shall automatically stand modified to cover revision(s)/amendment (s) in accordance with the applicable laws, regulations in force from time to time.

This Code is uploaded on the Company's website www.oracle.com/financialservices
