TOHEAL PHAARMACHEM LIMITED

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)

This Document forms the Code of Practices and Procedure for Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code") adopted by Toheal Phaarmachem Limited. This Code is consisted with SEBI (Prohibited of Insider Trading) Regulation, 2015.

The Principles of Fair Disclosure adopted by Toheal Phaarmachem Limited are as follows:

a) Prompt public disclosure of UPSI that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.

b) Uniform and universal dissemination of UPSI to avoid selective disclosure.

c) Designation of a senior officer as a Chief Investor Relations Office to deal with dissemination of information and disclosure of UPSI. The Chief Investor Relations Officers may, along with the compliance Officer, coordinate the dissemination of UPSI.

d) Prompt, dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

e) Appropriate and fair response to queries on news reports and request for verification of market rumors by regulatory authorities.

f) Ensuring that information shared with analysts and research personnel is not UPSI.

g) Developing best practices to make transcripts or records of proceeding of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosure made.

h) Handling of all UPSI on a need-to-know basis.

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