

**Code of Practice and Procedure for
(Fair Disclosure of Unpublished Price Sensitive Information)**

Formulated with Sub regulation (1) of Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015 read with Schedule A thereof

- A) This code may called “SRL code for FDUPSI”
- B) This code shall come into force from 15th May, 2015
- C) Covenants of Code are:
- 1 SRL insure to make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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 - 2 SRL shall ensure to make uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
 - 3 SRL has designated Ms. Parul Choudhary, Company Secretary as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
 - 4 SRL shall ensure to make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
 - 5 SRL shall ensure to make appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
 - 6 SRL shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
 - 7 SRL shall be developing 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.
 - 8 SRL shall handle all unpublished price sensitive information on a need-to-know basis.

Persons of SRL, who are in possession or access to unpublished price sensitive information, shall handle such information with care and to deal with information with them as and when transacting their business strictly on a need to know basis.
