

SUMERU INDUSTRIES LIMITED

Code of Fair Disclosure of Unpublished Price Sensitive Information under Regulation 8 of the SEBI (Prohibition of Insider Trading) Regulations, 2015

The Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992, which was amended on 20th February, 2002 is replaced by the new regulation namely “Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation, 2015 (hereinafter referred to as “Regulations”) to put in place a framework for prohibition of Insider Trading in securities and to strengthen the legal framework thereof.

In terms of regulation 8, the Board of Directors of the Company has formulated this Code of Practices and procedures for fair disclosure of unpublished Price Sensitive Information effective from 15th May, 2015, in order to adhere to the principles set out below:

1. The Company shall make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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. The Company shall make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosures.
3. In case of any unpublished price sensitive information gets disclosed selectively, inadvertently or otherwise, the Company shall make prompt dissemination of such information to make it generally available.
4. The Company shall give 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 The Company shall ensure that the information shared with analysts and research personnel is not unpublished price sensitive information.
6. The Company shall post transcripts or records of proceedings of meetings with analysts and other investor relations conferences on its official website to ensure official confirmation of documentation of disclosures made.
7. The Company shall handle all unpublished price sensitive information on a need to know basis i.e. unpublished price sensitive information should be disclosed only to those within the Company who need the information to discharge their duties and whose possession of such information will not get rise to a conflict of interest or misuse of the information.
8. The Company Secretary of the Company is designated as the “Compliance Officer” to deal with all matters relating with dissemination of information and disclosure of unpublished price sensitive information.
9. The Board of Directors may amend this code from time to time.

This code shall be published on the website of the Company www.sumerugroup.in