

South Asian Enterprises Limited

CIN – L91990UP1990PLC011753

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Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

[Under Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015(hereinafter referred to as 'regulations')]

The Board of Directors of South Asian Enterprises Limited (hereinafter referred to as “Company”) has adopted the following Principles of Fair Disclosure for purposes of ‘Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information’ under the regulations. It shall come into force w.e.f. 29/05/2015.

1. The Company shall ensure prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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 The Company shall handle all unpublished price sensitive information on a need to know basis.
3. The Company shall ensure uniform and universal dissemination of unpublished price sensitive information and avoid selective disclosure.
4. The Company shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company Secretary shall be ex-officio Compliance Officer of the Company for the regulations unless decided otherwise by the Board of Directors and shall also act as the Chief Investor Relations Officer of the Company under the regulations to deal with dissemination of information and disclosure of unpublished price sensitive information.
6. The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
7. The Company will ensure that information shared with analysts and research personnel, if any, is not unpublished price sensitive information.
8. The Company shall develop and follow 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.
