

# **SHRIRAM ASSET MANGEMENT COMPANY LIMITED**

## **CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

(Pursuant to Regulation 8 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015)

The Board of Directors of Shriram Asset Management Company Limited ("Company") adopted the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code") effective from May 15, 2015 framed on the basis of the principles of fair disclosure outlined in the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("SEBI PIT Regulations"). These Regulations were further amended by the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018. Accordingly, the Board of Directors of the Company would follow the following practice and procedure for the fair disclosure of unpublished price sensitive information:

1. The Company shall ensure to make prompt public disclosure of unpublished price sensitive information (UPSI) that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. Uniform and universal dissemination of UPSI would be ensured by the Company by adopting a common platform i.e. Stock Exchanges for public disclosure. Once the UPSI is communicated to Stock Exchanges as aforesaid, then other medium of dissemination may also be used to ensure such information is made accessible to the public on a non-discriminatory basis.
3. The Company has designated Ms. Reena Yadav, Company Secretary as a Chief Investor Relations Officer (CIO) to deal with dissemination and disclosure of UPSI.
4. The Company shall ensure prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information and disclosure of UPSI.
5. The Chief Investor Relations Officer of the Company is authorized to respond to any queries that may be received from Stock Exchanges, any regulatory authorities, press or investors of the Company, for verification of any market rumours relating to the Company, subject to internal clearances.
6. The Company shall ensure that information shared with analysis and research personnel is not an UPSI.
7. The Company shall develop 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. Any information that may be classified as UPSI would be dealt with the Directors, Employees of the Company and Connected persons on 'Need to Know' basis only.
9. Sharing of UPSI for 'legitimate purpose'.

UPSI can be shared for legitimate purposes which shall include sharing of unpublished price sensitive information in ordinary course of business by an insider with collaborators, lenders, customers, suppliers, merchant bankers, legal advisors,

auditors, insolvency professionals or other advisors or consultants. Legitimate purposes would mean actions including but not limited to sharing of UPSI in any mode, as a part of business operations and in the normal course of business. Provided that sharing of information for the above-said purposes shall not be carried out with a motive to evade or circumvent the prohibitions of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Any person who is in receipt of the UPSI for legitimate purposes shall be considered as an "insider" and due notice shall be given to such person to maintain confidentiality of the UPSI.