

## **SYSCHEM (INDIA) LIMITED**

### **Code of Practices & Procedures for Fair Disclosure of Unpublished Price Sensitive Information**

*(As envisaged under SEBI (Prohibition of Insider Trading) Regulations, 2015)*

#### **1. Prompt public disclosure of unpublished price sensitive information**

1.1 The Board of Directors of the Company shall ensure prompt public disclosure of Unpublished Price Sensitive Information pursuant to this Code as required under the Regulations with an objective to make such information generally available in public domain.

1.2 The disclosure of Unpublished Price Sensitive Information shall be in a uniform manner and shall not be on selective basis.

1.3 The Company shall disseminate all unpublished price sensitive information promptly and on a continuous basis to stock exchanges where its securities are listed and thereafter to the electronic or print media so as to make generally available.

#### **2. Chief Investors Relations Officer**

2.1 Mr. Ranjan Jain, Director of the company shall act and designated as a Chief Investor Relations Officer of the Company and shall deal with dissemination and disclosure of unpublished price sensitive information.

2.2 Mr. Ranjan Jain, Director of the company acting as Chief Investor Relations Officer shall discuss with Managing Director / Whole-time Director & CFO depending upon the nature of sensitivity of the information.

#### **3. Responding to Market Rumours**

3.1 The Company will provide appropriate and fair response to queries on news reports and requests for verification of market rumours received from the stock exchanges or other regulatory authorities.

3.2 The Chief Investor Relations Officer shall on receipt of requests as aforesaid, consult the Managing Director / Whole-time Director & CFO and respond to the same without any delay.

#### **4. Disclosure / dissemination of unpublished price sensitive information with special reference to Analysis, Research Personnel and Institutional Investor.**

##### **4.1 Sharing of Public Information :**

The Directors, Officers, and Employees of the Company shall provide only public information to the analysts / research personnel / large investors like financial institutions, private equity etc.

##### **4.2 Simultaneous Release of Information:**

Whenever the Company proposes to organize meetings with investment analysts / institutional investors, the Company shall make a press release or post relevant information on its website after every such meeting. The Company may also consider live webcasting of analyst meets.

#### **5. Sharing of unpublished price sensitive information on need to know basis**

5.1 Price Sensitive Information will be handled on a 'need to know' basis.

5.2 Such information should be disclosed only to those within the Company who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of information.

This Code has been adopted by the Board of Directors of SYSCHEM (INDIA) LIMITED in its meeting held on 15<sup>th</sup> April, 2015 and shall be deemed to have come in to force from 15th May, 2015. Subsequent modification(s) / amendment (s) to SEBI (Prevention of Insider Trading) Regulations, 2015 shall automatically apply to this Code. Further, the Company reserves its right to amend or modify the Code in whole or in part, at any time, when it deems appropriate.