



**SATRA
GROUP**

ISO 9001 : 2015 Company

Satra Properties (India) Limited

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CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

The Board of Directors adopted the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information framed on the basis of the principles of fair disclosure outlined in the SEBI (Prohibition of Insider Trading) Regulations, 2015. Pursuant to SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018, the Board of Directors has amended the "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" and shall come into effect from 1st April, 2019.

The Company shall adhere to the following principles to ensure timely and fair disclosure of Unpublished Price Sensitive information:

1. The Company shall endeavour to make prompt public disclosure of all unpublished price sensitive information(s) that may impact price discovery, as soon as credible and concrete information comes into being, in order to make such information generally available.
2. The Company shall endeavour to make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Company has Chief Investor Relations Officer who deals with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall endeavour to make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall make appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. No communication shall be made by the Company to any analyst or investor of any Unpublished Price Sensitive Information or a part thereof at any such meetings with analysts or investor conferences. The Company shall develop best practices while dealing with analysts and research personnel and to make records of proceedings or transcripts of meetings with analysts and other investor relations conferences on the website of the Company to ensure official confirmation and documentation of the disclosures made.
8. The Company shall handle all unpublished price sensitive information on a need-to-know basis.

POLICY FOR DETERMINATION OF "LEGITIMATE PURPOSES"

Pursuant to Regulation 3(2A) of SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 and any modification(s)/ amendment(s) thereto, Policy for determination of legitimate purposes is as under:

"Legitimate purpose" shall mean Sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals, other advisors or consultants provided that such sharing has not been carried out to evade or circumvent the prohibitions of the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018.

Any person in receipt of unpublished price sensitive information pursuant to a legitimate purpose shall be considered an "insider" for purposes of the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with the said Regulations.

A structured digital database shall be maintained containing the names of such persons or entities, as the case may be, with whom information is shared for legitimate purposes along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Adequate and effective system of internal controls will also be laid out to secure such database.

AMENDMENTS

The Board reserves the right to amend or modify this Policy in whole or in part, at any point of time. In case of any amendment(s), clarification(s), circular(s) etc. issued by the relevant authorities, not being consistent with the provisions laid down under this Policy, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Policy shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.