

# **SHRIRAM ASSET MANGEMENT COMPANY LIMITED**

## **CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

Pursuant to Regulation 8 of the newly introduced SEBI (Prohibition of Insider Trading) Regulations, 2015 a listed company is required to formulate and publish on its official website a “Code of Practices and procedure for fair disclosure of unpublished price sensitive information” in adherence to the principles set out in Schedule A to the said Regulation, Accordingly, the Principles of Fair Disclosure of Unpublished price Sensitive information adopted by Shriram Asset Management Company Limited are as Follows:

1. SAMC shall ensure to make prompt public disclosure of unpublished price sensitive information (UPSI) that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.  
“UPSI” means any information, which is relating to the SAMC or its securities that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities of SAMC and shall, ordinarily including but not restricted to, information relating to the (i) financial result, (ii) dividends, (iii) change in capital structure, (iv) mergers, de-mergers. Acquisitions, delisting, disposals and expansion of business and such other transaction, (v) changes in key managerial personnel and (vi) material events in accordance with the listing agreement entered into by the SAMC with the Stock Exchanges.  
“Generally available information” means information that is accessible to the public on a non-discriminatory basis.
2. Uniform and universal dissemination of UPSI would be ensured by the SAMC 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. SAMC has designated Ms. Reena Yadav, Company Secretary as a Chief Investor Relations Officer to deal with dissemination and disclosure of UPSI
4. SAMC 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 Office of the SAMC is authorized to respond to any queries that may be received from Stock Exchanges, any regulatory authorities, press or investors of the SAMC, for verification of any market rumours relating to the SAMC, subject to internal clearances.
6. SAMC shall ensure that information shared with analysis and research personnel is not an UPSI
7. SAMC 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 SAMC and Connected persons on ‘Need to Know’ basis only.

This Code is subject to review from time to time.