

SBEC SYSTEMS (INDIA) LIMITED

Code of practices and procedures for Fair Disclosure of Unpublished Price Sensitive Information

[Pursuant to sub-regulation (1) of regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015]

The Board of Directors of SBEC Systems (India) Limited ("the Company") are expected to manage their affairs of the Company in a fair, transparent and ethical manner keeping in view the needs and interest all the stakeholders. The Company has since time immemorial, been committed to transparency and fairness in dealing with all the stakeholders.

Preface:

1. SEBI on 15th January, 2015, has introduced SEBI (Prohibition of Insider Trading) Regulations, 2015, to be effective from 15th May, 2015.
2. Chapter –IV of SEBI (Prohibition of Insider Trading) Regulations, 2015, Regulation 8 provides for the formulation of a "Code of practices and procedures for Fair Disclosure of Unpublished Price Sensitive Information" (hereinafter referred to as "Code".)
3. The Company endeavor to preserve the confidentiality of unpublished price sensitive information and to prevent the misuse such information. To achieve these objectives and in compliance with the aforesaid SEBI regulations, the Company notifies this code.
4. The code shall be applicable on all the Board of Directors of the Company w.e.f. 15th May, 2015.
5. Any subsequent modification and/or amendments brought about by SEBI in the aforesaid Regulations shall automatically apply this code.

Principles of Fair Disclosure for purpose of Code of practices and procedures for fair Disclosure of Unpublished Price Sensitive Information:

1. Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete

information comes in to being in order to make such information generally available.

2. Uniform and universal dissemination of unpublished price sensitive to avoid selective disclosure, shall be ensured.
3. The Chief Financial Officer of the Company shall act as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. There shall be prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise. It shall be ensured that such information is made generally available.
5. The Board of Directors shall ensure that appropriate and fair response shall be provided to queries on news reports and request for verification of market rumours by regulatory authorities.
6. The Board of Directors shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. The Board of Directors 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. Unpublished price sensitive information shall be followed on a need-to-know basis.

Powers of Board of Directors

The Board of Directors of the Company will be responsible for implementation of this "Code". Board reserves the right to modify this code in whole or in part, at any time without assigning any reason what so ever but within the framework of the aforesaid regulations.

Disclosure of the Code in Public Domain:

This Code shall be published on the official website of the Company.

Further, this code and every subsequent amendment thereto, shall be promptly intimated to the Stock Exchange where the securities of the Company Listed.