

**POLICY FOR  
CODE OF PRACTICES AND PROCEDURES FOR FAIR  
DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE  
INFORMATION(PURSUANT TO REGULATION 8(1) OF  
SEBI (PROHIBITION OF INSIDER TRADING  
REGULATIONS, 2015)**

**SAWACA BUSINESS MACHINES LIMITED**

(CIN.: L65910GJ1994PLC023926)

**Regd. Office:** 45, Chinubhai Towers, Ashram Road, Ahmedabad – 380 009.

**Phone:** 079-26587363. **Email :** [sawaca.business@yahoo.com](mailto:sawaca.business@yahoo.com)

**Website :** [www.sawacabusiness.com](http://www.sawacabusiness.com)

## **CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION (PURSUANT TO REGULATION 8(1) OF SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015)**

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### **Introduction:**

The Securities and Exchange Board of India (“SEBI”), in its endeavor to protect the interests of investors in general, had notified the new Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“Regulations”) on 15th January, 2015 effective from 15th May, 2015.

It is mandatory in terms of the Regulations for every listed company to formulate a Code of Practice and Procedure for Fair Disclosure of Unpublished Price Sensitive Information.

### **The company shall adhere to the following Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“UPSI”):**

1. UPSI which will impact on price of security shall be promptly disclosed to general public, no sooner than credible and concrete information comes into being in order to make such information generally available.
2. UPSI shall be not disseminated selectively but shall be disseminated uniformly and universally.
3. Compliance Officer shall be a chief investor relations officer to deal with dissemination of information and disclosure of UPSI.
4. The Company shall give appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
5. The following practice shall be complied while meeting with analysts, institutional investors and other investor relations conferences:
  - a. No UPSI shall be shared with them and only information available in public domain shall be shared.
  - b. Any of the designated company officials shall remain present during meeting with them.
  - c. Transcripts or records of proceedings of meeting with them shall be placed on website of the Company within 30 days from meeting.
6. All UPSI shall be handled on a need-to-know basis.