

SIDH MANAGEMENT CORPORATE SERVICES LIMITED
CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF
UNPUBLISHED PRICE SENSITIVE INFORMATION

[Formulated pursuant to Regulation 8 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

PREAMBLE

The Securities and Exchange Board of India ("SEBI") vide its Notification dated 15th January, 2015, has introduced SEBI (Prohibition of Insider Trading) Regulation, 2015 ("said Regulations"), to be effective from 15th May, 2015.

Regulation 8 of the said Regulations requires a listed company to formulate and publish on its official website a "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" (hereinafter referred to as the "Code"), in adherence to the principles set out in Schedule A to the said Regulations.

Accordingly, in compliance with the said Regulations, the Board of Directors of Sidh Management Corporate Services Limited ("the Company") has adopted the Code as enumerated below, in order to ensure timely and adequate disclosure of Unpublished Price Sensitive Information ("UPSI") and to prevent misuse of such information.

CODE OF FAIR DISCLOSURE

The Code of Fair Disclosure is in line with the above SEBI Regulations. The Principles of Fair Disclosure adopted by the Company are as follows:

Prompt Disclosure

To make prompt public disclosure of UPSI that would impact price discovery no sooner than credible and concrete information comes into being, in order to make such information generally available.

Uniform and Universal Dissemination

To make disclosures of uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.

Chief Investor Relations Officer

Unless otherwise decided, the Company Secretary / Compliance Officer of the Company shall act as the Chief Investor Relations Officer for the purpose of dealing with dissemination of information and disclosure of UPSI to the Stock Exchanges, where the equity shares of the Company are listed and also upload the same on the official website of the Company, from time to time.

Prompt Dissemination

To make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

Response to Queries

The Company shall ensure the appropriate fair and prompt response to all queries received from the Stock Exchanges including queries on news reports and requests for verification of market rumors by regulatory authorities.

Sharing of information with Analyst and Research Personnel

To ensure that information shared with analysts and research personnel, if any, is not unpublished price sensitive information.

Documentation of Disclosures made

To develop and follow 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.

Handling of UPSI

To handle all unpublished price sensitive information on a need -to- know basis.

Disclosures

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

Amendment

Subsequent modification(s) / amendment(s) to SEBI (Prevention of Insider Trading) Regulations, 2015 shall automatically apply to this Code.

This Code can be modified by the Board of Directors of the Company as and when it may deem necessary.