

CENTRUM CAPITAL LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

This document forms the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“Code”) adopted by Centrum Capital Limited (“CCL”). This Code is framed pursuant to Regulation 8(1) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time.

OBJECTIVE

The objective of this Code is to formulate a framework so as to ensure prompt, adequate and fair disclosure of unpublished price sensitive information thereby upholding Investors’ confidence in the integrity and securities of CCL.

To achieve this objective, all the Directors / Officers, designated employees and connected persons shall adhere to the following principles in letter as well as in spirit.

PRINCIPLES

The Principles of Fair Disclosure adopted by CCL are as follows:

1. To promptly make public disclosure of unpublished price sensitive information that would impact price discovery. Such disclosures are made no sooner than credible and concrete information comes into being in order to make such information generally available.
2. To make disclosures of unpublished price sensitive information, as and when made, in a universal and uniform manner through forums like widely circulated media and/ or through stock exchanges where its equity shares are listed. Selective disclosure of unpublished price sensitive information shall be avoided.
3. CCL’s Chief Financial Officer serves as its Chief Investor Relations Officer (“CIRO”) to deal with dissemination of information and disclosure of unpublished price sensitive information. In the absence of Chief Financial Officer, the Accounts/ Finance Head in charge shall deal with the responsibility.
4. To promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise if at all, to make such information generally available.
5. To handle all unpublished price sensitive information on a need-to-know basis only.

Disclosure/ dissemination of unpublished price sensitive information may normally be approved in advance by the CIRO. In selected cases, the CIRO shall consult and seek approval of the Managing Director/Executive Chairman, before dissemination of such information.

RESPONDING TO MARKET RUMOURS / QUERIES

CCL shall provide appropriate and fair response to queries on news reports and requests for the verification of market rumours by the regulatory authorities.

CIRO may decide whether a public announcement is needed to verify or deny rumours. CIRO may consult the Managing Director /Executive Chairman and thereafter, make the appropriate disclosure required on the matter.

SHARING OF INFORMATION WITH ANALYSTS & RESEARCH PERSONNEL

Whenever research analysts/ research personnel meet or a call is organised, CCL's representatives shall ensure that information shared with analysts and research personnel is only public information and not unpublished price sensitive information.

CCL shall ensure that immediately after such meet/ call and other investor relations conferences, transcripts or records of proceedings of meetings/ calls are uploaded on the official website www.centrum.co.in to ensure official confirmation and documentation of disclosures are made.

HANDLING OF UNPUBLISHED PRICE SENSITIVE INFORMATION

All employees, directors and insiders of CCL are required to ensure that they handle unpublished price sensitive information on a "need to know" basis and in line with any other applicable codes, policies and procedures of CCL.

REVIEW / REVISION OF POLICY

This Code would be subject to revision/ amendment in accordance with the guidelines as may be issued by SEBI or such other regulatory authority as may be authorised, from time to time, on the subject matter.

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 Code, then such amendment(s), clarification(s), circular(s) etc. shall prevail upon the provisions hereunder and this Code shall stand amended accordingly from the effective date as laid down under such amendment(s), clarification(s), circular(s) etc.

Note:

Last reviewed on: August 31, 2017

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