



Superhouse Limited

(A Government of India recognized Export Trading House)
Regd. Office: 150 Feet Road, Jajmau, Kanpur-208010 (India)
CIN: L24231UP1980PLC004910 Tel: (0512) 2462124, 2465995 Fax: 0515-2829325
email: share@superhouse.in url: http://www.superhouse.in

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

In terms of the SEBI (Prohibition of Insider Trading) Regulation 2015, to ensure principles set out there under, the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information is formulated. The revised Code has been approved by the Board of Directors at its meeting held on 14.02.2019 and the Code shall come into force with effect from 01.04.2019.

1. Prompt Public Disclosure of unpublished price sensitive information:-

- 1.1 The Company shall make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
- 1.2 All unpublished price sensitive information related to the Company shall be disclosed only by the members of the Board or person authorized by the Board in its behalf. Any such information so disclosed shall be promptly provided to the Compliance Officer.
- 1.3 The Company shall disseminate the said information, for the benefit of investing public, to all the Stock Exchanges where the shares of the Company are listed. The company shall also post the said information on its website.
- 1.4 The Company shall also ensure that information shared with Analysts/ other investor relations conferences etc. is posted on its website.

2. Uniform and universal dissemination of unpublished price sensitive information:-

The Company shall ensure uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.



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3. Chief Investor Relations Officer:-

The compliance office of the company has been designated as Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.

4. Prompt dissemination of unpublished price sensitive information:-

The company shall ensure prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

5. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities:-

5.1 If the Company receives any query or request for verification of reports in the print / electronic media or market rumors from the Stock Exchanges, the Chief Investor Relations Officer shall seek clarifications on such items from the Unit Heads/Financial Heads concerned.

5.2 The Unit Heads/Financial Heads shall provide such clarifications without any delay to the Chief Investor Relations Officer with the approval of the Chairman & Managing Director/Joint Managing Director.

6. Sharing of public information with analysts and research personnel:-

6.1 Generally available information only shall be provided to the Analysts/ Research personnel / large Investors / institutions etc. In case the information given to the Analysts/ Research personnel / large Investors / institutions etc. was not made public earlier, the same should be simultaneously made public by information to the Stock Exchanges.

6.2 The Company will ensure that the information shared with analysts and research personnel is not unpublished price sensitive information.



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6.3 The Company will ensure to post relevant information on its website after every meeting organized by the Company with the analysts and other investor relations conferences to ensure official confirmation and documentation of disclosures made.

7. Developing best practices to make transcripts or records of proceeding:-

The company will develop the 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. Handling of all unpublished price sensitive information on a need-to-know basis:-

All information shall be handled within the organization on a need-to-know basis and no unpublished price sensitive information shall be communicated to any person except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

9. Sharing of Information for legitimate purposes:-

Sharing of information with partners, collaborators, subsidiaries, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals, other advisors or consultants, shall be considered as "legitimate purposes" for the purpose of sharing unpublished price sensitive information in the ordinary course of business by an insider, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the PIT regulations.



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10. Structured digital database of person or entities with whom information shared:-

A structured digital database shall be maintained containing the names of such persons or entities as the case may be with whom information is shared for legitimate purposes along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Adequate and effective system of internal controls will also be laid out to ensure the compliance of maintenance of a digital database for sharing the information for said legitimate purposes.

11. Responsibility to ensure confidentiality of unpublished price sensitive information:-

Any person in receipt of unpublished price sensitive information pursuant to a "legitimate purpose" shall be considered an "insider" for purposes of SEBI PIT regulations and such persons are also required to ensure the confidentiality of unpublished price sensitive information shared with them, in compliance with SEBI PIT Regulations.