



Date: April 08, 2019

TRC Financial Services Limited

CIN: L74899MH1994PLC216417

To,
The Corporate Relationship Dept.
BSE Limited,
1st Floor, P.J.Towers Dalal Street,
Fort Mumbai - 400 001

Ref: Scrip Code 511730

Dear Sirs,

Sub: Disclosure under of SEBI (Prohibition of Insider Trading) Regulations, 2015 and SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 and 2019

In compliance with the requirements of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 and 2019, we hereby inform you the following:

1. The Company has amended the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information including the policy for determination of legitimate purposes for sharing of Unpublished Price Sensitive Information by the Insiders in the ordinary course of business. A copy of the same is enclosed for your records.
2. The Company has amended its Code of Internal Procedures and Conduct to Regulate, Monitor and Report Trading by Insiders.

We request you to take the above on record.

Thanking You,

Yours Faithfully,

For TRC Financial Services Limited

Chirag Meswani
Whole time Director

DIN: 07987316

Encl: a/a

TRC FINANCIAL SERVICES LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

(Pursuant to Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015)

The Company will adhere to the following practices and procedure to ensure fair disclosure of price sensitive information such as the events and occurrence that could impact price of securities of the Company.

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 The Company shall make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
2. The Company shall make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Compliance Officer of the Company shall act as the Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company shall ensure that information, if any, shared with analysts and research personnel is not unpublished price sensitive information.
7. The Company 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. The Company shall handle all unpublished price sensitive information on a need-to-know basis.

POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES:

The unpublished price sensitive information ('UPSI') can be shared by Insiders subject to the following:

The UPSI shall be shared only on 'need to know' basis.

The UPSI shall be shared in the ordinary course of business by an Insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Any person in receipt of UPSI pursuant to a legitimate purpose shall be considered an 'Insider' and due notice shall be given to such person to maintain confidentiality of UPSI.

The Insider sharing the UPSI shall ensure that the recipient is also bound by non-disclosure or confidentiality agreements and the duties and responsibilities of such recipients with respect to such UPSI and the liabilities involved if such person misuses or uses such UPSI in breach of the Company's Code.

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