



**SUVEN PHARMACEUTICALS LIMITED**

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Banjara Hills Hyderabad – 500 034 **CIN:** L24299TG2018PLC128171

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**Code of Internal Procedures and Conduct for Regulating,  
Monitoring and Reporting of Trading by Insiders, Code of Practices and  
Procedures for Fair Disclosure of Unpublished Price Sensitive Information**

**and**

**Policy on Determination of Legitimate Purpose**

**(Effective from 9<sup>th</sup> March, 2020)**

## **Preamble:**

The Board of Directors formulated the Code that it would follow in order to adhere each of the principles set out in Schedule A of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“the Regulations”). The Code has been approved by the Board on March 23, 2020 and shall be effective from March 09, 2020.

The Equity Shares of the Company are listed on National Stock Exchange of India Ltd. (NSE) and BSE Ltd. (BSE), collectively referred to as the Stock Exchanges.

### **A code of practices and procedures for fair disclosure of unpublished price sensitive information (UPSI) for adhering each of the principles is set out below:**

1. The Company shall ensure to promptly disclose to the public all of Unpublished Price Sensitive Information (UPSI) that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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 The Company shall ensure uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Compliance Officer is designated as a Chief Investor Relations Officer of the Company to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. In case of any UPSI getting disclosed selectively either inadvertently or otherwise, the Company shall ensure prompt dissemination of UPSI, as generally available, by intimating to stock exchanges and/or by publishing the same on Company's website at [www.suvenpharm.com](http://www.suvenpharm.com)
5. The Company shall ensure that appropriate and fair response shall be provided to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company shall ensure that information shared with analysts and research personnel is not UPSI.
7. The Company shall develop / follow best practices to promptly publish the transcripts or records of proceedings of meetings with analysts and other investor relations conferences, on the official website of the Company 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.
9. Any amendment of the policy, upon approval of the Board of the company shall be intimated to the stock exchanges and shall also be updated in the company's official website.