

SEBI (PROHIBITION OF INSIDER TRADING)
REGULATIONS, 2015
CODE OF FAIR DISCLOSURE
[REGULATION 8]

In pursuance to the powers conferred by Section 30 read with clause (g) of sub-section (2) of Section 11 and clause (d) and clause (e) of Section 12A of the Securities and Exchange Board of India Act, 1992 (15 of 1992), has made a framework for Prohibition of Insider Trading in securities and to strengthen the legal framework, the Company i.e. **M/s Smart Capital Services Limited**, has adopted the following Schedules at their Meeting of the Board of Directors held at their registered office.

SCHEDULE A

[sub regulation (1) of regulation 8]

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

This document forms the **Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code")** adopted by **Smart Capital Services Limited** ("Company"). This Code is consistent with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

The Principles of Fair Disclosure for the purpose of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information adopted by **Smart Capital Services Limited ("Company")** are as follows: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 To promptly make public disclosure of unpublished price sensitive information that would impact price discovery.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 To make disclosures of unpublished price sensitive information, as and when made, in a universal and uniform manner through forums like widely circulated media and / or through stock exchanges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 Selective disclosure of unpublished price sensitive information is to be avoided.
3. The Compliance Officer shall act as its Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information
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 To promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise if at all, to make such information generally available.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 provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. To ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. To publish proceedings of meetings with analysts and of other investor relations conferences on its official website www.smartcapitalservices.in in to ensure official confirmation and documentation of disclosures made therein.
8. To handle all unpublished price sensitive information on a need-to-know basis only.