SecUR Credentials

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Date: 03rd April, 2019

To,
The Manager,
National Stock Exchange of India Limited,
Exchange Plaza,
Bandra Kurla Complex, Bandra (E),
Mumbai 400 051.

Subject: Amendment to "The Code for Prohibition of Insider Trading"

Dear Sir/Madam,

We wish to inform you that the Board of Directors in their Meeting held on 29th March, 2019 has approved the amendments in line with SEBI (Prohibition of Insider Trading) Regulations, 2015 and amendments thereto ("Regulations"). The Code shall be effective from April 01, 2019 and it covers the following:

1. Code of Practices and Procedures for Fair and Disclouser of Unpublished Price Sensitive Information (UPSI) and also Policy for Determination of "Legitimate Purposes" as a part of it.
2. Code of Conduct to Regulate, Moniter and Report Trading by Insiders.

In line with Regulation 8(2) of the said "Regulations", we forward herewith amended Code of Practices and Procedures of UPSI covering also Policy for Determination of Legitimate Purpose.

The complete "The Code for Prohibition of Insider Trading" is hosted on the website of our Company.

This is for your information and record.

For SecUR Credentials Limited

SECUR CREDENTIALS LIMITED MUMBAI

Vipul Bhoy
Company Secretary and Compliance Officer

Encl:a/a

CODE OF PRACTICES AND PROCEDURE FOR FAIR DISCLOSURES ON UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI).

The Designated Persons of Company shall abide by the following principles of fair disclosures of UPSI for fair disclosure of events and occurrences that could impact the price discovery for its securities in the market.

i. Ensure that all unpublished price sensitive information that may impact the market price of Companies Securities shall be promptly made available in Public domain.

ii. Avoid selective disclosure of Unpublished Price Sensitive Information and ensure that all UPSI is disclosed uniformly and universally.

iii. Ensure that appropriate and fair response is provided to queries on news reports and requests for verification of market rumors by regulatory authorities.

iv. Ensure that the information shared with analysts and research personnel is not UPSI.

v. Best practices be followed 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 disclosure made.

vi. All UPSI shall be handled on need-to-know basis i.e. no UPSI shall be communicated to any person except in furtherance of the legitimate purpose, performance of duties or discharge of their legal obligations.

vii. Company Secretary of Company is designated as the Compliance Officer to deal with all matters relating to dissemination of information and disclosure of UPSI.



POLICY FOR DETERMINATION OF LEGITIMATE PURPOSE

The sharing of UPSI shall be deemed to be for "Legitimate Purpose" if it satisfies the following criteria:

i. The UPSI shall be shared with any person on 'need to know' basis.

ii. The "Legitimate purpose" shall include sharing of unpublished price sensitive information 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 Regulations.

iii. Insiders shall share the UPSI with the external agencies only in the interest of the Company and/or in compliance with the requirements of the law.

iv. 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 in compliance with the Regulations.

v. The Insider sharing UPSI shall ensure that such third party with whom the UPSI is shared, is also bound by non-disclosure or confidentiality agreements and the liabilities involved which shall mention the duties and responsibilities of such person with respect to such UPSI and the liabilities involved if such person misuses or uses such UPSI in breach of the Code or Regulations.

