



## **CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UPSI**

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

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### **1. Objective**

This Code has been formulated to ensure timely, fair, and adequate disclosure of Unpublished Price Sensitive Information (UPSI) by the Company in a uniform and transparent manner to promote investor confidence and maintain the integrity of the securities market, in compliance with Regulation 8 of the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("SEBI PIT Regulations").

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### **2. Scope**

This Code applies to all officers and employees of the Company who are in possession of or have access to UPSI. It governs the practices and procedures for fair disclosure and handling of UPSI.

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### **3. Definitions**

**Unpublished Price Sensitive Information (UPSI):** As defined under Regulation 2(n) of SEBI PIT Regulations, UPSI means any information relating to the Company or its securities that is not generally available and which upon becoming generally available is likely to materially affect the price of the securities.

**Chief Investor Relations Officer (CIRO):** The Compliance Officer of the Company shall act as the CIRO to deal with dissemination of information and disclosure of UPSI.

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### **4. Principles of Fair Disclosure**

The Company shall adhere to the following principles for fair disclosure of UPSI:

Prompt public disclosure of UPSI that would impact price discovery as soon as credible and concrete information is available.

Uniform and universal dissemination of UPSI to avoid selective disclosure.

Designation of the Compliance Officer as CIRO to deal with dissemination and disclosure.

Prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise, to make such information generally available.

Appropriate and fair response to queries on news reports and market rumours by regulatory authorities.

Ensuring that information shared with analysts and research personnel is not UPSI.

Developing best practices to make transcripts or records of meetings with analysts and investor conferences available on the official website to ensure official confirmation and documentation of disclosures made.

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### **5. Digital Disclosure Practices**

All UPSI disclosures shall be promptly uploaded to the Company's website and retained for a minimum of five years.

The Company shall also disclose the policy and code on its website and provide a link in its annual report.

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### **6. Review and Amendments**

This Code shall be reviewed periodically and may be amended by the Board of Directors to ensure continued compliance with applicable laws and regulatory guidance.

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**Approved by the Board of Directors on May 28, 2025**

## **SAKETH SEVVENSTAR INDUSTRIES LIMITED**



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