

CODE OF CONDUCT FOR FAIR DISCLOSURE OF UNPUBLISHED

PRICE SENSITIVE INFORMATION

("Fair Disclosure Code")

(Framed in terms of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015)

Norms for Fair Disclosure of Unpublished Price Sensitive Information ("UPSI"):

The following is the corporate disclosure policy/ norm to ensure timely and adequate disclosure of UPSI:

- The Company shall promptly public disclose to the public any unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
- The Company will endeavor to make uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
- The Chief Financial Officer of the Company shall act as the Chief Investor Relations Officer for the purpose of dealing with dissemination of information and disclosure of UPSI relating to the Company to the investors, analysts, press and electronic / social media
- The Company to promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- The Company to ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
- The Company to 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.

- The Company to handle all unpublished price sensitive information on a need-to-know basis for legitimate purpose and shall be disclosed to only those within the Company who need the information to discharge their duties.
- The information released to the Stock Exchanges will also be posted on the Company's corporate website www.sequent.in.

Policy for determination of 'legitimate purposes'

All information shall be handled within the organisation on a need-to-know basis and no unpublished price sensitive information shall be communicated to any person except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

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 these regulations.

The Code is subject to review by the Board of Directors as and when deemed necessary.