



Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information [Framed under regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

In consonance with the principles of fair disclosure specified in SEBI (Prohibition of Insider Trading Regulations), 2015 (as amended), (herein after referred to as “Insider Trading Regulations”) the Company would adhere to following practice and procedure for fair disclosures in respect of unpublished price sensitive information (UPSI) relating to the Company and/ or its securities

- 1, The Company shall promptly make public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being and as soon as the information or the decisions are validated by the Board of Director of the Company to National Stock Exchange of India Limited (NSE) and BSE Limited (BSE) and upload such information on the Company’s official website in order to make such information generally available to investors and members of the Company.
2. The Company shall make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure by making simultaneous disclosure to NSE and BSE and also at the website of the Company.
3. The Company Secretary is designated as Chief Investor Relations Officer to take all required action for dissemination of information and disclosure of unpublished price sensitive information indiscriminately.
4. In case of selective disclosure of unpublished price sensitive information inadvertently or otherwise, the Company shall make prompt dissemination of such unpublished price sensitive information to ensure that such information is generally available.
5. Chief Investor Relations Officer shall provide appropriate assistance and fair response to queries raised by regulatory authorities on news reports and requests for verification of market rumours.
6. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. The Company shall take reasonable steps to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences, if held, are generally available by uploading such transcripts and records available to the Company on the official website to ensure official confirmation and documentation of disclosures made.
8. Unpublished price sensitive information shall be handled on a “need-to-know basis” i.e., unpublished price sensitive information shall be disclosed only to those who need the information by virtue of statutory requirement, contractual obligation to discharge their duties/obligations etc. in the

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interest of the Company.

9. The Unpublished Price Sensitive Information (UPSI) can be shared by an insider for legitimate purpose in the ordinary course of business which includes sharing of UPSI with collaborators, partners, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants.

The legitimate purpose shall be determined by the Company Secretary and the Chief Financial Officer in consultation with the Managing Director or Whole-time Director or Chief Executive Officer, which shall be in the best interest of the Company.

Provided that sharing of information for the above-said purposes shall not be carried out with a motive to evade or circumvent the provisions of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Any person who is in receipt of the UPSI pursuant to legitimate purposes shall be considered as an "insider" and due notice shall be given to such person to maintain confidentiality of the UPSI.

For and on behalf of
Semac Construction Limited,

For Semac Construction Limited


Aakriti Gupta
Company Secretary

Aakriti Gupta
Company Secretary and Compliance Officer