



YUG DECOR LIMITED

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CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI)

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)

Pursuant to Regulation 8 of the SEBI (Prohibition of Insider Trading) Regulation, 2015 the Company had formulated a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI) in adherence to the principle set out in Schedule A to the said Regulations. The Code was duly approved by the Board of Directors of the Company and came into force from 10th October, 2015.

SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 notified on 31st December, 2018 has amended PIT Regulations. As per the amendment, Regulation 3(2A) of the PIT Regulations provided as under:

The board of directors of a listed company shall make a policy for determination of "legitimate purposes" as a part of "Codes of Fair Disclosure and Conduct" formulated under regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015 as amended from time to time.

In pursuance of the above, the Company (Yug Decor Limited) has formulated Policy for Determination of Legitimate Purpose as an integral Part of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information which is applicable w.e.f. 1st April, 2019.

Code:

1. The Company shall ensure prompt public disclosure of UPSI that would impact price discovery, as soon as it has credible and concrete information, in order to make such information 'generally available', i.e. to make the information accessible to the public on a non-discriminatory basis.
2. The Company shall make, uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Company shall ensure prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information 'generally available'.
4. The Compliance Officer of the Company will be chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
5. The Company shall ensure an appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. The Company shall ensure that, information if any shared with analysts and research personnel is not UPSI.

7. The Company shall 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 disclosure made.

8. The Company shall ensure the handling of all UPSI on a need-to-know basis.

The UPSI can be shared as an exception by an insider for legitimate purpose as per the "Policy for Determination of Legitimate Purpose" ("Annexure A" to this Policy)

"ANNEXURE-A"

POLICY FOR DETERMINATION OF LEGITIMATE PURPOSE

1. The term "legitimate purposes" 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 PIT Regulations.
2. Any person in receipt of unpublished price sensitive information pursuant to a "Legitimate Purpose" shall be considered an "insider" for the purpose of these Regulations and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with these Regulations.

