

ACE SOFTWARE EXPORTS LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

Pursuant to Regulation 8(1) and Schedule A of the SEBI (Prohibition of Insider Trading) Regulations, 2015 accordingly, in suppression of previous code of the Company, a code is hereby framed as under:-

Effective from: 15th May, 2015

Following principles shall be followed by the Company to ensure fair, timely and adequate disclosure of unpublished price sensitive information-

1. The Company shall make Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
2. The Company shall make uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
3. The Compliance Officer will act as a chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company will make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Compliance Officer will ensure the Company complies with continuous disclosure requirements. He will co-ordinate disclosure of price sensitive information to Stock Exchanges, Analysts, Shareholders and media which will be approved by him in advance.
6. The Compliance Officer shall be responsible for deciding whether a public announcement is necessary for verifying or denying any news for effective responding to market gossips and will respond to queries on news reports and requests for verification of market rumours by regulatory authorities.

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7. Following guidelines will be adopted by the Company while dealing with Analysts/ Institutional investors;-

(a) The Company will provide only public information to analysts/Research persons/large investors/institutions.

(b) At least two officers of the Company will be present at the meetings with Analysts, Brokers, institutional investors and discussions with them will be recorded to avoid misquoting or misrepresenting.

(c) Questions outside the intended scope of discussions by the Analysts will not be answered normally but the same may be taken on notice and a considered response give later.

(d) Whenever the Company will organize meetings with analysts it will normally be followed by a press release and the same information will also be posted on the website of the Company and intimated to Stock Exchange immediately

8. The Company will handle all unpublished price sensitive information on a need-to-know basis.

This code is subject to review from time to time.