

SILICON VALLEY INFOTECH LIMITED

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CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

[As envisaged under Regulation 8 (1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015]

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 The Company shall make, prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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 The Company shall disseminate the unpublished price sensitive information on uniform, continuous and universal manner to avoid selective disclosure.
3. Managing Director of the Company shall be Chief Investor Relation Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall avoid selective disclosure of unpublished price sensitive information. In any event if due to oversight or inadvertence the same information is not uniformly and universally made available to all the stakeholders, necessary steps shall be taken to make such information generally available on a non discriminatory basis.
5. Chief Investor Relation Officer shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Chief Investor Relation Officer shall ensure that information, if any shared with analysts and research personnel is not unpublished price sensitive information. In case any UPSI is shared with them, disclosure thereof shall be made to the Stock exchange simultaneously.
7. The Company shall take reasonable steps, to make generally available, any discussion on unpublished price sensitive information at the meeting of analyst or investors relations through website to ensure official confirmation and documentation of disclosures made.
8. The Company shall handle all unpublished price sensitive information on a need-to-know basis i.e. unpublished price sensitive information shall be disclosed only to those within the Company who need the information to discharge their duty.

This code and every subsequent modification, alteration or amendment made thereto, shall be intimated to the Stock Exchange where the securities of the Company are listed.

This code is duly approved by the Board on 28th May, 2015 and shall be effective from that day itself.