



**SUVEN PHARMACEUTICALS LIMITED**

**Regd. Office:** # 8-2-334, SDE Serene Chambers, 3<sup>rd</sup> Floor, Road No 5, Banjara Hills

Hyderabad – 500 034 **CIN:** U24299TG2018PLC128171

**Tel:** 040-2354 9414, **Fax:** 040-2354 1152

**Website:** [www.suvenpharm.com](http://www.suvenpharm.com) **E-mail:** [investorservices@suvenpharm.com](mailto:investorservices@suvenpharm.com)

**Code of Internal Procedures and Conduct for Regulating,  
Monitoring and Reporting of Trading by Insiders, Code of Practices and  
Procedures for Fair Disclosure of Unpublished Price Sensitive Information**

**and**

**Policy on Determination of Legitimate Purpose**

**(Effective from 9<sup>th</sup> March, 2020)**

**(Amended on December 21, 2023)**

**Preamble:**

The Board of Directors of the Company, formulated and adopted the policy for the Company in compliance with Chapter IV read with Schedule A of the Regulations by passing a resolution dated 23<sup>rd</sup> March, 2020. The policy will be intimated to the Stock Exchanges and is also published on the official website of the Company [www.suvenpharm.com](http://www.suvenpharm.com)

The Equity Shares of the Company are listed on National Stock Exchange of India Ltd. (NSE) and BSE Ltd. (BSE), collectively referred to as the Stock Exchanges.

**A code of practices and procedures for fair disclosure of UPSI for adhering each of the principles is set out below**

1. There shall be prompt public disclosure of UPSI 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 uniform and universal dissemination of UPSI to avoid selective disclosure, shall be ensured.
3. The Compliance Officer is designated as a chief investor relations officer to deal with dissemination of information and disclosure of UPSI.
4. There shall be prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Board of Directors shall ensure that appropriate and fair response shall be provided to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Board of Directors shall ensure that information shared with analysts and research personnel is not UPSI.
7. The Board of Directors shall develop developing 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.
8. The Board of Directors of the company shall ensure the handling of all UPSI on a need-to-know basis.