

SHREYAS SHIPPING AND LOGISTICS LIMITED

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CIN : L63000MH1988PLC048500

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURES OF UNPUBLISHED PRICE SENSITIVE INFORMATION

1. Introduction

- Shreyas Shipping & Logistics Limited (the “**Company**”) has formulated and adopted this Code of Practices and Procedures For Fair Disclosure Of Unpublished Price Sensitive Information (this “**Code**”) in accordance with Clause 8 of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as applicable (the “**Regulations**”).
- This Code establishes a framework for adequate disclosure of “price sensitive information” (as defined under the Regulations), including to the stock exchanges on which the securities of the Company are listed (the “**Stock Exchanges**”).

2. Compliance Officer

- Company Secretary of the Company acts as Compliance Officer for this purpose. In absence of Company Secretary due to separation/pre-occupation with other work, Board of Directors may place the responsibility for compliance with some other senior official of the Company, until such time new Company Secretary is appointed and assumes office/ or is available for this work.

3. Disclosure/Dissemination Of Price Sensitive Information

- Price sensitive information is disseminated / disclosed on continuous basis to the Stock exchanges as required by listing agreement. This is further supplemented by Public announcements by way of Press release and release of information on website of the Company.
- Disclosure of information to Press and website is also overseen by Chairman & Managing Director and Chief Executive Officer.
- Compliance Officer is responsible for continuous disclosure of “price sensitive information” to Stock Exchanges, Analysts, Shareholders, and Media and for educating concerned staff on disclosure policy and procedures.
- Information disclosure and dissemination is approved by Chairman & Managing Director and Chief Executive Officer. Only public information is provided to Analysts, Research Personnel, Institutional and large shareholders. Alternatively information provided to Analysts, Research Personnel, Institutional and

large shareholders is simultaneously put in public domain which may include hosting the same on the website of the Company.

- In case any information is accidentally disclosed without prior approval by any official, the person responsible is expected to draw attention of Compliance Officer. Compliance Officer shall thereafter take steps for its immediate and proper disclosure.
- All unpublished price sensitive information is shared strictly on need to know basis.
- At least two representatives of the Company remain present at any meeting with Analysts, stock brokers, institutional investors. Efforts are made to record the proceedings of such meetings, where situation permits. For unanticipated questions from Analysts, brokers, investors, note of the questions are made and response is given later. If the response/information to be provided is considered as price sensitive, the same is put in public domain, before providing the response/ information is provided to the questions/ queries.

4. Medium of disclosure/dissemination of information

- The disclosure/dissemination of information is done through various media to achieve maximum reach and to ensure that the information is generally available (i.e. accessible to the public on a non-discriminatory basis) and disclosures to the Stock Exchanges are made promptly and such disclosures are also made available on the Company's website.

5. Responding to Rumors

- Company does not provide response to mere market rumors.
- Compliance Officer, in consultation with Chairman & Managing Director / Chief Executive Officer examines the news item and after investigation provides response to media and / or Stock Exchanges if necessary. Any queries / questions from Stock Exchanges shall be dealt forthwith. Press release is issued in respect of the information released at Analyst meet / Press Meet/ Brokers Meet.
