

EMERGENT GLOBAL EDU AND SERVICES LIMITED

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

(Effective from 15th May 2015)

EMERGENT GLOBAL EDU AND SERVICES LIMITED

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

In compliance with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, the Board of Directors of Emergent Global Edu and Services Limited (“the Company”), have formulated and approved the following principles of fair disclosure of unpublished price sensitive information:

1. The Company shall ensure prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being, in order to make such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 The Company shall ensure Uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Company Secretary / Compliance Officer of the Company shall act as the Chief Investor Relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company will ensure that information shared with analysts and research personnel, if any, is not unpublished price sensitive information.
7. The Company shall develop and follow 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 The Company shall handle of all unpublished price sensitive information on a need to-know basis.
9. This Code shall be applicable and binding on the Company, Directors, Promoters and their immediate relatives, Insiders, Employees and connected persons.

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This Code has been approved and adopted by the Board of Directors of Emergent Global Edu and Services Limited in its meeting held on 13th May, 2015 and shall be deemed to have come in to force from 15th May, 2015.