
Principles of Fair Disclosure for purposes of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information



1. Objective

SQS India BFSI Limited (The Company) is a listed Company. The shares of the Company is Listed in National Stock Exchange of India Limited (NSE) and Bombay Stock Exchange Limited (BSE). The Securities and Exchange Board of India (SEBI) has brought in the New Securities and Exchange Board of India (Prohibition of Insider Trading) Regulation, 2015 (The Regulation) by publishing the same in the Official Gazette of India on 15th January 2015, replacing the old Securities and Exchange Board of India (Prevention of Insider Trading) Regulation, 1992. The Regulation is applicable to all listed Companies. SQS India BFSI Limited being a listed Company the said Regulations becomes applicable. The Regulation mandates all listed Company to formulate a policy on the Principles of Fair Disclosure for purposes of Code of Practices and Procedures for Fair Disclosure of 'Unpublished Price Sensitive Information' (UPSI).

2. Scope

The Policy governs the code of practices and procedures to be followed by the Company for fair disclosure of Unpublished Price Sensitive Information. The Policy shall be disclosed to Stock Exchanges and shall also be posted in the Company's website.

3. Approval

This policy is approved by the Board of Directors of the Company on 12th May, 2015.

4. Policy

The Company will adhere to the following so as to ensure fair disclosure of events and occurrence that could impact price of its securities in the market:

1. Prompt public disclosure of Unpublished Price Sensitive Information that would impact price discovery, no sooner than credible and concrete information comes into being in order to make such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. Uniform and universal dissemination of Unpublished Price Sensitive Information to avoid selective disclosure.
3. The Managing Director of the Company shall act as a Chief Investor Relations Officer to deal with dissemination of information and disclosure of Unpublished Price Sensitive Information.

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4. Prompt dissemination of Unpublished Price Sensitive Information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company will provide, appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. Ensure that the information, if any, shared with analysts and research personnel is not Unpublished Price Sensitive Information.
7. To develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the website of the Company to ensure official confirmation and documentation of disclosures made.
8. The Company will handle all Unpublished Price Sensitive Information on a need-to-know basis.

5. Enforcement

The Policy will come into force effective from 14th May 2015 upon the approval by the Board of Directors of the Company.