



S V GLOBAL MILL LIMITED

CIN No.: L17100TN2007PLC065226

23.01.2024

SVGML/COFD/A/FY2023-24

To
The Listing Department,
BSE Limited,
P.J. Towers, Dalal Street,
Mumbai 400 001.

Scrip: 535621

Sub: Intimation of amendment in Code of Fair Disclosure of Unpublished Price Sensitive Information Policy of the Company.

Ref: Regulation 30 read with Schedule III of SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015

This is to inform that the Board of Directors at their Meeting held on Monday, January 22, 2024 has reviewed and approved the amendments in the S V Global Mill Limited Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI) ("Code of Fair Disclosure") of the Company. The said Code of Fair Disclosure is enclosed herewith as **Annexure - A** and is also being hosted on the website of the Company www.svgml.com.

We request you to kindly take the same on your records.

Thanking you,

Yours faithfully,
For S V Global Mill Limited

D. Krishnamoorthy
Company Secretary & Compliance Officer

**S V GLOBAL MILL LIMITED CODE OF PRACTICES AND PROCEDURES
FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSI)**

I. [Definitions:

- a) **“Code”** means the “S V Global Mill Limited Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information”.
- b) **“Concrete information”** means any information, which is clear, confirmed and is not subject to any kind of ambiguity.
- c) **“Material Events”** means any event as prescribed by the Company’s Policy on Determination of Materiality for disclosure of events or information.
- d) **“Selective Disclosure”** means, the disclosure made only for a particular individual, group of people or any regulators or authority required under any law for the time being in force.
- e) **“The Company”** means S V Global Mill Limited.
- f) **“Regulation”** means SEBI (Prohibition of Insider Trading) Regulation, 2015.
- g) **“Unpublished Price Sensitive Information”** means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following:
 - i. Contracts, Joint Ventures, new projects etc, which may have a material impact in the business of the company.
 - ii. Financial Results
 - iii. Dividends
 - iv. Change in capital structure;
 - v. Mergers, de-mergers, acquisitions, delisting, disposals and expansion of business and such other transactions;
 - vi. changes in key managerial personnel.
- h) Words and phrases not specifically defined herein shall have the same meaning as defined under the Regulation as amended from time to time.]***

II. This Code provides the following practices and procedures to be followed while handling and disclosing an Unpublished Price Sensitive Information:

1. Disclosure of unpublished price sensitive information (UPSI) would be done promptly when credible and concrete information is available for making the same generally available.
2. The Company will endeavour to make uniform and universal dissemination of UPSI and will avoid making selective disclosure once the information is ready to be made generally available.
3. Material events will be disseminated as mandated by the stock exchanges under Regulation 30 and Schedule III of the SEBI (Listing Obligations and Disclosure Requirements) Regulations, 2015 (herein after called as Listing Regulations), as amended from time to time.
4. In case the Company is required to make selective disclosure of UPSI, then the information will be promptly disseminated either in the form of notification to stock exchanges, press releases or upload of information in the website of the Company as required.
5. Unless otherwise resolved by the Board of Directors, the Company Secretary of the Company for the time being shall be the Chief Investor Relations Officer (CIRO) to deal with dissemination of information and disclosure of UPSI.

6. The Company will ensure that the information shared with analysts or research personnel participating in Investor & Analyst meet conducted by the Company is not UPSI and in case any such information is shared that it will promptly make the information generally available.
7. The Company will make available the transcripts or records of the proceedings of the meetings with analysts and investor relation meetings (if any), on the website of the Company promptly.
8. Responding to Market rumours:
 - a. The Company will subject to non-disclosure obligations, aim to provide appropriate and fair response to the queries on news reports and requests for verification of market rumours by the appropriate regulatory authorities.
 - b. Any query on verification of market rumours by stock exchanges shall be immediately forwarded to the CISO who shall decide on the response.
 - c. Employees of the Company should not respond to stock exchanges, media or others unless authorised by CISO.
9. [UPSI handling will be on a need-to-know basis and for legitimate purposes only. [For determining legitimate purposes, the below mentioned policy shall be adhered to:
 - a) UPSI can be shared only on a need-to-know basis and not to evade or circumvent the prohibitions of the Regulations.
 - b) UPSI can be shared in the ordinary course of business only if the same is necessary to be shared in order to complete any task / activity / deal including any other assignment for furtherance of the business and in the interests of the company.
 - c) Subject to conditions prescribed in (a) and (b) above, UPSI can be shared with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants etc. in respect of proposed assignment or in order to avail professional services from them or other business purposes, as the case may be, subject to maintaining confidentiality.
 - d) UPSI can also be shared in case same is mandatory for performance of duties or discharge of legal obligations.] ***
10. Any person in receipt of UPSI pursuant to a legitimate purpose shall be considered as an "insider" as construed under SEBI (Prohibition of Insider Trading) Regulations, 2015 and the Company's Code of Conduct for Prohibition of Insider Trading.
11. The Company shall publish this Code on official website of the Company and to intimate such Code and any amendments thereto to the Stock Exchanges where the company is listed in accordance with Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015