

Code of Practices & Procedures for Fair Disclosure of Unpublished Sensitive Information

Company's disclosure policy:

This Code has been framed in pursuance to Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulation, 2015, which provides for formulation of a "Code of Practices and Procedures for Fair Disclosure of unpublished Price Sensitive Information".

In view of SEBI (PIT) (Amendment) Regulation 2018 notified on December 2018 and subsequent amendment to PIT Regulations notified on January 21, 2019, the Board of Directors of Mideast Portfolio Management Ltd has adopted this revised Code which will be effective from April 1, 2019.

Purpose:

The code aims to provide a framework of practices and procedures for fair disclosure of events and occurrences which may impact the price discovery in the market for the securities of the company listed on the stock exchange.

Definitions:

1. **"MPML" or "Company"**: means Mideast Portfolio Management Ltd
2. **Chief Investor Relations Officer:**
The Director and/or the Compliance officer of the Company have been designated as a Chief Investor Relations Officer of the Company.
3. **"Generally Available Information"**: means information that is accessible to the public on a non-discriminatory basis.
4. **"Unpublished Price Sensitive Information"**: means any information, relating to a Company or its securities, directly or indirectly, that is not generally available which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 materially affect the price of the securities and shall ordinarily including but not restricted to, information relating to the following :-
 - (i) Financial results
 - (ii) Dividends;
 - (iii) Change in Capital Structure;
 - (iv) Merger, De-mergers , acquisition , delisting, disposals and expansion Of business and such other transactions ; and
 - (v) Changes in key managerial personnel.
5. **Insider:**
 - (i) A connected person; or
 - (ii) In Possession of or having access to unpublished price sensitive information.
 - (iii) Who is in receipt of unpublished price sensitive information pursuant to a "legitimate purpose"

6. Legitimate Purpose:

Legitimate purpose shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with Partners, Collaborators, Lenders, Customers, Suppliers, Merchant bankers, Legal advisors, Auditors, Insolvency professional or Other advisors or consultants, etc

A. Principles Of Fair Disclosures For Purpose Of Code Of Practices And Procedures For Fair Disclosure Of Unpublished Sensitive Information:

This document forms the Code of Practices and Procedures for fair disclosure of Unpublished Price Sensitive Information ("Code") adopted By **Mideast Portfolio Management Ltd.**

The Principles of Fair Disclosure adopted by MPML are as follows:

1. To promptly make public disclosure of unpublished Price Sensitive information that would impact price discovery. Such disclosures are made no sooner than credible and concrete information comes into being in order to make such information generally available.
2. To make disclosure of unpublished price sensitive information, as and when made, in a universal and uniform manner through forums like widely circulated media and /or through stock exchange where its equity shares are listed. Selective disclosure of unpublished price sensitive information is to be avoided.
3. Director and/or Compliance Officer serves as its Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. To promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise if at all, to make such information generally available.
5. To provide appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. To ensure that information shares with analysts and research personnel is not unpublished price sensitive information.
7. To publish proceedings of meetings with analysts and of other investors relations conferences on its official website to ensure official confirmation and documentation of disclosure made therein.
8. To handle all unpublished price sensitive information on a need-to-know basis only.
9. Any person in receipt of unpublished price sensitive information pursuant to a "legitimate purpose" shall be considered an "insider" for purposes of PIT Regulations.

The expression "Legitimate Purpose" shall have the same meaning as defined in the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations 2015 (as amended).

B. Policy For Determination Of "Legitimate Purpose"

No person and insider shall communicate, provide, or allow access to any unpublished price sensitive information, relating to the Company, to person including other insiders except where such communication is in furtherance of legitimate purposes, performances of duties or discharge of legal obligations.

No person shall procure from or cause the communication by any insider of unpublished price sensitive information, relating to the company, except in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.

Any person in receipt of unpublished price sensitive information pursuant to a "legitimate purpose" shall be considered as "insider" for purpose of these regulations and such persons shall maintain confidentially of such unpublished price sensitive information in compliance with this policy.

Provided that such sharing has not been carried out to evade or circumvent the prohibitions of their regulations.

C. Amendments To This Policy

Any statutory amendments in SEBI (Prohibition of Insider Trading) Regulations, 2015 other applicable Regulations, if any shall be deemed to be included in the code and the participants shall be governed by it. Pursuant to such amendments, the Compliance Officer may carry out the necessary changes to this Code, as may be required.
