

15.5.2015

Listing Department Bombay Stock Exchange Limited Floor 1, Phiroze Jeejeebhoy Towers Dalal Street MUMBAI - 400 001

Dear Sir,

Sub: Code of Practices and Procedures For Fair Disclosure of Unpublished Price Sensitive Information

Ref: ISIN No: INE454D01015 SEASONF STOCK CODE 521182

Please note that the Company has formulated the Code of Practices and Procedures For Fair Disclosure of Unpublished Price Sensitive Information (effective from 15th May 2015) (copy enclosed) pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and the same has been published in the official website of the company.

The company has also formulated the code of conduct for regulating, monitoring and reporting trading pursuant to aforesaid regulations.

The above is for your information and records please.

Thanking You, Yours Faithfully

For Seasons Furnishings Limited

Company Secretary

Encl: As above.

SEASONS FURNISHINGS LIMITED

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CODE OF PRACTICES AND PROCEDURES

FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

(effective from 15th May 2015)

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015 and based on the principles of Fair Disclosure outlined in the said Regulations, the Board of Directors of Seasons Furnishings Limited has formulated following Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information:

- 1. Prompt public disclosure of Unpublished Price Sensitive Information
- 1.1 The Company shall ensure prompt public disclosure of Unpublished Price Sensitive Information with an objective to make such information generally available in public domain.
- 1.2 The disclosure of Unpublished Price Sensitive Information shall be uniform and universal to avoid selective disclosure.
- 1.3 In the unlikely event of any Unpublished Price Sensitive Information getting disclosed selectively, inadvertently or otherwise, the same shall be made generally available.
- 2. Chief Investor Relations Officer

The Company Secretary of the Company has been designated as a Chief Investor Relations Officer of the Company and shall, after obtaining required internal

approvals, disseminate and disclose Unpublished Price Sensitive Information.

3. Responding to Market Rumours

The Company shall always endeavour to provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.

- 4. Sharing of Information with Analysts and Research Personnel
- 4.1 Sharing of Information:

The Company shall ensure that information shared with analysts and research personnel is not Unpublished Price Sensitive Information.

4.2 Simultaneous Release of Information:

Whenever the Company proposes to organize meetings with analysts or other investor relations conferences, the Company shall post relevant information / record on its official website after every such meeting / conference.

- 5. Sharing of Unpublished Price Sensitive Information on need-to-know basis
 5.1 All Unpublished Price Sensitive Information shall be handled on a 'need-to-
- know' basis.

 5.2 Employees working in concerned departments of the Company which are

handling Unpublished Price Sensitive Information shall not communicate such Unpublished Price Sensitive Information with employees of other departments of the Company or with any person except where such communication is in furtherance of legitimate purposes, performance of duties or discharge of legal obligations.