

Swan Energy Limited

(Formerly Swan Mills Limited)

6, Feltham House, 2nd Floor, 10 J. N. Heredia Marg, Ballard Estate, Mumbai 400001.
Tel.: 022-4058 7300 • Fax : +91-22-4058 7360 • Email : swan@swan.co.in

CIN: L17100MH1909PLC000294

Website: www.swan.co.in

Enclosure

'Code of Practices and Procedures for fair Disclosure of unpublished Price sensitive information', pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015

The Company shall make fair disclosure of all Unpublished Price Sensitive information and shall:

1. Make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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. Make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. Make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
4. Ensure appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
5. Ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
6. Develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on its official website to ensure official confirmation and documentation of disclosures made.
7. Ensure handling of all unpublished price sensitive information on a need-to-know basis.

Compliance Officer of the Company shall act as chief investor relation officer to deal with dissemination of information and disclosure of unpublished price sensitive information.

This code is subject to review by the Board from time to time.

For Swan Energy Limited



(Arun S. Agarwal)
Company Secretary