

USS GLOBAL LIMITED

(Formerly known as SURNIDHI INVESTMENT LIMITED)

Regd office : 1502, 15th Floor, RG Trade Tower, Netaji Subhash Place, Pitam Pura, New Delhi – 110034

Phone: 011- 45824477 , website: www.ussglobaltd.com

E-mail: surnidhiinvestmenttd@gmail.com CIN: L74900DL1993PLC056491

To,

Date : 01/04/2019

Head- Listing & Compliance
Metropolitan Stock Exchange of India Limited.(MSEI)
Vibgyor Towers, 4th Floor,
Plot No. C 62, G-Block,
Opposite Trident Hotel,
Bandra Kurla Complex, (Bandra East)
Mumbai- 400008

Dear Sirs,

Sub: Disclosure under of SEBI (Prohibition of Insider Trading) Regulations, 2015, and SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 and 2019

In compliance with the requirements of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 and 2019, we hereby wish to inform you the following:

The Board of Directors have made and approved the amended Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information including the Policy for determination of Legitimate Purposes for sharing of Unpublished Price Sensitive Information by the Insiders in the ordinary course of business.

A copy of the same is enclosed for your records.

The same is also made available on the website of the Company at www.ussglobaltd.com.

Your good office is requested to kindly take note of the same and acknowledge.

Thanking You,

Yours' faithfully,

For USS Global Limited
(Formerly known as Surnidhi Investment Limited)


Poonam

Company Secretary & Compliance Officer
ACS : 34664



Encl: As above

USS GLOBAL LIMITED
(FORMERLY KNOWN AS SURNIDHI INVESTMENT LIMITED)

**CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF
UNPUBLISHED PRICE SENSITIVE INFORMATION**

(Pursuant to Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015)

The Company will adhere to the following practices and procedure to ensure fair disclosure of price sensitive information such as the events and occurrence that could impact price of securities of the Company

1. The Company shall make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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. The Company shall make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Compliance Officer of the Company shall act as the Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company shall ensure that information, if any, shared with analysts and research personnel is not unpublished price sensitive information.
7. The Company shall develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
8. The Company shall handle all unpublished price sensitive information on a need-to-know basis.



POLICY FOR DETERMINATION OF LEGITIMATE PURPOSES:

The unpublished price sensitive information ('UPSI') can be shared by Insiders subject to the following:

The UPSI shall be shared only on 'need to know' basis.

The UPSI shall be shared in the ordinary course of business by an Insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Any person in receipt of UPSI pursuant to a legitimate purpose shall be considered an 'Insider' and due notice shall be given to such person to maintain confidentiality of UPSI.

The Insider sharing the UPSI shall ensure that the recipient is also bound by non-disclosure or confidentiality agreements and the duties and responsibilities of such recipients with respect to such UPSI and the liabilities involved if such person misuses or uses such UPSI in breach of the Company's Code.

As a general principle, sharing of information for any event or transaction that qualifies a UPSI under the Regulations will qualify as a "Legitimate purpose". Given below is an indicative list of transactions that will qualify as a "Legitimate purpose":

- a) Preparation and declaration of financial results or financial statements
- b) Corporate Actions such as dividend, bonus issue, rights issue, buyback, etc.
- (c) Changes in Capital Structure
- (d) Mergers, demergers, acquisitions, delisting, disposals and expansion of business and such other transactions
- (e) Changes in Key Managerial Personnel

Additionally, the Compliance Officer may from time to time determine and identify any other information, transaction or event to qualify as a "Legitimate purpose" for the purposes of the Regulations.

