

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DISCLOSURE OF UNPUBLISHED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

52 WEEKS ENTERTAINMENT LIMITED

1. Introduction

This Code has been framed in order to comply with the regulation 8 of SEBI (Prohibition of Insider Trading) Regulation, 2015 and to ensure timely and adequate disclosure of Unpublished Price Sensitive Information.

2. Objective of the Code of Fair Disclosures

52 Weeks Entertainment Limited has formulated this Code called Code of Practices and Procedures for Fair Disclosures of Unpublished Price Sensitive Information' to ensure timely and adequate disclosure of unpublished price sensitive information which would impact the price of the company's securities and to maintain the uniformity, transparency and fairness in dealing with all stakeholders and in ensuring adherence to applicable laws and regulations.

3. Relevant Definitions

'Unpublished Price Sensitive Information' means any information relating to a company or its securities, directly or indirectly, that is not generally available which upon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. Mergers, De-mergers, Acquisitions, Delistings, Disposals and Expansion of Business and such other transactions,
- v. Changes in Key Managerial Personnel and
- vi. Material Events in accordance with applicable rules/regulations.

'Compliance Officer' for the purpose of these regulations means the Company Secretary of the Company. In absence of the Company Secretary the Board of Directors may authorize such other officer of the Company to discharge the duties of Compliance Officer under the regulations.

'Chief Investors Relations Officer' means Compliance Officer of the Company.

4. Prompt Disclosure of Unpublished Price Sensitive Information

The Compliance Officer should take due care for immediate dissemination of Unpublished Price Sensitive Information to the Stock Exchanges where the securities of the company is listed to make such information generally available.

5. Uniform and Universal Dissemination of Unpublished Price Sensitive Information

The disclosure of material events and information and any other events considered to be price sensitive, disclosure of which shall be done no sooner than credible and concrete information comes into being in order to make such information generally available. The information released by the company to the stock exchanges may also be released to the press for wider circulation and may also be hosted on the company website www.52weeksentertainment.com for wider circulation.

6. Overseeing and Co-ordinating Disclosure

The duty for overseeing corporate disclosures and dealing with dissemination of Unpublished Price Sensitive Information shall be of the Compliance Officer. Disclosure/Dissemination may normally approved by the Compliance Officer, if information is accidentally disclosed without the prior approval of Compliance Officer, the person responsible shall inform the Compliance Officer immediately.

7. Appropriate and Fair Response to any queries on news reports and Requests for Verification of Market Rumours by Regulatory Authorities

All replies to queries or requests for verification of market rumours by regulatory authorities shall be sent only after discussion with the management. All such queries/request should be resolved within reasonable time frame. The Compliance Officer shall decide whether a public announcement is necessary for verifying or denying rumors and then making such disclosure.

8. Ensuring that information shared with analysts and research personnel is not Unpublished Price Sensitive Information

During the inter actions with the analysts/researchers, the company should ensure that no Unpublished Price Sensitive Information is disclosed to any one or group of research analyst or investors to the disadvantages of other stakeholders. Only public information is to be provided to Analysts/Research person and Institutional Investors or any information given to Analysts/Research Person should be simultaneously made public at the earliest. Company should remain careful while responding to analysts questions. Unanticipated questions may be taken note of and a considered response should be furnished later. If the answer includes price sensitive information, a public announcement should be made before responding. Whenever the Company proposes to organize meetings with investment analysts/institutional investors, the Company shall make a press release or post relevant information on its website after every such meeting. The Company may also consider live webcasting of analyst meets.

9. Handling of all Unpublished price sensitive information on Need-to know basis.

Unpublished Price Sensitive Information shall be handled on a need to know" basis i.e. unpublished Price Sensitive Information shall be disclosed only to those person who required such information for legitimate purposes for performance of duties or discharge of legal obligations. The Price Sensitive Information disclosed to the Stock Exchanges and to the Press may also be disclosed on the Company's web-site. The Company may also consider other modes of public disclosure of Price Sensitive Information so as to improve investor access to the same.

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