

**Principles of Fair Disclosure for purposes of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information**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 Company i.e. **SPENTEX INDUSTRIES LIMITED** has formulated following Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information: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 Prompt public disclosure of Unpublished Price Sensitive Information**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 The Company shall ensure prompt public disclosure of Unpublished Price Sensitive Information with an objective to make such information generally available in public domain.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 The disclosure of Unpublished Price Sensitive Information shall be uniform and universal to avoid selective disclosure.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 In the unlikely event of any Unpublished Price Sensitive Information getting disclosed selectively, inadvertently or otherwise, the same shall be made generally available.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Relations Officer of the Company and shall, after obtaining required internal approvals, disseminate and disclose Unpublished Price Sensitive Information.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 Rumors**

The Company shall always endeavor to provide appropriate and fair response to queries on news reports and requests for verification of market rumors 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 Sharing of Information: The Company shall ensure that information shared with analysts and research personnel is not Unpublished Price Sensitive Information.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 Sharing of Unpublished Price Sensitive Information on need-to-know basis**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 All Unpublished Price Sensitive Information shall be handled on a 'need-to-know' basis.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 Employees working in concerned departments of the Company which are handling Unpublished Price Sensitive Information shall not communicate such Unpublished Price Sensitive Information with employees of other departments of the Company or with any person except where such communication is in furtherance of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.