

SPECTRA INDUSTRIES LIMITED

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

As per sub-regulation (1) of regulation 8 of the SEBI (Prohibition of Insider Trading) Regulations, 2015

The Company will adhere to the following so as to ensure fair disclosure of events and occurrence that could impact price of its securities in the market.

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 Make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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 Make uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
3. The Compliance Officer of the Company appointed under the said regulation shall act as chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. Make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. Provide appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. Ensure that, information shared with analysts and research personnel is not unpublished price sensitive information.
7. 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. Handle of all unpublished price sensitive information on a need-to-know basis.

The Code shall be effective from 28th May, 2015.