

**SINNAR BIDI UDYOG LIMITED**  
**Code of Practices and Procedures for Fair Disclosure of Unpublished**  
**Price Sensitive Information (UPSI)**  
**(Effective from 15 May 2015)**

**I. Preamble**

Regulation (8) of the newly introduced SEBI (Prohibition of Insider Trading) Regulations, 2015 (the “Regulations”) requires a listed company to formulate and publish on its official website a Code of Practices and Procedure for fair disclosure of Unpublished Price Sensitive Information (hereinafter referred as “Code”) in adherence to the principles set out in Schedule A to the said Regulations.

**II. Objective of the Code**

The Code is required for Sinnar Bidi Udyog Limited (“the Company”) to prevent the misuse and ensure timely and adequate disclosure of Unpublished Price Sensitive Information (‘UPSI’) and to maintain the uniformity, transparency and fairness in dealing with the stakeholders.

**III. Guidelines for Fair Disclosure**

The Company, Board, officers, employees and connected persons as defined shall adhere to the following guidelines as framed as under, involving the compliance of Regulations with respect to principles of fair disclosure of unpublished price sensitive information in letter and spirit:

1. The Compliance Officer shall ensure prompt public disclosure of Unpublished Price Sensitive Information (UPSI) to stock exchanges and on the website of the Company, that would impact price discovery, as soon as it has credible and concrete information, in order to make such information ‘generally available’, i.e. to make the information accessible to the public on a non-discriminatory basis.
2. The Company shall ensure a uniform and universal dissemination of UPSI to avoid selective disclosure.
3. The Compliance Officer/ Chief Investor Relation Officer shall ensure prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information ‘generally available’.
4. The Company shall ensure an appropriate and fair response to queries on news reports and requests for verification of market rumor by regulatory authorities.
5. The Compliance Officer/ Chief Investor Relation Officer shall ensure that information shared with analysts and research personnel is not UPSI.
6. 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.
7. The Compliance Officer shall ensure the handling of all UPSI is on a need-to-know basis.
8. The Compliance Officer shall deal with dissemination of information and disclosure of UPSI as contained herein.

**IV. Amendment to the Code**

The Board may stipulate further guidelines, procedures and rules, from time to time, to ensure fair disclosure in whole or in part. This Code and any subsequent amendment(s) thereto, shall be promptly intimated to the stock exchange where the securities of the Company are listed.