

SSPDL LIMITED

The Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

The Board of Directors in their meeting held on 30th March, 2015 approved this Code. This Code is applicable with effective from 15th May, 2015.

The Company will:

- 1 Make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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- 2 Make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- 3 Make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- 4 Submit appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- 5 Ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
- 6 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- 7 Handle all unpublished price sensitive information on a need-to-know basis.

The Managing Director of the Company shall act as the chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information. However, he/she may authorise other director/other key managerial personnel/senior management personnel of the company, to make necessary disclosure.