GARWARE-WALL ROPES LIMITED



Regd. Office: Plot No. 11, Block D-1, M.I.D.C., Chinchwad, Pune: 411019.

Website: www.garwareropes.com, CIN No. L25209MH1976PLC018939

Tel.: (020) 30780000, Fax.: (91-20) 30780341, Email – secretarial@garwareropes.com

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)

Introduction:-

Regulation (8) of the Securities Exchange Board of India (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company to formulate and publish on its official website a "Code of Practices and Procedure for fair disclosure of Unpublished Price Sensitive Information" in adherence to the principles set out in Schedule A to the said Regulations.

Accordingly, The Board of Directors has formulated and adopted a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (the "Code") for **Garware-Wall Ropes Limited** (the "Company"), the same is as under:-

- **1.** The Company shall ensure the promptly public disclosure of Unpublished Price Sensitive Information (UPSI) that would impact price discovery, as soon as its possession credible and concrete information, in order to make such information 'generally available'.
- 2. The Company shall ensure a uniform and universal dissemination of UPSI and avoid the selective disclosure of UPSI.
- **3.** Chief Financial Officer of the Company is designated as its Chief Investor Relations Officer for the purpose of this code to deal with dissemination of information and disclosure of unpublished price sensitive information.
- 4. The Company shall promptly dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information 'generally available'.

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- **5.** The Company shall always make an appropriate and fair response to queries on news reports and requests for verification of market rumours made by regulatory authorities.
- **6.** The Company shall ensure that information shared with analysts and research personnel is not UPSI.
- **7.** 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 of the Company to ensure official confirmation and documentation of disclosures made.
- 8. The Company shall handle of all UPSI on a need-to-know basis.
- **9**. The Board will review and amend this Code from time-to-time as and when necessary or required.