



Fair Code for Insider Trading Policy

1. Objective

1.1 The Company has a policy of providing timely and credible material information to the investing public, Media etc. consistent with the legal and regulatory requirements.

1.2 This Code is formulated pursuant to Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 laying down the process of fair disclosure in connection with the Unpublished Price Sensitive Information.(UPSI)

1.3 The Company Secretary is designated as Chief Investor Relations Officer (CIRO) to deal with dissemination and disclosure of UPSI.

1.4 This Code is effective from May 15, 2015

2. The Code

Samrat Pharmachem Limited has adopted the following principles in connection with this Code

2.1 Adopt such process, such that any UPSI is handled only on a need-to-know basis.

2.2 Promptly disclose UPSI that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.

2.3 Ensure UPSI is not selectively disclosed and the same is disseminated uniformly and universally.

2.4 Exercise adequate care that UPSI is not shared with Analysts and other research personnel

2.5 Prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

2.6 Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.

2.7 Develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website www.samratpharmachem.com to ensure official confirmation and documentation of disclosures made.

3. Procedure

3.1 The Company has nominated a set of senior executives called Authorised Spokes Persons who will be authorised to speak about the company to Analysts, Security dealers and fund managers. "Authorised Spoke Persons" currently consist of Executive Chairman, Managing Director, CIRO and CFO.

3.2 All presentations and communications to the investing community and Press Releases relating to financial matters and other material developments shall be referred to CIRO for vetting before dissemination.

3.3 Any unintended communication of UPSI by any Employee of the Company shall be immediately brought to the notice of CIRO who will ensure that the same is disseminated to the Stock Exchange expeditiously.



Samrat Pharmachem Limited

Manufacturers & Exporters of Pharmaceutical Chemicals

3.4 Any visit to the Head Office or factories of the Company by any representatives of the investor community shall be arranged only with the prior consent of CIRO/Authorised Spokes Person and shall be accompanied by a person authorised by any of the Authorised Persons.

3.5 Enquiries received from Analysts, security holders etc. by any other department other than the investor relations must be forwarded to CIRO. Under no circumstances, any employee shall attempt to handle the enquiries without the prior authorisation from CIRO and Authorised Spokes Persons.

3.6 Employees of the company are required to generally assume that any information relating to the following “explanation clause” is material and non-published and if they have any doubt they should consult the CIRO for clarification.

Explanation Clause: UPSI generally means financial results, financial condition and forecasts, any announcement on future earnings or loss, funding/capital issue proposals, proposed dividend, discussions regarding acquisitions, joint ventures, divestments, change in business, new products, etc. and litigations.