



## **SPICE MOBILITY LIMITED**

### **Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information**

(Pursuant to Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015)

Securities and Exchange Board of India (SEBI) has notified SEBI (Prohibition of Insider Trading) Regulations, 2015 (hereinafter referred to as 'Regulations') effective from 15<sup>th</sup> May, 2015. Pursuant to Regulation 8 of the aforesaid Regulations, the Company is required to formulate a "Code of Practices and Procedures for Fair Disclosures of Unpublished Price Sensitive Information" ("**The Code**").

Pursuant to the Regulations and based on the Principles of Fair Disclosure for the purpose of the Code outlined in the said Regulations, the Board of directors in its meeting held on 11<sup>th</sup> May, 2015 has formulated "The Code". This Code shall be applicable and binding on all the Directors, employees and connected persons (as defined under the Code of Conduct to regulate, monitor and report trading by insiders).

The Principles of Fair Disclosure of Unpublished Price Sensitive Information adopted by the Company are as follows:

- 1) The Company shall promptly make public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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- 2) The Company shall make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- 3) The Compliance Officer shall act as the Chief Investor Relations Officer to deal with dissemination and disclosure of unpublished price sensitive information.
- 4) The Company shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- 5) The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- 6) The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.

- 7) The Company shall take reasonable steps to make the transcripts or records of proceedings of meetings with analysts and other investors relations conferences on the Company's website to ensure official confirmation and documentation of disclosures made.
- 8) Unpublished price sensitive information shall be handled on a "need to know" basis, i.e. unpublished price sensitive information shall be disclosed only to those within the Company who need the information to discharge their duty.

**Powers of the Board of Directors :**

The Board of directors of the Company may stipulate further guidelines and procedures from time to time to ensure fair disclosure of Unpublished Price Sensitive Information. The Board reserves the right to modify " the Code" in whole or in part, at any time without assigning any reason whatsoever but within the framework of the 'Regulations'.

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