

## SAMTEX FASHIONS LIMITED

Code of practices and procedures for Fair Disclosure of Unpublished Price Sensitive Information  
[Pursuant to Sub-regulation (1) of Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015]

### 1. Introduction

Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 (the "Regulations") require listed Company to formulate and publish on its official website, a code of practices and procedures for fair disclosure of unpublished price sensitive information (herein after referred as Code) in adhere to each of the principles set out in Schedule A to these regulations, without diluting the provisions of these regulations in any manner.

### 2. Objective of This Code

This Code is required for the Company to ensure timely and adequate Disclosure of unpublished Price Sensitive Information (UPSI) which would impact the price of the Company's securities and to maintain the uniformity, Transparency and fairness in dealing with all Stakeholders and complying all applicable Laws and regulations.

The Board of Directors of Samtex Fashions limited always thrived to conduct its Business in a fair and transparent manner with the intention to protect the interest of all the Stakeholders in the Company. Company will adhere to the below mentioned Principles of Fair Disclosure of UPSI, towards achieving this objective.

### 3. Principles of Fair Disclosure for purpose of Code of practices and procedures for fair Disclosure of Unpublished Price Sensitive Information:

- I. The Company will make Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
- II. The Company will make Uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.



- III. The Company Secretary & Compliance officer of the Company shall be designated as Chief Investor Relation officer. The chief investor relations officer will deal with dissemination of information and disclosure of unpublished price sensitive information and shall oversee Corporate Disclosure.
- IV. The Company will make Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- V. The Chief Investor Relations Officer shall promptly respond to the queries or request for verification of market rumors by exchange. The Company shall ensure an appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
- VI. The Company will ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
- VII. The Company will develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations and post relevant information on the official website- [www.samtexfashions.com](http://www.samtexfashions.com) to ensure official confirmation and documentation of disclosures made.
- VIII. The Company will Handle of all unpublished price sensitive information on a need-to-know basis i.e. UPSI shall be disclosed only to those where such communication is in furtherance of legitimate purpose, performance of duties or discharge of legal obligations.

#### 4. Digital Database

A structured digital database shall be maintained containing the names of such persons or entities as the case may be with whom information is shared under this regulation along with the permanent Account Number or any other identifier authorized by law where permanent account number is not available. Such database shall be maintained with adequate internal controls and checks such as time stamping and audit trails to ensure non-tampering of the database.

#### 5. Disclosure of the Code in Public Domain:

This Code shall be published on the official website of the Company.

Further, this code and every subsequent amendment thereto, shall be promptly intimated to the Stock Exchange where the securities of the Company Listed

This policy will be applicable to all the "insiders" and will be effective from 1<sup>st</sup> April 2019.

