

## **GARDEN SILK MILLS LIMITED**

### **Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information – with effect from 15th May, 2015.**

#### **SCOPE**

This Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“Code”) is adopted by Garden Silk Mills Limited (“The Company”). This Code is in compliance with Regulation (8)(1) of the newly introduced SEBI (Prohibition of Insider Trading) Regulations, 2015 (“Regulations”) read with Schedule A of the Regulations.

#### **CODE**

1. The Company will make prompt public disclosure of Unpublished Price Sensitive Information in relation to the Company that would impact price discovery of the securities of the Company no sooner than credible and concrete information comes into being in order to make such information ‘generally available’, i.e. to make the information accessible to the public on a non-discriminatory basis.
2. The Company will ensure uniform and universal dissemination of Unpublished Price Sensitive Information in relation to the Company via stock exchanges where the securities of the Company are listed and in order avoid selective disclosure.
3. The Compliance Officer of the Company will act as the Chief Investor Relations Officer (CIRO) to deal with dissemination of information and disclosure of Unpublished Price Sensitive Information in relation to the Company.
4. The Company will ensure prompt dissemination of Unpublished Price Sensitive Information in relation to the Company that gets disclosed selectively, inadvertently or otherwise to make such information ‘generally available’.
5. The Company will endeavor to provide appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. The Company will ensure that information shared with analysts and research personnel is not Unpublished Price Sensitive Information in relation to the Company.
7. The Company will develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conference on the Company’s website [www.gardenvareli.com](http://www.gardenvareli.com) to ensure official confirmation and documentation of disclosures made.
8. The Company executive will handle all Unpublished Price Sensitive Information in relation to the Company on a need-to-know basis.

#### **REVIEW/AMENDMENT**

The Board of Directors of the Company may amend, abrogate, modify or revise any or all clauses of this Code in accordance with the applicable provisions of the Regulations, listing agreement entered into by the Company with the stock exchanges and guidance note issued by such stock exchanges, from time to time.

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This Code has been approved by the Board of Directors of the Company on 18th March, 2015 and is effective from 15th May, 2015.