



INDO TECH TRANSFORMERS LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

Introduction:

Vide notification dated January 15, 2015 published in the official gazette, Securities and Exchange Board of India (SEBI) has notified the SEBI (Prohibition of Insider Trading) Regulations, 2015. The said regulations, which are effective from May 15, 2015, requires the Company to formulate and publish on its official website, a code of practices and procedures for fair disclosure of unpublished price sensitive information ("Code") that it would follow in order to adhere to each of the principles set out in Schedule A of the Regulations.

In compliance with the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Company has formulated this Code for the disclosure of unpublished price sensitive information in a fair and transparent manner.

Principles and Procedures for Fair Disclosure of Unpublished Price Sensitive Information for the Purposes of this Code:

- (a) There shall be prompt public disclosure of unpublished price sensitive information that would impact price discovery, no sooner than credible and concrete information comes into being (including if such information has already come into public domain or to a part of the public without the Company's disclosure), in order to make such information generally available.
- (b) The Company shall ensure uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- (c) Unless otherwise decided by the Board of Directors of the Company, the Company Secretary of the Company has been designated to deal with dissemination of information and disclosure of unpublished price sensitive information.
- (d) In the event of any unpublished price sensitive information getting disclosed selectively either inadvertently or otherwise, the Company shall ensure prompt dissemination of unpublished price sensitive information as generally available, by publishing the same on Company's website
- (e) The Company shall ensure appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- (f) The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.

(g) Best practices would be followed to make available the transcripts or the records of proceedings of meetings with analysts and other investor relations conferences on the official website of the Company for the purposes of ensuring official confirmation and documentation of disclosures made in an indiscriminate manner.

(h) The Company shall handle all unpublished price sensitive information on a need-to-know basis.
