

FIEM INDUSTRIES LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION (CODE OF FAIR DISCLOSURE)

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

Introduction:

The Securities and Exchange Board of India (SEBI), has notified SEBI (Prohibition of Insider Trading) Regulations, 2015 on 15th January, 2015. These Regulations will be effective from 15th May, 2015. These new Regulations have replaced the existing SEBI (Prohibition of Insider Trading) Regulations, 1992.

Regulation 8(1) of these newly introduced SEBI (Prohibition of Insider Trading) Regulations, 2015 (the "Regulations") requires a listed company to formulate and publish on its official website a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information in compliance with the said Regulations. While formulating the Code of Fair Disclosure, each of principles as set out in Schedule A to the Regulations need to be followed without diluting the provisions of these regulations in any manner.

Practices and Procedures:

1. Company will adhere the practice of prompt disclosure of Unpublished Price Sensitive Information (UPSI) to Stock Exchanges in order to make such information generally available. However, disclosure will be made after some credible and concrete information comes into being about the UPSI.
2. To avoid selective disclosure of UPSI, uniform and universal dissemination will be made through Stock Exchanges and other source like company's website and/or newspapers, as and when applicable.
3. Company Secretary is designated as Chief Investor Relations Officer to deal with dissemination of information and disclosure of UPSI.
4. If any information gets disclosed selectively, inadvertently or otherwise, that unpublished price sensitive information will be prompt disseminated to make such information generally available.
5. Appropriate and fair response will be given to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. It will be ensured that information shared with analysts and research personnel is not unpublished price sensitive information.
7. Best practices will be followed to make transcripts/ records of proceedings / presentations of meetings with analysts and other investor relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
8. Company will handle all strategic, material, confidential and unpublished price sensitive information in the organisation on a '**need-to-know**' basis and requisite confidentiality will be maintained for these information.

This Code of Fair Disclosure will be applicable w.e.f. 15th May, 2015.