



GARWARE
TECHNICAL FIBRES

GTFL:SEC:2019

March 29, 2019

BSE Limited

Corporate Relationship Department,
New Trading Ring,
Rotunda Building, P. J. Towers,
Dalal Street, Fort,
Mumbai 400001.

(Company code: 509557)

National Stock Exchange of India Ltd.

Exchange Plaza, Plot No. C/1, 'G' Block,
Bandra-Kurla Complex,
Bandra East,
Mumbai 400051.

(Symbol: GARFIBRES, Series: EQ)

Dear Sirs,

Sub. : Compliances under Regulation 8(2) of SEBI (Prohibition of Insider Trading) Regulations, 2015

You are aware that Securities and Exchange Board of India (SEBI) vide its notification dated 31st December, 2018, has amended SEBI (Prohibition of Insider Trading) Regulations, 2015 ("Insider Trading Regulations").

Accordingly, we are enclosing herewith revised "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)", pursuant to the provisions of Regulation 8 (2) of Insider Trading Regulations.

Please take the same on your record.

Thanking you,

Yours faithfully,
For GARWARE TECHNICAL FIBRES LIMITED


Sunil Agarwal
Company Secretary
M. No. FCS6407

Encl.: as above

Registered Office

Garware Technical Fibres Ltd. (Formerly Garware-Wall Ropes Ltd.): Plot No. 11, Block D-1, M.I.D.C., Chinchwad, Pune 411 019, India.
T +91 20 3078 0000/0306 E pune_admin@garwarefibres.com www.garwarefibres.com CIN: L25209MH1976PLC018939



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Better Ideas in Action

- **Garware Technical Fibres Limited (Formerly Garware-Wall Ropes Limited)**
Regd. Office : Plot No. 11, Block D-1, M.I.D.C., Chinchwad, Pune: 411019.
Website: www.garwarefibres.com, **CIN No.** L25209MH1976PLC018939
Tel.: (020) 30780000, **Fax.:** (91-20) 30780341, **E-mail:** secretarial@garwarefibres.com

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)

Introduction:-

Pursuant to regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Company has formulated a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI), as adopted by the Board of Directors of the Company at its meeting held on 26th May, 2015.

Securities Exchange Board of India ("SEBI") has vide notification dated 31st December, 2018, amended SEBI (Prohibition of Insider Trading) Regulations, 2015 effective from 1st April, 2019 ("Insider Trading Regulations").

As required under the Insider Trading Regulations, a revised Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI) ("Code of Fair Disclosure") has been framed and adopted by the Board of Directors of the Garware Technical Fibres Limited (the "Company") as on 29th March, 2019.

The said Code of Fair Disclosure shall supersede the earlier code and shall be effective from 1st April, 2019.

1. The Company shall ensure the prompt public disclosure of Unpublished Price Sensitive Information (UPSI) that would impact price discovery, as soon as it is in possession of credible and concrete information, in order to make such information 'generally available'.
2. The Company shall ensure a uniform and universal dissemination of UPSI and avoid the selective disclosure of UPSI.
3. The Company Secretary of the Company is designated as its Chief Investor Relations Officer for the purpose of this Code of Fair Disclosure to deal with dissemination of information and disclosure of UPSI.
4. The Company shall ensure prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information 'generally available'.
5. The Company shall always make an appropriate and fair response to queries on news reports and requests for verification of market rumours made by regulatory authorities.
6. The Company shall ensure that information shared with analysts and research personnel is not UPSI.
7. The Company shall develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the official website of the Company to ensure official confirmation and documentation of disclosures made.



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8. The Company shall handle of all UPSI on a need-to-know basis.
9. Any UPSI relating to the Company in possession of an Insider may be shared in furtherance of legitimate purpose(s), performance of duties or discharge of legal obligations.

For this purpose, the term "legitimate purposes" shall include the following:

- a. Sharing of UPSI in the ordinary course of business with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, etc. (whether existing or proposed);
- b. Sharing of UPSI with a court of law or any governmental authority or a regulatory body.
- c. Sharing of UPSI for any other genuine or reasonable purpose, as may be determined by the Compliance Officer of the Company in furtherance of interest of the Company.
- d. Sharing of UPSI for any other purpose as may be prescribed under any Regulations formulated by SEBI or the Companies Act, 2013 and Rules thereunder or any other law for the time being in force, as may be amended from time to time.

Any person in receipt of UPSI pursuant to a legitimate purpose shall be considered an "Insider" and the person disclosing such UPSI shall give due written notice, with a copy to Compliance Officer, to the person receiving UPSI clearly specifying the UPSI disclosed and asking him /her to maintain confidentiality of UPSI in compliance with the Insider Trading Regulations.

However, any UPSI relating to the Company shall not be shared by any Insider to evade or circumvent the prohibition of the Insider Trading Regulations.

10. The Board may review and amend this Code of Fair Disclosure from time-to-time as and when necessary or required.