

Ref. PILC/19

Date: May 22, 2019

BSE Limited
Phiroze Jeejeebhoy Towers,
Dalal Street,
MUMBAI – 400 001

The Manager,
Listing Department,
The National Stock Exchange of India Ltd.
Exchange Plaza, 5th Floor, Plot No.C/1, G-Block,
Bandra-Kurla Cmplx, Bandra (E),
MUMBAI – 400 051

Dear Sir,

Sub: Code of Fair Disclosure and Conduct under the SEBI (prohibition of Insider Trading) Regulations, 2015 as amended by SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018

Ref: PATSPIN INDIA LIMITED

Pursuant to Regulation 8(1) & 8(2) of the SEBI (Prohibition of Insider Trading) Regulation, 2015, as amended by SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018, necessary amendments have been made to the "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" of the Company.

A copy of the revised "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" approved by the Board of Directors at their meeting held on 21.05.2019 is enclosed.

The above referred amended Code will be effective from April 1, 2019 and shall be made available on the website of the Company viz. www.patspin.com

Kindly acknowledge receipt of the same

Thanking you,

Yours faithfully,

For PATSPIN INDIA LIMITED



DIPU GEORGE
Company Secretary

PATSPIN INDIA LIMITED

CIN: L18101KL1991PLC006194

MARKETING / REGD. OFFICE :

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Phone : 91-484-2661900, Fax: 91-484-2370812/2661980
E-mail: cs@patspin.com

CORPORATE OFFICE :

43, Mittal Chambers, 4th Floor, 228, Nariman Point, Mumbai-400 021 India.
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www.patspin.com

ISO 9001 : 2015 / 14001 : 2015 Certified



PATSPIN INDIA LIMITED

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)

(Under Regulation 8(1)& 8(2) of SEBI (Prohibition of Insider Trading) Regulation 2015)

In adherence of the principles of fair disclosure enumerated under Schedule A to the SEBI (Prohibition of Insider trading) Regulations, 2015, which stand further amended by the SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 (hereinafter referred to as "SEBI PIT Regulations"), the Board of Directors of the Company viz. Patspin India Limited, would follow the following practice and procedure for fair disclosure of unpublished price sensitive information:

Accordingly, in supersession of the previous Code, a new Code in line with the above provisions is hereby framed as under:

1. The Company shall ensure prompt public disclosure of UPSI that would impact price discovery. Such disclosures are made no sooner than credible and concrete information comes into being in order to make such information generally available.
2. The company shall ensure a uniform and universal dissemination of UPSI to avoid selective disclosure.
3. The company shall ensure prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information 'generally available'
4. The company shall ensure an appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
5. The company shall ensure that information shared with analysts and research personnel is not UPSI.
6. 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 to ensure official confirmation and documentation of disclosures made.
7. The company shall ensure the handling of all UPSI on a need-to-know basis .
8. The Compliance officer of the company shall act as the Chief Investor Relations Officer (CIRO) for the purpose of dealing with dissemination of information and disclosure of UPSI as contained herein.
9. Sharing of information with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals, other advisors or consultants, shall be considered as "legitimate purposes" for the purpose of sharing unpublished price sensitive information in the ordinary course of business by an insider, provided that such sharing has not been carried out to evade or circumvent the prohibitions of the PIT regulations.
10. 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 for legitimate purposes along with the Permanent Account Number or any other identifier authorized by law where Permanent Account Number is not available. Adequate and effective system of internal controls will also be laid out to ensure the compliance of maintenance of a digital database for sharing the information for said legitimate purposes.
11. Any person in receipt of unpublished price sensitive information pursuant to a "legitimate purpose" shall be considered an "insider" for purposes of SEBI PIT regulations and such persons are also required to ensure the confidentiality of unpublished price sensitive information shared with them, in compliance with SEBI PIT Regulations


A handwritten signature in black ink, consisting of a vertical line that curves at the bottom into a stylized, looped shape.

Apart from the above, the Board of Directors of the company may stipulate further guidelines, procedures and rules from time to time to ensure fair disclosure of unpublished price sensitive information.

This Code and every subsequent modification alteration for amendment made thereto, shall also be intimated to the Stock Exchange where the securities of the company are listed.

(Note: Clause 9 to 11 incorporated pursuant to SEBI (Prohibition of Insider Trading) (Amendment) Regulations, 2018 shall come into effective from 1st April, 2019).

For PATSPIN INDIA LIMITED


Dipu George
Company Secretary
(A38716)