## SARTHAK INDUSTRIES LIMITED

CIN: L99999MH1982PLC136834

Regd. Office: ROOM NO. 4, ANNA BHUVAN, 3RD FLOOR, 87C DEVJI RATANSI MARG, DANA BUNDER, MUMBAI, (Maharashtra) 400009, Phone: 022 23480110, Email: <a href="mailto:sarthakindustries@yahoo.in">sarthakindustries@yahoo.in</a>, website: <a href="mailto:www.sarthakindustries.com">www.sarthakindustries.com</a>

30.05.2015

To, Bombay Stock Exchange Limited 25<sup>th</sup> Floor, Phiroze Jeejeebhoy Towers, Dalal Street, Fort, Mumbai-400 001

The Secretary Madhya Pradesh Stock Exchange 201, Palika Plaza -II, MTH Compound, Indore- 452001

Dear Sir/ Madam,

#### Sub: SEBI (Prohibition of Insider Trading) Regulations, 2015.

In compliance with the requirements of the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("the Regulations") we hereby inform you that:

- 1. Company has formulated & published on its website the "Code of Practices & Procedures for Fair Disclosure of Unpublished Price Sensitive Information" a copy of which is enclosed herewith for your record.
- 2. Company has formulated a "Code of Conduct to regulate, monitor and Prevention of Insider Trading".

You are requested to take the same on your records and oblige.

Thanking You,

Yours Sincerely,

For Sarthak Industries Limited

Company Secretary

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# CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION:

Pursuant to the SEBI (Prohibition of Insider Trading) Regulations, 2015, the Board of Directors of Sarthak Industries Limited has formulated following Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information:

#### The Company,

- a) shall make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
- b) shall ensure uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
- c) appoints Company Secretary (Compliance Officer) as a Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
- d) shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- e) shall give appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- f) Shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
- g) shall develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the website of the Company to ensure official confirmation and documentation of disclosures made.
- h) shall ensure that all the unpublished price sensitive information are handled on a need-to-know basis.

