

GARWARE-WALL ROPES LTD.

Regd. Office & Factory : Plot No. 11, Block D-1, M.I.D.C., Chinchwad, Pune - 411019, India.
CIN No. : L25209MH1976PLC018939
Telephone: +91-20-30780000, Fax: +91-20-30780341
Email: pune_admin@garwareropes.com
Website: www.garwareropes.com



GWRL:SEC:2015

May 27, 2015

BSE Limited

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

By Fax (No. 022- 22721072/
22723121)
By Courier

(Company code: 509557)

National Stock Exchange of India Ltd.

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

By Fax (No. 022-26598237/38/
26598347/48)
By Courier

(Symbol: GARWALLROP, Series: EQ)

Dear Sirs,

Sub. : Compliances under Regulation 8 and 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015

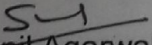
A "CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION (UPSII)", as formulated and uploaded on the website of the Company, is enclosed herewith.

Further, the Company also confirms that it has formulated a "CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY INSIDERS", pursuant to Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015.

Please take the same on your record.

Thanking you,

Yours faithfully,
For GARWARE-WALL ROPES LIMITED


Sumit Agarwal
Company Secretary
M. No. FCS6407

Encl: as above



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Tel.: (020) 30780000, Fax.: (91-20) 30780341, Email – secretarial@garwareropes.com

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)

Introduction:-

Regulation (8) of the Securities Exchange Board of India (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company to formulate and publish on its official website a “Code of Practices and Procedure for fair disclosure of Unpublished Price Sensitive Information” in adherence to the principles set out in Schedule A to the said Regulations.

Accordingly, The Board of Directors has formulated and adopted a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (the “Code”) for Garware-Wall Ropes Limited (the “Company”), the same is as under:-

1. The Company shall ensure the promptly public disclosure of Unpublished Price Sensitive Information (UPSI) that would impact price discovery, as soon as its possession 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. Chief Financial Officer of the Company is designated as its Chief Investor Relations Officer for the purpose of this code to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall promptly dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information ‘generally available’.





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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.
8. The Company shall handle of all UPSI on a need-to-know basis.
9. The Board will review and amend this Code from time-to-time as and when necessary or required.

