

SpiceJet Limited

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November 24, 2016

Department of Corporate Services, BSE Limited, Phiroz Jeejeebhoy Towers, Dalal Street, Mumbai- 400 001

Subject: Code of Fair Disclosure under the SEBI (Prohibition of Insider Trading) Regulations, 2015

Dear Sir,

Please find attached "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" of SpiceJet Limited in terms of Regulation 8 of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

Thanking you,

Yours truly, For SpiceJet Limited

Chandan Sand

VP (Legal) & Company Secretary

Encl.: As above



CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

This document forms the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code") adopted by Board of Directors of SpiceJet Limited (the "Company") on May 28, 2015. This Code is consistent with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

The Principles of Fair Disclosure adopted by Board of Directors of the Company are as follows:

- To promptly make public disclosure of unpublished price sensitive information that would impact price discovery.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. To make disclosures of unpublished price sensitive information, as and when made, in a universal and uniform manner through forums like widely circulated media and/or through stock exchanges where its equity shares are listed. Selective disclosure of unpublished price sensitive information is to be avoided.
- 3. The compliance officer shall act as its chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
- 4. To promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise if at all, to make such information generally available.
- 5. To provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- 6. To ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
- 7. To publish proceedings of meetings with analysts and of other investor relations conferences on its official website www.spicejet.com to ensure official confirmation and documentation of disclosures made therein.
- 8. To handle all unpublished price sensitive information on a need-to-know basis only.

This Code and any subsequent amendment(s) thereto, shall be intimated to the stock exchange where the securities of the Company are listed.