

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FAIR DISCLOSURE OF UNPUBLISHED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

INDO RAMA
Synthetics (India) Limited

**20th Floor, DLF Square, DLF Phase - II
NH - 8 Gurgaon - 122002
Haryana, India**

INDO RAMA SYNTHETIS (INDIA) LIMITED**Code of Practices and Procedures for Fair Disclosure of
Unpublished Price Sensitive Information
(Fair Disclosure Code)****1. Introduction:**

- 1.1 The Securities and Exchange Board of India (~~SEBI~~) notified the SEBI (Prohibition of Insider Trading) Regulations, 2015 (~~Regulations~~) on January 15, 2015, which is effective from May 15, 2015.
- 1.2 Pursuant to Regulation 8 of the Regulations, Indo Rama Synthetics (India) Limited (IRSL) is required to formulate a code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (~~Fair Disclosure Code~~).
- 1.3 Accordingly the Board of Directors of IRSL has formulated the Fair Disclosure Code.

2. Scope:

- 2.1 IRSL endeavours to preserve the confidentiality of Unpublished Price Sensitive Information (UPSI) and to prevent its misuse. To achieve these objectives and in compliance with the aforesaid Regulations, IRSL has adopted this Fair Disclosure Code.
- 2.2 This Code ensures timely and adequate disclosure of UPSI which would impact the price of its securities and to maintain uniformity, transparency and fairness in dealing with all its stakeholders.

2.3 IRSL is committed to timely and accurate disclosure based on applicable legal and regulatory requirements.

3. Terms and Definition:

Words and expressions used but not defined in this Code shall have the same meaning assigned to them in the SEBI (Prohibition of Insider Trading) Regulations, 2015 or the Securities and Exchange Board of India Act, 1992, or the Securities Contracts (Regulation) Act, 1956, the Depositories Act, 1996 or the Companies Act, 2013 and the Rules and Regulations made thereunder, as the case may be or in any amendment thereto.

4. Principles of Fair Disclosure:

To adhere to the principles as mentioned in Schedule A to the Regulations, IRSL shall ensure the following:

4.1 Promptly disclose publicly any UPSI that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information is generally available.

4.2 Uniformly and universally disseminate in a timely manner UPSI to avoid selective disclosure by communicating the same to the Stock Exchange(s) and disclosing the same on its Website.

4.3 Promptly disseminate UPSI that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

4.4 Provide appropriate and fair response to queries on news reports and requests for verification of market rumours by Regulatory Authorities.

4.5 Ensure that information shared with analysts and research personnel is not UPSI.

4.6 The Company communicates with its Institutional shareholders through meetings with analysts and discussions between fund managers and management. All interactions with institutional shareholders, fund managers and analysts are based on generally available information that is accessible to the public on a non-discriminative basis.

Details relating to quarterly performance and financial results are disseminated to the shareholders through the press releases and uploaded on the Company's website.

4.7 Handle all price sensitive information on a need-to-know basis.

4.8 The Board of Directors of IRSL has appointed a CIRO for the purpose of this code to deal with dissemination of information and disclosure of UPSI. The CIRO may be contacted by e-mail at: investor-relations@indorama-ind.com

5. The Fair Disclosure Code is subject to review by the Board of Directors as and when deemed necessary.
