

Dhampure Speciality Sugars LIMITED

Code of Practices and Procedures for fair Disclosure of Unpublished Price Sensitive Information

(Pursuant to sub-regulation (1) of regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015)

A. Introduction

The Securities and Exchange Board of India (SEBI), in its endeavor to protect the interests of investors in general, had formulated the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("Regulations") under the powers conferred on it under the SEBI Act, 1992. These regulations came into force with effect from 15th May, 2015 and the same have been made applicable to all companies whose shares were listed on Indian stock exchanges.

In due compliance of the aforesaid provisions, the Board of Directors of Dhampure Speciality Sugars Limited, "the Company" have formulated a code known as "**The Code of Practices and Procedures for Fair Disclosures of Unpublished price sensitive information**".

B. Objective of the Code of Fair Disclosures

The Code of Practices and Procedures for Fair Disclosures is required for the Company to ensure timely and adequate disclosure of unpublished price sensitive information which would impact the price of the company's securities and to maintain the uniformity, transparency and fairness in dealing with all stakeholders and in ensuring adherence to applicable laws and regulations. Further, the Company endeavors to preserve the confidentiality of un-published price sensitive information and to prevent misuse of such information.

C. Chief Investor Relations Officer (CIRO)

The Company Secretary or any other senior officer duly authorised by the Board of Directors of the Company, shall act as the Chief Investor Relations Officer, who shall be responsible for satisfactory discharge of the duties and responsibilities laid down under this code.

D. Responsibility for Implementation

The Board of Directors of the Company will be responsible for implementation of this "Code". It reserves the right to modify this code in the whole or in part, at any time within the framework of the aforementioned regulations, as may be amended from time to time.

E. Disclosure of the Code in Public Domain

This Code shall be published on the official website of the Company.

Further, this Code and every subsequent amendment there to, shall be promptly intimated to the Stock Exchange where the securities of the Company are listed.

F. Principles of Fair Disclosure for purposes of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information:

1. There shall be 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.
2. The Uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure, shall be ensured.
3. The Compliance Officer of the Company shall act as a Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. There shall be prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise. It shall be ensured that such information is made generally available.
5. The Board of Directors shall ensure that appropriate and fair response shall be provided to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Board of Directors shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. The Board of Directors 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.
8. The Board shall ensure the handling of all unpublished price sensitive information on a need-to-know basis.

G. Declaration

The Company hereby declares that all requisite measures shall be taken to ensure adherence to the principles of fair disclosures of Unpublished Price Sensitive Information.