

Smiths & Founders (India) Limited
(formerly Shimoga Technologies Limited)

**CODE OF PRACTICES AND PROCEDURES FOR DISCLOSURE OF
UNPUBLISHED PRICE SENSITIVE INFORMATION**
(adopted by the Board of Directors on 30/5/2015)

Pursuant to notification of SEBI (Prohibition of Insider Trading) Regulation, 2015, effective from May 15, 2015, and based on the principles of Fair Disclosures outlined in Regulation 8 of the said Regulations, Smiths & Founders (India) Limited have formulated the following Code of Practices and Procedures for disclosure of Unpublished Price Sensitive Information:

- i) The Company shall ensure prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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 i.e. to make the information accessible to the public on a non-discriminatory basis.
- ii) The Company shall ensure a uniform and universal dissemination of unpublished price sensitive information through stock exchanges and its official website to avoid selective disclosure of the same.
- iii) The Compliance Officer of the Company shall act as the Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
- iv) The Company shall ensure prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- v) The Company shall ensure appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- vi) The Company shall ensure that the information shared with analysts and research personnel is not unpublished price sensitive information.
- vii) 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 to ensure official confirmation and documentation of disclosures made.

- viii) The Company will handle all unpublished price sensitive information on a need-to-know basis. All insiders shall communicate, provide or allow access to any unpublished price sensitive information relating to the Company or its securities to any person only for furtherance of legitimate purposes, performance of duties or discharge of legal obligations. All the insiders having in possession of unpublished price sensitive information are required to handle such information with care and deal with such information when transacting their business strictly on a need-to-know basis.

30.05.2015

For Smiths & Founders (India) Limited


Company Secretary