



SPECTROGEN PHARMACHEM LIMITED

CODE OF PRACTICE AND PROCEDURE FOR FAIR DISCLOSURE





SPECTROGEN PHARMACHEM LIMITED
(Formerly, Spectrogen Pharmachem Private Limited)

CIN: U24299TG2020PLC147109

E-mail: info@spectrogen.co.in Website: www.spectrogen.co.in

Tel No: 040 - 35035220

GST: 36ABFCS1492M1ZV

CODE OF PRACTICE AND PROCEDURE FOR FAIR DISCLOSURE

The Code aims at prompt Public Disclosure of Unpublished Price Sensitive Information (UPSI) that would impact Price Discovery, to make such information generally available. The Disclosure shall be done no sooner than credible and concrete information comes into being. The Code also covers the Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (UPSI)

1. Uniform and Universal Dissemination of UPSI shall be ensured to avoid selective disclosure. In case of selective dissemination of UPSI, inadvertently or otherwise, it shall be ensured to make such information generally available promptly.

2. The Company and the Designated Persons shall maintain confidentiality of all Unpublished Price Sensitive Information (UPSI) and shall communicate the same purely on need-to-know basis, and shall not communicate to any unauthorized person, or on selective basis.

3. The Company shall promptly disclose UPSI, on such credible and concrete information comes into being.

4. The Company shall disclose UPSI by making its prompt disclosure with sufficient and unambiguous details to the Stock Exchange on which its Securities are Listed. The Company shall also disclose UPSI on its website.

5. In case the Company finds that any UPSI has been disclosed selectively, inadvertently, or otherwise, it shall promptly disclose and disseminate as soon as the circumstances permit such information to make it uniformly and non-discriminatorily available to the general public.

6. The Company designates its 'Chief Executive Officer' as its Chief Investor Relations Officer and entrusts him with the function of dissemination and disclosure of UPSI. Whenever the Chief Executive Officer is not available, the Company Secretary shall be the Chief Investor Relations Officer.

7. The Company shall ensure that no UPSI is shared with the Analysts and Researchers on a selective basis.

9. The Company shall make transcripts or records of proceedings of its meetings with Analysts / Investor Conferences and make the same accessible to all by uploading them on its website.

Registered Office: Sy. 115, First Floor, Brig Sayed Road, Hanumanji Colony, Bowenpally, Manovikasnagar, Tirumalagiri, Secunderabad, - 500009, Telangana, India

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