

MATRU-SMRITI TRADERS LIMITED

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M/S MATRU-SMRITI TRADERS LIMITED

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

(Pursuant to Schedule A of SEBI (Prohibition of Insider Trading) Regulations, 2015)

Securities and Exchange Board of India (SEBI) has notified (Prohibition of Insider Trading) Regulations, 2015 on January 15, 2015 to be effective from May 15, 2015

The Board of Directors of every Company, whose securities are listed on a Stock Exchange, shall formulate and publish on its official website, a Code of Practices and Procedures for Fair Disclosure ('the Code') of Unpublished Price Sensitive Information ("UPSI") that it would follow in order to adhere to each of the principles as stated in Schedule A of the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("the Regulations").

The Board of Directors of the Company formulated and adopted the Code on May 30, 2015. The Code is posted on website of the Company viz; www.matrusmrititraders.com.

A Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information for adhering each of the principles is set out below:

1. The Company shall promptly disclose to the public of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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 The Company shall follow uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Board of Directors designated Mr. Abbas Hussain – Chief Financial Officer of the Company as the Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise, to make such information generally available.
5. The Company shall ensure appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. 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.
8. The Company shall handle all unpublished price sensitive information on a need-to-know basis.
9. Any amendment to the Code upon approval of the Board of the Company shall be intimated to the Stock Exchanges and shall also be updated in the company's official website.

