

WILLIAMSON MAGOR & COMPANY LIMITED

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

This Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information, in relation to the securities of the Company, is framed pursuant to regulation 8(1) of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 which have become effective from 15th May, 2015.

This Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (hereinafter referred to as the 'Code') was adopted by the Board of Directors of the Company at its Meeting held on 27th May, 2015 in terms of which the Company will abide by the following principles:

1. Prompt public disclosure of unpublished price sensitive information ('UPSI') that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.
2. Uniform and universal dissemination of UPSI to avoid selective disclosure.
3. Prompt dissemination of UPSI that may get disclosed selectively, inadvertently or otherwise to make such information generally available.
4. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities,
5. That the information shared with any analysts and or any research personnel is not UPSI.
6. The Company will ensure that all UPSI is handled on a need-to-know basis.
7. The Company Secretary/Compliance Officer of the Company shall act as the Chief Investor Relations Officer to deal with dissemination of information and disclosure of UPSI.

This Code can be modified by the Board of Directors of the Company as and when it may be deemed necessary.