



## CODE FOR PREVENTION OF INSIDER TRADING

The SEBI [Prohibition of Insider Trading] Regulations, 2015 mandates every listed Company to formulate a stated framework and policy for fair disclosure of events and occurrences that could impact price discovery in the market for its securities.

In this regard Sika Interplant Systems Limited ("SIKA"), has laid down the following code::

### Compliance Officer to oversee and co-ordinate disclosures;

1. The Compliance Officer of the Company is responsible for dissemination of information and disclosure of Unpublished Price Sensitive Information ("UPSI").
2. The Compliance Officer is also responsible for ensuring compliance under this code, overseeing and coordinating disclosure of Unpublished Price Sensitive Information ("UPSI") to stock exchanges, shareholders, analysts and media and for educating SIKA's staff on disclosure policies and procedure.
3. All the unpublished price sensitive information is to be handled on "need to know basis", i.e., UPSI should be disclosed only to those within SIKA who need the information to discharge their duty and whose possession of such information will not give rise to a conflict of interest or appearance of misuse of the information. All the non-public information directly received by any employee should immediately be reported to the Compliance Officer.

### Prompt disclosure of UPSI:

4. SIKA will ensure that any event which has a bearing on the share price of the Company shall be disseminated promptly upon the conclusion of the event by communicating the same to the stock exchanges in accordance with the listing agreement.
5. To ensure that the information is disseminated in a uniform manner, SIKA will transmit the information to all the Stock Exchanges at the same time.

### Disclosure with reference to Analysts :

6. All unpublished price sensitive information shall be first communicated to the Stock Exchanges before the same is shared with analyst and research personnel.
7. Transcript of the meetings/telephone call, if any, with analysts shall be furnished to the Stock Exchanges and then posted on SIKA Website.

### Responding to Market Rumours:

8. Any whole time Director of the Company and/or the Compliance Officer and/or the Investor Relations Team shall give an appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities. They shall also be responsible for deciding whether a public announcement is necessary for verifying or denying rumours and making disclosures.