



## **Code of Practices and Procedures for fair Disclosure of Unpublished Price Sensitive Information:**

Regulation (8) of the newly introduced SEBI (Prohibition of Insider Trading) Regulations, 2015 requires a listed company to formulate and publish on its official website a “code of Practices and Procedures of Unpublished Price Sensitive Information” in adherence to the Principles set out in Schedule A to the said Regulations.

Accordingly, a code is hereby framed as under:-


1. The Company shall ensure Prompt public disclosure of unpublished price sensitive information that would impact price discovery, as soon as it has credible and concrete information in order to make such information ‘generally available’.
2. The Company shall ensure a uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Compliance Officer of the Company shall act as the Chief Investor Relations Officer for the purpose of dealing with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall ensure prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information ‘generally available’.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 an 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 The Company shall ensure that information shared with the analysts and research personnel is not unpublished price sensitive information.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 investors relations conferences on the official website to ensure official confirmation and documentation of disclosures made.

**For POLYCHEM LIMITED**

  
**(A. H. MEHTA)**  
**DY. MANAGING DIRECTOR**  
**DIN : 00005523**

8. The Company shall handle all unpublished price sensitive information on need-to-know basis. All the insiders having in possession of unpublished price sensitive information are required to handle such information with care and deal with such information when transacting their business strictly on need-to-know basis.

This Code was duly approved by the Board of Directors of the Company in their meeting held on Monday, 11<sup>th</sup> May, 2015 and the code shall come into force with effect from 15<sup>th</sup> May, 2015.

For POLYCHEM LIMITED  
  
(A. H. MEHTA)  
DY. MANAGING DIRECTOR  
DIN : 00005523