

Polycon International Limited

CIN: L28992RJ1991PLC006265

Regd. Office: Rotary Bhawan, Church Road, M I Road, Jaipur-302001.

Tel:+91-141-2363048-49, Fax: +91-141-2377046

Website: www.polyconltd.com; Email: polycon@polycon.in

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

Preamble:

The Securities and Exchange Board of India notified SEBI (Prohibition of Insider Trading) Regulations, 2015 on January 15, 2015 in the Official Gazette of India (hereinafter referred to as the 'Regulations'). These Regulations are effective from 15th May, 2015.

As per the requirements of Regulation 8(1) of Securities and Exchange Board of India (Prohibition of Insider Trading Regulations), 2015, the Board of Directors of M/s. Polycon International Limited (hereinafter referred to as the "Company") has adopted Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (hereinafter referred to as the "Code") which is effective from 15th May, 2015.

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information:

1. The Unpublished Price Sensitive Information (UPSI), that would impact price discovery, shall be disclosed promptly and immediately to Stock Exchange(s). The UPSI shall also be disseminated on the Website of the Company on immediate basis in order to make such information generally available for the investors and all other stakeholders of the Company. The UPSI shall be disclosed or disseminated in the Formats specified in the

Listing Agreement, the Regulations, Takeover Regulations or any other laws as time being in force at that time.

2. The Company shall have the Uniform and universal way of dissemination of Unpublished Price Sensitive Information (UPSI) to avoid selective disclosure.
3. In case, the Unpublished Price Sensitive Information (UPSI) gets disclosed selectively, inadvertently or otherwise, the company should make such information generally available on prompt and immediate basis.
4. The Company shall have appropriate procedures to respond the queries fairly on news reports and to request for verification of market rumors by regulatory authorities. The Chief Investor Relations Officer shall be responsible for verifying the market rumors and to give clarifications, if necessary.
5. The Company shall provide only public information to analysts and research personnel. Such information should not be Unpublished Price Sensitive Information (UPSI). In other case, the information given to the analyst should be simultaneously made generally available to public.
6. Developing 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.
7. All Unpublished Price Sensitive Information (UPSI), that would impact price discovery, shall be handled on a need-to-know basis.
8. The Chief Financial Officer of the Company shall act as a **“Chief Investor Relations Officer” for the purpose of this code**, who will deal with dissemination of information and disclosure of Unpublished Price Sensitive Information.

The Chief Investor Relations Officer shall be responsible for ensuring that the Company complies with continuous disclosure requirements, overseeing and coordinating disclosure of Unpublished Price Sensitive Information to stock exchanges, analysts, shareholders, other stakeholders and media, and educating staff on disclosure policies and procedure.
