

POLYPLEX CORPORATION LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

PREAMBLE

This Code of Practices And Procedures For Fair Disclosure Of Unpublished Price Sensitive information has been approved by the Board of Directors pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and comes into force w.e.f. May 15, 2015 and replaces Company's earlier Code of Corporate Disclosure Practices for Prevention of Insider Trading framed pursuant to Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 1992

Objective of the Code of Corporate Disclosure Practices is to :-

1. To disseminate price sensitive information to Stock Exchanges on a continuous and immediate basis.
2. To Improve investor access to the public announcements by supplementing information released to Stock Exchanges.
3. To make timely and adequate disclosure of shareholdings/ ownership by major shareholders and changes therein as provided under any regulations under the SEBI Act and the Listing Agreement(s).

In pursuance of aforesaid Objectives and also while dealing with Large Investors, Institutional Investors and Analysts following guidelines shall be followed :-

1. The Company shall ensure prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being, in order to make such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 The Company shall ensure uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Company shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
4. The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
5. The Company will ensure that information shared with analysts and research personnel, if any, is not unpublished price sensitive information.
6. The Company shall develop and follow 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. The Company shall handle all unpublished price sensitive information on a need-to-know basis.

Mr. Pranay Kothari, Executive Director and in his absence Mr. Manish Gupta, Chief Financial Officer and in his absence Mr. Ashok Kumar Gurnani, Company Secretary are authorised as Designated Officer(s) for the purposes of approval of release of price sensitive information or making a public announcement for verifying or denying the rumours through various media so as to achieve maximum reach and quick dissemination..

As required by SEBI (Prohibition of Insider Trading) Regulations, 2015, Mr. Ashok Kumar Gurnani, Company Secretary is designated as Compliance Officer to oversee, coordinate disclosure of price sensitive information to Stock Exchanges, Analysts, Shareholders and media and educating staff on disclosure policies and procedures and ensure that the Company complies with continuous disclosure requirements in a timely and adequate manner.

This Code has been approved by the Board of Directors of the Company and comes into effect from 15.5.2015.