



## **POLYGENTA CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

---

**POLYGENTA TECHNOLOGIES LIMITED**

**IMS (ISO 9001, ISO 14001 and OHSAS 18001), Oekotex and Control Union certified**

Registered Office:-Solitaire Corporate Park, Building No.1 , 6<sup>th</sup> Floor, Unit No.2, Andheri Ghatkopar Link Road,Chakala, Andheri (East), Mumbai 400 093

Ph: +91 (0)22 6193 3333 | Fax: +91 (0)22 6193 3316

Plant:-Gat 265/1-266, Village Avankhed, Taluka Dindori, Dist. Nashik 422 201 | Ph: +91 (0)2557 228100 | Fax: +91 (0)2557 228156

E-mail: [info@polygenta.com](mailto:info@polygenta.com) | [www.polygenta.com](http://www.polygenta.com)

Corporate Identity Number : L17120MH1981PLC025388

# POLYGENTA CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

## 1. INTRODUCTION:

Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015, (*hereinafter referred to as "Insider Trading Regulations"*) the Board of Directors of the Company in its meeting held on 28<sup>th</sup> May, 2015 approved the "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information", which would come into force with retrospective effect from May 15, 2015. The objective of the Code is to formulate a standard and stated framework and policy for fair disclosure of events and occurrences that could impact price discovery in the market for its securities. The Code is based on the principles of equality of access to information and the publication of policies such as those on dividend, inorganic growth pursuits, calls and meetings with analysts and the publication of transcripts of such calls and meetings.

This Code shall be called as the "Polygenta Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" ('Code').

## 2. THE PRINCIPLES AND OBLIGATION:

The Company endeavours to preserve the confidentiality of un-published price sensitive information and to prevent misuse of such information. The Company is committed to transparency and fairness in dealing with all stakeholders and in ensuring adherence to all laws and regulations.

Every promoter, director and employee who deals with unpublished price sensitive information has a duty to safeguard the confidentiality of all such information obtained in the course of his or her work at the Company. There shall be no selective disclosure of information and the company and every employee of the Company shall endeavour to ensure equal accessibility of information to all the stakeholders associated with the company.

## 3. DEFINITIONS:

In this Code unless the context otherwise requires:

- (a) "**Generally available information**" means information that is accessible to the public on a non-discriminatory basis;
- (b) "**Unpublished price sensitive information**" means any information, relating to the company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following: –
  - (i) financial results;
  - (ii) dividends;
  - (iii) change in capital structure;
  - (iv) mergers, de-mergers, acquisitions, delistings, disposals and expansion of business and such other transactions;
  - (v) changes in key managerial personnel; and
  - (vi) material events in accordance with the listing agreement.

#### 4. **POLICY:**

- i The Company shall make prompt public disclosure of unpublished price sensitive information that would impact price discovery as soon as credible and concrete information comes into being and will make the same information generally available by way of making an appropriate disclosure to the Stock Exchange(s) where the Company's shares are listed .
- ii The Company shall ensure that Unpublished Price Sensitive Information is disseminated uniformly and universally and shall avoid selective disclosure.
- iii The Company has designated Company Secretary as a Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information. He 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 and media.

The information disclosure / dissemination shall normally be approved by the Chief Investor Relations Officer or by such other officer as approved by the Board.

- iv. If any price sensitive information is disclosed selectively, inadvertently or otherwise without prior approval, the Chief Investor Relations Officer on having knowledge of such partial dissemination shall upload the information on the website of the Company and if required intimate the Stock Exchanges to ensure that the unpublished price sensitive information is generally available
- v. The Company shall ensure that at all times that appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities are provided promptly. However, the company is not under an obligation to respond to speculative news / press report. However if the media reports carry such information which is largely accurate, the information underlying the speculation or rumour or press report is based on insider information, which has been leaked, the company would therefore be under obligation to respond to the same and make the insider information generally available.

If the market information or press report is false or inaccurate, the company is not under an obligation to make any announcement / negative disclosures. However if the stock exchange were to make a query to clarify the position, the company must make a formal announcement to the stock exchange and shall not selectively disclose any information / make a negative disclosure.

- vi. The company shall ensure that during meetings / calls/ interactions with the analysts/ research persons / large investors, no such information which is Unpublished Price Sensitive Information is shared with them selectively.
- vii. The Company shall strive to develop 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.
- ix. All unpublished price sensitive information shall be handled only on a "Need-to-Know" basis.