

JINDAL POLY INVESTMENT AND FINANCE COMPANY LTD.

Head Office: Plot No. 12, Local Shopping Complex, Sector-B1, Vasant Kunj, New Delhi-110070 (INDIA) Phone: 011-26139256 (10 Lines) Fax: (91-11) 26125739 Website: www.jpifcl.com

Ref: JPIFCL/SE/APRIL-19/002_

Date: 02nd April, 2019

The Manager Listing	The Manager, Listing
BSE Limited	National Stock Exchange of India
Phiroze Jeejeebhoy Towers,	Ltd.
Dalal Street, Fort, Mumbai – 400 001	Exchange Plaza, Bandra-Kurla Complex, Bandra (E), Mumbai - 400 051
Scrip Code: 536773	Wallibar - 400 051
	Scrip Symbol: JPOLYINVST

Sub: Intimation for adopting Code of Practice and Procedure for Fair Disclosure of Unpublished Price Sensitive Information

Dear Sir/Ma'am,

Pursuant to the provisions of Regulation 8 of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, this is to inform that the Board of Directors of the Company has amended and adopted the revised "CODE OF FAIR DISCLOSURE" incorporating therein Policy on Determination of "Legitimate Purpose" to be effective April 1, 2019, in compliance with the Securities and Exchange Board of India (Prohibition of Insider Trading) (Amendment) Regulations, 2018.

AMENDMENT IN THE CODE OF FAIR DISCLOSURE IS REPRODUCED HEREUNDER:-

Policy for determination of Legitimate Purposes

- a) "Legitimate purpose" shall mean sharing of Unpublished Price Sensitive Information in the course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, other advisors or consultants provided that such sharing has not been carried out to evade or circumvent the prohibitions of the Regulations.
- b) Any person in receipt of Unpublished Price Sensitive Information for a legitimate purpose shall be considered as an "insider" for purposes of these Regulations and due notice shall be given to such person to maintain confidentiality of such Unpublished Price Sensitive Information. Such person is also required to ensure the confidentiality of Unpublished Price Sensitive Information shared with him/her, in compliance with the Regulations.
- c) There shall be limited access to Unpublished Price Sensitive Information and the same will be disclosed on "need to know" basis only to those persons who

need the information for legitimate purposes to discharge their duty or legal obligations.

The amended Code is available on the website of the Company i.e. http://www.jpifcl.com.

Please take the above information in your record.

For Jindal Poly Investment and Finance Company Limited

ont and Finance New Delhi (pa) (Rupesh Kumar) Company Secretary, pa ACS: 43104