

Code of practices and procedures for fair disclosure of  
unpublished price sensitive information  
(Pursuant to SEBI (Prohibition of Insider Trading)  
Regulations, 2015)

**Purpose:**

The Board of Directors of every company, whose securities are listed on a stock exchange, shall formulate and publish on its official website, a Code of practices and procedures for fair disclosure (“the policy”) of unpublished price sensitive information (“UPSI”). This Code is consistent with the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 and the terms used therein shall have the same meaning as given in the said Regulations:

**Preamble:**

The Board of Directors of the Company, formulated and adopted the policy for the Company in compliance with Chapter IV read with Schedule A of the Regulations by passing a resolution dated 22<sup>nd</sup> May, 2015. The policy will be intimated to the Stock Exchanges and is also published on the official website of the Company [www.nippobatteries.com](http://www.nippobatteries.com)

The Equity Shares of the Company are listed on National Stock Exchange of India Ltd. (NSE) and BSE Ltd. (BSE), collectively referred to as the Stock Exchanges.

**Code of Fair Disclosure of the Company**

1) Unpublished price sensitive information (UPSI) that would impact price discovery will be intimated to the Stock Exchanges immediately on any such credible and concrete



information crystalizing or coming into the knowledge of the Company.

2)The Company shall follow uniform and universal dissemination of UPSI to avoid selective disclosure.

3) The Board of Directors designated Mr. J.Srinivasan Company Secretary as the Chief Investor Relations Officer of the Company to deal with dissemination of information and disclosure of UPSI.

4) In the event of any UPSI getting disclosed selectively either inadvertently or otherwise, the Company shall ensure prompt dissemination of UPSI as generally available, by publishing the same on Company's website [www.nippobatteries.com](http://www.nippobatteries.com)

5) The Company shall ensure appropriate and fair response to queries on news reports and requests for verification of market remorse by regulatory authorities.

6) The Company shall ensure that information shared with analysts and research personnel is not UPSI.

7) The Company shall handle all UPSI on a need-to-know basis.

8) Any amendment of the Policy, upon approval of the Board of the Company shall be intimated to the Stock Exchanges and shall also be updated in the company's official website.

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