



22<sup>nd</sup> May, 2015

The Secretary  
The Calcutta Stock Exchange Ltd.  
7, Lyons Range,  
Kolkata – 700 001

Dear Sir,

**Sub: Code of Practice and Procedures for fair Disclosures of Unpublished Price Sensitive Information**

Please find enclosed herewith the Code of Practice and Procedure for Fair Disclosure of Unpublished Price Sensitive information as per SEBI (Prohibition of Insider Trading) Regulations, 2015 as considered and approved by the Board of Directors and the same will be effective from 15<sup>th</sup> May, 2015.

*The above is for your information and record.*

Thanking You

Yours faithfully

For LINC PEN & PLASTICS LTD.

N. K. DUJARI  
Chief Financial Officer &  
Company Secretary

- CC: 1. The Executive Director  
The Stock Exchange, Mumbai
2. The manager,  
Listing Department,  
National Stock Exchange of India Ltd.

Stock Code - 531241

**Code of Practice and Procedures for Fair Disclosure of Unpublished Price Sensitive Information as envisaged under SEBI (Prohibition of Insider Trading) Regulations, 2015**

Principles of Fair Disclosure for purposes of Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

The company will adhere to the following so as to ensure timely and adequate disclosure of Price Sensitive Information with respect to it or its securities which is likely to affect price of the securities.

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 The Company will make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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 The Company will make uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.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of the Company will be Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.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 The Company will make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.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 The Company will ensure that information shared with analysts and research personnel is not unpublished price sensitive information.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

The Code was duly approved by the Board and shall be effective from 15<sup>th</sup> May, 2015.

