



19.05.2015

M/s. Bombay Stock Exchange Limited  
Department of Corporate Services  
Floor 25, Phiroze Jeejeebhoy Towers  
Dalal Street  
Mumbai - 400 001

Fax No. 022 - 26598237 / 38

Dear Sirs,

Sub: Adoption of new code of conduct under SEBI (PIT) Regulation, 2015

This is to inform that the Board of Directors of the Company vide their circular resolution dated 11.05.2015 approved and adopted the new code of practices and procedures for fair disclosure of unpublished price sensitive information and code of conduct to regulate and report trading by insiders as required under Regulations 8 and 9 of SEBI (Prohibition of Insider Trading) Regulation, 2015. As per circular dated 11.05.2015 issued by SEBI, the new code of practices and procedures for fair disclosure of unpublished price sensitive information is also published on the company's web site.

The above information may kindly be taken on record.

Thanking you,

Yours faithfully,  
For Sicagen India Limited

A handwritten signature in black ink, appearing to read "G. Arunmozhi".

G. Arunmozhi  
Head Legal & Company Secretary  
Encls : a/a

**Sicagen India Limited.**

Head Office: 4th floor, SPIC House, 88, Mount Road, Guindy, Chennai-600032, India.

Tel: +91 44 3007 0300 Fax: +91 44 3007 0399 [www.sicagen.com](http://www.sicagen.com)

Registered Office: Adayar House, Chennai-600085, India. CIN : L74900TN2004PLC053467

**Sicagen India Limited****Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information**

[Pursuant to Regulation 8 of the SEBI (Prohibition of Insider Trading) Regulations, 2015]

This following is the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code") adopted by Sicagen India Limited, (Sicagen). 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:

The following are the principles of Fair Disclosure adopted by Sicagen:

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 Unpublished price sensitive information (UPSI) that would impact price discovery will be intimated to the Stock Exchanges immediately on any such credible and concrete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. Sicagen will ensure that there is no selective disclosure of any UPSI.
3. The Whole Time Director/Managing Director of the Company/Company Secretary have been designated as the Chief Investor Relations Officer (CIRO) for the purpose of determining the information and timing of dissemination of any UPSI.
4. In case any UPSI gets disclosed inadvertently to any select persons or group of persons in the ordinary course, the CIRO will immediately take steps for disclosing such information to the Stock Exchanges and also the website of the Company.
5. Sicagen will provide prompt and appropriate response to queries on news reports and verification of market rumours by regulatory authorities.
6. All the functional heads and other senior executives of the Company will ensure that:
  - a. The information shared with analysts and research personnel are not UPSI. They will seek guidance from the CIRO and the Company Secretary in case it is not clear to them if any of the proposed disclosure to such analysts and research personnel would be a UPSI.
  - b. The proceedings are captured aptly and the details of disclosures made are uploaded in the website of the Company.
  - c. Share all the UPSI with the concerned personnel strictly on a need to know basis.
  - d. Keep all internal presentations and other documents relating to business plans and other related activities as classified documents and not discuss such information in public or with persons not concerned with the proposal.
  - e. Appropriate non-disclosure agreements are signed by the advisors, consultants, etc. who are engaged for advising on major business plans and similar proposals, which have not otherwise been made public.

*The above Code has been duly approved by the Board of Directors of Sicagen on 11.05.2015.*

