



# POLYMAC THERMOFORMERS LIMITED

CIN No. L25201WB1999PLC090774

29A, WESTON STREET, 3RD FLOOR, ROOM NO.: C-5, KOLKATA - 700 012

Ref No.....

Date.....

## CODE OF PRACTICES AND PROCEDURE FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION OF POLYMAC THERMOFORMERS LIMITED

### 1.1 Introduction

The Securities and Exchange Board of India (SEBI), in its endeavour to protect the interest of investors in general, had formulated the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("Regulations") under the powers conferred on it under the SEBI Act, 1992. These regulations came into force with effect from 15<sup>th</sup> May, 2015 and the same have been made applicable to all companies whose shares were listed on the Indian Stock Exchange. The company is required to formulate Code of Practices and Procedures for Fair Disclosures.

### 1.2 Objective of the Code of Fair Disclosures

The Code of Practices and Procedures for Fair Disclosures is required for the Company to ensure timely and adequate disclosure of unpublished price sensitive information which would impact the price of the company's securities and to maintain the uniformity, transparency and fairness in dealing with all stakeholders and in ensuring adherence to applicable laws and regulations. Further, the Company endeavours to preserve the confidentiality of unpublished price sensitive information and to prevent misuse of such information.

### 1.3 Title

This code shall be known as the Code of Practices and Procedures for Fair Disclosures of price sensitive information of Polymac Thermoformers Limited ("the Code") and has been made pursuant to regulation 8 (1) of the SEBI (Prohibition Of Insider Trading ) Regulations, 2015

### 1.4 Applicability

This Code shall be applicable to Polymac Thermoformers Limited

### 1.5 Definitions as used in this code

- a. "Chief IRO" shall mean the person nominated to function as the Chief Investor Relations Officer under these Regulations;
- b. "Company" shall mean Polymac Thermoformers Limited and where the context requires shall include its subsidiaries;
- c. Un-published price sensitive information shall have the meaning assigned thereto in the regulations.





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## 2. Publication of the code

This code upon its adoption by the board of directors of the company shall be uploaded on the company's websites and any updates hereto shall be promptly reflected on the company's website.

## 3. Norms for handling and dissemination of price sensitive information

- 3.1 Polymac Thermoformers limited will promptly make public disclosures of unpublished price sensitive information as soon as credible and concrete information is available or the decisions are validated by the board to BSE limited and simultaneously upload such information on company's official website [www.polymacthermoformers.com](http://www.polymacthermoformers.com) in order to make such information generally available to investors and members of the company
- 3.2 Polymac Thermoformers limited shall disclose information on its official website and in the portal of BSE limited to avoid selective disclosure.
- 3.3 Mr. Pramod Kumar Agrawal is designated as chief investor relations officer to take all required action for dissemination of information and disclosure of unpublished price sensitive information indiscriminately
- 3.4 Prompt action shall be taken by the chief investor relation officer to ensure that the inadvertent selective disclosure of unpublished price sensitive information is generally available.
- 3.5 Chief investor relations officer shall provide appropriate assistance and fair response to the queries of analysts & regulatory authorities for verification of news report or market rumors.
- 3.6 chief investor relations officer shall further ensure that information shared with analyst and research personnel is not unpublished price sensitive information
- 3.7 any decision on unpublished price sensitive information at the meeting of analysts or investors relations will be made generally available through the official website of the company to ensure official confirmation and documentation of disclosure is made.
- 3.8 unpublished price sensitive information shall be handled on a need to know basis, i.e unpublished price sensitive information shall be disclosed to those within the Polymac Thermoformers Limited who need the information to discharge their duty.

