

VINAYAK POLYCON International Ltd.

CIN No. L25209RJ2009PLC030620

E-mail : vinayak@vinayakpolycon.com

www.vinayakpolycon.com

UNIT I

No. 16, Pandur Village,
P.O. Kayarambedu, Via Guduvanchery,
Distt. Kanchipuram-603 202,
Tamil Nadu

Regd. Office :

312, Navjeevan Complex,
29, Station Road, Jaipur - 302 006
Ph. : 2377007, 2378830

UNIT II

H-13-14, Heerawala Ind. Area
Kanota, Jaipur-303012
Rajasthan

To,
The Manager,
Department of Corporate Services,
B.S.E. Limited, 25th Floor,
P. J. Towers,
Dalal Street,
Mumbai-400001.

VPIL/BSEL/2018-19/15022019

Friday, February 15, 2019

Sub.: Code of Practices and Procedures for Fair Disclosure of Un-Published Price Sensitive Information of Vinayak Polycon International Limited as amended

Scrip Code: 534639

Dear Sir,

We enclose herewith Code of Practices and Procedures for fair disclosure of Unpublished Price Sensitive information made pursuant to Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015, as amended, to be effective from April 01, 2019, which has been adopted by the Board of Directors of the Company at its meeting held on February 14, 2019.

The said code is enclosed herewith for information of the exchange in compliance with the requirement under Regulation 8(2) of the aforesaid SEBI Regulations.

You are kindly requested to take the same on record and to inform all those concerned.

Thanking You,
For Vinayak Polycon International Limited

Rashmi

Rashmi Agarwal
Company Secretary & Compliance Officer



Encl: As above

(VINAYAK POLYCON INTERNATIONAL LIMITED)

(CIN: L25209RJ2009PLC030620)

Registered Office: 312, Navjeevan Complex, 29, Station Road, Jaipur-302006

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**CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF
UNPUBLISHED PRICE SENSITIVE INFORMATION FOR ADHERING TO
THE PRINCIPLES OF FAIR DISCLOSURE**

(As envisaged under Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015 and Amendment thereon)

The Company will adhere to the following so as to ensure fair disclosure of events and occurrence that could impact price of its securities in the market:

- The Company will make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
- The Company will make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
- The Compliance Officer of the Company appointed under the said Regulation shall act as Chief Investor Relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
- The Company will make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
- The Company will provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
- The Company will ensure that, information, if any, shared with analysts and research personnel is not unpublished price sensitive information.
- The Company will develop best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the website of the Company to ensure official confirmation and documentation of disclosures made.
- The Company will handle all unpublished price sensitive information on a need-to-know basis.
- The Company will make a policy for determination of legitimate purposes.

The amended code has been adopted by the Board of Directors in its meeting held on February 14, 2019 and shall come into force from April 01, 2019.

For Vinayak Polycon International Limited

Rashmi

Rashmi Agarwal
Company Secretary & Compliance Officer

