

## **NATIONAL PLASTIC TECHNOLOGIES LTD.:**

### **Code of Practices & Procedures for Fair Disclosure of unpublished price sensitive information (UPSI)**

1. The Company and connected persons are required to make Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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. There should be Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
3. The Company Secretary is designated as chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall be Prompt in dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall make appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. The Company shall ensure 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.

The Company shall handle all unpublished price sensitive information on a need-to-know basis. The Company Secretary is entrusted with the Compliance of the above code.

### **Code of Conduct to Regulate, Monitor and Report Trading by Insiders**

1. The Company Secretary /compliance officer shall report to the board of directors and in particular, shall provide reports to the Chairman of the Audit Committee or to the Chairman of the board of directors atleast once in a calendar quarter.
2. All information shall be handled within the organisation on a need-to-know basis and no unpublished price sensitive information shall be communicated to any person except in furtherance of the insider's legitimate purposes, performance of duties or discharge of his legal obligations. There shall be Chinese Walls and designated person shall not cross the wall except in case of urgent need with preclearance from the compliance officer.
3. Employees and connected persons shall be designated based on their functional role (“**designated persons**”) in the organization by the Compliance Officer and such designated

persons shall be governed by an internal code of conduct governing dealing in securities. Due regard shall be had to the access that such role and function would provide to unpublished price sensitive information in addition to seniority and professional designation.

4. Designated persons may execute trades subject to compliance with these regulations. Towards this end, a notional trading window shall be used as an instrument of monitoring trading by the designated persons. The trading window shall be closed when the compliance officer determines that a designated person or class of designated persons can reasonably be expected to have possession of unpublished price sensitive information. Such reasonable period shall not be less than 7 days or such other period as prescribed under the law. Such closure shall be imposed in relation to such securities to which such unpublished price sensitive information relates. Designated persons and their immediate relatives shall not trade in securities when the trading window is closed.

5. The timing for re-opening of the trading window shall be determined by the compliance officer taking into account various factors including the unpublished price sensitive information in question becoming generally available and being capable of assimilation by the market, which in any event shall not be earlier than forty-eight hours after the information becomes generally available. The trading window shall also be applicable to any person having contractual or fiduciary relation with the company, such as auditors, accountancy firms, law firms, analysts, consultants etc., assisting or advising the company.

6. When the trading window is open, trading by designated persons shall be subject to preclearance by the compliance officer, if the value of the proposed trades is above Rs. 10 lacs. No designated person shall apply for pre clearance of any proposed trade if such designated person is in possession of unpublished price sensitive information even if the trading window is not closed.

7. The compliance officer shall confidentially maintain a list of such securities as a “restricted list” which shall be used as the basis for approving or rejecting applications for preclearance of trades.

8. Prior to approving any trades, the compliance officer shall be entitled to seek declarations to the effect that the applicant for pre-clearance is not in possession of any unpublished price sensitive information. He shall also have regard to whether any such declaration is reasonably capable of being rendered inaccurate.

9. Within seven trading days trades that have been pre-cleared have to be executed by the designated person, failing which fresh pre-clearance would be needed for the trades to be executed.

10. Within six months a designated person who is permitted to trade shall not execute a contra trade. The compliance officer may be empowered to grant relaxation from strict application of such restriction for reasons to be recorded in writing provided that such relaxation does not violate these regulations. Should a contra trade be executed, inadvertently or otherwise, in violation of such a restriction, the profits from such trade shall be liable to be disgorged for remittance to the Board for credit to the Investor Protection and Education Fund administered by the Board under the Act.

11. Applications for pre-clearance, reporting of trades executed, reporting of decisions not to trade after securing pre-clearance, recording of reasons for such decisions and for reporting level of holdings in securities can be made in a plain paper as and when such transaction is carried out.

12. Any non-compliance with this code shall attract monetary penalty of not less than Rs.1000 for every act of non-compliance and such other disciplinary action as may be determined by the Compliance officer in consultation with the chairman of the Audit Committee.

13. Any violation of the Code shall be brought to the notice of the Board of Directors in subsequent meeting following such violation. The Company Secretary who shall act as compliance officer shall be responsible for compliance with this code and the SEBI (Prohibition of Insider Trading) Regulations, 2015.