

POLSON LIMITED
Code of practices and procedures for fair disclosure of unpublished price sensitive information
(Pursuant to SEBI (Prohibition of Insider Trading) Regulations, 2015)

Purpose:

The Board of Directors of every company, whose securities are listed on a stock exchanges, shall formulate and publish on its official website, a Code of practices and procedures for fair disclosure ("the policy") of unpublished price sensitive information ("UPSI") that it would follow in order to adhere to each of the principles as stated in Schedule A of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 ("the Regulations").

Preamble:

The Committee of Board of the Company formulated and adopted the policy for the Company in compliance with Chapter IV read with Schedule A of the Regulations by passing a resolution dated May 09, 2015. The policy will be intimated to the Stock Exchange and is also published on the official website of the Company at www.polsonltd.com

The Equity Shares of the Company are listed on BSE Ltd. (BSE) hereafter referred as the Stock Exchange.

- 1) The Company shall promptly disclose to the public all of unpublished price sensitive information ("UPSI") that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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 shall follow uniform and universal dissemination of UPSI to avoid selective disclosure.
- 3) The Board of Directors designated Chief of Compliance and Company Secretary as the Compliance Officer of the Company to deal with dissemination of information and disclosure of UPSI.
- 4) In the event of any UPSI getting disclosed selectively either inadvertently or otherwise, the Company shall ensure prompt dissemination of UPSI as generally available, by publishing the same on Company's website www.polsonltd.com.
- 5) The Company shall ensure appropriate and fair response to queries on news report and requests for verification of market rumors by regulatory authorities.
- 6) The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information (UPSI).
- 7) The Company shall develop best practices to make transcripts or record of proceeding of meetings with analyst and conference call with investors/analysts are promptly published on the official website of the Company to ensure official confirmation and documentation of disclosures made.
- 8) The Company shall handle all UPSI on a need-to-know basis.
- 9) Any amendment of the Policy, upon approval of the Board of the Company shall be intimated to the Stock Exchanges and shall also be updated in the company's official website

Date:

Place: Mumbai