



**PATSPIN INDIA LIMITED**  
**Regd. Office. 3<sup>rd</sup> Floor, Palal Towers, Ravipuram, M G Road, Kochi-682016**  
**(CIN:L18101KL1991PLC006194)**

**Code of Practices and Procedures for Fair Disclosure  
of Unpublished Price Sensitive Information(UPSI)**

(Approved by the Board of Directors in their meeting held on 27<sup>th</sup> May,2015)

Regulation (8) of the newly introduced SEBI(Prohibition of Insider Trading) Regulations, 2015 requires a listed company to formulate and publish on its official website a " Code of Practices and Procedure for fair disclosure of Unpublished Price Sensitive Information"(UPSI) in adherence to the principles set out in Schedule A to the said Regulations.

Accordingly, in supersession of the previous Code, a new Code in line with the above provisions is hereby framed as under:

1. The Company shall ensure prompt public disclosure of UPSI that would impact price discovery. Such disclosures are made no sooner than credible and concrete information comes into being in order to make such information generally available.
2. The company shall ensure a uniform and universal dissemination of UPSI to avoid selective disclosure.
3. The company shall ensure prompt dissemination of UPSI that gets disclosed selectively, inadvertently or otherwise to make such information 'generally available'
4. The company shall ensure an appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
5. The company shall ensure that information shared with analysts and research personnel is not UPSI.
6. The company shall develop 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.
7. The company shall ensure the handling of all UPSI on a need-to-know basis .
8. The Compliance officer of the company shall act as the Chief Investor Relations Officer (CIRO) for the purpose of dealing with dissemination of information and disclosure of UPSI as contained herein.

This Code is subject to review from time to time.

B K Patodia  
Chairman

Kochi  
27<sup>th</sup> May, 2015