

CAPLIN POINT LABORATORIES LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

[Pursuant to Sub-Regulation (1) of Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015]

This Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information (“Code”) adopted by Caplin Point Laboratories Limited (“CPLL”). This code is in line with the SEBI (Prohibition of Insider Trading) Regulations, 2015.

The Code of Fair Disclosure adopted by CPLL Consists of the following Principles:

1. To make prompt disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.

“unpublished price sensitive information” means any information, relating to a company or its securities, directly or indirectly, that is not generally available which upon becoming generally available, is likely to materially affect the price of the securities and shall, ordinarily including but not restricted to, information relating to the following:-

- i. Financial results;
 - ii. Dividends;
 - iii. Change in capital structure;
 - iv. Mergers, De-mergers, Acquisitions, Delistings, Disposals and Expansion of business and
 - v. Such other transactions;
 - vi. Changes in key managerial personnel; and
 - vii. Material events in accordance with the listing agreement.
2. The Company shall ensure to make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosures.
3. The Company has designated Mr D Muralidharan, Chief Financial Officer to deal with dissemination of Information and disclosure of the unpublished price sensitive information.
4. To promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise if at all, to make such information generally available.

5. To provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. To ensure that the information shared with analysts and research personnel in not unpublished price sensitive information.
7. To develop best practices to make transcripts or records of proceedings of meetings with analysts and other investors' relations conferences on the official website to ensure official confirmation and documentation of disclosures made.
8. To handle all unpublished price sensitive information on a need-to-know basis only.
