
PANASONIC CARBON INDIA CO. LTD
**Code of Practices and Procedures for Fair Disclosure of Unpublished
Price Sensitive Information**

Purpose:

The Board of Directors of every company whose securities are listed on a stock exchange 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and publish on its official website, a “Code of practices and Procedures for Fair Disclosure (“the policy”) of Unpublished Price Sensitive Information (“UPSI”). This code is in adherence to the principles set out in Schedule A to the said Regulations. The objective of this Disclosure Code is to ensure timely and adequate public disclosure of Unpublished Price Sensitive Information.

Preamble:

The Board of Directors of the Company formulated and adopted the policy for the Company in compliance with Chapter IV read with Schedule A of the Regulations. The same policy is also published on the official website of the Company www.panasoniccarbon.co.in

Definition:

“**Company**” means Panasonic Carbon India Co. Ltd.

“**Regulation**” means SEBI (Prohibition of Insider Trading) Regulations, 2015.

“**unpublished price sensitive information**” means any information, relating to a company or its securities, directly or indirectly, that is not generally available which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 such other transactions;
- (v) changes in key managerial personnel; and
- (vi) material events in accordance with the listing agreement.



Code of Fair Disclosure of the Company:

1. Unpublished Price sensitive Information (UPSI) that would impact price discovery will be intimated to the Stock Exchanges immediately on any such credible and concrete information coming in to the knowledge of the Company.
2. The Company shall follow uniform and universal dissemination of UPSI to avoid selective disclosure.
3. The Compliance Officer designated as the Chief Investor Relations 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 Companies website www.panasoniccarbon.co.in
5. The Company shall ensure 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 the information shared with analysts and research personnel is not UPSI.
7. The Company shall handle all UPSI on a need-to-know basis.
8. Any amendment of the policy upon approval of the Board of the Company shall be intimated to the Stock Exchange and shall also be updated in the Company's official website.



PANASONIC CARBON INDIA CO. LTD

CIN: L29142TN1982PLC009560

Regd. Office: Pottipati Plaza, 77 (Old No.35) Nungambakkam High Road, Third Floor,
Nungambakkam, Chennai- 600 034
