

(VINAYAK POLYCON INTERNATIONAL LIMITED)

(CIN: L25209RJ2009PLC030620)

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PRICE SENSITIVE INFORMATION DISCLOSURE POLICY

1. Objective

The objective of the policy is to ensure timely and adequate disclosure of Price Sensitive Information under Clause 36 of the Listing Agreement.

2. Title & Scope

Price Sensitive Information shall be given to the Stock Exchanges and disseminated promptly on a continuous basis. For this purpose Price Sensitive Information means any information, which relates directly or indirectly to a Company and which if published is likely to materially affect the price of shares of the Company. As per the current Clause 36, the following is the indicative list of 'material' events on which listed entities are required to make disclosure to the Exchange:

- Events such as strikes, lock-outs, closure on account of power cuts etc.
- Change in the general character or nature of business.
- Disruption of operations due to natural calamity
- Commencement of Commercial Production / Commercial Operations
- Developments with respect to pricing/ realization arising out of change in regulatory framework.
- Litigation / dispute with a material impact
- Revision in Rating
- Any other information having bearing on the operations / performance of the Listed Entity as well as Price Sensitive Information, such as :-

- I) Periodical Financial Results of the Company
- II) Intended declaration of Dividend (Both Interim and final);
- III) Issue of Securities or buy back of Securities
- IV) Any major expansion plans or execution of new projects.
- V) Amalgamation, Mergers or Takeovers;
- VI) Disposal of the Whole or substantial part of the undertaking; and
- VII) Significant changes in the policies, plans or operations of the Company

3. Prompt Disclosure of Price Sensitive Information

Price sensitive information shall be given by the Company to Stock Exchange and disseminated on a continuous and immediate basis. The Company may also consider, from time to time, ways of supplementing information, released to Stock Exchange by improving investor access to public announcement.

4. Overseeing and Coordinating Disclosures

4.1 The Chairman & Managing Director or in his absence, CFO shall have authority to decide:

- i) the event that qualifies for disclosure as per clause 36 of the Listing Agreement.
- ii) the appropriate time at which such disclosure is to be filed with the Exchange.
- iii) the details that may be filed in the best interest of present and potential investors.

4.2 Information disclosure / dissemination shall be approved by the Chairman & Managing Director of the Company or in his absence, CFO of the Company.

4.3 All disclosures pertaining to price sensitive information shall either be signed by CFO or Company Secretary of the Company.

5. Posting of Price Sensitive information on Company's website

All price sensitive information shall also be posted on the website of the Company.