



Kkalpana Industries (India) Limited

(Formerly Kalpena Industries Ltd.)

Code of practices and procedures for fair disclosure of unpublished price sensitive information

[Pursuant to Sub-regulation (1) of Regulation 8, of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015]

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and publish on its official website, a Code of practices and procedures for fair disclosure ("**the Code**") of unpublished price sensitive information that it would follow in order to adhere to each of the principles as stated in Schedule A of the Regulations.

In order to ensure complete adherence to the spirit of this regulation, Kkalpana Industries (India) Limited (Earlier Kalpena Industries Limited) hereby notifies that the Board of Directors at their meeting held on 27th June, 2015, formulated and adopted the Code for the Company in compliance with Chapter IV read with Schedule A of the Regulations.

The Board of Directors of the Company designated Mr. Narrindra Suranna (DIN: 00060127), Chairman & Managing Director and Mr. A.B.Chakrabarty (Membership No. FCS 7184), Company Secretary as the Chief Investor Relations Officer, to deal with dissemination of information and disclosure of Unpublished Price Sensitive Information.

The Chief Investor Relation Officer shall ensure the following:

1. Prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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.
2. Uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
4. Appropriate and fair response to queries on news reports and requests for verification of market rumors by regulatory authorities.
5. The information shared with analysts and research personnel is not unpublished price sensitive information.

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CIN : L19202WB1985PLC039431

6. Developing best practices to make transcripts or records of proceedings of meetings with analysts and other investor relations conferences to ensure official confirmation and documentation of disclosures made.
7. Handling of all unpublished price sensitive information on a need-to-know basis.

The Board of Directors reserves the right to amend or modify the Code in whole or in part, at any time without assigning any reason whatsoever and to establish further rules and procedures, from time to time, to give effect to the intent of the Code. The decision of the Board of Directors of the Company with regard to any or all matters relating to the Code shall be final and binding on all concerned.