



**PEARL
Polymers Limited**

PET
POLYETHYLENE TEREPHTHALATE
**JARS
BOTTLES**

Regd. Office : A-97/2, Okhla Industrial Area, Phase II, New Delhi – 110020, INDIA
CIN NO. L25209DL1971PLC005535
Tel.No: +91-11-47385300, **Fax,** +91-11-47480746,
Email: pearl@pearlpet.net, **Website:** www.pearlpet.net

Ref No. PPL :SD:ITR-8-9: 402-2015-16

11 June, 2015

The Secretary,

1. National Stock Exchange of India Ltd.

Exchange Plaza, 5th Floor,
Plot No. C1, G Block,
Bandra, Kurla Complex,
Bandra (East)
MUMBAI - 400 051

2. The BSE Ltd.

Phiroze Jeejeebhoy Towers,
25th Floor, Dalal Street,
MUMBAI - 400 001

Sub: Code of Fair Disclosure of Unpublished Price Sensitive Information (UPSI) and Code of Conduct for Prevention of Insider Trading under SEBI (Prohibition of Insider Trading) Regulation, 2015.

Dear Sir/ Madam,

With reference to above captioned subject, pursuant to regulation 8(2) of SEBI (Prohibition of Insider Trading) Regulation, 2015 and SEBI circular no.CIR/ISD/01/2015 dated 11th May, 2015, we hereby confirm that the Company has adopted Code of Practices and Procedures for Fair Disclosures of Un-Published Price Sensitive Information as per the Regulation 8 of SEBI (Prohibition of Insider Trading) Regulations, 2015, a copy of the same is annexed herewith.

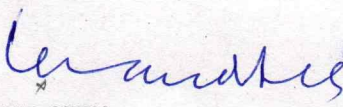
The Company has also adopted and implemented the Code of conduct to regulate, monitor and report trading by insider as per the Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015.

You are kindly requested to take the same on record and bring it to the notice of all concerned.

Thanking you,

Yours faithfully,

For **PEARL POLYMERS LIMITED**


CHAND SETHI
(Chairman & Managing Director)
DIN: 00002944



Encl: As Above

PEARL POLYMERS LIMITED

**CODE OF PRACTICES & PROCEDURES FOR FAIR DISCLOSURE OF
UNPUBLISHED PRICE SENSITIVE INFORMATION**

CIN: L25209DL1971PLC005535

(Effective from 15th May, 2015)



**CODE OF PRACTICES & PROCEDURES FOR FAIR DISCLOSURE OF
UNPUBLISHED PRICE SENSITIVE INFORMATION**
[Under Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015]

INTRODUCTION:

The Securities and Exchange Board of India (SEBI), in its endeavor to protect the interests of investors in general, has formulated the SEBI (Prohibition of Insider Trading) Regulations, 2015.

It is mandatory in terms of the Regulations for every listed company/entity to formulate a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information.

Accordingly, the Board of Directors of Pearl Polymers Limited (hereinafter referred to as 'the Company') has, in compliance with the aforesaid Regulations, formulated a specific Code of Fair Disclosure for Pearl Polymers Limited for use by its Promoters, Directors, Officers, Employees and Connected Persons.

This document embodies the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information to be adopted by the Company and followed by its Directors, Officers, Employees and Connected Persons.

CODE OF FAIR DISCLOSURE:

The Board of Directors of Pearl Polymers Limited has always thrived to conduct its business in a fair and transparent manner with a view to protect the interest of all the stakeholders in the Company. Towards achieving this objective, the Company and the members of the Board, Officers, all employees and connected persons shall adhere to the following principles of fair disclosure of unpublished price sensitive information in letter as well as in spirit:

1. The Company shall ensure 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. The Company shall ensure Uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Company Secretary / Compliance Officer of the Company shall act as the Chief Investor Relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company shall provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. The Company will ensure that information shared with analysts and research personnel, if any, is not unpublished price sensitive information.



7. The Company shall develop and follow 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.
8. The Company shall handle of all unpublished price sensitive information on a need to-know basis.

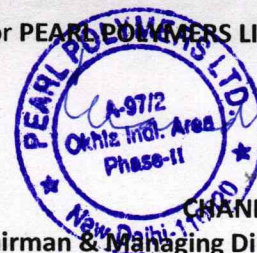
The Board of Directors may amend or modify this Code or stipulate further guidelines, procedures and rules, from time to time, to ensure fair disclosure of unpublished price sensitive information.

This Code and every subsequent modification, alteration or amendment made thereto, shall be intimated to the Stock Exchange where the securities of the Company are listed.

This Code has been adopted by the Board of Directors of Pearl Polymers Limited in its meeting held on May 27, 2015.

Subsequent modification(s) / amendment (s) to SEBI (Prevention of Insider Trading) Regulations, 2015 shall automatically apply to this Code.

For PEARL POLYMERS LIMITED



CHAND SETH
(Chairman & Managing Director)
DIN: 00002944