

# Octopus Papers Limited

## CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

(As envisaged under Regulation 8(1) of the SEBI (Prohibition of Insider Trading) Regulations, 2015)

### Introduction:

Securities and Exchange Board of India (SEBI) has notified SEBI (Prohibition of Insider Trading) Regulations, 2015 (Regulations) vide its Circular No. LAD-NRO/GN/2014-15/21 85 dated 15th January, 2015 to be effective from date of listing of the Company on BSE SME. Regulation 8 contained in Chapter - IV of the Regulations, 2015, provides for the formulation of a "Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information" (hereinafter referred to as the "Code").

The Company endeavors to preserve the confidentiality of un-published price sensitive information and to prevent the misuse of such information. To achieve these objectives, and in compliance with the aforesaid SEBI Regulations, Octopus Papers Limited (hereafter referred to as 'The Company') hereby notifies this Code.

### Principles of Fair Disclosure of Unpublished Price Sensitive Information

The Company will adhere to the following so as to ensure fair disclosure of events and occurrence that could impact price of its securities in the market:

1. The Company will make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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 The Company shall endeavor to make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Company Secretary of the Company shall act as the Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company will make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. The Company will provide 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 The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. The Company shall take reasonable steps, to make generally available, any discussion on unpublished price sensitive information at the meeting of analyst or investors relations through the official website to ensure official confirmation and indiscriminate disclosure.

8. The Company will handle all unpublished price sensitive information on a “need to know” basis, i.e. Unpublished Price Sensitive Information shall be disclosed only to those within the Company who need the information to discharge their duty.

9. This Code will be effective from the date of listing of the Company on BSE SME and shall be published on the website ([www.octopuspapersltd.com](http://www.octopuspapersltd.com)) of the Company. Further, this Code and every subsequent amendment made thereto shall be promptly intimated to the Stock Exchange where the securities of the Company are listed and will be updated on Company’s website.