

**PITTI ENGINEERING LIMITED**  
**[Formerly Pitti Laminations Limited]**  
**Registered Office: IV Floor, Padmaja Land Mark, 6-3-648/401,**  
**Somajiguda, Hyderabad - 500082**  
**Tel: 91 040-23312774 Fax: 91 040-23393985**  
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**CIN: L29253TG1983PLC004141**

**<sup>1</sup>CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION.**

**FRAMED UNDER REGULATION 8 (1) OF THE SECURITIES AND EXCHANGE BOARD OF INDIA (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015**

**PITTI ENGINEERING LIMITED (the Company)** will adhere to the following so as to ensure timely and adequate disclosure of the Price Sensitive Information with respect to it or its securities which is likely to affect price of the securities:

1. The Company shall make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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 The Company shall make, uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.
3. The Company Secretary and / or the Compliance Officer of the Company shall be considered as the chief investor relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.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 The Company shall make prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.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 rumors by regulatory authorities.
6. The Company shall ensure that any information shared with analysts and research personnel is not unpublished price sensitive information.
7. The Company shall make transcripts or records of proceedings of meetings with analysts and other investor relations conferences on the website of the Company to ensure official confirmation and documentation of disclosures made.
8. The Company shall handle all unpublished price sensitive information on need to know basis i.e. unpublished price sensitive information shall be disclosed only to those within the Company who require such information to discharge their duty or legal obligations by virtue of their respective role and responsibility, where possession of such information will not give rise to a conflict of interest or appearance of misuse of such information.

9. An unpublished price sensitive information can be disclosed for the legitimate purposes. Provided that such sharing should not be carried out to evade or circumvent the prohibitions of Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015.

‘Legitimate purpose’ for the purpose of this code shall include:

sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions under this policy and/or Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015 (“PIT Regulations”);

Any person in receipt of unpublished price sensitive information pursuant to a Legitimate purpose shall be considered an insider for the purpose of PIT Regulations and due notice shall be given to such persons to maintain confidentiality of such unpublished price sensitive information in compliance with PIT Regulations.

The Vice-Chairman & Managing Director and President Corporate Resources & CFO have been designated to determine purpose for communication of any UPSI to any person for and in furtherance of performance of duties or discharge of legal obligations from time to time.

10. The Board of Directors of the Company shall have the powers to amend or modify this Policy in whole or in part, as may be required from time to time.

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<sup>1</sup>This code has been approved by the Board of Directors on March 29, 2019. Effective from April 1, 2019 this code shall supersede the existing code.