



RAJ POLYPACK LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

(Policy approved by the Board of Directors on June 01, 2026)

1. PREAMBLE

This Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information ("Code") has been formulated and adopted by Raj Polypack Limited ("Company") pursuant to Regulation 8 read with Schedule A of the Securities and Exchange Board of India (Prohibition of Insider Trading) Regulations, 2015, as amended from time to time ("PIT Regulations").

The Company endeavors to preserve the confidentiality of Unpublished Price Sensitive Information ("UPSI") and to ensure timely, adequate and uniform disclosure of such information to the public in order to prevent insider trading and maintain fairness in the securities market.

2. OBJECTIVE

The objective of this Code is to:

- a) Ensure prompt public disclosure of UPSI;
- b) Ensure uniform and universal dissemination of UPSI;
- c) Prevent selective disclosure of UPSI;
- d) Maintain transparency in communication with investors, analysts and stakeholders; and
- e) Comply with the requirements of the PIT Regulations and other applicable laws.

3. DEFINITIONS

3.1 Unpublished Price Sensitive Information ("UPSI")

"Unpublished Price Sensitive Information" means any information, relating to the Company or its securities, directly or indirectly, that is not generally available and which upon becoming generally available is likely to materially affect the price of the securities and shall ordinarily include, but not be restricted to, information relating to:

- Financial results;
- Dividends;
- Change in capital structure;
- Mergers, demergers, acquisitions, delistings, disposals and expansion of business;
- Changes in key managerial personnel; and
- Such other information as may be considered price sensitive under applicable laws.

Words and expressions used but not defined in this Code shall have the meanings assigned to them under the PIT Regulations.





4. CHIEF INVESTOR RELATIONS OFFICER

The Company Secretary shall act as the Chief Investor Relations Officer ("CIRO") for the purpose of this Code.

The CIRO shall be responsible for:

- Dissemination of information and disclosure of UPSI;
- Responding to queries from investors, analysts and regulatory authorities;
- Ensuring compliance with this Code; and
- Monitoring fair disclosure practices.

5. PRINCIPLES OF FAIR DISCLOSURE

The Company shall adhere to the following principles:

5.1 Prompt Public Disclosure

The Company shall make prompt public disclosure of UPSI that would impact price discovery as soon as credible and concrete information comes into being, in order to make such information generally available.

5.2 Uniform and Universal Dissemination

The Company shall ensure uniform and universal dissemination of UPSI to avoid selective disclosure.

5.3 Designated Authority

The Company Secretary, Managing Director, Chairperson or any other person authorized by the Board shall deal with dissemination of information and disclosures.

5.4 Prompt Dissemination of Inadvertent Disclosure

In the event UPSI is disclosed selectively, inadvertently or otherwise, the Company shall promptly disseminate such information to make it generally available.

5.5 Appropriate Response to Market Rumours

The Company may provide appropriate and fair responses to queries on news reports and market rumours as required under applicable laws and regulations.

5.6 Information Sharing with Analysts and Investors

The Company shall ensure that information shared with analysts, institutional investors and research personnel is not UPSI.





Any information disclosed during analyst or investor meetings shall be simultaneously made available to the public if required under applicable regulations.

5.7 Handling of UPSI

UPSI shall be shared only on a need-to-know basis and in accordance with the PIT Regulations and the Company's Code of Conduct for Prevention of Insider Trading.

6. DISCLOSURE OF THE CODE

This Code and any amendments thereto shall be published on the website of the Company and shall be communicated to all concerned persons.

7. REVIEW AND AMENDMENT

The Board of Directors reserves the right to amend, modify or revise this Code from time to time in accordance with applicable laws and regulatory requirements.

8. EFFECTIVE DATE

This Code shall come into force from the date of approval by the Board of Directors of Raj Polypack Limited.

