

OTCO INTERNATIONAL LIMITED (OIL)
CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED
PRICE SENSITIVE INFORMATION

(Formulated in line with sub regulation (1) of Regulation 8 of SEBI (PROHIBITION OF INSIDER TRADING) REGULATIONS, 2015 read with schedule A thereof)

(A) This code may be called (OIL code for FDUPSI)

(B) This code shall Effective from 15th May 2015

(C) Covenant of code are

(1) OIL shall ensure to make prompt public disclosure of unpublished price sensitive information (UPSI) that would impact price discovery no sooner than credible and concrete information comes into being in order to make such information generally available.

“UPSI” means any information which is likely to materially affect the price of the securities and shall include financial results, dividends, change in capital structure, mergers, demergers, acquisitions, delisting, disposals and expansion of business and such other transactions, change in KMP and material events in accordance with listing Agreement.

“Generally available information” means information that is accessible to the public on a discriminatory basis”

(2) OIL shall ensure to make uniform and universal dissemination of unpublished price sensitive information to avoid selective disclosure.

(3) OIL has designated compliance officer to act as a Chief Investor Relations officer to deal with dissemination of information and disclosure of unpublished price sensitive information.

(4) OIL shall ensure Prompt dissemination of unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.

(5) OIL shall ensure to make appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.

(6) OIL shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.

(7) OIL shall develop 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(8) OIL shall handle all unpublished price sensitive information on a need-to-know basis.