SUMITOMO CHEMICAL INDIA LTD.
Corporate Identity Number (CIN) - U24110MH2000PLC124224

Corporate Office: 13/14, Aradhana IDC,
Near Virwani Industrial Estate, Goregaon (East),
Mumbai - 400 063.
Tel. : +91-22-4252 2200 / Fax : +91-22-4252 2360
URL http://www.sumichem-india.co.in

SCIL/SEC/2019-20/04
29th January, 2020

To,
BSE Limited,
Listing Department,
Phiroze Jeejeebhoy Towers,
Dalal Street,
Mumbai-400001

The National Stock Exchange of
India Listing Department,
Exchange Plaza,
Bandra Kurla Complex
Bandra East,
Mumbai - 400 051

Sub: Intimation under Regulation 8(2) of the SEBI (Prohibition of Insider Trading) Regulations, 2015

Dear Sir,

We enclose herewith the Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information pursuant to regulation 8 of the SEBI (Prohibition of Insider Trading) Regulations, 2015.

The Code is posted on the Company's website www.sumichem.co.in as well.

Kindly take the same on record.

Thanking you,

Yours faithfully,
For **Sumitomo Chemical India Limited**

Pravin D. Desai
V.P. - Legal & Company Secretary

Encl: As above

SUMOTOMO CHEMICAL INDIA LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

[Principles of fair disclosure pursuant to Regulation 8(1) of SEBI (Prohibition of Insider Trading) Regulations, 2015 read with Schedule A to the said Regulations]

The Company believes in adopting, practising and upholding the highest standards of professionalism, honesty, integrity and ethical behavior in order to prohibit and prevent insider trading in the Company's securities. Towards this end, the Company has formulated a Code of Conduct to be followed by its directors and designated employees who, in the opinion of the Company, may have access to price sensitive information (hereinafter referred to as 'Designated Persons').

Legitimate Purpose

For the purpose of complying with SEBI (Prohibition of Insider Trading) Regulations, 2015, ("Regulations") the term 'legitimate purpose' shall include sharing of unpublished price sensitive information by an insider with holding company, subsidiary companies, associate companies, companies in the same group as the Company, partners, collaborators, lenders, customers, suppliers, merchant bankers, legal, business and other professional advisors and consultants, auditors, company secretaries, chartered accountants and cost and management accountants in practice and insolvency professionals, in the ordinary course of business, or for the purpose of:

- furtherance of the Company's business ; or
- furtherance of the Company's business or corporate objectives ; or
- compliance with regulatory or other requirements in the country or any other country where the Company or the recipient of the information operates

Provided that such sharing is not carried out to evade or circumvent prohibition laid down by the Regulations.

Any person in receipt of unpublished price sensitive information pursuant to a "legitimate purpose" shall be considered as an "insider"). Further, a notice shall be served to the recipient of the unpublished price sensitive information informing the recipient to maintain confidentiality of such unpublished price sensitive information.



Principles, Practices and Procedures

The Company adopts principles, practices and procedures as under to ensure fair disclosure of unpublished price sensitive information and undertakes to follow the same:

1. The Company and the 'designated persons' shall maintain confidentiality of all unpublished price sensitive information (hereinafter referred to as 'UPSI'), shall communicate the same purely on 'need-to-know basis' and shall not communicate to any unauthorized person or on selective basis.

2. The Company shall ensure uniform and universal dissemination of UPSI to avoid any selective disclosure of such information.

3. The Company shall promptly disclose UPSI once such credible and concrete information comes into being.

4. The Company shall disclose UPSI by making its prompt disclosure with sufficient and unambiguous details to the Stock Exchanges on which its securities are listed. The Company shall also disclose UPSI on its website.

5. In case the Company finds that any UPSI has been disclosed selectively, inadvertently or otherwise, it shall promptly disclose and disseminate as soon as the circumstances permit such information to make it uniformly and universally available to general public.

6. The Company designates its 'Company Secretary' as its Chief Investor Relations Officer and entrusts him with the function of dissemination and disclosure of UPSI. The Company Secretary is entrusted with giving appropriate and fair response to the regulatory authorities in respect of queries, questions and explanations in relation to news reports and market rumors.

7. The Company shall ensure that no UPSI is shared with analysts and researchers on selective basis.

8. The Company shall ensure that its conferences with analysts and investors shall be open to participation by all analysts, shareholders, investors and general public.

9. The Company shall record/ make transcript of proceedings of its conferences with analysts/ investor conferences and make the same accessible to all by uploading the same on its website.

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SUMITOMO CHEMICAL INDIA LTD. * MUMBAI *