

GRAPHITE INDIA LIMITED
(CIN L10101WB1974PLC094602)

**Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information
[under Regulation 8(1) of the Securities and Exchange (Prohibition of Insider Trading) Regulations 2015]**

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 The Company shall make prompt public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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. Uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information shall be made to avoid selective disclosure.
3. The Compliance Officer / Company Secretary has been designated as the “Chief Investor Relations Officer” to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. Prompt dissemination of unpublished price sensitive information that gets disclose selectively, inadvertently or otherwise shall be made to make such information generally available.
5. Appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities would be provided.
6. Ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. 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. Handle all unpublished price sensitive information on a need-to-know basis (i.e.) only to those who need such information to discharge their duties.

Date: 15th May 2015