



LUPIN LIMITED

CODE OF PRACTICES AND PROCEDURES FOR FAIR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION

Registered office & Investors' Services Department

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Lupin Limited

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

Introduction

The Securities and Exchange Board of India (SEBI) vide its notification dated January 15, 2015 has published the SEBI (Prohibition of Insider Trading) Regulations, 2015 ("Regulations 2015") replacing the erstwhile SEBI (Prohibition of Insider Trading) Regulations, 1992. The Regulation 2015 shall be effective from May 15, 2015.

Regulations 2015 envisages every listed company to formulate a Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information.

The Company shall follow the attached Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information pursuant to the Regulations 2015.

This Code has been approved by the Board of Directors at its meeting held on 13th May, 2015. The same has also been hoisted on the official website of the Company.



Lupin Limited

Code of Practices and Procedures for Fair Disclosure of Unpublished Price Sensitive Information

1. The Company shall make prompt public disclosure of unpublished price sensitive information that would impact price discovery and shall ensure that such public disclosures are made no sooner than credible and concrete information comes into being in order to make such information generally available.
2. The Company shall ensure that the public disclosure of Unpublished Price Sensitive Information shall be in uniform manner and be disseminated through widely circulated media and / or through stock exchanges where Company's securities are listed. The selective disclosure of unpublished price sensitive information shall be avoided.
3. The Company Secretary of the Company is designated as a Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. The Company shall ensure that the unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise, the same shall be disseminated promptly to make such information generally available.
5. The Company shall ensure that appropriate and fair response shall be provided to queries on news reports and requests for verification of market rumors by regulatory authorities.
6. The Company shall ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. The Company shall ensure that the proceedings of meetings with analysts and other investor relations conferences shall be published on the official website of the Company to ensure official confirmation and documentation of disclosures made therein.
8. The Company shall ensure that all unpublished price sensitive information shall be handled on a need to know basis only.
