

BANCO PRODUCTS (INDIA) LIMITED



Registered Office: Bil, Near Bhaili Railway Station,  
Padra Road, Dist. Baroda - 391 410.  
CIN: L51100GJ1961PLC001039

POLICY FOR DETERMINATION OF "LEGITIMATE PURPOSES"

( as a part of "Codes of Fair Disclosure and Conduct" formulated under regulation 8 of Securities and Exchange Board of India ( Prohibition of Insider Trading) Regulations, 2015 as amended and effective from 01.04.2019. )

1) SCOPE OF THE POLICY

PREAMBLE:

The Board of Directors ("the Board") of Banco Products (India) Limited ("the Company") has adopted the following policy and procedures with regard to Preservation of Documents.

This policy is for determination of "legitimate purposes" as a part of "Codes of Fair Disclosure and Conduct" formulated under regulation 8 of Securities and Exchange Board of India ( Prohibition of Insider Trading) Regulations, 2015

This Policy may be amended at any time by the Board of Directors of the Company/ or its Committee and is subject to further amendments, as may be required by SEBI or other Regulatory Authorities from time to time .

II. OBJECTIVE:

This policy is framed as per requirement of Regulation 3 (2A) of the Chapter – II of Securities and Exchange Board of India ( Prohibition of Insider Trading) Regulations.

III. POLICY STATEMENT

The Board of Directors hereby make a policy for determination of "legitimate purposes" as a part of "Codes of Fair Disclosure and Conduct" formulated under regulation 8.

1. The term "legitimate purpose" shall include sharing of unpublished price sensitive information in the ordinary course of business by an insider with partners, collaborators, lenders, customers, suppliers, merchant bankers, legal advisors, auditors, insolvency professionals or other advisors or consultants, provided that such sharing has not been carried out to evade or circumvent the prohibitions of these regulations.

2 Any person in receipt of unpublished price sensitive information pursuant to a "legitimate purpose" shall be considered an "insider" for purposes of these regulations and shall be subject to Securities and Exchange Board of India ( Prohibition of Insider Trading) Regulations.

3. The Securities and Exchange Board of India ( Prohibition of Insider Trading) Regulations , as applicable and amendments , if any , shall be placed on the WEB Site of the Company viz. [bancoindia.com](http://bancoindia.com), investors relations section. All the constituents of the Company , present and or Future are advised to visit the WEB Site of the Company in this regards.

For Banco Products (India) Limited

A handwritten signature in blue ink, appearing to read "Sudhakar", written over the printed name of the Managing Director.  
Managing Director

