

**Continental Petroleums Limited (CPL) formulated and adopted the following in accordance with SEBI (Prohibition of Insider Trading) Regulations, 2015**

1. Code of practices and procedures for fair disclosure of unpublished price sensitive information (UPSI) as per Regulation 8 (1) of SEBI (Prohibition of Insider Trading) Regulations, 2015.
2. Code of conduct as per Regulation 9(1) of SEBI (Prohibition Insider Training Regulation, 2015.

**In consistent with SEBI (Prohibition of Insider Trading) Regulations, 2015 the following principles of fair disclosure are adopted:**

1. Unpublished price sensitive information (UPSI) that would impact price will be intimated to stock exchanges immediately as on such credible and concrete information crystallizing or coming into knowledge of the company.
2. CPL will ensure that there is no selective disclosure of UPSI.
3. The Managing Director of the Company designated as chief Investor Relation officer for the purpose of determining the information and timing of dissemination of USPI.
4. In case UPSI disclosed inadvertently to any selected person, CIRO will immediately take for disclosure such information to stock exchange and web site of the company.
5. CPL would provide prompt response to queries on news reports and verification of market rumors by regulatory authorities.
6. All the functional heads and other senior executives of the Company will ensure that:
  - a) The information shared with analysts is not UPSI.
  - b) The proceedings are captured aptly and details of the same are made and uploaded in web site of the Company.
  - c) Share all the UPSI with concerned personnel strictly on a need to know basis.
  - d) Keep all the internal representations and other documents relating to business plans and other related activities as classified documents and not discuss such information in public.
  - e) Non disclosure agreements which are signed by advisors and consultants etc. who are engaged in advising on major business plans and similar proposals which have not otherwise been made public.

**FOR ATTENTION OF INSIDERS:**

In terms of Regulation 9 of SEBI (Insider Trading Regulations, 2015) the Board of Directors of the Company as on 30<sup>th</sup> May, 2015 has framed a code for internal procedures .

The persons and entities falling with in the definition of insider of the company within the meaning of SEBI (Insider Trading) Regulations, 2015 read with code of conduct are required to contact the company for obtaining a copy of code of the conduct to comply with the requirement specified therein.