

COMBAT DRUGS LIMITED

CODE OF CONDUCT TO REGULATE, MONITOR AND REPORT TRADING BY "INSIDERS"

[Regulation 9 of SEBI (Prohibition of Insider Trading) Regulations, 2015]

This Code of conduct covers the trading by "insiders" as defined in and arising from the SEBI Prohibition of Insider Trading Regulations 2015 replacing the earlier 1992 regulations and its regulation, monitoring and reporting.

This code shall be applicable to Directors, Promoters, Key Managerial Personnel and "designated employees", connected persons and their immediate relatives all of whom are defined as Insiders.

Designated Employee(s) - The employees designated by the Company to whom trading restrictions shall be applicable, keeping in mind the objectives of this Code of Conduct.

The Compliance Officer shall report on "insider trading" by provide reports to the Chairman of the Audit Committee or to the Chairman of the Board of Directors at such frequency as may be stipulated by the Board of Directors.

The Company shall adhere to the following standards as stipulated in the Prohibition of Insider Trading Regulations 2015 while adopting this Code of conduct to be followed by insiders while trading in the Company's shares:

- Preservation of "Price Sensitive Information"
- Prevention of misuse of "Unpublished Price Sensitive Information"
- Implementation of Trading plans by Insiders
- Trading Window and Window Closure
- Pre-clearance of trades - above the threshold limit of 5000 equity shares
- Disclosures by 'certain persons' – initial and continual disclosures.
- Disclosures by other 'Connected' persons
- Penalty for Contravention of the code.

This code has been adopted by the Board of Directors of the Company and it shall come into force from May 30, 2015.

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