

## **SADHANA NITRO CHEM LIMITED**

### **CODE OF PRACTICE FOR DISCLOSURE OF UNPUBLISHED PRICE SENSITIVE INFORMATION**

The Securities and Exchange Board of India (SEBI), has advised to all the companies under the SEBI (Prohibition of Insider Trading) Regulations, 2015 to put in place a framework for fair disclosure of unpublished price sensitive information and to strengthen the legal framework thereof and to protect the interest of investors in general. These regulations have come into force with effect from 15th May 2015 and are applicable to all companies listed on any Stock Exchange in India.

The Regulations require all listed Companies to set up an appropriate mechanism and to frame and enforce a policy of internal procedures and conduct so as to curb insider trading.

In order to comply with the requirements of the Regulations, it was necessary to formulate a specific Code for Fair Disclosure SADHANA NITRO CHEM LIMITED (hereinafter referred to as "the Company") which shall be applied to Promoters, Directors, Officers, Employees and connected persons. This document embodies the Code of Practices and procedures for Fair Disclosure of Unpublished Price Sensitive Information to be adopted by the Company and be followed by its Directors, Officers,

### **PRINCIPLES OF FAIR DISCLOSURE:**

The principles of Fair Disclosure adopted by the company are as follows:

1. To promptly make public disclosure of unpublished price sensitive information that would impact price discovery no sooner than credible and concrete information comes into being in order to make such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. To ensure uniform and universal dissemination of unpublished price sensitive unpublished price sensitive information to avoid selective disclosure.
3. The Compliance officer of the Company shall act as Chief Investor Relations Officer to deal with dissemination of information and disclosure of unpublished price sensitive information.
4. To promptly disseminate unpublished price sensitive information that gets disclosed selectively, inadvertently or otherwise to make such information generally available.
5. To provide appropriate and fair response to queries on news reports and requests for verification of market rumours by regulatory authorities.
6. To ensure that information shared with analysts and research personnel is not unpublished price sensitive information.
7. To develop best practices to make transcript 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. To handle all unpublished price sensitive information on a need-to-know basis.

### **DISCLOSURE OF THE CODE:**

This Code shall be published on the official website of the Company and the every amendment thereto shall be promptly intimated to the Stock Exchange(s) where the securities of the Company are listed.